

**MALAYSIAN SUSTAINABLE PALM OIL
4th ANNUAL SURVEILLANCE ASSESSMENT (ASA4)
Public Summary Report**

Sime Darby Plantation Berhad
Client company Address: Level 11, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7, Ara Damansara 47301 Petaling Jaya, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 10) - Bukit Puteri Palm Oil Mill and Bukit Puteri Estate Location of Certification Unit: K/B 31, Sungai Koyan 27650 Raub, Pahang, Malaysia

Report prepared by:
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Report Number: SMO 3404926

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 Puteri POM	536632004000	28/02/2022
	Bukit Puteri Estate	524186002000	31/10/2021
Address	Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia		
Certification Unit	SOU 10 Bukit Puteri		
Contact Person Name	Shylaja Devi Vasudevan Nair		
Website	www.simedarbyplantation.com	E-mail	shylaja.vasudevan@simedarbyplantation.com
Telephone	+(603) 78484379	Facsimile	+(603) 78484379

1.2 Certification Information			
Certificate Number	Mill: MSPO 745404 Estate: MSPO 745405		
Issue Date	27/11/2017	Expiry date	26/11/2022
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estates: Production of Sustainable Oil Palm Fruits		
Standard	MS 2530-4:2013 Part 4: General Principles for Palm Oil Mills MS 2530-3:2013 Part 3: General Principles for Oil Palm Plantations and Organized Smallholders		
Stage 1 Date	Previous CB		
Stage 2 / Initial Assessment Visit Date (IAV)	Previous CB		
Continuous Assessment Visit Date (CAV) 1	14-15/11/2018		
Continuous Assessment Visit Date (CAV) 2	11-12/10/2019		
Continuous Assessment Visit Date (CAV) 3	21-22/09/2020		
Continuous Assessment Visit Date (CAV) 4	12/04 & 14 - 16/04/2021		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 745403	RSPO P&C 2018: MYNI 2019	BSI Services Malaysia Sdn. Bhd.	06/07/2026
MSPO 745406	MSPO SCCS	BSI Services Malaysia Sdn. Bhd.	24/10/2024

1.3 Location of Certification Unit			
Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Bukit Puteri POM	K/B 31, Sungai Koyan, 27650 Raub, Pahang, Malaysia	4° 12' 09.19" N	101° 51' 45.43" E
Bukit Puteri Estate	Sungai Koyan, 27650 Raub, Pahang, Malaysia	4° 12' 47.02" N	101° 51' 39.63" E

1.4 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Puteri	3,795.58	21.36	58.86	3,875.80	97.93
Total	3,795.58	21.36	58.86	3,875.80	97.93

Note: -

1.5 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bukit Puteri	378.72	2,084.21	292.34	1,040.31	-	3,416.86	378.72
Total (ha)	378.72	2,084.21	292.34	1,040.31	-	3,416.86	378.72

1.6 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Nov 2020 - Oct 2021)	Actual (Sep 2020 - Mar 2021)	Forecast (Nov 2021 - Oct 2022)
Bukit Puteri	53,000.00	26,382.36	71,775.23
Kerdau	-	87.76	-
Sg Mai	-	264.38	-
Noor Azlan Bin Kasmani	-	641.23	-
Tee Chin Hock	-	90.86	-
Tee Ching Keong	-	106.81	-
MXF Gemilang Enterprise	-	2,178.50	-
Total	53,000.00	29,751.90	71,775.23

Note: -

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1.7 Uncertified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Nov 2020 - Oct 2021)	Actual (Sep 2020 - Mar 2021)	Forecast (Nov 2021 - Oct 2022)
Atil Mela Enterprise	NA	4,728.32	NA
CK Teik Ent		651.50	
Green Agro Pyramid		667.60	
MXF Gemilang Enterprise		748.04	
Pertiwi Palms Sdn Bhd	NA	444.71	NA
Total	NA	7,240.17	NA

Note: -

1.8 Certified Tonnage			
Mill Capacity: 20 MT/hr	Estimated (Nov 2020 - Oct 2021)	Actual (Sep 2020 - Mar 2021)	Forecast (Nov 2021 - Oct 2022)
	FFB	FFB	FFB
	53,000.00	29,751.90	71,775.23
SCC Model: MB	CPO (OER: 20.51%)	CPO (OER: 22.63%)	CPO (OER: 20.68%)
	10,870.00	6,732.21	14,843.12
	PK (KER: 4.75%)	PK (KER: 4.54%)	PK (KER: 4.77%)
	2,520.00	1,352.19	3,423.68

Note: -

1.9 Actual CPO Sold Volume (mt) (Sep 2020 - Mar 2021)					
CPO (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
6,732.21	-	-	-	5,522.76	5,522.76

1.10 Actual PK Sold Volume (mt) (Sep 2020 - Mar 2021)					
PK (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
1,352.19	-	-	-	1,325.31	1,325.31

Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 190 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

Assessment Methodology, Programme, Site Visits

This on-site Annual Surveillance Assessment 4 was conducted from 12/04 & 14 - 16/04/2021. The audit programme is included in Section 2.3. The approach to the audit was to treat SOU 10 Bukit Puteri Palm Oil Mill and its supply base i.e. Bukit Puteri Estate as an 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 samples 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 was based on the formula $(r\sqrt{n})$; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix C.

