

**MALAYSIAN SUSTAINABLE PALM OIL  
4<sup>th</sup> ANNUAL SURVEILLANCE ASSESSMENT (ASA 4)  
Public Summary Report**

<b>Sime Darby Plantation Berhad</b>
Client company Address: Level 11, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia
Certification Unit: SOU 22 Bukit Benut Palm Oil Mill & Bukit Benut Estate, CEP Nyior Estate & Lambak Elaeis Estate  Location of Certification Unit: KM 12, Jalan Mengkibol 86009 Kluang, Johor, Malaysia

**Report prepared by:**  
**Nor Halis Abu Zar** (Lead Auditor)

**Report Number: 3293198**

**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	
	Bukit Benut POM - 528154004000	31/03/2022	
	Bukit Benut Estate - 522307002000	31/07/2022	
	CEP Nyior Estate - 508445102000	31/03/2022	
	Lambak Elaeis Estate - 518641002000	28/02/2022	
Address	KM 12, Jalan Mengkibol, 86009 Kluang, Johor, Malaysia		
Certification Unit	SOU 22 Bukit Benut Palm Oil Mill		
Contact Person Name	Mdm. Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM)		
Website	www.simedarbyplantation.com	E-mail	shylaja.vasudevan@simedarbyplantation.com
Telephone	+603-78484379 (Head Office)	Facsimile	+603-78484356 (Head Office)

1.2 Certification Information			
Certificate Number	Mill: MSPO 682040 Plantations: MSPO 686845		
Issue Date	18/12/2017	Expiry date	17/12/2022
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Standard	i. MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Oil Palm Plantations and Organized Smallholders ii. 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)		
Stage 2 / Initial Assessment Visit Date (IAV)	23 - 25/10/2017		
Continuous Assessment Visit Date (CAV) 1	21 - 23/11/2018		
Continuous Assessment Visit Date (CAV) 2	31/07 - 02/08/2019		
Continuous Assessment Visit Date (CAV) 3	20 - 22/07/2020		
Continuous Assessment Visit Date (CAV) 4	09/08 & 11 - 12/08/2021 (Remote Audit)		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date

RSPO 591229	RSPO Principles & Criteria for Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019; with Identity Preserved Supply Chain Module	BSI Services Malaysia Sdn Bhd	04/10/2021
MSPO 714131	MSPO SCCS	BSI Services Malaysia Sdn Bhd	17/09/2024

### 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
Bukit Benut Palm Oil Mill	Bukit Benut POM, KM 12, Jalan Mengkibol, 86009 Kluang, Johor, Malaysia	1.93076	103.34729
Bukit Benut Estate	Ladang Bukit Benut, P.O. Box 513, 86009 Kluang, Johor, Malaysia	1.91134	103.332798
CEP Nyior Estate	Ladang CEP Nyior, K.B. No. 514, 86009 Kluang, Johor, Malaysia	2.09381	103.26825
Lambak Elaeis Estate	Ladang Lambak Elaeis, K.B. 510, 86009 Kluang, Johor, Malaysia	1.96663	103.325596

### 1.4 Certified Area

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Benut Estate	2,536.70	24.18	238.90	2,799.78	90.60
CEP Nyior Estate	1,880.68	6.11	78.783	1,965.57	95.68
Lambak Elaeis Estate	3,344.72	2.65	392.79	3,740.16	89.43
<b>TOTAL</b>	<b>7,762.10</b>	<b>32.94</b>	<b>710.47</b>	<b>8,505.51</b>	<b>91.26</b>

Note:

Reduction of planted area for Lambak Elaeis Estate due to GPS re-survey on April 2021.

### 1.5 Plantings & Cycle

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bukit Benut Estate	84.11	861.03	1030.98	447.14	113.44	2452.59	84.11
CEP Nyior Estate	152.05	588.50	656.75	483.38	0	1728.63	152.05
Lambak Elaeis Estate	409.16	840.64	1974.25	31.56	89.11	2935.56	409.16

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<b>Total (ha)</b>	<b>645.32</b>	<b>2,290.17</b>	<b>3,661.98</b>	<b>962.08</b>	<b>202.55</b>	<b>7,116.78</b>	<b>645.32</b>
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### 1.6 Certified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Nov 2020 - Oct 2021)	Actual (Jul 2020 - Jul 2021)	Forecast (Nov 2021 - Oct 2022)
Bukit Benut Estate	53,650.96	49,935.25	52,570.80
CEP Nyior Estate	28,800.00	636.05	-
Lambak Elaeis Estate	66,951.37	58,508.29	69,502.49
Tun Dr Ismail Estate	-	103.42	-
Cenas Estate	-	2,709.92	-
CEP Renggam Estate	-	3,951.73	-
Bukit Paloh Estate	-	779.87	-
Kempas Klebang Estate	-	371.06	-
<b>Total</b>	<b>149,402.33</b>	<b>116,995.59</b>	<b>122,073.30</b>

Note: N/A

### 1.7 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Nov 2020 - Oct 2021)	Actual (Jul 2020 - Jul 2021)	Forecast (Nov 2021 - Oct 2022)
N/A	N/A	N/A	N/A
<b>Total</b>	N/A	N/A	N/A

### 1.8 Certified Tonnage

	Estimated (Nov 2020 - Oct 2021)	Actual (Jul 2020 - Jul 2021)	Forecast (Nov 2021 - Oct 2022)
	FFB	FFB	FFB
<b>Mill Capacity: 20 MT/hr</b>	149,402.33	116,995.59	122,073.30 MT
<b>SCC Model: SG</b>	<b>CPO (OER: 21.00%)</b>	<b>CPO (OER: 20.22 %)</b>	<b>CPO (OER: 21.11 %)</b>
	31,374.49	23,655.07 MT	25,769.67 MT
	<b>PK (KER: 4.50%)</b>	<b>PK (KER: 4.53 %)</b>	<b>PK (KER: 5.50 %)</b>
	6,723.11	5,294.37 MT	6,714.03 MT

Note: N/A

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<b>1.9 Actual Sold Volume (CPO)</b>					
<b>CPO (MT)</b>	<b>MSP0 Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSPO</b>		
23,655.07	-	-	15,732.44	7,756.43	23,488.87

<b>1.10 Actual Sold Volume (PK)</b>					
<b>PK (MT)</b>	<b>MSP0 Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>RSPO</b>		
5,294.37	-	-	3,617.53	1,676.84	5,294.37

## 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 full remote assessment was conducted due to Pandemic COVID-19 from 09, 11 & 12/08/2021. The audit programme is included as Section 2.3. This remote audit has been conducted using Information and Communication Technologies including (Microsoft Teams, WhatsApp and phone call). The planned audit objectives have been achieved, there were no connectivity issues which adversely affected the audit. The approach to the audit was to treat the SOU 22 Bukit Benut POM Certification Unit 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 remotely. Field workers were interviewed informally in small groups remotely. 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 years cycle:

<b>Assessment Program</b>					
<b>Name (Mill / Plantation / Group smallholders)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Bukit Benut Palm Oil Mill	√	√	√	√	√
Bukit Benut Estate	√	√	-	√	√
CEP Nyior Estate	-	√	√	-	√
Lambak Elaëis Estate	√	-	√	√	-

**Tentative Date of Next Visit: August 9, 2022 - August 11, 2022**

**Total No. of Mandays: 11 mandays**

**2.1 BSI Assessment Team**

<b>Team Member Name</b>	<b>Role (Team Leader or Team member)</b>	<b>Qualifications (Short description of the team members)</b>
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, MSPO 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 MSPO requirements. Fluent in English and Bahasa.
Ismadi Ismail	Team Member	He holds Diploma in Planting Industry Management from MARA Institute of Technology, Kuantan Pahang. 24 years of working experiences with various plantation companies and skills in Best Agriculture Practices (GAP) for plantation. Fully trained in CoP, MSPO and OSHAS. Qualified as Lead Auditor/Auditor for MSPO and CoP. Involved in MSPO assessment since 2017. Completed and certified MSPO Auditor course in 2017 held by SGS (M) Sdn Bhd and ISO 9001:2015 lead auditor course by TOMC. During this



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		assessment, he assessed on the aspects of Continual Improvement, OSH, HCV, Environment, waste management and best practices. Able to speak and understand Bahasa Malaysia and English.
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**2.2 Accompanying Persons**

No.	Name	Role
	N/A	

**2.3 Assessment Plan**

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

Date	Time	Subjects	(NHA)	(II)	ICT Planned
Thursday, 05/08/2021	1600 - 1700	Communication on document preparation - Audit plan - Any additional Information	√	√	Teleconference, Microsoft Team Meeting, Email
Monday, 09/08/2021 <b>Bukit Benut Estate</b>	0900 - 0915	Opening meeting - Opening presentation by audit team leader - Confirmation of assessment scope and finalize audit plan	√	√	Teleconference, Microsoft Team Meeting, Email
	0915 - 1030	Assessment and documentation review on social aspects, legal requirements, employees' welfare, stakeholder management, good agricultural practices, legal requirements, OHS, environment, biodiversity, and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1030 - 1040	10-minute break	√	√	
	1040 - 1230	Assessment and documentation review on social aspects, legal requirements, employees' welfare, stakeholder management, good agricultural practices, legal requirements, OHS, environment, biodiversity, and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch & Break	√	√	
	1330 - 1450	Assessment and documentation review on social aspects, legal requirements, employees' welfare, stakeholder management, good agricultural practices, legal requirements, OHS, environment, biodiversity, and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1450 - 1500	10-minute break	√	√	

Date	Time	Subjects	(NHA)	(II)	ICT Planned
	1500 - 1700	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management, mill best practice, legal requirements, OHS, environment and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1700 - 1730	Interim closing briefing	√	√	Teleconference, Microsoft Team Meeting, Email
Tuesday, 10/08/2021	-	Public Holiday	-	-	-
Wednesday, 11/08/2021 <b>Bukit Benut POM</b>	0900 - 1030	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management, mill best practice, legal requirements, OHS, environment and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1030 - 1040	10-minute break	√	√	
	1040 - 1230	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management, mill best practice, legal requirements, OHS, environment and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch & Break	√	√	
	1330 - 1450	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management, mill best practice, legal requirements, OHS, environment and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1450 - 1500	10-minute break	√	√	
	1500 - 1700	Assessment and documentation review on social aspects, legal requirements, employees' welfare and stakeholder management, mill best practice, legal requirements, OHS, environment and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1700 - 1730	Interim closing briefing	√	√	Teleconference, Microsoft Team Meeting, Email
	Thursday, 12/08/2021 <b>CEP Nyior Estate</b>	0900 - 1030	Assessment and documentation review on social aspects, legal requirements, employees' welfare, stakeholder management, good agricultural practices, legal requirements, OHS, environment, biodiversity, and continual improvement	√	√

Date	Time	Subjects	(NHA)	(II)	ICT Planned
	1030 - 1040	10-minute break	√	√	
	1040 - 1230	Assessment and documentation review on social aspects, legal requirements, employees' welfare, stakeholder management, good agricultural practices, legal requirements, OHS, environment, biodiversity and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1230 - 1330	Lunch & Break	√	√	
	1330 - 1450	Assessment and documentation review on social aspects, legal requirements, employees' welfare, stakeholder management, good agricultural practices, legal requirements, OHS, environment, biodiversity, and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1450 - 1500	10-minute break	√	√	
	1500 - 1700	Assessment and documentation review on social aspects, legal requirements, employees' welfare, stakeholder management, good agricultural practices, legal requirements, OHS, environment, biodiversity, and continual improvement	√	√	Teleconference, Microsoft Team Meeting, Email
	1700 - 1800	Finalization of audit findings, Team discussion and closing meeting	√	√	Teleconference, Microsoft Team Meeting, Email

### 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

During the Certification Assessment there were zero (0) nonconformities and Opportunity for Improvement raised.

Minor Nonconformities:		
<b>Ref:</b> N/A	<b>Area/Process:</b> N/A	<b>Clause:</b> N/A
	<b>Issue Date:</b> N/A	<b>Due Date:</b> N/A
Requirements:	N/A	
Statement of Nonconformity:	N/A	
Objective Evidence:	N/A	
Corrections:	N/A	
Root cause analysis:	N/A	
Corrective Actions:	N/A	
Assessment Conclusion:	N/A	

Opportunity For Improvement		
<b>Ref:</b> N/A	<b>Area/Process:</b> N/A	<b>Clause:</b> N/A
Objective Evidence:	N/A	

Noteworthy Positive Comments	
1	Good relationship being maintained with surrounding communities.
2	Good commitment by management

**3.3 Status of Nonconformities Previously Identified and OFI**

Minor Nonconformities:									
<b>Ref:</b> <b>1929475-202007-N1</b>	<table border="1" style="width: 100%;"> <tr> <td style="width: 50%;"><b>Area/Process: Lambak Estates</b></td> <td style="width: 50%;"><b>Clause: 4.4.5.4 Part 3</b></td> </tr> <tr> <td><b>Issue Date: 22/07/2020</b></td> <td><b>Date of closure: 12/08/2021</b></td> </tr> </table>	<b>Area/Process: Lambak Estates</b>	<b>Clause: 4.4.5.4 Part 3</b>	<b>Issue Date: 22/07/2020</b>	<b>Date of closure: 12/08/2021</b>				
<b>Area/Process: Lambak Estates</b>	<b>Clause: 4.4.5.4 Part 3</b>								
<b>Issue Date: 22/07/2020</b>	<b>Date of closure: 12/08/2021</b>								
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:	The contractor did not pay his workers based on Employment Act 1955, Clause 60 (3) (d).								
Objective Evidence:	<p>Reviewed the payslips and FFB Despatch by Field report for the contractor’s (Syarikat Sin Kim Huat) workers in Lambak Estate on June 2020 found that they have worked on rest day. However, no evidence to show that the workers have been paid as per Employment Act 1955, Clause 60 (3) (d). This has confirmed with the contractor that he only paid additional RM 0.20 as incentive for work on rest day on top of the ordinary rate per piece.</p> <p>The sampled workers are as below:</p> <table border="1" style="width: 100%; margin-left: 20px;"> <thead> <tr> <th style="width: 50%;">I/C No.:</th> <th style="width: 50%;">Date of WDR</th> </tr> </thead> <tbody> <tr> <td>770923-01-53XX</td> <td>7/6/2020</td> </tr> <tr> <td>621212-71-50XX</td> <td>7/6/2020 and 28/6/2020</td> </tr> <tr> <td>651011-71-55XX</td> <td>7/6/2020, 21/6/2020 and 28/6/2020</td> </tr> </tbody> </table>	I/C No.:	Date of WDR	770923-01-53XX	7/6/2020	621212-71-50XX	7/6/2020 and 28/6/2020	651011-71-55XX	7/6/2020, 21/6/2020 and 28/6/2020
I/C No.:	Date of WDR								
770923-01-53XX	7/6/2020								
621212-71-50XX	7/6/2020 and 28/6/2020								
651011-71-55XX	7/6/2020, 21/6/2020 and 28/6/2020								
Corrections:	Estate will inform the said contractor to pay the amount for work on rest day as per Employment Act 1955 that is due to sampled workers based on the sampled date.								
Root cause analysis:	The issue happened when the contractor is in-consistent in submitting their workers’ proof of payment for Estate Management monitoring, resulting estate not being able to monitor the contractor’s compliance to Employment Act 1955. At the same time, the contractor also did not fully understand the Employment Act 1955 requirements resulting in such issue occurred.								
Corrective Actions:	Estate with RSQM representative will conduct briefing on the MSP0 requirement of employment condition (based on Employment Act 1955) for the said contractor. The contractors will submit the copy of their worker’s proof of wages payment to the estate management on monthly basis for consistent monitoring.								
Assessment Conclusion:	The CAP is accepted, and the implementation of the CAP will be verified during next assessment.								
Verification Statement	<p>ASA 4 verification:</p> <p>Training related MSP0 has been given to contractor (Syarikat Sin Kim Huat). Refer “Penerangan Tentang Syarat-Syarat Pensijilan Sawit Lestari RSPO Dan MSP0 Dan Ketidakpatuhan” dated 11/01/2021. Copy of workers payment was sighted and found in order. Payment has been done as per evidence of document to workers NRIC 770923-01-53XX, 621212-71-50XX, and 651011-71-55XX. The evidence of</p>								

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	correction and corrective actions were found to be adequate to close the minor Non – Conformity. Minor NC was closed on 12/08/2021.
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<b>Minor Nonconformities:</b>		
<b>Ref:</b> <b>1929475-202007-N2</b>	<b>Area/Process: Lambak Estates</b>	<b>Clause: 4.5.3.2 Part 3</b>
	<b>Issue Date: 22/07/2020</b>	<b>Date of closure: 12/08/2021</b>
Requirements:	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products	
Statement of Nonconformity:	The disposal of used motor oil (2T/4T) was not identified and monitored accordingly as per SOP.	
Objective Evidence:	Lambak Estate The Operational Control Procedure for Landfill Management In Estate (SD/SDP/PSQM(ESH)203-EN7) dated 13th march 2017 states under Section 6 Requirements and Procedures; Section 6.6 Landfill Prohibitions; No Scheduled Wastes. Sime Darby Berhad Group Sustainability Quality Management (GSQM); Waste Management Procedure; Doc No. SD/SDH/GSQM/ESH/312 (Date: 01.07.16); 5.2 Waste Segregation; Waste shall be segregated into scheduled waste and non-hazardous waste at the point of generation by the waste generator at sites. During the site visit to the landfill it was sighted that there were several motor oil containers (2T/4T Oil) disposed as domestic waste in the landfill. The contaminated oil containers should be treated as a scheduled waste and therefore be disposed through a licensed waste manager. The oil containers even though might not be generated by estate operations, its sources are from within the estate thus any activity within the vicinity of the estate should be identified, monitored and treated as per MSPO requirements.	
Corrections:	Estate has removed the empty motor oil containers (2T/4T Oil) from the landfill and store it in the scheduled waste store and will dispose accordingly together with other scheduled wastes.	
Root cause analysis:	The issue happened due to empty motor oil containers (2T/4T Oil) was not generated from estate’s operation activity hence estate did not pick that up as part of estate’s operation generated waste or scheduled waste in their waste monitoring. The waste possibly generated by outsider/workers at linesite area. Linesite inspection did not cover on the monitoring of waste that should not be generated in the linesite area.	
Corrective Actions:	Estate will conduct briefing on waste management to all the workers and contractors which includes to inform them what type of waste should not be generated at linesite. Estate also will include checking on wastes that should not be generated at linesite area in the weekly linesite inspection.	
Assessment Conclusion:	The CAP is accepted, and the implementation of the CAP will be verified during next assessment.	
Verification Statement	ASA 4 verification:	

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	<p>The following evidences were verified:</p> <ol style="list-style-type: none"> <li>1) Training records on Human Right Defender Policy, Whistle blowing, and Schedule Waste Management dated 15/1/2021. The training was attended by 118 workers and briefed by the Assistant Manager.</li> <li>2) Evidence, the new signboard has been erected at landfill, based on the photo provided by the Management.</li> <li>3) Sighted in the Housing Complex / NEST/ Community Hall Inspection Report dated 6/11/2020, scheduled waste is one of the elements during on-site inspections.</li> <li>4) The SW 409, 2T-Oil also being documented in the 5<sup>th</sup> Schedule based on the record from October 2020 until February 2021.</li> <li>5) No onsite verification being made to verify the above statement as the assessment on Remote / Virtual Audit.</li> </ol> <p>The evidence of correction and corrective actions were found to be adequate to close the minor Non-Conformity. Minor NC was closed on 12/08/2021.</p>
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<b>Opportunity For Improvement</b>		
<b>Ref:</b> <b>1929475-202007-I1</b>	<b>Area/Process: Bukit Benut &amp; CEP Nyior Estates</b>	<b>Clause: 4.4.2.2 Part 3</b>
Objective Evidence:	The management to ensure all the complaints received are resolve in an effective, timely and appropriate manner.	
Verification Statement	<p>ASA 4 verification:</p> <p>Sighted sample of complaint by workers at Bukit Benut estate and CEP Nyior Estate. Verified that all complaint has been attended by the respective person in charge and solved in the timely manner.</p>	

**3.4 Summary of the Nonconformities and Status**

<b>CAR Ref.</b>	<b>CLASS</b>	<b>ISSUED</b>	<b>STATUS</b>
1929475-202007-N1	Minor	22/07/2020	Closed on 12/08/2021
1929475-202007-N2	Minor	22/07/2020	Closed on 12/08/2021


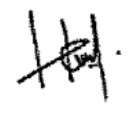
**3.5 Issues Raised by Stakeholders**

IS #	Description
1	<p><b>Issues: Contractors (Syarikat Sin Kim Huat Enterprise, Sakthi Enterprise)</b>            Agreement between Sime Darby and contractors were signed and verified during the audit. No complaint for the management. The payment paid within 1 month as agreed. Contractors were being trained and briefed regarding RSPO &amp; MSPO.</p> <p><b>Management Responses:</b>            Noted on the information.</p> <p><b>Audit Team Findings:</b>            No other issue.</p>
2	<p><b>Issues: Contractors (TTK Sdn Bhd, AVN Brothers)</b>            Agreement between Sime Darby and suppliers were signed and verified during the audit. No complaint for the management. The payment paid within 1 month as agreed. Suppliers were being trained and briefed regarding RSPO &amp; MSPO.</p> <p><b>Management Responses:</b>            Noted on the information.</p> <p><b>Audit Team Findings:</b>            No other issue.</p>
3	<p><b>Issues: Local communities (JKK Kg Pisang, JKK Kg Melayu Nyior)</b>            Villagers and temple have good relationship with estate and mill management. They often joined both parties' community programme. There is no issue of encroachment or dispute case so far.</p> <p><b>Management Responses:</b>            Noted on the information.</p> <p><b>Audit Team Findings:</b>            No other issue.</p>
4	<p><b>Issues: SK Agama Ladang Bukit Benut</b>            The school management would like to extend their appreciation for the contribution and donations that Sime Darby management given and upkeep of school facilities upon request.</p> <p><b>Management Responses:</b>            Noted on the information.</p> <p><b>Audit Team Findings:</b>            No other issue.</p>
5	<p><b>Issues: NUPW Representatives Bukit Benut POM &amp; Estate)</b>            The election for NUPW were made through vote. Most of the employee joined NUPW and no restriction from the company. No serious complaint from the workers, mainly for the housing maintenance.</p> <p><b>Management Responses:</b>            Noted on the information.</p> <p><b>Audit Team Findings:</b>            No other issue.</p>



<b>6</b>	<p><b>Issues: Foreign Workers (Bukit Benut POM &amp; Estate)</b>            Training were provided for all workers. Workers welfare were keep monitored by the management. There is no illegal deduction of their salary has been made.</p>
	<p><b>Management Responses:</b>            Noted on the information.</p>
	<p><b>Audit Team Findings:</b>            No other issue.</p>
<b>7</b>	<p><b>Issues: Gender Committee (Bukit Benut POM &amp; Estate)</b>            No case of sexual harassment reported in the certification unit. New mothers in the certification units were assessed on their needs and no restriction to have a breastfeeding time, check-up session, etc. the gender committee meeting was conducted regularly with active participation and activities among the female employees.</p>
	<p><b>Management Responses:</b>            Noted on the information.</p>
	<p><b>Audit Team Findings:</b>            No other issue.</p>

**Section 4: Assessment Conclusion and Recommendation**

<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>	
Based on the findings during the assessment SOU 22 Bukit Benut Palm Oil Mill and Estates Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of SOU 22 Bukit Benut Palm Oil Mill and Estates Certification Unit is approved and continued.	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<b>Name:</b> Zulkifli bin Mohammed Hashim	<b>Name:</b> NOR HALIS ABU ZAR
<b>Company name:</b> Sime Darby Plantation Berhad	<b>Company name:</b> BSI MALAYSIA
<b>Title:</b> Manager (SOU 22 Chairman)	<b>Title:</b> CLIENT MANAGER
<b>Signature:</b> SIME DARBY PLANTATION BERHAD BUKIT BENUT ESTATE Reg. No. 647766-V  <b>Date:</b> ..... Manager 01/09/2021 TN. ZULKIFLI BIN MOHAMMED HASHIM	<b>Signature:</b>  <b>Date: 26/08/2021</b>

**Appendix A: Summary of the findings by Principles and Criteria**

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

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	A policy for the implementation of MSPO shall be established. - <b>Major compliance -</b>	Sighted Group Sustainability & Quality Policy Statement dated 02/12/2019 signed by Group Managing Director Mr. Mohamad Helmi Othman Basha.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. - <b>Major compliance -</b>	The policy established mention that Sime Darby are committed to making: <ol style="list-style-type: none"> <li>1. Promoting Good Governance and Transparency</li> <li>2. Contributing to a better society</li> <li>3. Minimizing environmental harm</li> <li>4. Delivering sustainability quality</li> </ol> This policy shall be guided by the commitment spelt out in the company's: <ol style="list-style-type: none"> <li>1. Responsible Agriculture Charter (RAC)</li> <li>2. Human Right Charter (HRC)</li> <li>3. Innovation &amp; Productivity Charter (IPC)</li> </ol>	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			

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Criterion / Indicator		Assessment Findings	Compliance
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. <b>- Major compliance -</b>	RSPO + MSPO Internal Audit for SOU 22 Bukit Benut was carried out on 12/07/2021 in Bukit Benut Estate and 21/07/2021 in CEP Nyior Estate by GSQM & RSQM. The audit was carried out based on the reference of MS 2530-3:2013 and MS 2530-4:2013. Total 4 major, 2 minor non-conformity and 14 Opportunity for Improvement raised in Bukit Benut Estate and 3 major, 1 minor non-conformity and 11 Opportunity for Improvement raised in CEP Nyior Estate.  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.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. <b>- Major compliance -</b>	Sime Darby Plantation Berhad has developed Internal Audit Procedure, Doc. No.: SD/SDP/PSQM/IAP, Rev. 2 dated 1/9/2017. The frequency of the internal audit shall be carried out at least once a year and when is required.  Total 4 major, 2 minor non-conformity and 14 Opportunity for Improvement raised in Bukit Benut Estate and 3 major, 1 minor non-conformity and 11 Opportunity for Improvement raised in CEP Nyior Estate.  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.	Complied
4.1.2.3	Report shall be made available to the management for their review. <b>- Major compliance -</b>	The internal audit report has distributed to the estate's management. The Management Representative has acknowledged on the acceptance of the Internal Audit Report on 12/07/2021 in Bukit Benut Estate and 21/07/2021 in CEP Nyior Estate. Management review meeting was conducted to review the findings of the internal audit.	Complied

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Criterion / Indicator		Assessment Findings	Compliance								
<b>Criterion 4.1.3 – Management Review</b>											
<b>4.1.3.1</b>	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. <b>- Major compliance -</b>	The latest management review meeting was carried out on 16/07/2021 in Bukit Benut Estate and 04/08/2021 in CEP Nyior Estate where the agenda that discussed as below: 1. Opening Remarks by Chairman 2. Previous Meeting Minutes Review 3. Matters Arising from Previous Minutes of Meeting 4. Objective/ Management Program 5. Training Plan 6. Results from Internal Audits: RSPO & MSPO 7. Nonconformity, Corrective and Preventive Actions 8. Customers/ Stakeholders Feedback/ Complaints 9. Resource Needs 10. Changes that could affect the management systems 11. Recommendations for Improvement 12. Other matters 13. Conclusion	Complied								
<b>Criterion 4.1.4 – Continual Improvement</b>											
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. <b>- Major compliance -</b>	All Estates did document the Continuous Improvement Plan for year 2021. The detail as follows: <u>Bukit Benut Estate</u> <table border="1" data-bbox="1048 1337 1868 1367"> <thead> <tr> <th>No</th> <th>Description</th> <th>Action</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	No	Description	Action	Status					Complied
No	Description	Action	Status								

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Criterion / Indicator		Assessment Findings				Compliance
		1	To reduce circle spraying cost/ha for mature areas	To convert CDA Spraying at flat/undulating areas to MB Sprayer L100	On - going	
		2	To reduce circle manuring cost for mature areas	Maximise mechanise manuring application area using Vicon Spreader	On - going	
		3	To reduce rat baiting labour application cost	Placement of 5 baits per palm and no replacement round	On - going	
		<u>CEP Nyior Estate</u>				
		No	Area/ system	Objective	Timeline / PIC	
		1	SIME card	To identify unsafe act and condition to minimize near missed / accident occurrences.	On-going / Medical Assistant	
		2	SEMUA 2.0	To keep tracks on the FFB movement from the field up to the oil mill.	On-going / Asst Manager	
		3	SMS IT System	Reporting on accidents, OSH Programme, alert on expiring dates for permit and licenses.	On-going / Medical Assistant	
		4	Raking	To reduce raking cost by using Circle Blower.	On-going / Asst Manager	

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<b>4.1.4.2</b>	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. <b>- Major compliance -</b>	The Bukit Benut Estate has introduced MB L00 Sprayer the mechanical spraying as a new technology. However, no new technology at CEP Nyior Estate.	Complied
<b>4.1.4.3</b>	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. <b>- Major compliance -</b>	The mechanical sprayer, MB L00 Sprayer training was conducted on 28/5/2021 attended by 13 participants by En. Mohamad Wafiy Bin Mison, Edaran Badang. The objective of the training is: - 1. To properly understand on how to operate the MB 2 2. To understand the PPE use and chemical to be used 3. To understand the PMV for the MB 4. To properly understand on how to records chemical/lubricant usage	Complied
<b>4.2 Principle 2: Transparency</b>			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
<b>4.2.1.1</b>	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. <b>- Major compliance -</b>	Sime Darby Plantation Berhad has developed Standard Operation Manual (SOM) – Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 1/4/2008 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the estate. 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. Manager is responsible for address the communication and requests.	Complied

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<b>4.2.1.2</b>	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. <b>- Major compliance -</b>	The management has disseminated the information of the documents that made publicly available such as management plan, OSH plan, audit reports and land titles upon request during the stakeholder meetings. Besides, internal and external stakeholders could access to the company's website to obtain information such as policies, annual report and complaint procedures: ( <a href="http://www.simedarbyplantation.com/Sustainability.aspx">http://www.simedarbyplantation.com/Sustainability.aspx</a> )	Complied
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication with the relevant stakeholders. <b>- Major compliance -</b>	Sime Darby Plantation Berhad has developed Standard Operation Manual (SOM) – Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 1/4/2008 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the estate. 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.	Complied
<b>4.2.2.2</b>	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. <b>- Minor compliance -</b>	Senior Assistant Manager of Bukit Benut Estate and CEP Nyior Estate has been appointed as social officer to handle any issues related to social in the estate by the Manager. Appointment letter dated 10/03/2021 and 01/01/2021 was sighted respectively.	Complied
<b>4.2.2.3</b>	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. <b>- Major compliance -</b>	A stakeholder meeting for Bukit Benut Estate and CEP Nyior Estate was conducted on 07/04/2021 and 08/04/2021 respectively. Stakeholders such as contractors, suppliers, school's representatives, sundry shops' owner, smallholders, government authorities and MAPA representative were attended the meeting. Issues raised by stakeholders were recorded in the minutes and responded by the management	Complied



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Criterion / Indicator		Assessment Findings	Compliance
		accordingly. Sighted evidence of minutes of meeting and attendance list.	
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). <b>- Major compliance -</b>	<p>Sime Darby Plantation has developed Plantation Quality Management System – Standard Operating Procedure for Sustainable Supply Chain and Traceability, Doc. No.: Appendix 15, Version: 2; Issue No 3, Issued Date; April 2019 under section 6.0 delivery FFB from Estate or under section 7.0 receiving FFB.</p> <p>The objective of the procedure is to establish a suitable identification and traceability of oil palm Fresh Fruit Bunch (FFB) production traceable from the plantation activities till dispatch at Palm Oil Mill.</p> <p>Sighted the FFB flow chart at CEP Nyior Estate from harvesting at designated block to mill weighbridge. The mandore will key-in the daily production into SEMUA System and generate the report at office.</p> <p>Further, the FFB will be loaded into Bin System by the Grabber. The hook lift lorry will carry the Bin to Estate weighbridge. The weighbridge clerk at Estate and Auxiliary Police will ensure the safety measures are in place before dispatching the FFB to mill.</p>	Complied
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	The Estate Management team holds the responsibility on regular inspection of traceability system. Periodical inspections also being conducted through Internal Audit, HQ Personnel or Agronomist visit. The effectiveness of the monitoring will evidence in the internal audit and visit report findings.	Complied
<b>4.2.3.3</b>	The management should identify and assign suitable employees to implement and maintain the traceability system. <b>- Minor compliance -</b>	All the Estates have appointed their person in charge to monitor Traceability System as below: -	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ol style="list-style-type: none"> <li>Bukit Benut Estate is Pn. Nur Nadiah Hani binti Mohmad Natni, Assistant Manager through appointment letter dated 30/12/2020 signed by En. Rozdizam Kasan, Estate Manager.</li> <li>As for CEP Nyior Estate, En. Azlan bin Mustafa, Assistant Manager through appointment letter dated 2/1/2020 signed by En. T. Paramasivam Estate Manager.</li> </ol>	
<b>4.2.3.4</b>	<p>Records of sales, delivery or transportation of FFB shall be maintained.</p> <p><b>- Major compliance -</b></p>	<p>Sime Darby has established Standard Operating Procedure to maintain all records of evidence under Sustainability Plantation Management System, Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records. All traceability records should be maintained at minimum period of 3 years.</p> <p>FFB being sell to Own Mill, Bukit Benut POM and being monitored by Headquarters. Sighted the records of sales, delivery or transportation of FFB. This record being maintained, and the documents are kept by the both site, estate and mill. Sample taken as follows:-</p> <p><u>Bukit Benut Estate</u></p> <ol style="list-style-type: none"> <li>Consignment Note, C/N No: 11627, Date: 04/08/2021, Vehicle Number: JNL 1997, Driver Name: Rahimi, FFB, Block: 2000C Total Bunches: 420, Bunch Wt: 20 kg Harvesting Interval: 11, Date Harvested: 4/8/2021, Estimate Tonnage: 8.80 Mt, Loose Fruit, Field No: 2000, Harvesting Interval: 12, Estimate Tonnage: 3.00 Mt</li> <li>Weighbridge Ticket No: 107437, Date: 4/8/2021 Estate: Bukit Benut, Transporter: Yap Sim Kim Huat, Vehicle No: JNL 1997, Product code: 0001-FFB Crop A, Block: 2000, loose fruit and block 2000C FFB, Gross Weight: 26,130 kg, Tare Weight:, 14,330 kg, Net Weight: 11,880 kg, ABW: 20.95</li> </ol>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p><u>CEP Nyior Estate</u></p> <p>1. Estate Weighbridge Ticket No: 21410, Date: 30/6/2021 Estate: CEP Nyior, Transporter: RSKP Brother Customer: Gunong Mas Mill, Vehicle No: JHX 6382 Product code: 0002-FFB Crop B, CEP Nyior - Block: 2008, Interval:11, Bunches: 725, Ulu Paloh – Block 2008, Loose fruit 500 kg, Gross Weight: 25,240 kg, Tare Weight: 13,810 kg, Net Weight: 11,430 kg ABW: 15.08</p>	
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
<b>4.3.1.1</b>	<p>All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p><b>- Major compliance -</b></p>	<p>The following compliance to the legislative requirement necessary for both estates among others are;</p> <p><u>Bukit Benut Estate</u></p> <ol style="list-style-type: none"> <li>1. Permit Barang Kawalan Berjadual (Diesel &amp; Petrol); Reference Number: BPGK JH (KLU) 0624 SK; Diesel -9,000 litre and Petrol – 1,000 litres. Valid from 21/7/2020 till 20/7/2021. The new permit is still under process.</li> <li>2. MPOB License; License Number: 522307002000; License Valid from 01/8/2020 till 31/7/2021.</li> <li>3. Surat Akaun Penerimaan Peralatan Pembelajaran dan Permainan untuk Pusat Asuhan Kanak-Kanak Ladang from Jabatan Tenaga Kerja Negeri Johor dated 10/2/2009.</li> <li>4. Air Compressor License; Registration Number: JH PMT 22514; License Valid till 28/3/2022.</li> </ol>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>5. Permit kebenaran untuk membuat potongan upah di bawah Seksyen 24 Akta Kerja 1955 for Ladang Bukit Benut – for electricity payment not more than RM70.00 per month dated 30/11/2006.</p> <p><u>CEP Nyior Estate</u></p> <ol style="list-style-type: none"> <li>1. Weighbridge Stamp of Verification under Weights and Measures, Act 1972, Certificate No D 053060 Sticker No DE 18002639 Dated 9/7/2021 for 40,000 kg x 10 kg</li> <li>2. Permit Barang Kawalan Berjadual (Diesel &amp; Petrol); Reference Number: BPGK JH (KLU) 0614 SK; Diesel -15,000 litre and Petrol – 450 litres. Valid from 18/8/2020 till 17/8/2021.</li> <li>3. Lesen MPOB for CEP Nyior Estate (menjual dan mengalih FFB) for 1,961.65 ha. No lesen 508445102000 for a period of 01/04/2021 till 31/3/2022.</li> <li>4. Permit kebenaran untuk membuat potongan upah di bawah Seksyen 24 Akta Kerja 1955 for Sime Darby Plantation Sdn Bhd – bagi tujuan potongan bayaran bil elektrik from Ibu Pejabat Jabatan Tenaga Kerja Semenanjung Malaysia, Putrajaya No Rujukan: BHG.PU/9/129 JLD38(53) dated 06/07/2017.</li> <li>5. Permit Potongan Daripada Gaji Pekerja Seksyen 24 Akta Kerja 1955 untuk bayaran bil air SAJ No Rujukan: PP3/29/0144 from Jabatan Tenaga Kerja Negeri Johor dated 01/12/1998.</li> <li>6. Fire Extinguisher – 47 units – expiry date 19/7/2022.</li> </ol>	
<b>4.3.1.2</b>	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>The Company has established the Standard Operation Manual (SOM) Section 5: Management Responsibility Sub-Section 5.2 Customer Focus, Appendix 5.2.4a – Procedure for Legal and Other Requirements prepared by the Standards &amp; Compliance Section, Total Quality and Environmental Management (TQEM) Plantation dated 01/11/2008.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>The estates are operating in compliance with the applicable local, state, national and ratified international laws and regulations. All legal requirements were documented in Legal and Other Requirement Register, Appendix 5.2.4b – Legal Requirements Register Form. Amongst the document are: -</p> <ol style="list-style-type: none"> <li>1. Prevention and Control of Infectious Diseases Act 1988, Act 342</li> <li>2. OSHA Act 1994 (Act 514)</li> <li>3. Factories and Machinery Act 1967 (Act 139)</li> <li>4. Uniform Building By Law, 1986</li> <li>5. Pesticides Act 1974 (Act 149)</li> <li>6. Electrical Supply Act, 1990</li> <li>7. Petroleum (Safety Measures) Act, 1984</li> <li>8. Fire Services Act, 1984</li> <li>9. Code of Practice for Safe Working in a Confined Space, 2010</li> <li>10. Environmental Quality Act, 1974</li> <li>11. Etc</li> </ol> <p>The latest review of LORR at Bukit Benut Estate was 21/7/2021 and CEP Nyior Estate on 22/7/2021.</p>	
<b>4.3.1.3</b>	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p><b>- Major compliance -</b></p>	<p>The periodic review and evaluation on the legal requirement register to ensure that any new/addition as well as changes and amendment are captured and update, through the following manner:</p> <ol style="list-style-type: none"> <li>1. Plantation Sustainability and Quality Management Department</li> <li>2. Enquiring the laws books publisher</li> <li>3. Communication with law/enforcement officers</li> <li>4. Website</li> </ol>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Changes to legal requirements are monitored and updated by company's Group Sustainability &amp; Quality Management (GSQM). The SOP 2.0 (Legal Compliance) has specified any changes to legal requirements are tracked by means of periodic review and evaluation on the Laws &amp; regulations list to ensure that any new/addition as well as changes and amendment are captured and updated, through the following manner:</p> <ol style="list-style-type: none"> <li>1. Head Office Assignee to identify and register all applicable laws &amp; regulations pertaining to estate / palm oil mill operation.</li> <li>2. Head Office Assignee to arrange the purchase of the applicable laws &amp; regulations books where possible or downloaded/ soft copy would be used.</li> </ol> <p>The latest up-date for 2021 at both Estates is; -</p> <ol style="list-style-type: none"> <li>1. Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 Minimum Wages Order 2020.</li> <li>2. Malaysian Anti-Corruption Commission Act (Amended) 2018</li> <li>3. Whistle-blower Protection Act 2010</li> </ol>	
<b>4.3.1.4</b>	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p><b>- Minor compliance -</b></p>	<p>All the Estates have appointed their person in charge to monitor Legal Requirement System as below: -</p> <p>Bukit Benut Estate is Pn. Nur Nadiah Hani binti Mohmad Natni, Assistant Manager through appointment letter dated 30/12/2020 signed by En. Rozdizam Kasan, Estate Manager.</p> <p>As for CEP Nyior Estate, En. Azlan bin Mustafa, Assistant Manager through appointment letter dated 2/1/2020 signed by En. T. Paramasivam Estate Manager.</p>	Complied
<b>Criterion 4.3.2 – Lands use rights</b>			

Criterion / Indicator		Assessment Findings	Compliance
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. <b>- Major compliance -</b>	The was no evidence to show that oil palm cultivation activities Bukit Benut Estate and CEP Nyior Estate had diminished the land use rights of others. Verified documents to show legal ownership of its land.	Complied
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. <b>- Major compliance -</b>	Verified the land titles shown that the legal ownership of the company. Sample of land title as below: <u>Bukit Benut Estate:</u> There are total 30 land titles found in Bukit Benut Estate for total 2799.87 ha. All the land titles have been issued under the name of owner to Sime Darby Plantations Sdn Bhd. 1. Land Title No.: 85632; Lot No.: 1760; Area Lot: 2.43 ha 2. Land Title No.: 98981; Lot No.: 874; Area Lot: 285.41 ha 3. Land Title No.: 120741; Lot No.: 1085; Area Lot: 180.89 ha 4. Land Title No.: 98998; Lot No.: 873; Area Lot: 195.969 ha 5. Land Title No.: 21382; Lot No.: 875; Area Lot: 45.2741 ha 6. Land Title No.: 120742; Lot No.: 1087; Area Lot: 108.8603 ha <u>CEP Nyior Estate:</u> There are total 21 land titles found in CEP Nyior Estate for total 1573.0829 ha. All the land titles have been issued under the name of owner to Sime Darby Plantations Sdn Bhd. 1. Land Title No.: 101738; Lot No.: 309; Area Lot: 53.3678 ha 2. Land Title No.: 120101; Lot No.: 1745; Area Lot: 3.493 ha 3. Land Title No.: 325880; Lot No.: 1748; Area Lot: 4.0443 ha 4. Land Title No.: 86982; Lot No.: 2373; Area Lot: 415.4015 ha 5. Land Title No.: 530151; Lot No.: 8199; Area Lot: 377.50 ha	Complied