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

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

All the previous nonconformities are remains closed. The assessment findings for the ASA4 assessment are detailed in Section 4.2.

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

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

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

Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Bukit Puteri POM	✓	✓	✓	✓	✓
Bukit Puteri Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: April 11, 2022 - April 14, 2022

Total No. of Mandays: 7

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2.1 BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Valence Shem (VSH)	Team Leader	He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 14001, RSPO P&C, RSPO SCCS, MSPO and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012, MSPO Awareness Training in 2014 and ISO 45000 Lead Auditor Course in 2019. Able to communicate in Bahasa Malaysia and English. During this assessment, he covers the aspects on legal, mill best practices, good agriculture practice, occupational safety and health.
Hafriazhar Mohd Mokhtar (HMM)	Team Member	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands and Gabon. He is fluent in Bahasa Malaysia and English languages. During assessment, he covered the legal issues, social issues, worker’s welfare and stakeholder consultation.

2.2 Accompanying Persons

No.	Name	Role
	Nil	

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2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment.

Date	Time	Subjects	VSH	HMM
Monday 12/4/2021	0830 - 0900	Opening meeting: <ul style="list-style-type: none"> Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation) 	✓	✓
	0900 - 1300	Bukit Puteri Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, workers housing, clinic, Landfill, etc.	✓	✓
	1300 - 1400	Lunch break		
	1400 - 1630	Bukit Puteri Estate Document review P1 – P7 (MSPO Part 3): General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓
	1630 - 1700	Interim closing briefing	✓	✓
Tuesday 13/4/2021		Awal Ramadan		
Wednesday 14/4/2021	0900 - 1300	Bukit Puteri Estate Continue with documentation review	✓	✓
	1000 - 1300	Stakeholder consultation – government agencies, NGO, surrounding communities, and contractors/vendors	-	✓
	1300 - 1400	Lunch break		
	1400 - 1630	Bukit Puteri Estate Continue with documentation review	✓	✓
	1630 - 1700	Interim closing briefing	✓	✓
Thursday 15/4/2021	0900 - 1300	Bukit Puteri POM Site visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	✓	✓
	1300 - 1400	Lunch break		
	1400 - 1630	Bukit Puteri POM Document Review P1 – P6 (MSPO Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓
	1630 - 1700	Interim closing briefing	✓	✓

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Date	Time	Subjects	VSH	HMM
Friday 16/4/2021	0900 - 1000	<u>Bukit Puteri POM</u> Continue with documentation review	✓	✓
	1000 - 1030	Interim closing briefing	✓	✓
	1030 - 1130	Audit team discussion & preparation for closing meeting	✓	✓
	1130 - 1230	Closing meeting	✓	✓

Section 3: Assessment Findings

3.1 Details of audit results

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

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

3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During the ASA 4 there were two (2) Major, four (4) Minor nonconformities and zero (0) opportunity for improvement (OFI) raised. The SOU 10 Bukit Puteri Palm Oil Mill and Supply Base Certification Unit Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Major Nonconformities:		
Ref: 2042967-202104-M1	Area/Process: Estate	Clause: MS 2530:2013 Part-3, 4.5.3.4
	Issue Date: 16/04/2021	Due Date: 15/07/2021
Requirements:	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.	
Statement of Nonconformity:	Empty pesticide container was not disposed in such that there is no risk to human health.	
Objective Evidence:	During the visit on circle spraying at field no. 2012C, it was observed that an empty herbicide container was used to keep the workers food. The container was mounted to a mini tractor which was used to transport the pre-mixed herbicides.	
Corrections:	The driver has removed the empty chemical container from the mini tractor immediately. Warning letter had been issued to the respective tractor driver on 16/04/2021.	
Root cause analysis:	Risk on usage of the container awareness is not instil amongst the worker.	
Corrective Actions:	Briefing on awareness of schedule waste management to the driver and all workers. To monitor the usage of empty chemical container during site observation and housing inspection	