Criterion / Indicator		Assessment Findings	Compliance																				
		6. Land Title No.: 68986; Lot No.: 6369; Area Lot: 40.47 ha																					
<b>4.3.2.3</b>	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p><b>- Major compliance -</b></p>	<p>Bukit Benut Estate boundary was clearly demarcated with red and white poles. Security trenches were constructed along the boundary as a clear demarcation of the area. The Management have identified 125 markers with GPS Coordinate. Sample taken as below: -</p> <table border="1"> <thead> <tr> <th>Field</th> <th>GPS Coordinate</th> </tr> </thead> <tbody> <tr> <td rowspan="3">2016A</td> <td>1.894685, 103.316175</td> </tr> <tr> <td>1.894838, 103.317949</td> </tr> <tr> <td>1.894689, 103.321195</td> </tr> <tr> <td rowspan="3">08B</td> <td>1.904321, 103.325262</td> </tr> <tr> <td>1.904719, 103.324979</td> </tr> <tr> <td>1.905554, 103.324393</td> </tr> <tr> <td rowspan="3">2014A</td> <td>1.905610, 103.323392</td> </tr> <tr> <td>1.904850, 103.322449</td> </tr> <tr> <td>1.903842, 103.321393</td> </tr> </tbody> </table> <p>As for CEP Nyior Estate, boundary marker was clearly demarcated with red poles. The boundary with smallholder and Chin Bee Estate is by trenches. Sample taken as herein: -</p> <table border="1"> <thead> <tr> <th>Field</th> <th>GPS Coordinate</th> </tr> </thead> <tbody> <tr> <td>2002</td> <td>2°5'26" N, 103°16'30" E</td> </tr> <tr> <td>2005</td> <td>2°5'2" N, 103°14'30" E</td> </tr> </tbody> </table>	Field	GPS Coordinate	2016A	1.894685, 103.316175	1.894838, 103.317949	1.894689, 103.321195	08B	1.904321, 103.325262	1.904719, 103.324979	1.905554, 103.324393	2014A	1.905610, 103.323392	1.904850, 103.322449	1.903842, 103.321393	Field	GPS Coordinate	2002	2°5'26" N, 103°16'30" E	2005	2°5'2" N, 103°14'30" E	Complied
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<b>4.3.2.4</b>	<p>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).</p>	<p>There is no land dispute in the Bukit Benut Estate and CEP Nyior Estate at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified.</p>	Complied																				



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- Minor compliance -			
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. <b>- Major compliance -</b>	There is no customary land or negotiated agreements within the Bukit Benut Estate and CEP Nyior Estate land area.	Complied
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. <b>- Minor compliance -</b>	There is no customary land or negotiated agreements within the Bukit Benut Estate and CEP Nyior Estate land area.	Complied
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. <b>- Major compliance -</b>	There is no customary land or negotiated agreements within the Bukit Benut Estate and CEP Nyior Estate land area.	Complied
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. <b>- Minor compliance –</b>	Sustainability Strategy Unit, PSQM Department has conducted Social Impact Assessment (SIA) on 16 – 19 May 2016 for SOU 22 Bukit Benut. There is no new SIA was conducted since last assessment. A prevention plan for COVID-19 was developed on 13/4/2020 and briefed to the workers on the preventive actions for COVID-19 in Bukit Benut Estate. The management has acted such as taking temperature for all the workers during morning muster and recorded in Temperature and Health Examination COVID-19 on daily basis. SIA Management Plan has been prepared:	Complied

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		Bukit Benut Estate: 16/07/2021 CEP Nyior Estate: 27/07/2021	
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented. <b>- Major compliance -</b>	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 01/11/2008. The procedure has detailing the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.  Sime Darby Plantation Berhad has developed Standard Operation Manual (SOM) – Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 1/4/2018 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the mill. 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.	Complied
<b>4.4.2.2</b>	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. <b>- Major compliance -</b>	Bukit Benut Estate and CEP Nyior Estate has implemented External Complaint Book and Housing Defect Complaint Form to record complaints and requests reported by the stakeholders. The complaints or grievances were resolved within the time frame. Most of the complaints were related to housing repair. The complaint form has recorded the name of complainant, date of completion and acknowledgement from the complainant after action taken.  Sampled of the complaints as below: 1. House No.: 109A dated 25/06/2021 (Bukit Benut Estate)	Complied

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		<p>Issue: Fan, Lamp and Roof broken.            Action: Management has repaired on 30/06/2021 and seen the photo evident of repair. The complainant has acknowledged on 30/06/2021 for the repair done.</p> <p>2. House No.: 24 dated 24/06/2021 (Bukit Benut Estate)            Issue: Fan and Lamp broken.            Action: Management has repaired on 29/06/2021 and seen the photo evident of repair. The complainant has acknowledged on 29/06/2021 for the repair done.</p> <p>3. House No.: MA dated 22/07/2021 (CEP Nyior Estate)            Issue: Lamp broken.            Action: Management has repaired on 23/07/2021 and seen the photo evident of repair. The complainant has acknowledged on 23/07 for the repair done.</p> <p>4. House No.: 49 dated 21/06/2021 (CEP Nyior Estate)            Issue: Lamp broken.            Action: Management has repaired on 23/06/2021 and seen the photo evident of repair. The complainant has acknowledged on 23/06/2021 for the repair done.</p>	
<b>4.4.2.3</b>	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p><b>- Minor compliance -</b></p>	<p>Bukit Benut and CEP Nyior Estate has implemented External Complaint Book and Housing Defect Complaint Form to record complaints and requests reported by the stakeholders.</p> <p>Sampled of the complaints as below:</p> <p>1. House No.: 109A dated 25/06/2021 (Bukit Benut Estate)            Issue: Fan, Lamp and Roof broken.</p>	Complied

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<b>4.4.2.4</b>	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p> <p><b>- Minor compliance -</b></p>	<p>Sime Darby Plantation Berhad has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 1/11/2008. 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. Verified through stakeholder's interview. Latest awareness training has been conducted on 27/07/2021 for CEP Nyior Estate.</p>	Complied

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<b>4.4.2.5</b>	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. <b>- Major compliance -</b>	The complaint record for request for maintenance are available and kept for 10 years according to the Standard Operation Manual Section 4; Sub-section 4.2.3 Control of Documents.	Complied
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
<b>4.4.3.1</b>	Growers should contribute to local development in consultation with the local communities. <b>- Minor compliance -</b>	Sighted evidence of CSR record for the year 2021 for Sime Darby SOU 22. <u>Bukit Benut Estate</u> 1. Free Sanitation Service for Mosque and Temple from Estate and COWAY dated 29/04/2021 2. "Sumbangan Daging Korban" from Estate and Yayasan Budi Ihsan Malaysia dated 28/07/2021 3. "Sumbangan Kepada Anak Yatim Dan Ibu Tunggal" from Southern Region and Estate dated 05/05/2021. <u>CEP Nyior Estate</u> 1. "Saringan Percuma dan survey Kanser Kolorektal" dated 14/04/2021 2. "Program Gorong royong Kawan Pondok Polis Nyior" dated 13/01/2021	Complied
<b>Criterion 4.4.4: Employees safety and health</b>			
<b>4.4.4.1</b>	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. <b>- Major compliance -</b>	The group has established Group Sustainability & Quality Policy Statement signed by Mohamad Helmy Othman Basha, Group Managing Director on 02/12/2019.	Complied

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		<p>For upstream operation, safety policy as per document "Upstream Malaysia – Health, Safety &amp; Environment (HSE) Policy Statement" signed by Roslin Azmy Hassan, CEO Upstream Malaysia on 01/06/2020.</p> <p>Sighted, Sime Darby Plantation Berhad has developed Occupational Safety and Health Manual dated 20/8/2008 by Plantation Sustainability and Quality Management Department.</p> <p>Occupational Safety and Health Plan for 2021 have been developed and documented. The Plan being reviewed on annually basis. The plan covers on OSH Policy, HIRARC, OSH Training, OSH Meeting, workplace inspection, medical surveillance, fire drill, firefighting and PPE Training.</p>	
<b>4.4.4.2</b>	<p>The occupational safety and health plan shall cover the following:</p> <ul style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risks of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:               <ul style="list-style-type: none"> <li>i. all employees involved shall be adequately trained on safe working practices</li> <li>ii. all precautions attached to products shall be properly observed and applied</li> </ul> </li> <li>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</li> <li>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe</li> </ul>	<p>The group has established Group Sustainability &amp; Quality Policy Statement signed by Mohamad Helmy Othman Basha, Group Managing Director on 02/12/2019.</p> <p>For upstream operation, safety policy as per document "Upstream Malaysia – Health, Safety &amp; Environment (HSE) Policy Statement" signed by Roslin Azmy Hassan, CEO Upstream Malaysia on 01/06/2020.</p> <ul style="list-style-type: none"> <li>a. Sighted, Sime Darby Plantation Berhad has developed Occupational Safety and Health Manual dated 20/8/2008 by Plantation Sustainability and Quality Management Department.</li> <li>b. Sime Darby has established SOP for HIRARC. Refer Estate Quality Management System, Level 2: Standard Operating Manual, Subsection 5.4: Planning, Appendix 5.4.1a Hazard Identification, Risk Assessment and Risk Control (HIRARC) Procedure ver. 1 Year 2008, issue no. 1 dated 1/4/2008. Adequate HIRARC being assessed and documented. Risk assessment was conducted through HIRARC based on the severity and the likelihood. HIRARC</li> </ul>	Complied

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<p>handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>is consist of hazard identification (type of work activity, hazard &amp; effect), Risk analysis (Existing risk control, likelihood, severity &amp; risk) &amp; Risk Control (Recommended control measures &amp; PIC appointed are Staff or Executive). HIRARC being reviewed yearly as well as whenever occurrence of accidents. Bukit Benut Estate has conducted Hazard Identification Risk assessment and Risk Control Review Meeting dated 22/5/2021 attended by 10 personnel chaired by the Manager. Latest reviewed as follows: -</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>Estate</th> <th>No of Activities</th> <th>Date Reviewed</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bukit Benut</td> <td>25</td> <td>22/5/2021</td> </tr> <tr> <td>2</td> <td>CEP Nyior</td> <td>22</td> <td>26/2/2021</td> </tr> </tbody> </table> <p>c. The Estate has a comprehensive annual training plan for the staffs and workers and this was sighted in the training matrix for each staff and workers. Amongst the training that have been conducted as listed herein: -</p> <p><u>Bukit Benut Estate</u></p> <ol style="list-style-type: none"> <li>1. The Policies, Procedures, COBC and Whistle - blowing being communicated to 185 workers dated 22/7/2021 at Muster Ground. The briefing was led by The Estate Manager.</li> <li>2. Fertilizer Application and PPE training to manuring team comprising 8 workers. The training being conducted by Puan Nur Nadiah Hani dated 6/2/2021 at Field 2007B</li> <li>3. Schedule Waste Training to Assistant, Staffs, Mandore and Workshop Fitter through Virtual / online dated 19/7/2021. The</li> </ol>		Estate	No of Activities	Date Reviewed	1	Bukit Benut	25	22/5/2021	2	CEP Nyior	22	26/2/2021	
	Estate	No of Activities	Date Reviewed											
1	Bukit Benut	25	22/5/2021											
2	CEP Nyior	22	26/2/2021											

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	<p>training conducted by Mr. Umeshnath Raguphaty to 10 participants.</p> <p><u>CEP Nyior Estate</u></p> <ol style="list-style-type: none"> <li>1. Rat Baiting training being communicated to 10 workers dated 13/7/ 2021 at Muster Ground. The briefing was led by The Estate Assistant Manager.</li> <li>2. Spraying Training by the Medical assistant to 8 sprayers dated 26/3/ 2021. The training was held at Field 2011A.</li> <li>3. Training on Palm Pruning to 18 harvesters at Block 2011A by the Staff in- charge dated 1/7/2021.</li> </ol> <p>d. Company is fully aware that working on safety is first priority during the works. The records on PPE Issuance and replacement are up to date. All the workers have been trained with safety and the workers wear the PPE required by his/her works.</p> <p>e. The Company has established Standard Operation Manual (SOM) on Chemical Safety Management Procedure, Health Safety Environment Upstream Malaysia dated 9/3/2021.The SOM covers the following;</p> <ol style="list-style-type: none"> <li>1. Procedures for receiving</li> <li>2. Procedures for handling</li> <li>3. Procedures for storage</li> <li>4. Procedures for disposal</li> </ol> <p>Detail of chemicals used in Estate operation are listed in Register of Chemicals Hazardous to Health. No Class 1 or paraquat being used at all the Estates as per documents dated 21/7/2021 at Bukit Benut Estate and 1/7/2021 at CEP Nyior Estate.</p>	



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	<p>Chemical Health Risk Assessment was conducted by Nisafety Consultancy, Nor Khairunnisa Liyana Binti Ahmid JKKP Registration No.: HQ/15/ASS/00/363 Date of Completion of Assessment was 22/7/2020 at Bukit Benut Estate and 23/7/2020 at CEP Nyior Estate. The CHRA is assessing the diesel handlers, rat baiting gangs, manurers, fogging personnel, sprayers and workshop operator.</p> <p>All the Estates have conducted medical surveillance for their pesticides operator as follows: -</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Estate</th> <th>Date</th> <th>No of Worker</th> <th>Name of Clinic</th> </tr> </thead> <tbody> <tr> <td>Bukit Benut</td> <td>28/06/2021</td> <td>25</td> <td rowspan="2">Dr. Helen Tan, Rengam Clinic</td> </tr> <tr> <td>CEP Nyior</td> <td>30/11/2020</td> <td>12</td> </tr> </tbody> </table> <p>The finalized report from Bukit Benut Estate yet to be obtained from the Occupational Doctor. Based on Employee Medical Record Book (USECHH 2) and Certificate of Fitness (USECHH 3), all the workers are fit for work at CEP Nyior Estate.</p> <p>The Company has conducted the Noise Risk Assessment by Etosh, Consultant and Training Services, Ms Izzati Salleh (HQ/16/PEB/00/158) a registered Noise Risk Assessor dated 2/9/2020 at Bukit Benut Estate and 21/8/2020 at CEP Nyior Estate covering workshop, tractor &amp; MTG driver, Zenoah blower operator, knapsack grass cutter, trunk injection driller and cantas operator.</p> <p>The company has appointed Nisafety Consultancy, the assessor to conduct the Audiometry Test for 20 workers at Bukit Benut Estate ON 9/8/2021.</p> <p>f. The responsibility and accountability to ensure Safety &amp; Health at each operating unit lies with the respective Manager. He is assisted</p>	Estate	Date	No of Worker	Name of Clinic	Bukit Benut	28/06/2021	25	Dr. Helen Tan, Rengam Clinic	CEP Nyior	30/11/2020	12	
Estate	Date	No of Worker	Name of Clinic										
Bukit Benut	28/06/2021	25	Dr. Helen Tan, Rengam Clinic										
CEP Nyior	30/11/2020	12											

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	<p>by his nominated Assistant Manager and other OSH Committee members representing Employer and Employee of Each Operating Unit.</p> <p>g. OSH Meeting being conducted quarterly and chaired by OSH Chairman or Manager. The Assistant Manager as Secretary and attended by Worker’s Representatives and Management Representatives. The meeting for 2021 has been conducted and minutes of meeting was available for verification. Among the issues discussed were on SOPs for PPE, achievement of OSH objectives, training, accident report and etc.</p> <p>Sime Darby Plantation Berhad has developed Primary Healthcare Services in Plantation, Document No: SD/SDP/PSQM(ESH)202-OH14, Revision 1, dated 1/3/2017 by Plantation Sustainability and Quality Management Department</p> <p>h. Sime Darby Plantation Berhad Sustainability and Quality Management (SQM) Doc. No SDP/SQM(ESH)/001-2-9 Revision 1 Date 30/05/2019 has documented Sustainable Plantation Management System, Standard Operating Procedure Of Incidents, Accidents &amp; Non-Conformance Management.</p> <p>Sighted the Emergency Response Team (ERT) organization chart is made available at estate. The ERP (Emergency response plan) is available which covers the sampled incident as:</p> <ul style="list-style-type: none"> <li>i. Fire in the estate, office, store or workers housing</li> <li>ii. Chemical spillage</li> </ul> <p>i. The mandore was appointed as a 1<sup>st</sup> Aider in the Estate and responsible their workplace. Each of them being provided with complete set of 1<sup>st</sup> Aid Box and being replenished and inspected monthly by Management.</p>	

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		<p>j. Occupational injuries and LTA are monitor and Records on Lost Time Accident (LTA) metrics at estates had been verified and JKKP 6 &amp; 8 been submitted to DOSH in timely manner. The estate has submitted JKKP 8 to DOSH for calendar year 2020 base on the following details: -</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Date Submission of JKKP 8</th> <th>No of Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Bukit Benut</td> <td>15/01/2021</td> <td>3</td> <td>70</td> </tr> <tr> <td>CEP Nyior</td> <td>04/01/2021</td> <td>6</td> <td>13</td> </tr> </tbody> </table>	Estate	Date Submission of JKKP 8	No of Cases	LTA	Bukit Benut	15/01/2021	3	70	CEP Nyior	04/01/2021	6	13	
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<b>Criterion 4.4.5: Employment conditions</b>															
<b>4.4.5.1</b>	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>Sime Darby Plantation has established Group Sustainability &amp; Quality Policy Statement dated 2/12/2019 by Group Managing Director where the company is respecting, upholding &amp; no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) last revised 2020. Besides, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/3/2020. Sime Darby Plantation respect and safeguard human rights, notion of democracy and its institution. They recognize that Human Rights Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with SDP. This Policy is applied to all stakeholders affected by the business activities and relationships including directors, employees, counterparties, business partners, workers in our operations and supply chains, and communities surrounding our operations.</p> <p>Latest policy briefing for estate workers were conducted as below:</p>	Complied												

Criterion / Indicator		Assessment Findings	Compliance
		1. Bukit Benut Estate: 22/07/2021 2. CEP Nyior Estate: 16/03/2021	
<b>4.4.5.2</b>	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p><b>- Major compliance -</b></p>	<p>Sime Darby has implemented The Group Sustainability &amp; Quality Policy Statement which signed on 02/12/2019.</p> <p>Sighted Human Right Charter Revised 2020 has been established to cover on Human Right consist of Preamble, Scope, Commitments, Approach, Implementation and Responsibilities &amp; Reporting.</p> <p>Refer section 3.2 Respect and Uphold Labour Right where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation union membership, political view, religion and/or age.</p>	Complied
<b>4.4.5.3</b>	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>Employment contract are available and explained in language that understood by workers and signed by the workers (Local, Indonesian and Bangladesh). Besides, for workers who workers more than 2 years (Indonesian) and 3 years (other nationalities) have signed an extension contract (version: ECFW/Mac19/Pnsr/Ind/Ext/V2.0).</p> <p>There were employment contracts for staffs and workers. Pay and conditions are documented and achieved the Minimum Wage Order 2020. Sampled of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Employment Act 1955 which have been signed by the worker.</p> <p>Sampled of agreement and payslip for Dec 2020, Mar 2021 and June 2021 as below:</p> <p><u>Bukit Benut Estate</u></p> <p>1. Employee ID: 0000017780</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	2. Employee ID: 0000017884 3. Employee ID: 0000017801 4. Employee ID: 0000155368 5. Employee ID: 0000150891 6. Employee ID: 0000136516 7. Employee ID: 0000155621 8. Employee ID: 0000162837 <u>CEP Nyior Estate</u> 1. Employee ID: 0000145183 2. Employee ID: 0000119780 3. Employee ID: 0000146934 4. Employee ID: 0000055377 5. Employee ID: 0000015744 6. Employee ID: 0000076394 7. Employee ID: 0000082834 8. Employee ID: 0000113217	

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Criterion / Indicator	Assessment Findings	Compliance
<p><b>4.4.5.4</b> Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p><b>- Minor compliance -</b></p>	<p>Based on the payment voucher checked, daily rate for contract workers is RM 42.31/day for outside town and RM 46.15/day for town area. Pay slip/cash voucher of the workers were sighted that it is according to the employment contract. The records are documented and available for review. Refer employee of contractor's agreement:</p> <p><u>Bukit Benut Estate</u>            Syarikat Sin Kim Huat – FFB Transportation            1. Zulkarnain Surip NRIC 740924-XX-XXXX            2. Rahimi Bin Samingan NRIC 770923-XX-XXXX            Thiagarajan A/L Chellappan – Backhoe services            1. Chandaran Balakrishnan NRIC 721023-XX-XXXX  <u>CEP Nyior Estate Estate</u>            Sakhthi Enterprise – Backhoe services            1. Ranjan A/L Rajadurai NRIC 821019-XX-XXXX</p> <p>Verified that sample of contractor's workers agreement and payslip were in line with law and regulation.</p>	<p>Complied</p>
<p><b>4.4.5.5</b> The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p><b>- Major compliance -</b></p>	<p>The estates' 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 and wages were recorded.</p> <p>Besides, contractor (Syarikat Sin Kim Huat) in Bukit Benut Estate have provided the Personal Particulars to the management to maintain.</p>	<p>Complied</p>
<p><b>4.4.5.6</b> 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</p>	<p>The estates' management has employed local and foreign workers from Indonesia, India, Myanmar, Bangladesh and Nepal. They are all under direct employment to the estates. All of them have signed on the employment contract prior to work and extension contract where</p>	<p>Complied</p>

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<p>indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>the original contract has expired. Terms and conditions were according to Collective Agreement and Employment Act 1955.</p> <p>Sampled of agreement and payslip for Dec 2020, Mar 2021 and June 2021 as below:</p> <p><u>Bukit Benut Estate</u></p> <ol style="list-style-type: none"> <li>1. Employee ID: 0000017780</li> <li>2. Employee ID: 0000017884</li> <li>3. Employee ID: 0000017801</li> <li>4. Employee ID: 0000155368</li> <li>5. Employee ID: 0000150891</li> <li>6. Employee ID: 0000136516</li> <li>7. Employee ID: 0000155621</li> <li>8. Employee ID: 0000162837</li> </ol> <p><u>CEP Nyior Estate</u></p> <ol style="list-style-type: none"> <li>1. Employee ID: 0000145183</li> <li>2. Employee ID: 0000119780</li> <li>3. Employee ID: 0000146934</li> <li>4. Employee ID: 0000055377</li> <li>5. Employee ID: 0000015744</li> <li>6. Employee ID: 0000076394</li> <li>7. Employee ID: 0000082834</li> <li>8. Employee ID: 0000113217</li> </ol> <p>Interviewed with the foreign workers confirmed that they have freedom to go out from the compound during off day. They are volunteered to surrender the passport to the management for safety</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		reason as they worried the passport will be lost if kept by themselves. They have signed on the passport retain in office.	
<b>4.4.5.7</b>	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. <b>- Major compliance -</b>	Mill and estate have employed local and foreign workers. All the mill and estates workers are under direct employment and under contract. The pay slip has included basic pay, overtime, allowances, working days, deduction of salary such as Union, electricity, and temple and mosque fund.  Seen the Estate Daily Attendance Report for monthly basis where it recorded the number of days work and hours of overtime work. The data was transferred from the checkroll record book for the workers to the SAP system.	Complied
<b>4.4.5.8</b>	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. <b>- Major compliance -</b>	The working hours and breaks of the individual worker indicated in the time records were comply with legal regulations and collective agreements. Based on check roll records, overtime and breaks were recorded and consistent with the pay slip for sample months shown no evidence of overtime exceeded 104 hours as per Employment (Limitation of Overtime Work) Regulations 1980.	Complied
<b>4.4.5.9</b>	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. <b>- Major compliance -</b>	Wages and overtime were paid according to the Daily Attendance Report and productivity reports. Total hours of overtime and daily attendance has recorded in the SAP system and the payslips. Refer to indicator 4.4.5.3.	Complied
<b>4.4.5.10</b>	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. <b>- Minor compliance -</b>	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. Incentives were provided to workers for special capabilities on certain jobs.	Complied



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<p><b>4.4.5.11</b> In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p><b>- Major compliance -</b></p>	<p>The estates' management has provided free housing facilities to all the workers. Basic amenities such as water and electricity were provided to the workers. Linesite inspection was carried out on weekly basis by Medical Assistant using Housing Complex/ Nest/ Community Hall Inspections.</p> <p><u>Bukit Benut Estate</u>            The last inspection conducted on 24/07/2021, 16/07/2021, 08/07/2021 and 01/07/2021.</p> <p><u>CEP Nyior Estate</u>            The last inspection conducted on 07/08/2021, 30/07/2021,24/07/2021 and 17/07/2021.</p>	<p>Complied</p>
<p><b>4.4.5.12</b> The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p><b>- Major compliance -</b></p>	<p>Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They seek to create a working environment with zero tolerance for sexual harassment and abuse and in which violence is never used to resolve issues or conflict.</p> <p>Gender Committee was established in Bukit Benut Estate and CEP Nyior Estate to monitor if there is any case of sexual harassment reported. The last meeting was carried out on 22/02/2021 at Bukit Benut Estate while at CEP Nyior estate on 28/06/2021. Issues reported were recorded in the minutes. Interviewed with the female workers found that no sexual harassment or violence case reported so far.</p> <p>Latest policy briefing for estate workers were conducted as below:</p> <ol style="list-style-type: none"> <li>1. Bukit Benut Estate: 22/07/2021</li> <li>2. CEP Nyior Estate: 16/03/2021</li> </ol>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
<p><b>4.4.5.13</b> The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p><b>- Major compliance -</b></p>	<p>Sime Darby has implemented The Group Sustainability &amp; Quality Policy Statement which signed on 02/12/2019 where the management is respecting Freedom of Association.</p> <p>Sighted Human Right Charter Revised 2020 has been established to cover on Human Right consist of Preamble, Scope, Commitments, Approach, Implementation and Responsibilities &amp; Reporting.</p> <p>Refer section 3.2 stated respect the rights of employees to join and form organizations of their own choice and to bargain collectively.</p> <p>The NUPW minute meeting for Bukit Benut Estate was conducted on 09/04/2021.</p> <p>The NUPW minute meeting for CEP Nyior Estate was conducted on 15/02/2021.</p> <p>The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate.</p> <p>Latest policy briefing for estate workers were conducted as below:</p> <ol style="list-style-type: none"> <li>1. Bukit Benut Estate: 22/07/2021</li> <li>2. CEP Nyior Estate: 16/03/2021</li> </ol>	<p>Complied</p>
<p><b>4.4.5.14</b> Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. 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><b>- Major compliance -</b></p>	<p>Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornograph. They are eradicating child</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p>labour in all their supply chain and not employ anyone under age of 18 years.</p> <p>No employees below the age of 18 were sighted through verified the Employee Master Listing and interviewed with the workers.</p> <p>Latest policy briefing for estate workers were conducted as below:</p> <ol style="list-style-type: none"> <li>1. Bukit Benut Estate: 22/07/2021</li> <li>2. CEP Nyior Estate: 16/03/2021</li> </ol>	
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	<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><b>- Major compliance -</b></p>	<p>The Estate has a comprehensive annual training plan for the Staffs and Workers and this was sighted in the training matrix for each staff and workers. Amongst the training that have been conducted as listed herein:</p> <p><u>Bukit Benut Estate</u></p> <ol style="list-style-type: none"> <li>1. The Policies, Procedures, COBC and Whistle - blowing being communicated to 185 workers dated 22/7/2021 at Muster Ground. The briefing was led by The Estate Manager.</li> <li>2. Fertilizer Application and PPE training to manuring team comprising 8 workers. The training being conducted by Puan Nur Nadiah Hani dated 6/2/2021 at Field 2007B</li> <li>3. Schedule Waste Training to Assistant, Staffs, Mandore and Workshop Fitter through Virtual / online dated 19/7/2021. The training conducted by Mr. Umeshnath Raguphaty to 10 participants.</li> </ol> <p><u>CEP Nyior Estate</u></p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ol style="list-style-type: none"> <li>1. HCV and Complaint &amp; Grievances Training to all 100 workers dated 27/7/2021. The training conducted by the Assistant Manager during Muster.</li> <li>2. Rat Baiting training being communicated to 10 workers dated 13/7/2021 at Muster Ground. The briefing was led by The Estate Assistant Manager.</li> <li>3. Spraying Training by the Medical assistant to 8 sprayers dated 26/3/2021. The training was held at Field 2011A.</li> <li>4. Training on Palm Pruning to 18 harvesters at Block 2011A by the Staff in- charge dated 1/7/2021</li> </ol>	
<b>4.4.6.2</b>	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p><b>- Major compliance -</b></p>	Yearly training plan is created based on Training Needs Analysis for workers involved in the operations based on their competencies and job description.	Complied
<b>4.4.6.3</b>	<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><b>- Minor compliance -</b></p>	<p>All workers involved in the operations have been adequately trained in safe working practice. The estate has a comprehensive annual training plan for its staffs and workers and this was sighted in the training records file,</p> <p>Trainings conducted were recorded in the various trainings record and completed with attendance records, training materials and photographs of the training.</p>	Complied
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			

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<p><b>4.5.1.1</b> An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>The group has established Group Sustainability &amp; Quality Policy Statement signed by Mohamad Helmy Othman Basha, Group Managing Director on 02/12/2019. The Policy stated:            Group Sustainability and Quality Statement: Minimizing environmental Harm:</p> <ol style="list-style-type: none"> <li>1. Protecting and enhancing biodiversity and ecosystem</li> <li>2. No deforestation and no new development on peat land</li> <li>3. Enhancing resilience against climate change impact</li> <li>4. Adopting responsible consumption and production</li> </ol> <p>For upstream operation, safety policy as per document "Upstream Malaysia – Health, Safety &amp; Environment (HSE) Policy Statement" signed by Roslin Azmy Hassan, CEO Upstream Malaysia on 01/06/2020. The Policy stated:</p> <ol style="list-style-type: none"> <li>1. Comply to emission and effluent standard</li> <li>2. Efficient use of water and energy</li> <li>3. Minimize waste</li> <li>4. Protect the ecosystem and biodiversity</li> </ol>	<p>Complied</p>
<p><b>4.5.1.2</b> The environmental management plan shall cover the following:</p> <ol style="list-style-type: none"> <li>a) An environmental policy and objectives;</li> <li>b) The aspects and impacts analysis of all operations.</li> </ol> <p><b>- Major compliance -</b></p>	<p>The Company has established the Standard Operation Manual (SOM) Sub-Section 5.4 Planning, Appendix 5.4.1b - Environmental Aspect/Impacts Evaluation Procedure prepared by the Standards &amp; Compliance Section, Total Quality and Environmental Management (TQEM) Plantation dated 01/11/2008.</p> <p>The estates had conducted Environmental Aspect and Impact Identification (EAI) and environmental impact evaluation (EIE) for all its' activities in financial year 2021.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance																						
	<p>The Environmental Aspect &amp; Impact Identification (EAI) register has identified columns for Activity, Environmental Aspect, Environmental Load Item, Environmental Impact, Legislation. EAI being reviewed on annual basis.</p> <p>The Environmental Impact Assessment has covered 20 keys activities of the plantation at both Estates such as: -</p> <table border="1" data-bbox="1050 639 1865 794"> <tr> <td>1. Spraying</td> <td>5. Replanting</td> </tr> <tr> <td>2. Store</td> <td>6. Schedule Waste Store</td> </tr> <tr> <td>3. Diesel</td> <td>7. Workshop</td> </tr> <tr> <td>4. FFB Transport</td> <td>8. Etc</td> </tr> </table> <p>Sample evidence of EAI established by the estates includes:</p> <table border="1" data-bbox="1050 847 1865 1315"> <thead> <tr> <th>Activities</th> <th>Aspect</th> <th>Load Item</th> <th>Impact</th> <th>Potential of Non-Compliance Environmental regulations</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Starting the MB Sprayer</td> <td>Release to Air</td> <td>Exhaust Gas</td> <td>Global warming &amp; air Pollution</td> <td>Yes - EQ, Control of Emission from Diesel Engines) Reg 1996</td> </tr> <tr> <td></td> <td>Dust</td> <td>Unpleasant working</td> <td>Yes - EQ, (Clean Air) Reg 2014</td> </tr> </tbody> </table>	1. Spraying	5. Replanting	2. Store	6. Schedule Waste Store	3. Diesel	7. Workshop	4. FFB Transport	8. Etc	Activities	Aspect	Load Item	Impact	Potential of Non-Compliance Environmental regulations	Starting the MB Sprayer	Release to Air	Exhaust Gas	Global warming & air Pollution	Yes - EQ, Control of Emission from Diesel Engines) Reg 1996		Dust	Unpleasant working	Yes - EQ, (Clean Air) Reg 2014	
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Criterion / Indicator		Assessment Findings					Compliance																
			Spillage	Diesel, lubricant, chemical	Land contamination, Business Impact	EQA, 1974																	
		Mixing Chemical	Spillage	Chemical	Water & Land Contamination, Business Impact	Yes, OSH (USECHH) Regulation 2000																	
		Selective Weeding	Water Consumption	Water	Depletion of Natural Resources	Yes																	
<b>4.5.1.3</b>	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>The Environmental Management Plan was incorporated with Pollution Prevention Plans 2021. Both the estates identified the following activities and areas for Improvement plan;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Environment Issue</th> <th>Mitigation measures</th> <th>Time frame</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>To reduce any run-off pesticides to land / waterways during chemical mixing or washing of chemical container</td> <td>To recollect the surplus water at chemical mixing area and recycle for mixing of chemical.</td> <td>Continuously</td> </tr> <tr> <td>2</td> <td>To reduce the releases exhaust emission to air</td> <td>Scheduled maintenance for all vehicle/ machineries that could release emissions</td> <td>Continuously</td> </tr> <tr> <td>3</td> <td>To reduce GHG emission from</td> <td>To implement the zero-burning policy</td> <td>Continuously</td> </tr> </tbody> </table>					No	Environment Issue	Mitigation measures	Time frame	1	To reduce any run-off pesticides to land / waterways during chemical mixing or washing of chemical container	To recollect the surplus water at chemical mixing area and recycle for mixing of chemical.	Continuously	2	To reduce the releases exhaust emission to air	Scheduled maintenance for all vehicle/ machineries that could release emissions	Continuously	3	To reduce GHG emission from	To implement the zero-burning policy	Continuously	Complied
No	Environment Issue	Mitigation measures	Time frame																				
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Criterion / Indicator		Assessment Findings			Compliance
			replanting or oil palm activities		
<b>4.5.1.4</b>	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p><b>- Minor compliance -</b></p>	<p>Based on the Standard Operation Manual; subsection 5.4; Planning and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure, Estates carried out the annual review of environmental impacts documented in Registration of Environmental Aspects and Impacts. Amongst the Plan are; -</p> <ol style="list-style-type: none"> <li>1. To reduce any run-off pesticides to land / waterways during chemical mixing or washing of chemical container</li> <li>2. To reduce the releases exhaust emission to air</li> <li>3. To reduce GHG emission from replanting or oil palm activities</li> <li>4. To reduce traces of oil spillage at the workshop / tractors/parking bay</li> <li>5. Monitoring on the land preparation during replanting</li> <li>6. To avoid any blocked drainage system at housing areas.</li> </ol>			Complied
<b>4.5.1.5</b>	<p>An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.</p> <p><b>- Major compliance -</b></p>	<p>Sighted environment training that has conducted as below:</p> <p><u>Bukit Benut Estate</u></p> <ol style="list-style-type: none"> <li>1. The Policies, Procedures, COBC and Whistle - blowing being communicated to 185 workers dated 22/7/2021 at Muster Ground. The briefing was led by The Estate Manager.</li> <li>2. Schedule Waste Training to Assistant, Staffs, Mandore and Workshop Fitter through Virtual / online dated 19/7/2021. The training conducted by Mr. Umeshnath Raguphaty to 10 participants.</li> </ol>			Complied



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Criterion / Indicator		Assessment Findings	Compliance																								
		<p>3. HCV and Biodiversity Training to Assistant, Staffs and Mandore through Virtual / online dated 22/6/2021. The training conducted by Puan Nuraida Abd Ghani to 11 participants</p> <p>4. A presentation paper on Scheduled Waste Management by RSQM STR 7/2021</p>																									
<b>4.5.1.6</b>	<p>Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.</p> <p><b>- Major compliance -</b></p>	<p>Sighted meeting on Environmental in 2021 as below: -            Environmental Aspect and Impacts and Environmental Impact Evaluation meeting was conducted at Bukit Benut Estate dated 22/5/2021 chaired by the Estate Manager. The meeting attended by 10 participants.</p> <p>In CEP Nyior Estate, the Environmental Meeting being runs concurrently with OSH Meeting. The latest meeting was on 7/7/2021.</p>	Complied																								
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>																											
<b>4.5.2.1</b>	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p><b>- Major compliance -</b></p>	<p>Monthly record of energy consumption for non-renewable and sources were kept and documented. It is monitored to optimize use of renewable energy. Sighted record of Non-Renewable Energy being monitored and establishing the baseline value in term of liter per MT FFB. The data as listed herein: -</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="2">2020</th> <th colspan="2">2021</th> </tr> <tr> <th>Bukit Benut</th> <th>CEP Nyior</th> <th>Bukit Benut</th> <th>CEP Nyior</th> </tr> </thead> <tbody> <tr> <td>FFB / Mt</td> <td>48,892</td> <td>27,457</td> <td>25,917</td> <td>11,116</td> </tr> <tr> <td>Diesel (l)</td> <td>51,796</td> <td>51,113</td> <td>44,924</td> <td>20,786</td> </tr> <tr> <td>Liter / Mt FFB</td> <td>1.06</td> <td>1.86</td> <td>1.73</td> <td>1.87</td> </tr> </tbody> </table>		2020		2021		Bukit Benut	CEP Nyior	Bukit Benut	CEP Nyior	FFB / Mt	48,892	27,457	25,917	11,116	Diesel (l)	51,796	51,113	44,924	20,786	Liter / Mt FFB	1.06	1.86	1.73	1.87	Complied
	2020			2021																							
	Bukit Benut	CEP Nyior	Bukit Benut	CEP Nyior																							
FFB / Mt	48,892	27,457	25,917	11,116																							
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		Diesel Baseline Value	1.73	1.95	1.73	1.95	
		Electricity, kWh	284,983	312,039	216,533	173,891	
		Kwh / Mt FFB	5.83	11.60	8.35	15.64	
		Electricity Baseline Value	6.70	11.68	6.70	11.68	
		Water Usage, m <sup>3</sup>	76,017	50,317	48,086	28,996	
		m <sup>3</sup> /mt FFB	1.55	1.83	1.86	2.61	
		Water Baseline Value	1.90	0.79	1.90	0.79	
<b>4.5.2.2</b>	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. <b>- Major compliance -</b>	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets.				Complied	
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible. <b>- Minor compliance -</b>	There was no renewable energy being used at both Estates				Complied	
<b>Criterion 4.5.3: Waste management and disposal</b>							

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Criterion / Indicator		Assessment Findings				Compliance																												
<b>4.5.3.1</b>	<p>All waste products and sources of pollution shall be identified and documented.</p> <p><b>- Major compliance -</b></p>	<p>All waste and pollution are identified and documented in the Waste Management Plan Year 2021. Details of waste generated from the estates operations among others are shown below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>SW Code</th> <th>Type of Waste</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>n/a</td> <td>Domestic Waste • Rubbish</td> <td>Line site, Office, Workshop, Store, Shop.</td> </tr> <tr> <td>2</td> <td>n/a</td> <td>Recycle Waste • POME • EFB • Re-used Empty Container</td> <td>Estate, Store</td> </tr> <tr> <td>3</td> <td>404</td> <td>Clinical Waste</td> <td>Dispensary</td> </tr> <tr> <td>4</td> <td>410</td> <td>Used Batteries, Tyre, Filter and Tubes.</td> <td>Workshop</td> </tr> <tr> <td>5</td> <td>408</td> <td>Contaminated soil, debris or matter i.e. sawdust</td> <td>Workshop</td> </tr> <tr> <td>6</td> <td>305</td> <td>Used lubricants</td> <td>Workshop</td> </tr> </tbody> </table>				No	SW Code	Type of Waste	Location	1	n/a	Domestic Waste • Rubbish	Line site, Office, Workshop, Store, Shop.	2	n/a	Recycle Waste • POME • EFB • Re-used Empty Container	Estate, Store	3	404	Clinical Waste	Dispensary	4	410	Used Batteries, Tyre, Filter and Tubes.	Workshop	5	408	Contaminated soil, debris or matter i.e. sawdust	Workshop	6	305	Used lubricants	Workshop	Complied
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6	305	Used lubricants	Workshop																															
<b>4.5.3.2</b>	<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><b>- Major compliance -</b></p>	<p>The Waste Management Plan for 2021 for Both Estates as follows:</p> <table border="1"> <thead> <tr> <th>SW Code</th> <th>Type of waste</th> <th>Location</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>305</td> <td>Used Lubricants</td> <td>Workshop</td> <td>Collect and record used lubricant, store items under lock &amp; key, put up used lubricant signage, Disposed off the item through register purchaser</td> </tr> </tbody> </table>				SW Code	Type of waste	Location	Action Plan	305	Used Lubricants	Workshop	Collect and record used lubricant, store items under lock & key, put up used lubricant signage, Disposed off the item through register purchaser	Complied																				
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		410	Used Batteries, Tyre, Filter and Tubes.		Collect and record used lubricant, store items under lock & key, Disposed off the item through register purchaser		
		As for CEP Nyior Estate, schedule collection was by Rengkas Maju Sdn Bhd, the details as follows: -					
		Schedule Waste (SW)	Recent Disposed	Date Generate	Previous Disposal	No of days from generate to recent disposal	
		305	8/7/2021	31/1/2021	9/9/2020	158	
		410	8/7/2021	31/1/2021	9/9/2020	158	
<b>4.5.3.3</b>	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p><b>- Major compliance -</b></p>	<p>Standard Operation Manual (SOM) on Chemical Safety Management Procedure, Health Safety Environment Upstream Malaysia dated 9/3/2021. The SOM covers the following;</p> <ol style="list-style-type: none"> <li>1. Procedures for receiving</li> <li>2. Procedures for handling</li> <li>3. Procedures for storage</li> <li>4. Procedures for disposal</li> <li>5. Etc</li> </ol> <p>Procedure for Scheduled Waste Management was established (SD/SDP/PSQM (ESH)/203-EN1 dated 26/2/2016. Proper disposal of waste material is carried out as per the company procedures.</p>					Complied

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Criterion / Indicator		Assessment Findings	Compliance																								
<b>4.5.3.4</b>	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p><b>- Major compliance -</b></p>	<p>The empty pesticide containers for Both Estate are disposed through S.S. Setia Teknologi Enterprise for the following items;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Bukit Benut Estate</th> <th>CEP Nyior Estate</th> </tr> </thead> <tbody> <tr> <td>Date</td> <td>2/7/2021</td> <td>16/4/2021</td> </tr> <tr> <td>Receipt Number</td> <td>1924</td> <td>1876</td> </tr> <tr> <td>Chemical Container - pcs</td> <td>46</td> <td>58</td> </tr> <tr> <td>Boxes - kg</td> <td>204</td> <td>251</td> </tr> <tr> <td>Kenlon container - pcs</td> <td>9</td> <td>27</td> </tr> <tr> <td>Ally bottle - kg</td> <td>1.4</td> <td></td> </tr> <tr> <td>Gunny - Mt</td> <td>1.53</td> <td>1.67</td> </tr> </tbody> </table>		Bukit Benut Estate	CEP Nyior Estate	Date	2/7/2021	16/4/2021	Receipt Number	1924	1876	Chemical Container - pcs	46	58	Boxes - kg	204	251	Kenlon container - pcs	9	27	Ally bottle - kg	1.4		Gunny - Mt	1.53	1.67	Complied
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<b>4.5.3.5</b>	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p><b>- Minor compliance -</b></p>	<p>Domestic waste from the housing area is well managed and being disposed to the designated landfill at Field P00C1 at Bukit Benut Estate and Field 99A at CEP Nyior Estate. The signboards were available with dates of close and open.</p> <p>Based on the Rubbish Collection Schedule, the arrangement is to collect on every Wednesday and Saturday, twice a week.</p>	Complied																								
<b>Criterion 4.5.4: Reduction of pollution and emission</b>																											
<b>4.5.4.1</b>	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.</p> <p><b>- Major compliance -</b></p>	<p>The Estate has conducted assessment of all polluting activities in the Environmental Aspect Impact and Environmental Impact Evaluation. The assessment was reviewed on an annual basis which includes GHG, Schedule Waste, Recycle Waste and Domestic Waste.</p>	Complied																								
<b>4.5.4.2</b>	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p><b>- Major compliance -</b></p>	<p>The action plan to reduce the identified significant impact has been documented in Pollution Prevention Plan and Waste Management Plan. In general, among the action plans were: -</p>	Complied																								