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Assessment Conclusion:	The following evidences were verified: Based on the evidence of correction and corrective action, the NCR is effectively closed on 12/07/2021. Continuous implementation shall be verified in the next assessment.
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Major Nonconformities:		
Ref: 2042967-202104-M2	Area/Process: Estate	Clause: MS 2530:2013 Part-3, 4.5.5.1
	Issue Date: 16/04/2021	Due Date: 15/07/2021
Requirements:	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: 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.	
Statement of Nonconformity:	The protection of water course which was addressed in the estate's "Biodiversity Management Programme FY 2021" was not satisfactorily implemented.	
Objective Evidence:	During the visit at the riparian zone at field no. 14, it was observed that there was trace of herbicide application within the allocated riparian zone despite the planted signage "No Spraying". This is not in-line with the estate's "Biodiversity Management Programme FY 2021".	
Corrections:	Warning letter was issued to the Mandore and sprayers on 19/04/2021. To educate spraying gang mandore on the sensitive area.	
Root cause analysis:	Training on HCV is not comprehensive. Implementation of biodiversity management plan is not effective.	
Corrective Actions:	To arrange for HCV training to all the workers and to create awareness in the protection of sensitive area such as river reserve.	
Assessment Conclusion:	The following evidences were verified: Based on the evidence of correction and corrective action, the NCR is effectively closed on 12/07/2021. Continuous implementation shall be verified in the next assessment.	

Minor Nonconformities:		
Ref: 2042967-202104-N1	Area/Process: Estate	Clause: MS 2530:2013 Part-3, 4.4.1.1
	Issue Date: 16/04/2021	Due Date: Next assessment visit
Requirements:	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.	
Statement of Nonconformity:	Identification of social impact established plan implemented to mitigate the negative impacts and promote the positive ones were not adequate.	
Objective Evidence:	SIA identified as per records of Social Impact Assessment (SIA) Report SOU 10 Bukit Puteri; Operating Units: Bukit Puteri Palm Oil Mill & Bukit Puteri Estate; Assessment Date: 17-18 September 2015; Assessment by: Social & Environment Projects Unit, PSQM Department. Implementation to mitigate the negative impacts and promote positive ones established in records of Management Plan for Social Impact Assessment	

	<p>Bukit Puteri Estate; Towards RSPO in Sime Darby Plantations; Date: 18/2/2021. Sighted the management plan as following:</p> <table border="1"> <thead> <tr> <th>Area of concerns</th> <th>Action plan</th> <th>Expected completion date</th> </tr> </thead> <tbody> <tr> <td>Land Matter – Land title still under Austral Enterprise Berhad and Sime Darby Austral Holdings Berhad</td> <td>To communicate with Land Management Department on the status of the estate land title</td> <td>Jul 2020 – on going & continuously</td> </tr> <tr> <td>Stray dog surrounding workers quarters</td> <td>To notify Majlis Daerah Lipis</td> <td>Jul 2021 – on going</td> </tr> </tbody> </table> <p>Based on the interview with workers’ representatives and records in the Internal & External Complain Book, it was found that there were issues in following:</p> <ul style="list-style-type: none"> - Water supply quality in Div. B workers’ housing not satisfactory, sometime water too muddy, workers need to purchase clean water for own drinking from outside (feedbacks from workers’ interviews) - Records in Internal & External Complain Book dated 3/2/2021 indicated that 6 workers among Gang 1 driver and loader highlighted issue on low salary for Jan 2021. Whilst the complaint recipient has clarified that any miscalculation will be corrected and to offer piece-rate work if low salary due to low crops, the workers suggested the following: <ol style="list-style-type: none"> 1. To pay daily-rate and OT if crop lower than target 2. Additional piece-rate work for driver to deliver chemicals into fields with price to be told later 3. Pricing and payment for additional work to push lorry stuck in field roads <p>However, these issues were not captured and identified its plan to mitigate the negative impacts. Hence, a Minor NC has been raised on the matter.</p>			Area of concerns	Action plan	Expected completion date	Land Matter – Land title still under Austral Enterprise Berhad and Sime Darby Austral Holdings Berhad	To communicate with Land Management Department on the status of the estate land title	Jul 2020 – on going & continuously	Stray dog surrounding workers quarters	To notify Majlis Daerah Lipis	Jul 2021 – on going
Area of concerns	Action plan	Expected completion date										
Land Matter – Land title still under Austral Enterprise Berhad and Sime Darby Austral Holdings Berhad	To communicate with Land Management Department on the status of the estate land title	Jul 2020 – on going & continuously										
Stray dog surrounding workers quarters	To notify Majlis Daerah Lipis	Jul 2021 – on going										
Corrections:	To identified and revise social management plan with an inclusion of issues highlighted in complain book and update the action taken.											
Root cause analysis:	The management is not train to effectively establish a social impact management plan.											
Corrective Actions:	To monitor the effective of the above mentioned training during internal audit annually. RSQM to arrange a training to the person in-charge on the management plan establishment in end of May 2021.											
Assessment Conclusion:	The correction and corrective action are accepted. Evidence of effective implementation of the correction and corrective action shall be verified in the next assessment visit.											