Criterion / Indicator		Assessment Findings	Compliance									
		a. To optimize the usage of diesel b. To apply more organic fertilizer such as bunch ash, EFB therefore reducing inorganic fertilizer dependency c. To monitor running engine of tractors and lorries d. To monitor usage of Nitrogen fertilizer  Identification of significant pollutants and greenhouse gas (GHG) emissions also be monitored through Approved GHG calculator, Palm GHG on Land conversion, Emissions from Fertilizer, Emissions from peat, Fuel Consumption, and crop sequestration.										
<b>Criterion 4.5.5:</b> Natural water resources												
<b>4.5.5.1</b>	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, 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.	The Estates has developed it Water Management Plan FY2021 and the objectives of the plan include; 1. Severe water pollution 2. Contingency during water shortage / dry spell 3. Breakdown of external piping system (Syarikat Air Johor) The Water Management Plan outlined by the Bukit Benut Estates include: <table border="1"> <thead> <tr> <th>Area concern</th> <th>Action Taken</th> <th>Resource Party</th> </tr> </thead> <tbody> <tr> <td>Severe Water Pollution</td> <td>To collect water using Estate tractor c/w tank from Bukit Benut Oil Mill</td> <td>Bukit Benut Oil Mill</td> </tr> <tr> <td>Breakdown of external piping system (Syarikat Air Johor)</td> <td>To collect water using Estate tractor c/w tank from Bukit Benut Oil Mill</td> <td>Bukit Benut Oil Mill</td> </tr> </tbody> </table>	Area concern	Action Taken	Resource Party	Severe Water Pollution	To collect water using Estate tractor c/w tank from Bukit Benut Oil Mill	Bukit Benut Oil Mill	Breakdown of external piping system (Syarikat Air Johor)	To collect water using Estate tractor c/w tank from Bukit Benut Oil Mill	Bukit Benut Oil Mill	Complied
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	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. <b>- Major compliance -</b>	Water shortage / dry spell	To collect water using Estate tractor c/w tank from Bukit Benut Oil Mill	Bukit Benut Oil Mill	
			Train workers to keep and conserve water	Estate Mgmt.	
			To control valve for water distribution at Main Water Pump House	Estate Mgmt.	
		Rainwater Harvesting	The rainwater shall be recycled for workshop activities	Foreman	
		Continuous monitoring on water piping system	1. Daily monitoring on water piping system 2. To ensure no leakage in piping system.	Water Pump Attendant	
		Water Saving initiative at Nursery	1. If yesterdays' rainfall recorded at 8mm, watering is ceased on that day 2. To reduce the usage of water for any pesticides mixing by using rainwater harvesting	Assistant	
		<p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014).</p> <p>Monitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/rivers, version 1, year 2008, issue no. 1, dated 01/11/2008. The quality of out-going water into rivers was monitored quarterly by conducting water analysis. River water sampling for</p>			

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		analysis was done for upstream, midstream and downstream. Sighted the water analysis records at Bukit Benut Estate as follows: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Parameter</th> <th colspan="2">Bukit Benut</th> </tr> <tr> <th>Reported Date</th> <th>11/3/21 S1</th> <th>11/3/21 S2</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>6.2</td> <td>6.0</td> </tr> <tr> <td>BOD</td> <td>4.0</td> <td>1.0</td> </tr> <tr> <td>COD</td> <td>32</td> <td>12</td> </tr> <tr> <td>SS</td> <td>2</td> <td>98</td> </tr> <tr> <td>AN</td> <td>&lt;1</td> <td>&lt;1</td> </tr> <tr> <td>DO (%)</td> <td>8.6</td> <td>7.04</td> </tr> <tr> <td>P</td> <td>8.619</td> <td>0.010</td> </tr> </tbody> </table>	Parameter	Bukit Benut		Reported Date	11/3/21 S1	11/3/21 S2	pH	6.2	6.0	BOD	4.0	1.0	COD	32	12	SS	2	98	AN	<1	<1	DO (%)	8.6	7.04	P	8.619	0.010	
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<b>4.5.5.2</b>	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. <b>- Minor compliance -</b>	Based on interview with Assistant Manager, no construction of bunds, weirs and dams across main rivers or waterways passing through an estate. No onsite verification could be made to concur the statement as the assessment on Remote / Virtual Audit.	Complied																											
<b>4.5.5.3</b>	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). <b>- Minor compliance -</b>	Based on interview with Assistant Manager, the practice of water harvesting is through the water from road-side drains being directed and stored in conservation road side pits. No onsite verification could be made to concur the statement as the assessment on Remote / Virtual Audit.	Complied																											
<b>Criterion 4.5.6:</b> Status of rare, threatened, or endangered species and high biodiversity value																														
<b>4.5.6.1</b>	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:	High Conservation Value (H) Assessment for Strategic Operating Unit SOU22 Bukit Benut was established and documented by PSQM Department Sime Darby Plantation Sdn. Bhd. dated December 2015, Version 2.	Complied																											



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Criterion / Indicator		Assessment Findings	Compliance																		
	<p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</p> <p><b>- Major compliance -</b></p>	<p>The high biodiversity value is included in the Assessment with the Management Plan. The list of HCV areas presence within the boundary of the estates were summarized as below:</p> <p><u>Bukit Benut Estate</u></p> <table border="1"> <thead> <tr> <th>Assessment Area</th> <th>Hectare</th> <th>Present HCV</th> </tr> </thead> <tbody> <tr> <td>Pond</td> <td>0.30</td> <td>HCV 4</td> </tr> <tr> <td>Natural Pond</td> <td>1.97</td> <td>HCV 4</td> </tr> <tr> <td>Water Catchment Area</td> <td>0.38</td> <td>HCV 4</td> </tr> </tbody> </table> <p><u>CEP Nyior Estate</u></p> <table border="1"> <thead> <tr> <th>Assessment Area</th> <th>Hectare</th> <th>Present HCV</th> </tr> </thead> <tbody> <tr> <td>Water Catchment Area</td> <td>6.11</td> <td>HCV 4</td> </tr> </tbody> </table> <p>No rare, threatened, or endangered species found at the Estate.</p>	Assessment Area	Hectare	Present HCV	Pond	0.30	HCV 4	Natural Pond	1.97	HCV 4	Water Catchment Area	0.38	HCV 4	Assessment Area	Hectare	Present HCV	Water Catchment Area	6.11	HCV 4	
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<b>4.5.6.2</b>	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p><b>- Major compliance -</b></p>	<p>No rare, threatened, or endangered species found at the Estate. Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented.</p> <p>Signage as well as routine patrolling activities were utilized as part of creating awareness among employees and maintain HCVs.</p> <p>The estates had established a HCV action plan for FY2021 such as briefing/training to workers on protection of water catchment that encroachment and hunting are not allowed.</p>	Complied																		
<b>4.5.6.3</b>	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p>	<p>The HCV and Conservation areas Management Plan for 2021 as follows: -</p>	Complied																		

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	<b>- Major compliance -</b>	No	Scope	Programme	Status To Date	
		1	River Reserve (Buffer zone)	Ensure no agrochemical activities carried out near the river reserved area	No agrochemical applications are allowed near any water bodies	
		2	Pond	Ensure no agrochemical activities carried out near the pond area	No agrochemical applications are allowed near any water bodies	
		3	Water Catchment	Ensure no agrochemical activities carried out near the water catchment area	No agrochemical applications are allowed near any water bodies	
		<p>Furthermore, both Estates did execute continuous monitoring of the HCV and other conservation areas. The area concerned for both Estates as follows: -</p> <p><u>Bukit Benut Estate</u></p> <ul style="list-style-type: none"> <li>- River Reserve (Sg. Melantai) at P10C,</li> <li>- Ravine at P11A, P08A, P00, P02C</li> <li>- Unplanted Area - P07B (Biodiversity Area)</li> <li style="padding-left: 20px;">- P00 (Conservation Area)</li> </ul> <p><u>CEP Nyior Estate</u></p> <ul style="list-style-type: none"> <li>- Slope Area, P00B</li> <li>- Water Catchment Area, P12A</li> <li>- Ravine, P07</li> </ul>				

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		- Unplanted Area, P13B The monitoring & patrolling being carried out on monthly basis.	
<b>Criterion 4.5.7: Zero burning practices</b>			
<b>4.5.7.1</b>	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. <b>- Major compliance -</b>	Zero burning technique was established by the Standards & Compliance Section, Total Quality and Environmental Management (TQEM) Plantation as stated in the Standard Operation Manual (SOM) Section 5 – Planning, issue No. 1, dated 01.11.2008. The SOM covers the following subject matters; 1. Replanting areas – the old and uneconomical stands of oil palm and other tree crops are felled and shredded and left to decompose in situ. 2. Domestic waste.	Complied
<b>4.5.7.2</b>	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. <b>- Major compliance -</b>	As per interview with Estate Assistant Managers, Estate replanting programme has been based on estate operation policies and agronomic practices. No significant risk of diseased palm was reported in the estate. Open burning during new plantings and re-plantings is not allowed.	Complied
<b>4.5.7.3</b>	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. <b>- Major compliance -</b>	Not applicable as there is no fire been used by all sample estates for replanting as the company uses method of felling and shredding and left to decompose in situ for clearing old crops.	Complied
<b>4.5.7.4</b>	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. <b>- Minor compliance -</b>	Felled palm trees are chipped / shredded and spread to decompose in situ. It allows all plant tissues to be recycled while enhancing the soil organic matter and improves the physical and chemical properties of the soil.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Site Management</b>			
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. <b>- Major compliance -</b>	Sime Darby Plantation Berhad has established a few numbers of SOP's. Among the documents are: - <ul style="list-style-type: none"> <li>• Estate Quality Management System (EQMS) Manual</li> <li>• Standard of Procedure (Plantation)</li> <li>• Agricultural Reference Manual</li> <li>• Sustainable Plantation Management System (SPMS) Manual</li> <li>• Occupational Safety and Health Manual</li> <li>• ESH Management System Manual</li> <li>• Pictorial Safety System Standards</li> <li>• Security Guidelines Sime Darby Plantation Berhad</li> </ul> The best agricultural practices which had been implemented being monitored via work programs, visits by General Managers, Plantation Advisors and Agronomist.	Complied
<b>4.6.1.2</b>	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. <b>- Major compliance -</b>	Sime Darby Plantation has established Responsible Agriculture Charter and this Charter has been endorsed by the Sustainability Committee of the Main Board. The Charter covering the aspects of Social, Environmental and Corporate Integrity Commitments. The Charter has superseded the Slope and River Protection Policy signed by the Managing Director in Jan 2015.	Complied

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<b>4.6.1.3</b>	A visual identification or reference system shall be established for each field. <b>- Major compliance -</b>	Estates visited had a visual identification/reference system for each established field/block and maps established. Field numbers and hectare were marked on palms and in some areas on concrete slaps. The estate has a visual reference system to identify each field or block. Each field has the signboard with block number/ year of planting & hectare only.	Complied																							
<b>Criterion 4.6.2: Economic and financial viability plan</b>																										
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. <b>- Major compliance -</b>	Business planning to ensure long-term economic and financial viability was evident. The annual budgets for the period 2021 - 2026 were sighted. The budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, etc. The budgets included projections on yield/ha, and total cost of production per MT & per ha	Complied																							
<b>4.6.2.2</b>	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. <b>- Major compliance -</b>	Sime Darby Plantation has established Long Range Replanting Program (LRRP) for all estates. The replanting programme was review yearly at the head office level and details as below: - <table border="1" data-bbox="1048 1037 1870 1193"> <thead> <tr> <th rowspan="2">Estate</th> <th colspan="5">Hectare</th> </tr> <tr> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Bukit Benut</td> <td>113.44</td> <td>144.69</td> <td>85.78</td> <td>97.31</td> <td>119.36</td> </tr> <tr> <td>CEP Nyior</td> <td>86.36</td> <td>143.78</td> <td>133.72</td> <td>104.57</td> <td>97.61</td> </tr> </tbody> </table>	Estate	Hectare					2022	2023	2024	2025	2026	Bukit Benut	113.44	144.69	85.78	97.31	119.36	CEP Nyior	86.36	143.78	133.72	104.57	97.61	Complied
Estate	Hectare																									
	2022	2023	2024	2025	2026																					
Bukit Benut	113.44	144.69	85.78	97.31	119.36																					
CEP Nyior	86.36	143.78	133.72	104.57	97.61																					
<b>4.6.2.3</b>	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production : cost per tonne of FFB	The business and management plans were available in the annual budget. The annual budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, etc. The budgets included projections on yield/ha, and total cost of production per MT & per ha.	Complied																							

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	d) Price forecast e) Financial indicators : cost benefit, discounted cash flow, return on investment <b>- Major compliance -</b>		
<b>4.6.2.4</b>	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. <b>- Major compliance -</b>	The management plan was effectively implemented, and the achievement of the goals and objectives were regularly monitored, documented and reviewed through Monthly Progress Reports, Monthly Accounts Reports, Annual Financial Reports, General Manager’s Visit, Plantation Advisor Visit Reports and Performance Unit Report.	Complied
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. <b>- Major compliance -</b>	The contract documents template was included with the provision for contractors to comply with all Sime Darby Plantation requirements including vendor integrity pledge where the contractor to adhere with integrity, transparency, responsibility, anti-bribery, etc. Pricing mechanism is stated in the appendix and agreed by both parties. Bukit Benut Estate and CEP Nyior Estate has engaged contractors for varieties of works such as replanting, FFB & EFB transporter and maintenance works. Sampled of the agreement between company and the contractors as below: <u>Bukit Benut Estate</u> 1. Agreement between Sime Darby Plantation Berhad with AVN Brothers dated 01/01/2021 for Excavator/ Backhoe/ Tractor/ Trailer Rental with Reference Number: 9001021927. 2. Agreement between Sime Darby Plantation Berhad Bukit Benut Estate with Syarikat Sin Kim Huat for FFB Transport with Reference Number: 9001005379.	Complied

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		<p><u>CEP Nyior Estate</u></p> <p>1. Agreement between Sime Darby Plantation Berhad with Sakhti Enterprise dated 01/11/2020 for Backhoe Service valid until 31/10/2021.</p> <p>Pricing of the works/ services and mechanism were clearly stated in the appendix of the agreement and agreed by the contractors. Terms and conditions for progress payment has clearly outlined in the Appendix of the agreement signed by the contractors.</p>	
<b>4.6.3.2</b>	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p><b>- Major compliance -</b></p>	<p>Contractors submitted invoice to Bukit Benut and CEP Nyior Estate. In the invoice stated the payment term of 30 days. The document has been uploaded to the MEX system. The finance department has made payment to contractors within the payment term of 30 days agreed by both mill and contractors.</p> <p>Payment terms were clearly stated in the agreement signed by the contractors. Verified the invoice submitted and payment records printed from system for the month of June 2021 and found in order.</p> <p>Besides, interviewed with contractors also confirmed that payment was made promptly.</p>	Complied
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	<p>Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.</p> <p><b>- Major compliance -</b></p>	<p>The contractors engaged by the estates' management has signed on a letter regarding the compliance of RSPO/ MSPO/ SCCS. All the contractors need to follow the RSPO/ MSPO/ SCCS requirements in accordance with Sime Darby Plantation Berhad management system.</p> <p>Briefing of RSPO &amp; MSPO was given to the contractors for SOU 22 on 12/01/2021. Seen the training attendance list and training materials.</p>	Complied

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		Interviewed with the contractors confirmed that they were provided with training and have signed on the letter.	
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	<p>Bukit Benut Estate and CEP Nyior Estate has engaged contractors for varieties of works such as replanting, FFB &amp; EFB transporter and maintenance works. Sampled of the agreement between company and the contractors as below:</p> <p><u>Bukit Benut Estate</u></p> <ol style="list-style-type: none"> <li>1. Agreement between Sime Darby Plantation Berhad with AVN Brothers dated 01/01/2021 for Excavator/ Backhoe/ Tractor/ Trailer Rental with Reference Number: 9001021927.</li> <li>2. Agreement between Sime Darby Plantation Berhad Bukit Benut Estate with Syarikat Sin Kim Huat for FFB Transport with Reference Number: 9001005379.</li> </ol> <p><u>CEP Nyior Estate</u></p> <ol style="list-style-type: none"> <li>1. Agreement between Sime Darby Plantation Berhad with Sakhti Enterprise dated 01/11/2020 for Backhoe Service valid until 31/10/2021.</li> <li>2. Agreement between Sime Darby Plantation Berhad with Syarikat Sin Kim Huat dated 01/07/2021 for Transportation of FFB valid until 31/08/2021.</li> </ol>	Complied
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. <b>- Minor compliance -</b>	Contractors have signed on the letter on RSPO/ MSPO/ SCCS requirements in accordance with Sime Darby Plantation Berhad management system which mentioned all contractors shall ensure to reserve the right of the certification bodies (CBs) to audit the activities when it is announce in advance. Sampled the letters signed by contractors on 12/01/2021 for Syarikat Sin Kim Huat and 12/01/2021 for Thiagarajan A/L Chellappan respectively at Bukit Benut Estate.	Complied



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<b>4.6.4.4</b>	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. <b>- Major compliance -</b>	All works performed at the estates are checked and verified by the estates personnel before payment been made to the contractors. Sighted the progress report update by both contractors and verified by estate management for payment process.	Complied
<b>4.7 Principle 7: Development of new planting</b>			
<b>Criterion 4.7.1: High biodiversity value</b>			
<b>4.7.1.1</b>	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. <b>- Major compliance -</b>	There is no development of new planting at both visited estates.	N/A
<b>4.7.1.2</b>	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. <b>- Major compliance -</b>	There is no development of new planting at both visited estates.	N/A
<b>Criterion 4.7.2: Peat Land</b>			
<b>4.7.2.1</b>	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice.	There is no development of new planting at both visited estates.	N/A

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- Major compliance -			
<b>Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)</b>			
<b>4.7.3.1</b>	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. <b>- Major compliance -</b>	There is no development of new planting at both visited estates.	N/A
<b>4.7.3.2</b>	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. <b>- Major compliance -</b>	There is no development of new planting at both visited estates.	N/A
<b>4.7.3.3</b>	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. <b>- Major compliance -</b>	There is no development of new planting at both visited estates.	N/A
<b>4.7.3.4</b>	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. <b>- Minor compliance -</b>	There is no development of new planting at both visited estates.	N/A
<b>Criterion 4.7.4: Soil and topographic information</b>			
<b>4.7.4.1</b>	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation.	There is no development of new planting at both visited estates.	N/A

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

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

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
<b>4.7.6.8</b>	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	There is no development of new planting at both visited estates.	N/A

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

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	Policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	Sighted Group Sustainability & Quality Policy Statement dated 02/12/2019 signed by Group Managing Director Mr. Mohamad Helmi Othman Basha.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. <b>- Major compliance -</b>	The policy established mention that Sime Darby are committed to making: <ol style="list-style-type: none"> <li>1. Promoting Good Governance and Transparency</li> <li>2. Contributing to a better society</li> <li>3. Minimizing environmental harm</li> <li>4. Delivering sustainability quality</li> </ol> This policy shall be guided by the commitment spelt out in the company's: <ol style="list-style-type: none"> <li>1. Responsible Agriculture Charter (RAC)</li> <li>2. Human Right Charter (HRC)</li> <li>3. Innovation &amp; Productivity Charter (IPC)</li> </ol>	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.	RSPO + MSPO Internal Audit for SOU 22 Bukit Benut was carried out on 15/07/2021 in Bukit Benut POM by GSQM & RSQM. The audit was carried out based on the reference of MS 2530-4:2013.	Complied

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	- Major compliance -	Total 3 major, 3 minor non-conformity and 11 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.	
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 1/9/2017. The frequency of the internal audit shall be carried out at least once a year and when is required. Total 3 major, 3 minor non-conformity and 11 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.	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 15/07/2021 in Bukit Benut POM. Management review meeting was conducted to review the findings of the internal audit.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	The latest management review meeting was carried out on 30/07/2021 in Bukit Benut POM where the agenda that discussed as below: 1. Opening by Chairman 2. Previous Meeting Minutes Review 3. Matters Arising from Previous Minutes of Meeting 4. Objective/ Management Program 5. Training Plan	Complied

		<ul style="list-style-type: none"> <li>6. Results from Internal Audits: RSPO &amp; MSPO</li> <li>7. Nonconformity, Corrective and Preventive Actions</li> <li>8. Customers/ Stakeholders Feedback/ Complaints</li> <li>9. Resource Needs</li> <li>10. Changes that could affect the management systems</li> <li>11. Recommendations for Improvement</li> <li>12. Other matters</li> <li>13. Conclusion</li> </ul>	
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	<p>The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.</p> <p><b>- Major compliance -</b></p>	<p>Bukit Benut POM have documented Continual Improvement Plan for 2021 into 5 sections and amongst the plan as follows:</p> <ul style="list-style-type: none"> <li>1. Mill Operation               <ul style="list-style-type: none"> <li>a. Clarification – To minimize using clean water for dilution and ex-centrifuge decanter.</li> <li>b. Oil Recovery – to re-steaming back sterilizer condensate water to system.</li> </ul> </li> <li>2. Waste Reduction               <ul style="list-style-type: none"> <li>a. Bolt and Nut – To keep open back bolt and nut during maintenance job rather than cut that unit in purposed to used back</li> </ul> </li> <li>3. People               <ul style="list-style-type: none"> <li>a. Mill Plant – To give support for worker that need to some event or festival celebration.</li> </ul> </li> <li>4. Plant               <ul style="list-style-type: none"> <li>a. Locate proper oil trap at chemical &amp; SW Stores to avoid the chemical going into monsoon drain.</li> </ul> </li> </ul>	Complied