Minor Nonconformities:		
Ref: 2042967-202104-N2	Area/Process: Estate	Clause: MS 2530:2013 Part-3, 4.4.5.4
	Issue Date: 16/04/2021	Due Date: Next assessment visit
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:	Employees of contractors not adequately ensured being paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.	

Objective Evidence:	<p>The estate management ensured through obtaining the copies of the contractor workers' monthly salary payslips as per sample sighted for Contractor: Lin Sing Wah Enterprise; Contract: FFB Transportation as following samples:</p> <ul style="list-style-type: none"> - Payslip for Month of Jan 2021; Employee # C7126128; Earning MT FFB: 1314.51 MT x RM 3/MT; Net Pay: 1314.51 - Payslip for Month of Feb 2021; Employee # C7126128; Earning MT FFB: [(230.87 MT x RM 3/MT = 692.61); MT FFB: (683.06 MT x RM 2.50/MT = 1707.05)]; Net Pay: 2399.66 - Payslip for Month of Mar 2021; Employee # C7126128; Earning MT FFB: [(495.00 MT x RM 3/MT = 1485.02); MT FFB: (600.00 MT x RM 2.50/MT = 1500.00)]; Net Pay: 2985.02 <p>However, it was found for all 3 months sample, the salary was wrongly calculated and should be as following:</p> <ul style="list-style-type: none"> - Payslip for Month of Jan 2021; Employee # C7126128; Earning MT FFB: 1314.51 MT x RM 3/MT; Net Pay: 3943.53 - Payslip for Month of Feb 2021; Employee # C7126128; Earning MT FFB: [(230.87 MT x RM 3/MT = 692.61); MT FFB: (683.06 MT x RM 2.50/MT = 1707.65)]; Net Pay: 2400.66 - Payslip for Month of Mar 2021; Employee # C7126128; Earning MT FFB: [(495.00 MT x RM 3/MT = 1485.00); MT FFB: (600.00 MT x RM 2.50/MT = 1500.00)]; Net Pay: 2985.00 <p>Furthermore, the employment contract agreed between the contractor and his employee was not available. Hence, a Minor NC has been raised on the matter.</p>
Corrections:	<ul style="list-style-type: none"> a) The estate management to inform the contractor to prepare and submit a copy of the employment agreement between contractor and his employee. b) Estate management has issued a written reminder to the said contractor for breaching a clause on legal requirement compliance in the contract between SDP and the contractor. c) To revise employees of contractors payslip.
Root cause analysis:	Due diligence to ensure the contractor compliance to legal requirement is not being monitored effectively.
Corrective Actions:	To arrange refresher training to contractor on the requirement to comply with Employment Act 1955.
Assessment Conclusion:	The correction and corrective action are accepted. Evidence of effective implementation of the correction and corrective action shall be verified in the next assessment visit.

Minor Nonconformities:		
Ref: 2042967-202104-N3	Area/Process: Estate	Clause: MS 2530:2013 Part-3, 4.6.1.1
	Issue Date: 16/04/2021	Due Date: Next assessment visit
Requirements:	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.	
Statement of Nonconformity:	The safe operating procedure was not adequately adhered to.	
Objective Evidence:	During the visit on circle spraying at field no. 2012C, it was observed that all the three spraying workers tucked their long pants inside their Wellington boots (PPE). This is	

	not in-line with the SOP Menyembur Racun (Herbicides Spraying) [doc. No. BPE/SOP/011], Clause no. 5, which reads, "Pastikan baju berlengan panjang dan memakai seluar panjang yang menutupi kasut getah sepanjang masa." (Ensure long-sleeve shirt is worn and long pants are covering the Wellington boots at all time.)
Corrections:	a) To carry out a refresher training on wearing a complete PPE and proper attire. b) A warning letter has been issued to the respective sprayers on 16/04/2021.
Root cause analysis:	The risk of non-compliance to SOP is not well communicated to the worker and insufficient monitoring of SOP implementation on the ground. SOP No BPE/SOP/011 is outdated and not relevant to current situation.
Corrective Actions:	To review the SOP of Herbicides Spraying with RSQM team as the clause of " <i>memakai seluar panjang yang menutupi kasut getah sepanjang masa</i> " (wearing long pants that cover the gumboot at all time) is not relevant. To continuously monitor PPE usage by supervisor/mandore.
Assessment Conclusion:	The correction and corrective action are accepted. Evidence of effective implementation of the correction and corrective action shall be verified in the next assessment visit.

Minor Nonconformities:		
Ref: 2042967-202104-N4	Area/Process: Mill	Clause: MS 2530:2013 Part-4, 4.3.1.4
	Issue Date: 16/04/2021	Due Date: Next assessment visit
Requirements:	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.	
Statement of Nonconformity:	The monitoring of legal compliance was not satisfactorily demonstrated.	
Objective Evidence:	<p>The following lapses was found:</p> <ul style="list-style-type: none"> i) The recorded videos from the CCTV to monitor the boiler's chimney for the past six months were insufficient. The oldest record was on 04/01/2021. This is not in-line with the Clause no. 20 stipulated in the "Jadual Pematuhan" (Compliance Schedule) of the DOE's License No. 004160. ii) The Safety Data Sheets (SDS) for most of the chemicals in the mill's chemical store were more than 5 years. Among the chemicals are Alum 3276, Soda Ash, Nalco 3935, Nalco 214, Nalco 19PULV and Nalco 22312. The last review of those SDS was in 2015. This is not in-line with Occupational safety and health (classification, labelling and safety data sheet of hazardous chemicals) Regulations 2013, Reg. 4(b). 	
Corrections:	<ul style="list-style-type: none"> a) Quotation to upgrade the memory disc drive has been received. Mill will proceed with issue the contract form. b) Mill has contacted the chemical supplier for the latest version of SDS. The collection of the SDS is in progress. 	
Root cause analysis:	A mechanism to monitor legal compliance is not comprehensive and training is not adequate.	
Corrective Actions:	<p>To provide training on compliance to legal requirement to the management and office staff.</p> <p>To monitor the compliance every quarterly during workplace inspection.</p>	

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Assessment Conclusion:	The correction and corrective action are accepted. Evidence of effective implementation of the correction and corrective action shall be verified in the next assessment visit.
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Noteworthy Positive Comments	
1	Good relationship being maintained with surrounding communities.
2	Mill continues to maximize the use of renewable energy by using fibre and shell which produced through internal process for boiler biofuel.
3	Good cooperation from the management team in facilitation the assessment.

3.3 Status of Nonconformities Previously Identified and OFI

The previous findings were issued by the former certifier i.e. Care Certification International (M) Sdn Bhd.

Major Nonconformities:		
Ref: NCR 1	Area/Process: Estate	Clause: MS 2530:2013 Part-3, 4.4.4.2 (d)
	Issue Date: 22/09/2020	Closed on: 16/04/2021
Requirements:	The occupational safety and health plan shall cover the following: 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).	
Statement of Nonconformity:	<i>Information is not available.</i>	
Objective Evidence:	Based on PPE issuance record log, seen that the harvesters were given safety helmet on 10 October 2019. However, upon inspection, during site visit to field block 98F to observe harvesting operation, seen that the harvesters were not wearing safety helmet as required by HIRARC.	
Corrections:	To conduct refresher training and briefing to all the harvesters. Thereafter stern disciplinary action to be taken against the harvesters, mandore and staff for non-compliance as safety should not be compromise.	
Root cause analysis:	Poor monitoring on PPE usage amongst the workers during operation.	
Corrective Actions:	Constant reminders and monitoring during muster and in the field. Harvesting Mandore to report to the Harvesting Staff concerned for immediate action to be taken against the cutters. To seek and provide a more comfortable and suitable hard hat so that the harvesters will use it while working.	
Assessment Conclusion:	<i>Information is not available.</i>	
ASA4 Verification	Based on site visit at Block 17C, harvesters seemed to wear Tanizawa helmet that is more suitable compare to the previous one. Verification on the PPE issuance records show that all the harvesters have been provided with the safety helmets. Apart from that, gum boots were also provided. Harvesters were constantly reminded on PPE wearing during morning muster and training session. Records of training were well maintained for verification. Thus, the Minor NCR is closed on 16/04/2021.	

3.4 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
NCR 1 (issued by previous CB)	Minor	22/09/2020	Closed on 16/04/2021
2042967-202104-M1	Major	16/04/2021	Closed on 12/07/2021
2042967-202104-M2	Major	16/04/2021	Closed on 12/07/2021
2042967-202104-N1	Minor	16/04/2021	Open
2042967-202104-N2	Minor	16/04/2021	Open
2042967-202104-N3	Minor	16/04/2021	Open
2042967-202104-N4	Minor	16/04/2021	Open

3.5 Issues Raised by Stakeholders


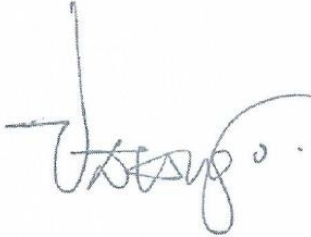
IS #	Description
1	Feedbacks: Estate Medical Assistant No issue of pandemic cases within Bukit Puteri Estate including COVID-19 since last audit. Estate fully implemented required SOP for prevention.
	Management Responses: Workers not allowed to go out of estate compound during MCO. Management provide all necessities for workers during the MCO period.
	Audit Team Findings: No further issue.
2	Feedbacks: Estate vendor No issue in pricing and payment by Bukit Puteri Estate and Sime Darby as a whole. Have long relationship with company as local vendor for more than 10 years.
	Management Responses: Priorities are given to local available vendor as part of company's policy for any tools, equipment and consumables procurements.
	Audit Team Findings: No further issue.
3	Feedbacks: AMESU, NUPW & Gender representative All employees among staff and workers are allowed to join employees union association with estate contributing part of the membership fees. All employees in general have good working relationship with management and easy to communicate or discuss in case of any issue.
	Management Responses: Management allowed and recognized employees union association and will support their program when necessary.
	Audit Team Findings: No further issue.