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		5. Profit a. To fully utilize turbine power thus reduce on TNB consumption	
<b>4.1.4.2</b>	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.  <b>- Major compliance -</b>	The latest technology to be adopted at mill is POME Oil & Biosolid Recovery through CMF System. The objective is; -  1. Maximising oil recovery / minimising palm oil mill oil loses 2. To support compliance to the new DOE Effluent Discharge Limit 3. Biosolid recovery before Effluent Treatment Plant 4. To reduce biological load of raw POME i.e. BOD, SS , COD, etc	Complied
<b>4.2 Principle 2: Transparency</b>			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
<b>4.2.1.1</b>	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.  <b>- Major compliance -</b>	Sime Darby Plantation Berhad has developed Standard Operation Manual (SOM) – Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 1/11/2008 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the mill. 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. Manager is responsible for address the communication and requests.	Complied
<b>4.2.1.2</b>	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.  <b>- Major compliance -</b>	The management has disseminated the information of the documents that made publicly available such as management plan, OSH plan, audit reports and land titles upon request during the stakeholder meetings. Besides, internal and external stakeholders could access to the company’s website to obtain information such as policies, annual	Complied

		report and complaint procedures. ( <a href="http://www.simedarbyplantation.com/Sustainability.aspx">http://www.simedarbyplantation.com/Sustainability.aspx</a> )	
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication with the relevant stakeholders. <b>- Major compliance -</b>	Sime Darby Plantation Berhad has developed Standard Operation Manual (SOM) – Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 1/11/2008 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the mill. 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.  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 01/11/2008. The procedure has detailing the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.	Complied
<b>4.2.2.2</b>	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . <b>- Minor compliance -</b>	Assistant Mill Engineer of the Bukit Benut 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 Manager.	Complied
<b>4.2.2.3</b>	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. <b>- Major compliance -</b>	Sighted List of stakeholders for the year of 2021. Stakeholder meeting for Bukit Benut POM has been conducted on 07/04/2021. Stakeholders such as contractors, suppliers, school’s representatives, sundry shops’ owner, smallholders, government authorities and MAPA representative were attended the meeting. Issues raised by stakeholders were recorded in the minutes and responded by the management accordingly.	Complied

<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - <b>Major compliance</b> -	Sime Darby Plantation has developed Plantation Quality Management System – Standard Operating Procedure for Sustainable Supply Chain and Traceability, Doc. No.: Appendix 15, Version 2 dated April 2019 under section 7.0 receiving FFB at the mill and 9.0 Process Monitoring. The objective of the procedure is to provide guideline for Mill to establish and ensure effective implementation on sustainable supply chain and traceability of certified sustainable materials (FFB).	Complied
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system. - <b>Major compliance</b> -	The Mill Management team holds the responsibility on regular inspection of traceability system. Periodical inspections also being conducted through Internal Audit visit, HQ Level visit or Mill Advisor. The effectiveness of the monitoring will evidence in the internal audit and visit report findings	Complied
<b>4.2.3.3</b>	The management shall identified and assign suitable employees to implement and maintain traceability system. - <b>Minor compliance</b> -	The mill has appointed their person in charge to monitor Traceability namely En. Ahmad Akhmal bin Anuar, Assistant Manager through appointment letter dated 1/1/2021 signed by En. Hj Anuar Hj Zakaria, Mill Manager.	Complied
<b>4.2.3.4</b>	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - <b>Major compliance</b> -	Sime Darby has established Standard Operating Procedure to maintain all records of evidence under Sustainability Plantation Management System, Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records. All traceability records should be maintained at minimum period of 3 years.  The records of incoming of FFB and outgoing of CPO and PK sales has been verified. The despatch of the CPO is determined by HQ Sales & Marketing and will be entered into the Sime Weigh System. The weighbridge operator will check the system before releasing the despatch.	Complied

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		<p>Bukit Benut POM has received FFB from own supplying estates (Bukit Benut Estate, Lambak Estate and CEP Nyior Estate) and diversion FFB from certified suppliers under same company. Sampled of the weighbridge tickets/ FFB Consignment Note from own supply estates with information as below:</p> <p>Sampled of the CPO despatch weighbridge ticket as below:          Weighbridge Ticket KKS Bukit Benut No: 009705,          Date: 30/7/2021, Customer: Tradina Hedaina,          Transporter: Teo Tuan Kwee Sdn Bhd,          Delivery Order: 6642, Purchase Order No: 389066          Vehicle No: NCU 1528,          Gross Weight: 59,580 kg, Tare Weight: 20,020 kg          Net Weight: 39,560 kg</p> <p>Sampled of the PK despatch weighbridge ticket as below:          Weighbridge Ticket KKS Bukit Benut No: 009656,          Date: 6/7/2021, Customer: SDO Carey KCP,          Transporter: Sin Tai Seng,          Delivery Order: 2322, Purchase Order No: 54377,          Vehicle No: JNM 9876          Gross Weight: 47,310 kg, Tare Weight: 18,650 kg,          Net Weight: 28,660 kg</p>	
<p><b>4.3 Principle 3: Compliance to legal requirements</b></p>			
<p><b>Criterion 4.3.1 – Regulatory requirements</b></p>			
<p><b>4.3.1.1</b></p>	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p>	<p>The following compliance to the legislative requirement necessary for Mill, the licenses/permit viewed among others were:</p>	<p>Complied</p>

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	<p><b>- Major compliance -</b></p>	<ol style="list-style-type: none"> <li>1. MPOB License: License Number 528154004000; Valid till 31/3/2022</li> <li>2. Jadual Pematuhan (DOE); Reference Number: 004747; Valid till 30/06/2022</li> <li>3. Air Compressor; Registration Number: PMT 149190; Valid till 06/01/2022</li> <li>4. Air Compressor; Registration Number: PMT 2917; Valid till 06/01/2022</li> <li>5. Local Exhaust Ventilation date examined 11/3/2021.</li> <li>6. Lesen Pemasangan Bekalan Elektrik 003573 Valid till 30/5/22</li> <li>7. Fire Certificate, Serial No 314650 JBPM: JH/7/275/2020 valid from 23/6/2020 until 22/6/2021.</li> <li>8. Weighbridge Stamp of Verification under Weights and Measures Act 1972, Certificate No D 052334, Sticker No DE 18002581 Dated 1/12/2020 for 60,000 kg x 10 kg</li> </ol> <p>Sime Darby Plantation Sdn Bhd has obtained approval from Jabatan Tenaga Kerja to make deduction of the wages of workers as below:</p> <ol style="list-style-type: none"> <li>1. Permit kebenaran untuk membuat potongan upah di bawah Seksyen 24 Akta Kerja 1955 for Sime Darby Plantation Sdn Bhd – bagi tujuan potongan bayaran bil elektrik from Ibu Pejabat Jabatan Tenaga Kerja Semenanjung Malaysia, Putrajaya No Rujukan: BHG.PU/9/129 JLD38(53) dated 06/07/2017.</li> <li>2. Permit Potongan Upah untuk pembayaran simpanan Lembaga Tabung Haji dan ASB bagi pekerja yang memohon No Rujukan: JTK/KG/ 10103 03994/01117 Bil 12/2011(5) Jabatan Tenaga Kerja Kluang dated 02/11/2011.</li> </ol>	
<p><b>4.3.1.2</b></p>	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p>	<p>The Company has established the Standard Operation Manual (SOM) Section 5: Management Responsibility Sub-Section 5.2 Customer</p>	<p>Complied</p>

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	<p><b>- Major compliance -</b></p>	<p>Focus, Appendix 5.2.4a – Procedure for Legal and Other Requirements prepared by the Standards &amp; Compliance Section, Total Quality and Environmental Management (TQEM) Plantation dated 01/11/2008.</p> <p>The Mill is operating in compliance with the applicable local, state, national and ratified international laws and regulations. All legal requirements were documented in Legal and Other Requirement Register, Appendix 5.2.4b – Legal Requirements Register Form. Amongst the document are: -</p> <ol style="list-style-type: none"> <li>1. Prevention and Control of Infectious Diseases Act 1988, Act 342</li> <li>2. OSHA Act 1994 (Act 514)</li> <li>3. Factories and Machinery Act 1967 (Act 139)</li> <li>4. Uniform Building By Law, 1986</li> <li>5. Pesticides Act 1974 (Act 149)</li> <li>6. Electrical Supply Act, 1990</li> <li>7. Petroleum (Safety Measures) Act, 1984</li> <li>8. Fire Services Act, 1984</li> <li>9. Code of Practice for Safe Working in a Confined Space, 2010</li> <li>10. Environmental Quality Act, 1974</li> </ol> <p>The latest review of LORR at Bukit Benut Mill was 2/7/2021</p>	
<p><b>4.3.1.3</b></p>	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p><b>- Major compliance -</b></p>	<p>The periodic review and evaluation on the legal requirement register to ensure that any new/addition as well as changes and amendment are captured and update, through the following manner:</p> <ol style="list-style-type: none"> <li>1. Plantation Sustainability and Quality Management Department</li> <li>2. Enquiring the laws books publisher</li> <li>3. Communication with law/enforcement officers</li> <li>4. Website</li> </ol>	<p>Complied</p>

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		<p>Changes to legal requirements are monitored and updated by company’s Group Sustainability &amp; Quality Management (GSQM). The SOP 2.0 (Legal Compliance) has specified any changes to legal requirements are tracked by means of periodic review and evaluation on the Laws &amp; regulations list to ensure that any new/addition as well as changes and amendment are captured and updated, through the following manner:</p> <ol style="list-style-type: none"> <li>1. Head Office Assignee to identify and register all applicable laws &amp; regulations pertaining to estate / palm oil mill operation.</li> <li>2. Head Office Assignee to arrange the purchase of the applicable laws &amp; regulations books where possible or downloaded/ soft copy would be used.</li> </ol> <p>The latest up-date for 2021 at Mill are;</p> <ol style="list-style-type: none"> <li>1. Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 Minimum Wages Order 2020.</li> <li>2. Malaysian Anti-Corruption Commission Act (Amended) 2018</li> <li>3. Whistle-blower Protection Act 2010</li> </ol>	
<b>4.3.1.4</b>	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p><b>- Minor compliance -</b></p>	<p>The mill has appointed their person in charge to monitor Traceability namely En. Ahmad Akhmal bin Anuar, Assistant Manager through appointment letter dated 1/1/2020 signed by En. Hj Anuar Hj Zakaria, Mill Manager.</p>	Complied
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p><b>- Major compliance -</b></p>	<p>Bukit Benut POM is located inside of the land of Bukit Benut Estate. The land is belonging to Sime Darby Plantation Sdn Bhd. Sighted the copy of the land title. There is no issue on land use claims evidence during the audit.</p>	Complied

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<p><b>4.3.2.2</b></p>	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.  <b>- Major compliance -</b></p>	<p>Bukit Benut POM is located inside of the land of Bukit Benut Estate. The land is belonging to Sime Darby Plantation Sdn Bhd. Sighted the copy of the land title. There is no issue on land use claims evidence during the audit.</p>	<p>Complied</p>
<p><b>4.3.2.3</b></p>	<p>Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.  <b>- Major compliance -</b></p>	<p>The mill is located in the premise of Bukit Benut Estate under Grant No: 90182 (Lot Number 1708).  Fencing parameters established around the mill building complex to separate the management boundary of estate and the mill. The housing and other recreational facilities are located within the same vicinity for ease of employees' management.</p>	<p>Complied</p>
<p><b>4.3.2.4</b></p>	<p>Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC).  <b>- Minor compliance -</b></p>	<p>There is no land dispute in the Bukit Benut POM at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified.</p>	<p>Complied</p>
<p><b>Criterion 4.3.3 – Customary rights</b></p>			
<p><b>4.3.3.1</b></p>	<p>Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.  <b>- Major compliance -</b></p>	<p>There is no customary land or negotiated agreements within the Bukit Benut POM land area.</p>	<p>Complied</p>
<p><b>4.3.3.2</b></p>	<p>Maps of an appropriate scale showing extent of recognized customary rights shall be made available.  <b>- Minor compliance -</b></p>	<p>The right to use the land is not disputed and there was no customary land within the Bukit Benut POM.</p>	<p>Complied</p>
<p><b>4.3.3.3</b></p>	<p>Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available.</p>	<p>There is no land dispute or customary rights issues in the mill.</p>	<p>Complied</p>



<b>- Major compliance -</b>			
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	<p>Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.</p> <p><b>- Minor compliance -</b></p>	<p>Sustainability Strategy Unit, PSQM Department has conducted Social Impact Assessment (SIA) on 16 – 19 May 2016 for SOU 22 Bukit Benut. There is no new SIA was conducted since last assessment. Refer Management Plan On Social Impact Assessment FY 2021 dated 30/07/2021. Sighted action taken on SIA has been conducted. Refer "Gotong Royong Membersihkan Kawasan Perumahan Pekerja Dan Cat Tandas" dated 04/02/2021.</p>	Complied
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p><b>- Major compliance -</b></p>	<p>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 01/11/2008. The procedure has detailing the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.</p> <p>Sime Darby Plantation Berhad has developed Standard Operation Manual (SOM) – Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 1/4/2018 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the mill. 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>	Complied

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<p><b>4.4.2.2</b></p>	<p>The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.  <b>- Major compliance -</b></p>	<p>Bukit Benut POM has implemented Internal Complaint Book and External Complaint/ Request Log Book. There is no external complaint received since June 2019. Reviewed the Internal Complaint Book found that most of the complaints related to housing repair. The complainants have acknowledged on the complaint book after actions have been taken to rectify the issue.</p>	<p>Complied</p>
<p><b>4.4.2.3</b></p>	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.  <b>- Minor compliance -</b></p>	<p>Bukit Benut POM has implemented Internal Complaint Book and External Complaint/ Request Log Book to record complaints and requests reported by the stakeholders. Sampled of the complaints as below:  1. House No.: 7 dated 01/06/2021  Issue: "Pokok Pelam Besar terlalu rapat dengan rumah,dahan besar jatuh pada bumbung, akar juga merosakkan simen. Mohon untuk tebang pokok Pelam di anantara rumah no 6 dan rumah no 7"  Action: Management noted the issue on 01/06/2021 and will contact contractor for removed the tree but due to MCO, the operation was postponed. Management has sent general workers to upkeep the tree on 05/07/2021.</p>	<p>Complied</p>
<p><b>4.4.2.4</b></p>	<p>Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.  <b>- Minor compliance -</b></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>Complied</p>
<p><b>4.4.2.5</b></p>	<p>Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.  <b>- Major compliance -</b></p>	<p>Record review found that previous complaints and requests from Year 2009 were still available.</p>	<p>Complied</p>

<b>Criterion 4.4.3:</b> Commitment to contribute to local sustainable development			
<b>4.4.3.1</b>	<p>Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.</p> <p><b>- Minor compliance -</b></p>	<p>Sighted evidence of CSR activities by Bukit Benut POM:</p> <ol style="list-style-type: none"> <li>1. Free Sanitization at linesite dated 05/07/2021</li> <li>2. Food Kit to workers dated 01/07/2021</li> <li>3. Donation of Meat during Raya Festival dated 19/07/2021</li> </ol>	Complied
<b>Criterion 4.4.4:</b> Employees safety and health			
<b>4.4.4.1</b>	<p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>The group has established Group Sustainability &amp; Quality Policy Statement signed by Mohamad Helmy Othman Basha, Group Managing Director on 02/12/2019.</p> <p>For upstream operation, safety policy as per document "Upstream Malaysia – Health, Safety &amp; Environment (HSE) Policy Statement" signed by Roslin Azmy Hassan, CEO Upstream Malaysia on 01/06/2020.</p> <p>Sighted, Sime Darby Plantation Berhad has developed Occupational Safety and Health Manual dated 20/8/2008 by Plantation Sustainability and Quality Management Department.</p> <p>The Environment, Safety and Health Plan for FY 2021 at Mill consist of the following elements:</p> <ul style="list-style-type: none"> <li>• ESH Risk Management</li> <li>• ESH Structure</li> <li>• Incident Reporting</li> <li>• Emergency Preparedness &amp; Response</li> <li>• Chemical Safety Management</li> <li>• Contractor Safety Management</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>• Scheduled Waste Management</li> <li>• Communication</li> <li>• Inspection</li> <li>• Health and Hygiene Monitoring Program</li> <li>• Awareness &amp; Competency Training</li> <li>• Reporting / Licensing</li> </ul>	
<p><b>4.4.4.2</b></p>	<p>The occupational safety and health plan should cover the following:</p> <ol style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risk of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:             <ol style="list-style-type: none"> <li>ii. All employees involved are adequately trained on safe working practices;</li> <li>iii. All precautions attached to products should be properly observed and applied;</li> </ol> </li> <li>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</li> <li>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and</li> </ol>	<p>The group has established Group Sustainability &amp; Quality Policy Statement signed by Mohamad Helmy Othman Basha, Group Managing Director on 02/12/2019.</p> <p>For upstream operation, safety policy as per document "Upstream Malaysia – Health, Safety &amp; Environment (HSE) Policy Statement" signed by Roslin Azmy Hassan, CEO Upstream Malaysia on 01/6/2020.</p> <ol style="list-style-type: none"> <li>a. Sighted, Sime Darby Plantation Berhad has developed Occupational Safety and Health Manual dated 20/8/2008 by Plantation Sustainability and Quality Management Department.</li> <li>b. Sime Darby has established SOP for HIRARC. Refer Estate Quality Management System, Level 2: Standard Operating Manual, Subsection 5.4: Planning, Appendix 5.4.1a Hazard Identification, Risk Assessment and Risk Control (HIRARC) Procedure ver. 1 Year 2008, issue no. 1 dated 1/4/2008. The mill has conducted assessment for risk on all the operations and documented in Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment covers 22 operations such as Security, Office, Weighbridge, Boiler Station, Engine Room etc. HIRARC being reviewed yearly as well as whenever occurrence of accidents and latest reviewed was on 14/12/2020. Detail of chemicals used in Mill operation are listed in Register of Chemicals Hazardous to Health dated 22/7/2021 at Bukit Benut POM. The medical surveillance was conducted for a total of 18 workers on 20/5/2021</li> </ol>	<p>Complied</p>

	<p>Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers’ safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees’ safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>The workers were tested on cholinesterase, manganese traces and etc The results indicated all workers had normal test results and were fit to work by Polyclinic Intan Kluang. Based on Employee Medical Record Book (USECHH 2) and Certificate of Fitness (USECHH 3), all the workers are fit for work. The Company has conducted the Noise Risk Assessment by Etosh, Consultant and Training Services, Ms Izzati Salleh (HQ/16/PEB/00/158) a registered Noise Risk Assessor dated 14/10/2020 covering press, threshing, sterilizer, workshop, oil clarification, kernel plant, engine room and boiler. Annual &amp; Baseline Audiometric Testing was conducted for 33 workers by Procoma Environmental (M) Sdn Bhd on 6/7/2020. A total of 20 workers produced abnormal audiogram results. Re-test was conducted on 8/12/2020. CHRA was conducted on 02/02/2019 by registered assessor JKPP/HIE 127/171-2 (166) – Teh Teong Beng from ENV &amp; IH Services. The CHRA covering Laboratory, ETP, WTP, Boiler Fireman, Workshop Mechanic and Store Attendant.</p> <p>c. The Mill has a comprehensive annual training plan for the staffs and workers and this was sighted in the training matrix for each staff and workers. Amongst the training that have been conducted as listed herein:</p> <ol style="list-style-type: none"> <li>1. Health Awareness - 4/1/2021</li> <li>2. COBC &amp; Policies – 27/5/2021</li> <li>3. RSPO, MSPO &amp; Supply Chain – 28/6/2021</li> <li>4. Refresher training on LOTO, PTW and SW Management – 23/7/2021</li> </ol> <p>d. Company is fully aware that working on safety is first priority during the works. The records on PPE Issuance and replacement are up to date. Sample records taken for process operator on Safety Shoe, Safety harness, Safety Helmet, Ear Plug and safety Shirt. All the</p>	
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		<p>workers have been trained with safety and the workers wear the PPE required by his/her works.</p> <p>e. The Company has established Standard Operation Manual (SOM) on Chemical Safety Management Procedure, Health Safety Environment Upstream Malaysia dated 9<sup>th</sup> March 2021. The SOM covers the Procedures for receiving, Procedures for handling, Procedures for storage, Procedures for disposal.</p> <p>f. The responsibility and accountability to ensure Safety &amp; Health at each operating unit lies with the respective Manager. He is assisted by his nominated Assistant Manager and other OSH Committee members representing Employer and Employee of Each Operating Unit.</p> <p>g. OSH Meeting being conducted quarterly and chaired by OSH Chairman or Manager. The Assistant Manager as Secretary and attended by Worker's Representatives and Management Representatives. The 1<sup>st</sup> meeting conducted on 26/03/2021 and nd meeting conducted on 28/05/2021. Sighted evidence of minutes of meeting and attendance. Among the issues discussed were on SOPs for PPE, achievement of OSH objectives, training, accident report and etc. Sime Darby Plantation Berhad has developed Primary Healthcare Services in Plantation, Document No: SD/SDP/PSQM(ESH)202-OH14, Revision 1, dated 1<sup>st</sup> March 2017 by Plantation Sustainability and Quality Management Department</p> <p>h. Sime Darby Plantation Berhad Sustainability and Quality Management (SQM) Doc. No SDP/SQM(ESH)/001-2-9 Revision 1 Date 30/05/2019 has documented Sustainable Plantation Management System, Standard Operating Procedure Of Incidents, Accidents &amp; Non-Conformance Management. Accident and emergency procedures are available in Mill Quality Management System Standard Operation Manual dated November 1st, 2008. Flowchart of emergency handling was presented in Appendix</p>	
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		<p>5.5.3.3. Sighted the Emergency Response Team (ERT) organization chart is made available at. Mill. The ERP (Emergency response plan) is available which covers the sampled incident as:</p> <ul style="list-style-type: none"> <li>i. Fire in the Mill, office, store or workers housing</li> <li>ii. Chemical spillage</li> </ul> <p>i. The head of process unit was appointed as a 1<sup>st</sup> Aider in the Mill and responsible their workplace. Each of them being provided with complete set of 1<sup>st</sup> Aid Box and being replenished and inspected monthly by Management.</p> <p>j. The JKKP 8 form was submitted to JKKP on 30/1/2021 and there were no accident cases reported for the year 2020.</p>	
<b>Criterion 4.4.5: Employment conditions</b>			
<b>4.4.5.1</b>	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>Sime Darby Plantation has established Group Sustainability &amp; Quality Policy Statement dated 2/12/2019 by Group Managing Director where the company is respecting, upholding &amp; no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) last revised 2020. Besides, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/3/2020. Sime Darby Plantation respect and safeguard human rights, notion of democracy and its institution. They recognize that Human Rights Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with SDP. This Policy is applied to all stakeholders affected by the business activities and relationships including directors, employees, counterparties, business partners, workers in our operations and supply chains, and communities surrounding our operations.</p>	Complied

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		The policies were communicated to the employees during induction training for new employees and morning muster. Latest Policy Briefing was conducted at Bukit Benut POM on 27/05/2021.	
<b>4.4.5.2</b>	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. <b>- Major compliance -</b>	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They promote 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. The policy has been briefed to all the employees and stakeholders. The policy could be downloaded from <a href="http://www.simedarbyplantation.com/sustainability/human-rights-charter">http://www.simedarbyplantation.com/sustainability/human-rights-charter</a>	Complied
<b>4.4.5.3</b>	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. <b>- Major compliance -</b>	There were employment contracts for staffs and workers. Pay and conditions are documented and achieved the Minimum Wage Order 2020. Sampled of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Employment Act 1955 which have been signed by the worker. Sampled of agreement pay slips for December 2020, March 2021 and June 2021 as below: 1. Employee ID: 163941 2. Employee ID: 161644 3. Employee ID: 155316 4. Employee ID: 155322 5. Employee ID: 124552 6. Employee ID: 124555	Complied



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		7. Employee ID: 17491 8. Employee ID: 17494	
<b>4.4.5.4</b>	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. <b>- Minor compliance -</b>	Reviewed the payslips and employment contract for contractor's workers found that the workers were paid accordingly with Minimum Wages Order 2020. Deduction of EPF, SOCSO and EIS found in order. Verified pay slip month of December 2020, March 2021 and June 2021. Sample were taken as below: Contractor: Teo Tuan Kwee Sdn Bhd 1. Jeffri Bin Jasman NRIC Number: 790515-XX-XXXX 2. Nasrul Nizam Bin A Rahman NRIC Number: 900522-XX-XXXX Contractor: AVN Brothers 1. Ganesan A/L Chellappan NRIC Number: 611014-XX-XXXX	Complied
<b>4.4.5.5</b>	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. <b>- Major compliance -</b>	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, race, designation and wages were recorded.	Complied
<b>4.4.5.6</b>	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. <b>- Major compliance -</b>	The mill management has employed local and foreign workers from Indonesia. They are all under direct employment to the mill. All of them have signed on the employment contract prior to work and extension contract where the original contract has expired. Terms and conditions were according to Collective Agreement and Employment Act 1955. Sampled of agreement pay slips for December 2020, March 2021 and June 2021 as below: 1. Employee ID: 163941 2. Employee ID: 161644	Complied

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		<ul style="list-style-type: none"> <li>3. Employee ID: 155316</li> <li>4. Employee ID: 155322</li> <li>5. Employee ID: 124552</li> <li>6. Employee ID: 124555</li> <li>7. Employee ID: 17491</li> <li>8. Employee ID: 17494</li> </ul>	
<b>4.4.5.7</b>	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p><b>- Major compliance -</b></p>	<p>Seen the Mill Daily Attendance Report for monthly basis where it recorded the number of days work and hours of overtime work. The data was transferred from punch card into the SAP system.</p>	Complied
<b>4.4.5.8</b>	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p><b>- Major compliance -</b></p>	<p>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.</p>	Complied
<b>4.4.5.9</b>	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p><b>- Major compliance -</b></p>	<p>Wages and overtime 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.</p> <p>Sampled of agreement pay slips for December 2020, March 2021 and June 2021 as below:</p> <ul style="list-style-type: none"> <li>1. Employee ID: 163941</li> <li>2. Employee ID: 161644</li> <li>3. Employee ID: 155316</li> <li>4. Employee ID: 155322</li> <li>5. Employee ID: 124552</li> <li>6. Employee ID: 124555</li> </ul>	Complied

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		7. Employee ID: 17491 8. Employee ID: 17494	
<b>4.4.5.10</b>	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. <b>- Minor compliance -</b>	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 subsidized water supply. 10kg of rice was supplied to all the workers once every 2 months and confirmed through interviewed with the workers.	Complied
<b>4.4.5.11</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. <b>- Major compliance -</b>	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 SAJ water. Linesite inspection was carried out on weekly basis by Medical Assistant using Housing Complex/ Nest/ Community Hall Inspections. The last inspection for August 2021 and July 2021 was conducted on 04/08/2021, 28/07/2021, 21/07/2021 and 15/07/2021 in Bukit Benut POM.	Complied
<b>4.4.5.12</b>	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. <b>- Major compliance -</b>	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They seek to create a working environment with zero tolerance for sexual harassment and abuse and in which violence is never used to resolve issues or conflict. Latest Policy Briefing was conducted at Bukit Benut POM on 27/05/2021. Gender Committee was established in Bukit Benut POM to monitor if there is any case of sexual harassment reported. The last meeting was carried out on 24/07/2021. Issues reported were recorded in the	Complied

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		minutes. Interviewed with the female workers found that no sexual harassment or violence case reported so far.	
<b>4.4.5.13</b>	<p>The management shall respect the right of all employees to form and join trade union and allow workers’ own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective 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><b>- Major compliance -</b></p>	<p>Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They respect the rights of their employees to form and join unions and bargain collectively.</p> <p>Latest Policy Briefing was conducted at Bukit Benut POM on 27/05/2021.</p> <p>NUPW committee was established in Bukit Benut POM and last meeting was conducted on 04/07/2020 between the workers’ representatives and management representatives to discuss issues related to workers. Seen the meeting minutes and issues were recorded in the meeting minutes. For 2021, meeting planned on October 2021.</p>	Complied
<b>4.4.5.14</b>	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p><b>- Major compliance -</b></p>	<p>Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornograph. They are eradicating child labour in all their supply chain and not employ anyone under age of 18 years.</p> <p>No employees below the age of 18 were sighted through verified the Employee Master Listing and interviewed with the workers.</p>	Complied

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		Latest Policy Briefing was conducted at Bukit Benut POM on 27/05/2021.	
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. <b>- Major compliance -</b>	The Mill has a comprehensive annual training plan for the Staffs and Workers and this was sighted in the training matrix for each staff and workers. Amongst the training that have been conducted as listed herein: - 1. The Policies, Procedures, COBC and Whistle - blowing being communicated to 91 workers dated 29/9/2020 at Mill Compound. The briefing was led by The Mill Manager. 2. Training on Scheduled Waste, LOTO and Permit to Work. The training being conducted by Assistant Engineer dated 23/7/2021 at Bukit Benut POM 3. RSPO, MSPO & SCCS Awareness training being conducted by Cik Fatini Abd Wahid dated 30/9/2020 to all 91 mill workers.	Complied
<b>4.4.6.2</b>	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. <b>- Major compliance -</b>	Yearly training plan is created based on Training Needs Analysis for workers involved in the operations based on their competencies and job description.	Complied
<b>4.4.6.3</b>	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. <b>- Minor compliance -</b>	All staffs and workers involved in the operations have been adequately trained in safe working practice. The Mill has a comprehensive annual training plan for its staffs and workers and this was sighted in the training records file, Trainings conducted were recorded in the various trainings record and completed with attendance records, training materials and photographs of the training.	Complied

4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
<p><b>4.5.1.1</b></p>	<p>An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>The group has established Group Sustainability &amp; Quality Policy Statement signed by Mohamad Helmy Othman Basha, Group Managing Director on 02/12/2019. The Policy stated:            Group Sustainability and Quality Statement: Minimizing environmental Harm:</p> <ol style="list-style-type: none"> <li>1. Protecting and enhancing biodiversity and ecosystem</li> <li>2. No deforestation and No new development on peat land</li> <li>3. Enhancing resilience against climate change impact</li> <li>4. Adopting responsible consumption and production</li> </ol> <p>For upstream operation, safety policy as per document "Upstream Malaysia – Health, Safety &amp; Environment (HSE) Policy Statement" signed by Roslin Azmy Hassan, CEO Upstream Malaysia on 01/06/2020. The Policy stated:</p> <ol style="list-style-type: none"> <li>1. Comply to emission and effluent standard</li> <li>2. Efficient use of water and energy</li> <li>3. Minimize waste</li> <li>4. Protect the ecosystem and biodiversity</li> </ol>	<p>Complied</p>
<p><b>4.5.1.2</b></p>	<p>The environmental management plan shall cover the following:</p> <ol style="list-style-type: none"> <li>a) An environmental policy and objectives;</li> <li>b) The aspects and impacts analysis of all operations</li> </ol> <p><b>- Major compliance -</b></p>	<p>The Company has established the Standard Operation Manual (SOM) Sub-Section 5.4 Planning, Appendix 5.4.1b - Environmental Aspect/Impacts Evaluation Procedure prepared by the Standards &amp; Compliance Section, Total Quality and Environmental Management (TQEM) Plantation dated 01/11/2008.</p>	<p>Complied</p>

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		<p>The Mill had conducted Environmental Aspect and Impact Identification (EAI) and environmental impact evaluation (EIE) for all its' activities for financial year 2021.</p> <p>The Environmental Aspect &amp; Impact Identification (EAI) register has identified columns for Activity, Environmental Aspect, Environmental Load Item, Environmental Impact, Legislation. EAI being reviewed on annual basis.</p> <p>The Environmental Impact Assessment has covered 16 keys activities of the plantation such as: -</p> <table border="1" data-bbox="1048 678 1865 829"> <tr> <td>1. Reception</td> <td>5. Effluent Treatment Plant</td> </tr> <tr> <td>2. Sterilization</td> <td>6. Schedule Waste Store</td> </tr> <tr> <td>3. Diesel</td> <td>7. Workshop</td> </tr> <tr> <td>4. Boiler</td> <td>8. Etc</td> </tr> </table> <p>Sample evidence of EAI established by the Mill includes;</p> <table border="1" data-bbox="1048 922 1865 1321"> <thead> <tr> <th>Activities</th> <th>Aspect</th> <th>Load Item</th> <th>Impact</th> <th>Potential of Non-Compliance Environmental regulations</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Operation of Electro Static Precipitator</td> <td>Electric Power Consumption</td> <td>Electric</td> <td>Business</td> <td>No</td> </tr> <tr> <td>Air Contamination</td> <td>Bunch Ash</td> <td>Air Pollution, Unpleasant working condition</td> <td>YES, EQA</td> </tr> </tbody> </table>	1. Reception	5. Effluent Treatment Plant	2. Sterilization	6. Schedule Waste Store	3. Diesel	7. Workshop	4. Boiler	8. Etc	Activities	Aspect	Load Item	Impact	Potential of Non-Compliance Environmental regulations	Operation of Electro Static Precipitator	Electric Power Consumption	Electric	Business	No	Air Contamination	Bunch Ash	Air Pollution, Unpleasant working condition	YES, EQA	
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			Waste Disposal	Boiler ash	Air, Water, Land Pollution, Unpleasant working condition	YES, EQA																				
<b>4.5.1.3</b>	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. <b>- Major compliance -</b>	<p>The Environmental Management Plan was incorporated with Pollution Prevention Plans 2021. The Mill identified the following activities and areas for Improvement plan;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Environment Issue</th> <th>Mitigation measures</th> <th>Time frame</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Workshop</td> <td>To ensure all schedule waste must be accordance to legal requirement</td> <td>Quarterly</td> </tr> <tr> <td>2</td> <td>Workers Housing Complex -To ensure no open burning</td> <td>To erect open burning signage and weekly inspection.</td> <td>Weekly</td> </tr> <tr> <td>3</td> <td>To reduce black smoke emitted to air</td> <td>Frequent cleaning inside furnace area</td> <td>Monthly</td> </tr> <tr> <td>4</td> <td>To reduce risk of POME discharge at waterways</td> <td>To check the furrow and endure no over flowing</td> <td>Daily</td> </tr> </tbody> </table> <p>The EMP at Bukit Benut POM was reviewed quarterly.</p>				No	Environment Issue	Mitigation measures	Time frame	1	Workshop	To ensure all schedule waste must be accordance to legal requirement	Quarterly	2	Workers Housing Complex -To ensure no open burning	To erect open burning signage and weekly inspection.	Weekly	3	To reduce black smoke emitted to air	Frequent cleaning inside furnace area	Monthly	4	To reduce risk of POME discharge at waterways	To check the furrow and endure no over flowing	Daily	Complied
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<b>4.5.1.4</b>	A programme to promote the positive impacts should be included in the continual improvement plan. <b>- Minor compliance -</b>	<p>Based on the Standard Operation Manual; subsection 5.4; Planning and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure, Mill carried out the annual review of environmental impacts documented in Registration of Environmental Aspects and Impacts. Amongst the Plan are;</p> <ol style="list-style-type: none"> <li>To comply with EQA (Scheduled Waste) Reg 2005</li> </ol>				Complied																				



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		<ul style="list-style-type: none"> <li>2. No open burning at Workers Housing Complex</li> <li>3. To reduce black smoke emitted to air</li> <li>4. To reduce risk of POME discharge at waterways</li> <li>5. To ensure proper landfill management in accordance to SOP</li> </ul>																			
<b>4.5.1.5</b>	<p>An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives.</p> <p><b>- Major compliance -</b></p>	<p>Sighted environment training that has conducted as below:</p> <ul style="list-style-type: none"> <li>1. The Policies, Procedures, COBC and Whistle - blowing being communicated to 91 workers dated 29/9/2020 at Mill Compound. The briefing was led by The Mill Manager.</li> <li>2. Training on Scheduled Waste, LOTO and Permit to Work. The training being conducted by Assistant Engineer dated 23/7/2021 at Bukit Benut POM</li> </ul>	Complied																		
<b>4.5.1.6</b>	<p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p><b>- Major compliance -</b></p>	<p>Sighted meeting on Environmental in 2021 as below: -            Environmental Performance Monitoring Committee Meeting was conducted at Bukit Benut POM dated 26/3/2021 chaired by the Mill Manager. The meeting attended by 10 participants.</p>	Complied																		
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>																					
<b>4.5.2.1</b>	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period</p> <p><b>- Major compliance -</b></p>	<p>Monthly record of energy consumption for non-renewable and sources were kept and documented. It is monitored to optimize use of renewable energy. Record for Diesel, Electricity and water consumption for Bukit Benut Mill in year 2021 as tabulated below;</p> <table border="1"> <thead> <tr> <th></th> <th>2020</th> <th>2021</th> </tr> </thead> <tbody> <tr> <td>FFB / Mt</td> <td>114,021</td> <td>49,769</td> </tr> <tr> <td>Diesel (l)</td> <td>70300</td> <td>63300</td> </tr> <tr> <td>Liter / Mt FFB</td> <td>0.62</td> <td>1.27</td> </tr> <tr> <td>Diesel Baseline Value</td> <td></td> <td>1.00</td> </tr> <tr> <td>Electricity, kWh</td> <td>1,140,356</td> <td>567,382</td> </tr> </tbody> </table>		2020	2021	FFB / Mt	114,021	49,769	Diesel (l)	70300	63300	Liter / Mt FFB	0.62	1.27	Diesel Baseline Value		1.00	Electricity, kWh	1,140,356	567,382	Complied
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<b>4.5.2.2</b>	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. <b>- Major compliance -</b>	The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective Mill yearly budgets.	Complied																		
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible. <b>- Minor compliance -</b>	<p>Renewable energy used is from shell and fibre for boiler. The details as below: -</p> <table border="1"> <thead> <tr> <th></th> <th>2020</th> <th>2021</th> </tr> </thead> <tbody> <tr> <td>Total FFB Processed, Mt</td> <td>114,021</td> <td>59,531</td> </tr> <tr> <td>Total CPO Produced</td> <td>23,444</td> <td>11,992</td> </tr> <tr> <td>Total fibre usage</td> <td>21,892</td> <td>11,430</td> </tr> <tr> <td>Total Shell Usage</td> <td>5,929</td> <td>3,096</td> </tr> <tr> <td>Renewable Energy usage (Mt / CPO Mt)</td> <td>1.19</td> <td>1.21</td> </tr> </tbody> </table>		2020	2021	Total FFB Processed, Mt	114,021	59,531	Total CPO Produced	23,444	11,992	Total fibre usage	21,892	11,430	Total Shell Usage	5,929	3,096	Renewable Energy usage (Mt / CPO Mt)	1.19	1.21	Complied
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<b>Criterion 4.5.3: Waste management and disposal</b>																					
<b>4.5.3.1</b>	All waste products and sources of pollution shall be identified and documented. <b>- Major compliance -</b>	<p>All waste and pollution are identified and documented in the Waste Management Action Plan. The compilation for Financial Year 2021 was made at SOU level. Details of waste generated from the Mill operations among others are shown below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Type of Waste</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Schedule Waste</td> <td>Workshop</td> </tr> </tbody> </table>	No	Type of Waste	Location	1	Schedule Waste	Workshop	Complied												
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<p><b>4.5.3.2</b></p>	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p><b>- Major compliance -</b></p>	<p>The pollution identified from the mill activities</p> <table border="1"> <thead> <tr> <th></th> <th>Type of Waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black Smoke</td> <td>Emission from Boilers/vehicles/engines</td> </tr> <tr> <td>2</td> <td>Odor &amp; Gases</td> <td>Activities from the effluent treatment</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>Storage &amp; vehicle maintenance</td> </tr> </tbody> </table> <p>The Waste Management Plan for 2021 was documented as follows:</p> <table border="1"> <thead> <tr> <th>Category</th> <th>Location</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>Schedule waste</td> <td>Used Lubricant container pesticides</td> <td> <ol style="list-style-type: none"> <li>Record of inventory in E-Swiss</li> <li>Storage in SW Store</li> <li>Disposed to licensed contractor</li> </ol> </td> </tr> <tr> <td>Industrial Waste</td> <td>Scrap Metal</td> <td> <ol style="list-style-type: none"> <li>Labelling permanent signage at site</li> <li>Disposal of scrap through region office</li> </ol> </td> </tr> </tbody> </table>		Type of Waste	Details	1	Black Smoke	Emission from Boilers/vehicles/engines	2	Odor & Gases	Activities from the effluent treatment	3	Leakage of lubricant	Storage & vehicle maintenance	Category	Location	Action Plan	Schedule waste	Used Lubricant container pesticides	<ol style="list-style-type: none"> <li>Record of inventory in E-Swiss</li> <li>Storage in SW Store</li> <li>Disposed to licensed contractor</li> </ol>	Industrial Waste	Scrap Metal	<ol style="list-style-type: none"> <li>Labelling permanent signage at site</li> <li>Disposal of scrap through region office</li> </ol>	<p>Complied</p>
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		Domestic Waste	Sewage	To monitor during workers housing inspection / from resident's complaint																									
		Sighted the appointed licensed collector Kualiti Alam Sdn Bhd to collect the scheduled wastes at the Mill. Latest disposal of scheduled waste for the Mill as the following: -																											
		<table border="1"> <thead> <tr> <th>Schedule Waste (SW)</th> <th>Recent Disposed</th> <th>Date last Generate</th> <th>No of days from generate to disposal</th> </tr> </thead> <tbody> <tr> <td>109</td> <td>25/6/21</td> <td>26/1/21</td> <td>150</td> </tr> <tr> <td>322</td> <td>25/6/21</td> <td>26/1/21</td> <td>150</td> </tr> <tr> <td>324</td> <td>25/6/21</td> <td>26/1/21</td> <td>150</td> </tr> <tr> <td>409</td> <td>25/6/21</td> <td>26/1/21</td> <td>150</td> </tr> <tr> <td>410</td> <td>25/6/21</td> <td>26/1/21</td> <td>150</td> </tr> </tbody> </table>				Schedule Waste (SW)	Recent Disposed	Date last Generate	No of days from generate to disposal	109	25/6/21	26/1/21	150	322	25/6/21	26/1/21	150	324	25/6/21	26/1/21	150	409	25/6/21	26/1/21	150	410	25/6/21	26/1/21	150
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<p><b>4.5.3.3</b></p>	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p><b>- Major compliance -</b></p>	<p>Standard Operation Manual (SOM) on Chemical Safety Management Procedure, Health Safety Environment Upstream Malaysia dated 9/3/2021. The SOM covers the following;</p> <ol style="list-style-type: none"> <li>1. Procedures for receiving</li> <li>2. Procedures for handling</li> <li>3. Procedures for storage</li> <li>4. Procedures for disposal</li> <li>5. Etc</li> </ol> <p>Procedure for Scheduled Waste Management was established (SD/SDP/PSQM (ESH)/203-EN1 dated 26/2/2016. Proper disposal of waste material is carried out as per the company procedures.</p>			<p>Complied</p>																								
<p><b>4.5.3.4</b></p>	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p><b>- Minor compliance -</b></p>	<p>Domestic waste from the housing area is well managed and being disposed to the designated landfill at Field P00C1 at Bukit Benut Estate</p>			<p>Complied</p>																								