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4	Feedbacks: Foreign workers (Indonesia, Nepal, India & Bangladesh) Representatives Foreign workers were getting good salary and given fair accommodation. However, some workers had issues with water in the housing areas. The water most of the time not so clean to consume hence, they mostly need to buy from outside for drink and cook. Issues reported for quite some time already.
	Management Responses: Management had issue to supply piped water from public main and need to do own water treatment which sometime its quality affected by weather conditions.
	Audit Team Findings: Trailing of records found issue was reported and written in the Internal & External Complain Book but no clear action taken yet. Findings raised as details in indicator 4.4.1.1 below.

Section 4: Assessment Conclusion and Recommendation

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment Bukit Puteri Palm Oil Mill and Supply Bases Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Bukit Puteri Palm Oil Mill and Supply Bases Certification Unit is approved and/or continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: THE CHINA ENGINEERS (MALAYSIA) SDN BHD Company No. 7358-K	Name: Valence Shem
Company name: BUKIT PUTERI ESTATE MOHD SAFIRUS BIN HAILANI SENIOR MANAGER	Company name: BSI Services Malaysia Sdn Bhd
Title: SENIOR MANAGER	Title: Lead Auditor
Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 	Signature: 
Date: 18/08/2021	Date: 17/08/2021

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
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	SDPB has incorporated its policy on implementation of MSPO in the "Group Sustainability & Quality Policy Statement" mentioned in Indicator 4.1.1.2.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	Sime Darby Plantation has established a policy called "Group Sustainability & Quality Policy Statement" which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 2/12/2019. The policy covers commitment to: <ul style="list-style-type: none"> - Promoting good governance and transparency - Contributing to a better society - Minimising environmental harm - Delivering sustainability quality - The policy is guided by three main documents i.e.: - Responsible Agriculture Charter - Human Rights Charter - Innovation & Productivity Charter All the above documents and the policy statement are made available on Sime Darby's website.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	The Internal Audit Procedure (SD/SDP/PSQM/IAP) dated 01/11/2017 documented the process to conduct internal audit. The internal audit schedule for 2021 has been planned and communicated by Regional SQM to all the Central East Region estates and mills. The last internal audit for sustainable palm oil was conducted on 15/03/2021. The internal audit had covered all the MSPO MS2530-3:2013 elements. It was conducted by 3 auditors from an internal department called GSD Malaysia and Central East RSQM. There were 1 Major, 4 Minor NCR and 1 OFI raised as a result of the internal audit. The estate has closed all the NCRs.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	The internal audit report dated 15/03/2021 had included the root cause analysis and corrective action plan. Based on the identified root cause recorded in the internal audit report, generally it has guided the organisation to provide effective corrections and corrective actions to prevent recurrence of non-conformity.	Complied
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	The internal audit report was available and had also been one of the agenda discussed in the management review.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.	The latest MSPO Management Review was conducted on 30/03/2021 which was chaired by Sr Manager Kerdu Estate and attended by 12 key personnel. It was a combined meeting between SOU 10 and SOU 11.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Based on the minutes of meeting, among the agendas discussed were: <ul style="list-style-type: none"> - Results of the internal audits covering RSPO and MSPO SCCS - Customer feedback - Status of preventive and corrective actions - Follow up action from management review - Changes that could affect the management system - Recommendations for improvement - Improvement of the effectiveness of the management system - Resources needs 	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -	The continual improvement plan was addressed in QOSHE Objectives, Management Programme and Action Plan. It was documented in various forms such as: <ul style="list-style-type: none"> - Pollution Preventive Management Plan - Wastes Management Action Plan - Diesel Management Plan - Environmental Management Plan - Contingency Plan during Water Shortage - Water Management Plan - Safety Management Programme 	Complied
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry	The estates continuously ensure there are improvement practices in line with new information and techniques introduced in the workforce. Kaizen Charter is introduced to ensure improvement projects are in place. Lean Six Sigma is used to minimize waste (money, time,	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	standards and technology (where applicable) that are available and feasible for adoption. - Major compliance -	manpower, etc) where improved methods are introduced in the management system.	
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	There has been no opportunity for the estates to adopt any new technology since the last assessment.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance -	SOU 10 implemented the Procedure for External Communication dated 01/11/2008 established to communicate the information requested by the relevant stakeholders through various means including consultation meeting. Latest external stakeholder meeting was conducted on 6/7/2020 in combination for both Bukit Puteri Estate & Palm Oil Mill with attendance from wide range of external stakeholders among local authorities, local community representatives, neighbours, vendors etc. Bukit Puteri Estate has also conducted a specific meeting with cattle owners among villagers of Kampung LKPP Sungai Ular on 5/1/2021 that attended by a total of 8 cattle owners.	Complied
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance -	The Procedure for External Communication dated 01/11/2008 included the method for the public to obtain information from the company. The procedure was introduced to the local stakeholders during the stakeholder engagement.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Policies of the company is published on their website and copies of the polices can be seen posted on notice board within the vicinity of the mill.	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	The Procedure for External Communication dated 01/11/2008 is established. Latest external stakeholder meeting was conducted on 6/7/2020 in combination for both Bukit Puteri Estate & Palm Oil Mill with attendance from wide range of external stakeholders among local authorities, local community representatives, neighbours and vendors etc. Bukit Puteri Estate has also conducted a specific meeting with cattle owners among villagers of Kampung LKPP Sungai Ular on 5/1/2021 that attended by a total of 8 cattle owners.	Complied