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		Based on the Rubbish Collection Schedule, the arrangement is to collect on every Wednesday and Saturday, twice a week.												
Criterion 4.5.4: Reduction of pollution and emission														
<b>4.5.4.1</b>	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.</p> <p><b>- Major compliance -</b></p>	<p>The mill has conducted assessment of all polluting activities in the Environmental Aspect Impact, Environmental Impact Evaluation. Pollution and Pollution Prevention Plan.</p> <p>Air Emission Analysis (Stack Emission) for Boiler 3 was conducted by Spectrum Laboratories (Johore) Sdn Bhd dated 15/2/2021. The result as follows: -</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">Boiler No</th> <th style="width: 50%;">Parameters</th> <th style="width: 15%;">Results</th> <th style="width: 25%;">EQA/DOE Limits</th> </tr> </thead> <tbody> <tr> <td rowspan="2" style="text-align: center;">3</td> <td>Total Particulate Matter</td> <td style="text-align: center;">13.14</td> <td style="text-align: center;">150 mg/m<sup>3</sup></td> </tr> <tr> <td>Carbon Monoxide</td> <td style="text-align: center;">353</td> <td style="text-align: center;">1000 mg/m<sup>3</sup></td> </tr> </tbody> </table> <p>The plan to reduce or minimize the GHG emission has been established and implemented. In general, among the action plans were: -</p> <ol style="list-style-type: none"> <li>a. To optimize the usage of diesel</li> <li>b. To apply more organic fertilizer such as bunch ash, EFB therefore reducing inorganic fertilizer dependency</li> </ol> <p>Identification of significant pollutants and greenhouse gas (GHG) emissions has been conducted base on approved RSPO GHG calculator. The results as listed herein-</p>	Boiler No	Parameters	Results	EQA/DOE Limits	3	Total Particulate Matter	13.14	150 mg/m <sup>3</sup>	Carbon Monoxide	353	1000 mg/m <sup>3</sup>	Complied
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		<table border="1"> <tr><td>Product</td><td>Quantity</td></tr> <tr><td>FFB Production Per Hectare</td><td>18.01</td></tr> <tr><td>OER</td><td>20.57%</td></tr> <tr><td>KER</td><td>4.64%</td></tr> <tr><td>Mill Emission and Credits</td><td></td></tr> <tr><td>Emission - POME</td><td>0.20 tCOe2/ t FFB</td></tr> <tr><td>- Fuel</td><td>0.00 tCOe2/ t FFB</td></tr> <tr><td>Credits</td><td>0</td></tr> <tr><td>Estate Field Emission and Sinks</td><td></td></tr> <tr><td>Emission source</td><td></td></tr> <tr><td>- Land conversion</td><td>0.54 tCOe2/ t FFB</td></tr> <tr><td>- CO2 Emission from fertiliser</td><td>0.04 tCOe2/ t FFB</td></tr> <tr><td>- N2O Emission from fertiliser</td><td>0.02 tCOe2/ t FFB</td></tr> <tr><td>- Fuel Consumption</td><td>0.00 tCOe2/ t FFB</td></tr> <tr><td>Sinks</td><td></td></tr> <tr><td>- Crop Sequestration</td><td>- 0.48 tCOe2/ t FFB</td></tr> <tr><td>Total</td><td>0.13 tCOe2/ t FFB</td></tr> </table>	Product	Quantity	FFB Production Per Hectare	18.01	OER	20.57%	KER	4.64%	Mill Emission and Credits		Emission - POME	0.20 tCOe2/ t FFB	- Fuel	0.00 tCOe2/ t FFB	Credits	0	Estate Field Emission and Sinks		Emission source		- Land conversion	0.54 tCOe2/ t FFB	- CO2 Emission from fertiliser	0.04 tCOe2/ t FFB	- N2O Emission from fertiliser	0.02 tCOe2/ t FFB	- Fuel Consumption	0.00 tCOe2/ t FFB	Sinks		- Crop Sequestration	- 0.48 tCOe2/ t FFB	Total	0.13 tCOe2/ t FFB	
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<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. <b>- Major compliance -</b>	<p>Bukit Benut POM Environmental Management Plan was incorporated with Pollution Prevention Plans 2021. The Mill identified the following activities and areas for Improvement plan;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Category</th> <th>Mitigation measures</th> <th>Time frame</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Workshop</td> <td>To ensure all schedule waste must be accordance to legal requirement</td> <td>Quarterly</td> </tr> <tr> <td>2</td> <td>Workers Housing Complex -To ensure no open burning</td> <td>To erect open burning signage and weekly inspection.</td> <td>Weekly</td> </tr> </tbody> </table>	No	Category	Mitigation measures	Time frame	1	Workshop	To ensure all schedule waste must be accordance to legal requirement	Quarterly	2	Workers Housing Complex -To ensure no open burning	To erect open burning signage and weekly inspection.	Weekly	Complied																						
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		3	To reduce black smoke emitted to air	Frequent cleaning inside furnace area	Monthly										
		4	To reduce risk of POME discharge at waterways	To check the furrow and endure no over flowing	Daily										
<b>4.5.4.3</b>	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p><b>- Major compliance -</b></p>	<p>The POM is treating POME in accordance to the DOE Limits for final discharge into the land application at Bukit Benut Estate. Sighted the Schedule of Compliance (Jadual Pematuhan) from DOE: 00747; AS(B)J31/152/000/040 Jilid 9(6), License period: 01/07/2021 until 30/06/2022.</p> <p>DOE Limits for final discharge, land irrigation analyzed by Sime Darby Plantation Research Sdn Bhd sample taken on 29/7/2021. Results of the analysis as below: -</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Results</th> <th>DOE Limits</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>8.2</td> <td>5-9</td> </tr> <tr> <td>BOD mg/l</td> <td>1305</td> <td>2500</td> </tr> </tbody> </table>				Parameter	Results	DOE Limits	pH	8.2	5-9	BOD mg/l	1305	2500	Complied
Parameter	Results	DOE Limits													
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<b>Criterion 4.5.5: Natural water resources</b>															
<b>4.5.5.1</b>	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> <li>a) Assessment of water usage and sources.</li> <li>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</li> <li>c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night</li> </ul>	<p>Water Management Plan and Water Reduction Plan was established for the year 2021. Amongst the management plans are: -</p> <p>Water source - Mill water treatment Plan</p> <p>Areas of concern - Severe water Pollution</p> <p>Monitoring of water usage – To optimize water usage at all stations.</p> <p>Contingency plan - To conduct water sampling on mill water and initiate an action plan for the water treatment through recommendation by R&amp;D</p> <p>Water source – Steam Condensate Water</p> <p>Areas of concern – Maintain current system</p>				Complied									

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	application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <b>- Major compliance -</b>	Monitoring of water usage – Any leakage or failure of pumping report to Foreman Contingency plan – Monitoring on the implementation at site.	
<b>4.5.5.2</b>	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. <b>- Major compliance -</b>	The mill operates on a land application for the effluent discharge system. The POME is discharge to Land Irrigation, Field 02A, 07C, 95A, 95B, 97A. The BOD at the final discharge is 1305 mg/L below the Jadual Pematuhan Pelepasan (Schedule of Compliance) limit at 2500 mg/l.	Complied
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Mill Management</b>			
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. <b>- Major compliance -</b>	The mill has implemented Good Milling Practice (GMP) and has 4 types of Manuals for references:- a. Mill Quality Management System (Standard Operating Procedure) b. Mill Quality Management System (Standard Operation Manual) c. Occupational Safety and Health Manual d. Sustainable Plantation Management System These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from the reception, sterilization, threshing, pressing, clarification, effluent, laboratory, workshop and etc.	Complied
<b>4.6.1.2</b>	All palm oil mills shall implement best practices. <b>- Major compliance -</b>	Bukit Benut Palm Oil Mill has implemented Good Milling Practice (GMP) as per their own SOP's and in accordance to Schedule of Compliances (Jadual Pematuhan – Syarat-Syarat Lesen Premis Minyak Kelapa Sawit Mentah, Jabatan Alam Sekitar) The Mill Management holds the responsibility on regular inspection of all the mill processes and being documented and summarized in a daily	Complied



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		report. The external monitoring is made through visits by Regional General Manager, Mill Advisor, SQM and GCAD.	
<b>Criterion 4.6.2: Economic and financial viability plan</b>			
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.  - <b>Major compliance</b> -	The annual business plan is available. The document is in the form of annual budget and the projection for 5 years (Budget year, PY2, PY3, PY4, PY5) prepared as guidance for future planning. The business plan contains;  a) FFB processed production of CPO & CPK. b) Component of operating expenditure includes - process labour, - maintenance external/maintenance parts - consumable/EVIT, - admin cost/labour overhead.  Inclusive in the business plan is also Capital Expenditure (CAPEX) among others replacement / upgrading of building/machinery, workers amenities for the mill. The M Plan for 2020 was sighted and verified. A calculation of seeking the profitability quantum was also sighted. This is a standard format provided from the Regional CEO to the Manager and treated in high confidentiality.	Complied
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented.  - <b>Major compliance</b> -	Bukit Benut POM has received and processed FFB from owned supplying estates and diversion crops from own company's certified estates only.  Sampled the contract agreements for services provided as below:	Complied

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		<p>1. Contractor: Teo Tuan Kwee Sdn Bhd – Transportation of Crude Palm Oil (CPO) (Services) For Sime Darby Plantation Berhad’s Peninsular Malaysia’s Oil Mills dated 12/12/2020 valid until 31/10/2023.</p> <p>2. Contractor: AVN Brothers – Showel Rental c/w Driver dated 01/11/2018 valid until 30/10/2021.</p> <p>3. Contractor: Samareddy Enterprise – Transport POME from BBOM to BBE dated 01/01/2020 valid until 31/12/2020. Sighted Extension Contract evidence dated 28/12/2020 for 2021 services.</p> <p>Pricing of the contract was stated in the agreement and acknowledged by the contractors.</p>	
<b>4.6.3.2</b>	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p><b>- Major compliance -</b></p>	<p>Payment terms were clearly stated in the agreement signed by the contractors. Verified the invoice submitted and payment records as below:</p> <p>1. Samareddy Enterprise: PO Number: 430054646966, Invoice Number: 1002 dated 30/06/2021.</p> <p>2. AVN Brothers : PO Number: 4300546994, DO Number: DO-JUN21-007 dated 30/06/2021.</p> <p>Besides, interviewed with contractors also confirmed that payment was made promptly.</p>	Complied
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	<p>In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.</p> <p><b>- Major compliance -</b></p>	<p>The contractors engaged by the mill management has signed on a letter regarding the compliance of RSPO/ MSPO/ SCCS dated 26/07/2021. Sample seen for Teo Tuan Kwee Sdn Bhd and AVN Brothers.</p> <p>Briefing of sustainability were given to contractors on 07/04/2021. Seen the training attendance list and training materials. Interviewed</p>	Complied

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		with the contractors confirmed that they were provided with training and have signed on the letter.	
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	Mill has engaged contractors for varieties of works such as shovel rental, grass cutting and transporters. Sampled the contract agreements for services provided as below: 1. Contractor: Teo Tuan Kwee Sdn Bhd – Transportation of Crude Palm Oil (CPO) (Services) For Sime Darby Plantation Berhad’s Peninsular Malaysia’s Oil Mills dated 12/12/2020 valid until 31/10/2023. 2. Contractor: AVN Brothers – Showel Rental c/w Driver dated 01/11/2018 valid until 30/10/2021. 3. Contractor: Samareddy Enterprise – Transport POME from BBOM to BBE dated 01/01/2020 valid until 31/12/2020. Sighted Extension Contract evidence dated 28/12/2020 for 2021 services.	Complied
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. <b>- Minor compliance -</b>	A letter dated 26/07/2021 on RSPO/ MSPO/ SCCS awareness issued to all the contractors and suppliers in the mill. The letter has stated that all Contractors need to follow RSPO/ MSPO/ SCCS guideline in accordance with the Sime Darby Plantation of Mill Quality Management System. All contractors shall ensure to reserve the right of the certification bodies (CBs) to audit the operation if an audit is deemed necessary.	Complied

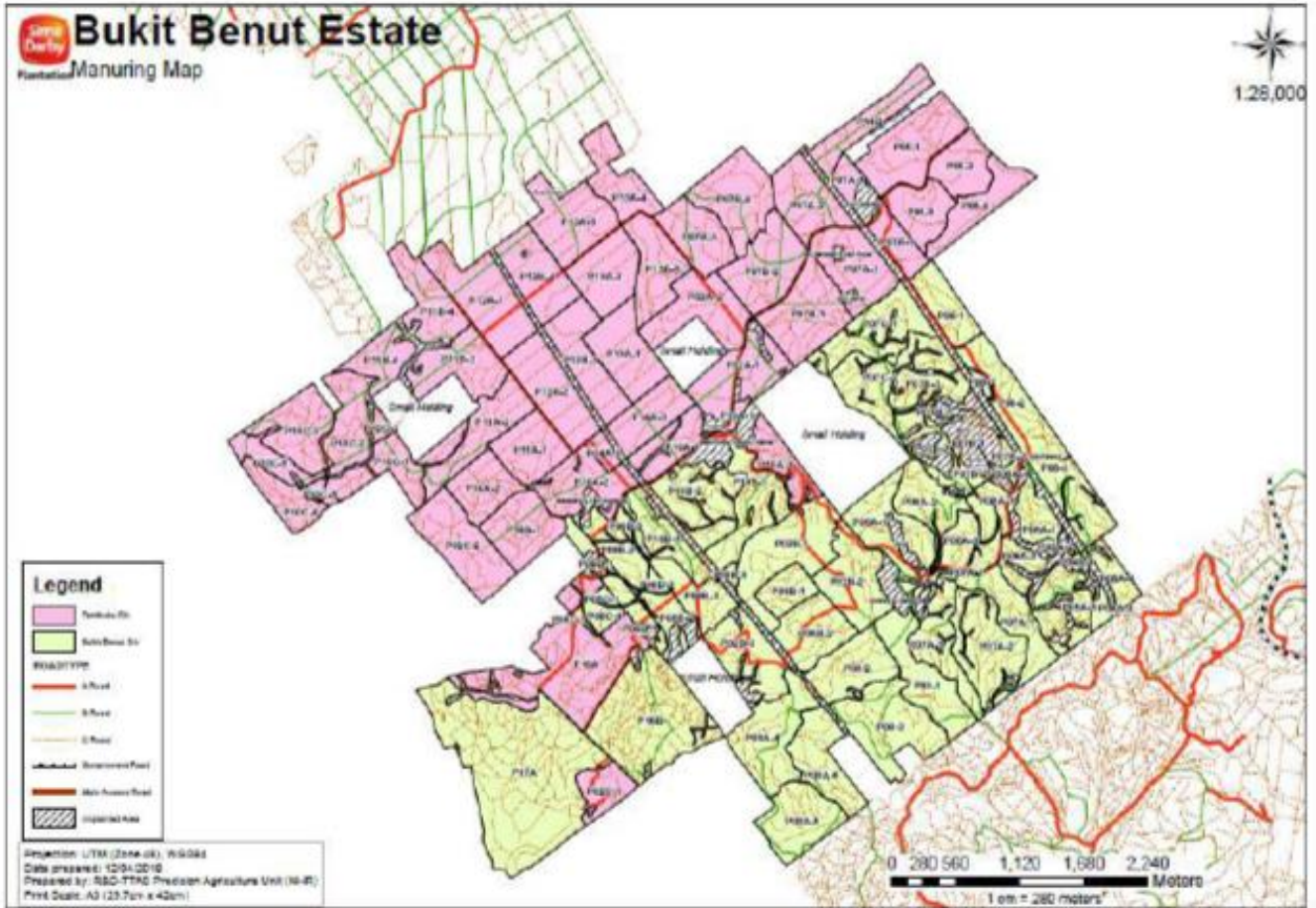
**Appendix B: List of Stakeholders Contacted**

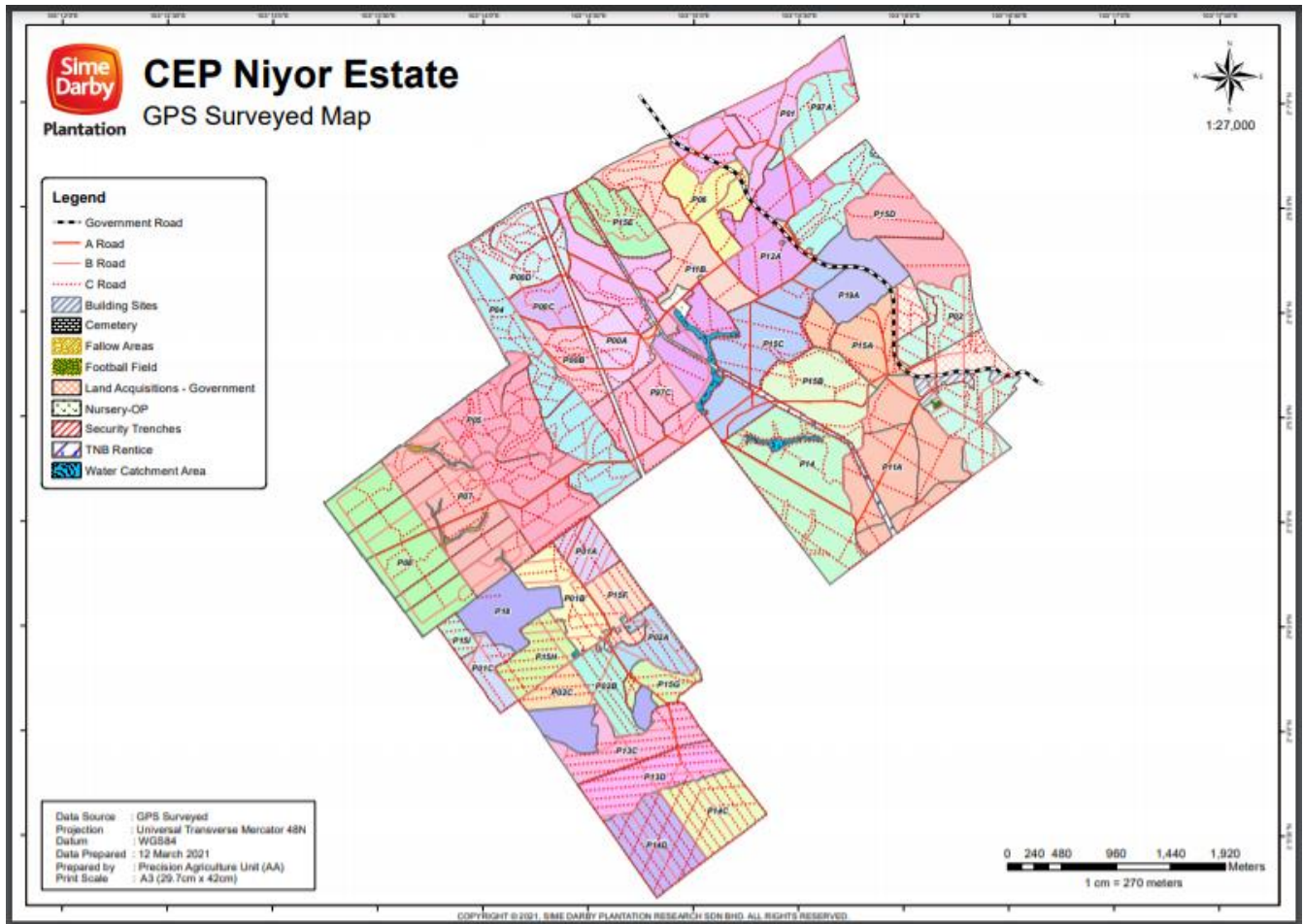
<p><b>Government Officer:</b>          SK Agama Ladang Bukit Benut</p>	<p><b>Community/neighbouring village:</b>          JKK Kampung Pisang          JKK Kampung Melayu Nyior Kluang          Imam Masjid Bukit Benut</p>
<p><b>Suppliers/Contractors/Vendors:</b>          Syarikat Sin Kim Huat          AVN Brothers          TTK Sdn Bhd          Sakhti Enterprise</p>	<p><b>Worker’s Representative/Gender Committee:</b>          Workers’ Representatives          Gender Committee Representatives          NUPW Representative</p>



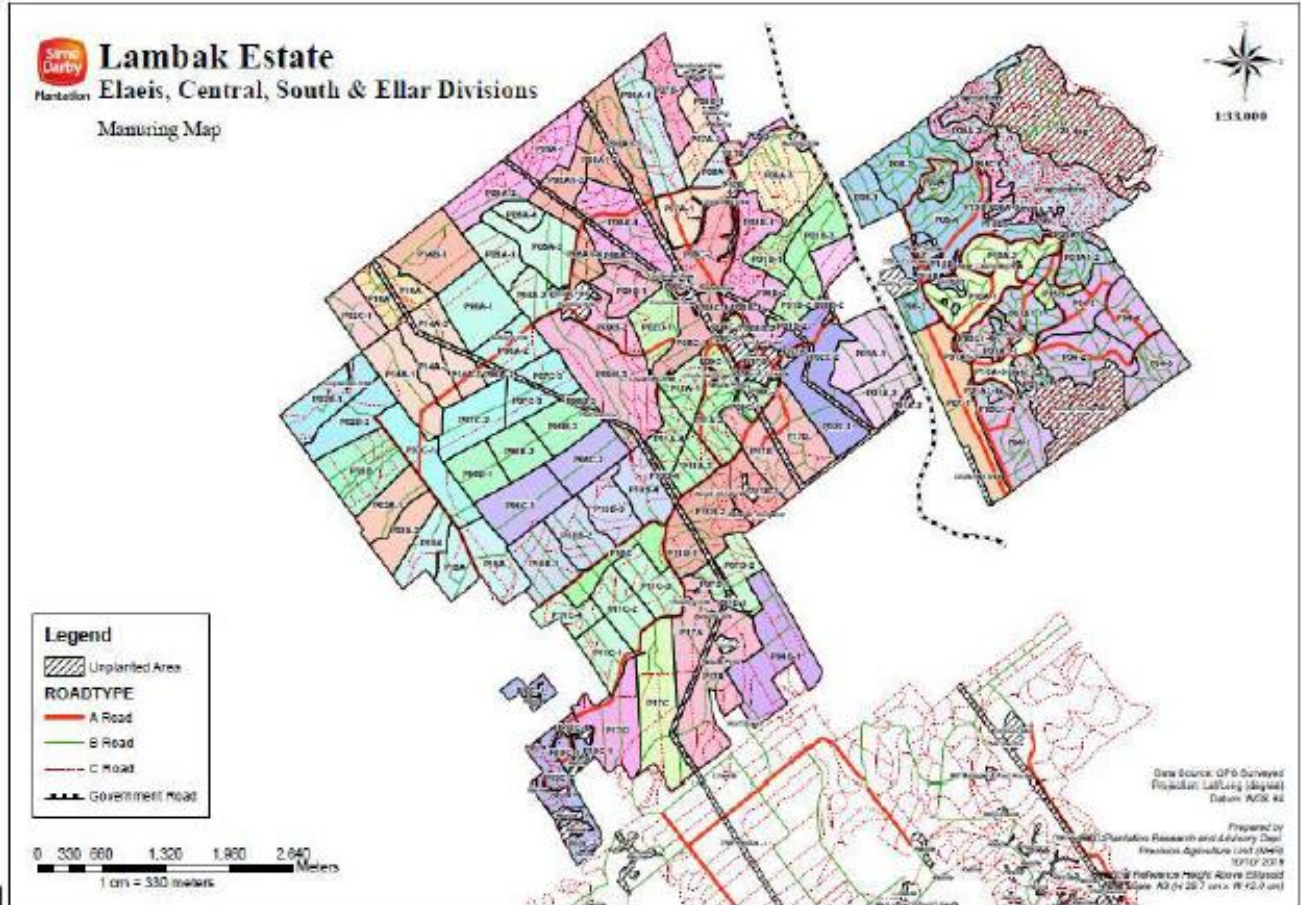
**Appendix D: Location and Field Map**











**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