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance -	The estate manager has been identified to be responsible to receive and manage all external communication while senior assistant manager was nominated to be responsible for internal communications.	Complied
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	Bukit Puteri Estate has established a List of Stakeholders 2021 SOU 10 which registered all relevant stakeholders among multiple categories of local authorities, local community heads, neighbours and vendors etc. Records of consultation available including minutes of meeting, feedbacks and requests as per sample sighted as following: - Letter to Pejabat Perhilitan Daerah Lipis on complaint of wild boar within line-site by workers; dated on 1/4/2021 - Letter to Majlis Daerah Lipis on complaint of stray dogs within line-site by workers; dated on 24/3/2021	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Minutes of meeting with cattle owners among villagers of Kampung LKPP Sungai Ular; dated on 5/1/2021 - Approval letter to request of estate's JCB machine use for gotong-royong program by Balai Belia RTP Sungai Ular; dated on 10/10/2020 	
Criterion 4.2.3 – Traceability			
4.2.3.1	<p>The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).</p> <p>- Major compliance -</p>	<p>The estate sends their FFB to Bukit Puteri POM.</p> <p>The weighbridge ticket provided the following details:</p> <ul style="list-style-type: none"> • Product (FFB or Loose fruit) • Delivery note from estates stating the weight and fruit grade (A or B). • D.O Number • Date of the shipment <p>The Sustainable Plantation Management System Appendix 15 dated March 2016 documented the procedure for traceability. The procedure requires validation of certificate of supplying estate.</p> <p>The procedure had identified critical control points to prevent contamination of non-certified FFB.</p> <p>The current traceability system is Sime Weigh System.</p> <p>The responsible personal for the traceability is the Estate Manager.</p>	Complied
4.2.3.2	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p>- Major compliance -</p>	<p>The method of inspection is by conducting MSPO internal audit. The last audits were conducted on 16/03/2021. Based on the inspection, there was no finding raised with regards to the implementation of traceability procedure.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The overall personal in charge for the traceability is the Head of Operating Unit, where in this case are the estate managers [ref.: Clause 4 of SOP for Sustainable Supply Chain and Traceability].	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	The delivery records of the FFB are kept at the operating units and will be retained for 10 years according to the Standard Operation Manual Section 4; Sub-section 4.2.3 Control of Documents. Verification of FFB Consignment Note, Weighbridge Tickets, Crop Book and FFB dispatch in SAP and Check-roll System (CRS) system showed that the recording of FFB delivered to the mill is accurate.	Complied
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	Bukit Puteri Estate continues to demonstrate their commitment towards compliance with legal requirements. Among the evidence of compliance verified were: <ul style="list-style-type: none"> • Diesel permit, C000440, The China Engineers (M) Sdn Bhd, 16,380 lt, 26/5/2020 – 25/5/2021 • Air receiver tank, PH PMT 81559, valid until 15/12/2021 • MPOB License #524186002000, valid until 31/10/2021 • Potongan Upah Di Bawah Seksyen 24, Akta Kerja 1955; Ref. # PMT10603/2014/0020; Date: 28/10/2014 • De Metrology Sdn. Bhd. Weighbridge Stamp; Serial # 01479066CP; Weighbridge: ATK 50,000kg Metler Toledo; Stamping date: 31/3/2021 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> MPOB license # 533567011000; Validity period 1/11/2020 – 31/10/2021; Licensed Activity: Produce, Sale & Transport, Store; Product: SLGBIJI # 	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	Bukit Puteri Estate listed all its applicable legal requirements in the Estate/Mill – Upstream Malaysia Legal & Other Requirements Register (LORR); Group Sustainability & Quality Management (GSQM); Updated Jan 2021.	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	The LORR was last reviewed on 20/1/2021. The evaluation of compliance score card result shown summary of overall percentage of 100% as reviewed by Assistant Manager and approved by Senior Manager.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance -	<p>A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 10.</p> <p>Regional PSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance as per Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10/12/2008.</p> <p>Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Tracking system on any changes in the law been well implemented. E.g. regular notification by Head Office and regular updates from the DOE/DOSH websites as well as from MAPA circulars.	
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	The management of Bukit Puteri Estate has ensured that their oil palm cultivation activities not diminishing the land use rights of other users. Bukit Puteri Estate hold a total of 7 land titles as per sample copies of titles sighted as following: <ul style="list-style-type: none"> - Title # PN 27191; District: Lipis; Sub-district: Mukim Telang; Lot # 2760; Area: 125.3 ha - Title # HSD 30; District: Lipis; Sub-district: Mukim Batu Yon; Lot # PT 856; Area: 809.37 ha - Title # PN 27193; District: Lipis; Sub-district: Mukim Batu Yon; Lot # 2998; Area: 374.9 ha - Title # HSD 237; District: Lipis; Sub-district: Mukim Telang; Lot # PT 976; Area: 1092.6495 ha 	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. - Major compliance -	Documents showing legal ownership shown as per indicator 4.3.2.1 above. Among the land titles, earliest registered date was as early as 14/2/1975 under name of Austral Enterprises Berhad and latest registered was on 21/5/2017 under name of Sime Darby Austral Holdings Berhad.	Complied
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Bukit Puteri Estate has clearly demarcated and visibly maintained its legal perimeter boundary markers. Based on site visit at Block No. 98G (GPS: 4°11'14"N 101°49'35"E), it was noted that trenching method was used to demarcate the boundary between the estate and FELDA Sg Koyan 2 Estate.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute recorded. This was verified with stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the process will be based on system established as Procedures for Handling Boundaries Disputes as per Sustainable Plantation Management System; Appendix 3; Flowchart and Procedures on Handling Land Disputes; Version 2; Issue # 1; Issue date: 1/11/2008.	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no land encumbered by customary rights within Bukit Puteri Estate as the only estate of SOU 10.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	Maps available as per sighted Bukit Puteri Estate Stakeholder Map; Data Source: GPS Surveyed; Datum WGS 1984 which include the information of field boundary point, block number and info of stakeholder/neighbour etc.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There is no negotiation and FPIC recorded. This was verified with stakeholders' consultation. In case of any, the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the FPIC process.	Complied
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			

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Criterion / Indicator		Assessment Findings	Compliance									
<p>4.4.1.1</p>	<p>Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.</p> <p>- Minor compliance -</p>	<p>SIA identified as per records of Management Plan for Social Impact Assessment Bukit Puteri Estate; Towards RSPO in Sime Darby Plantations; Date: 18/2/2021. Sighted the management plan as following:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Area of concerns</th> <th style="width: 33%;">Action plan</th> <th style="width: 33%;">Expected completion date</th> </tr> </thead> <tbody> <tr> <td>Land Matter – Land title still under Austral Enterprise Berhad and Sime Darby Austral Holdings Berhad</td> <td>To communicate with Land Management Department on the status of the estate land title</td> <td>Jul 2020 – on going & continuously</td> </tr> <tr> <td>Stray dog surrounding workers quarters</td> <td>To notify Majlis Daerah Lipis</td> <td>Jul 2021 – on going</td> </tr> </tbody> </table> <p>Based on the interview with workers’ representatives and records in the Internal & External Complain Book, it was found that there were issues in following:</p> <ul style="list-style-type: none"> - Water supply quality in Div. B workers’ housing not satisfactory, sometime water too muddy, workers need to purchase clean water for own drinking from outside (feedbacks from interview) - 6 workers among Gang 1 driver and loader highlighted issue on low salary for Jan 2021. Whilst the complaint recipient has clarified that any miscalculation will be corrected and to offer piece-rate work if low salary due to low crops, the workers suggested the following: <ol style="list-style-type: none"> 1. To pay daily-rate and OT if crop lower than target 	Area of concerns	Action plan	Expected completion date	Land Matter – Land title still under Austral Enterprise Berhad and Sime Darby Austral Holdings Berhad	To communicate with Land Management Department on the status of the estate land title	Jul 2020 – on going & continuously	Stray dog surrounding workers quarters	To notify Majlis Daerah Lipis	Jul 2021 – on going	<p>Minor non-conformity</p>
Area of concerns	Action plan	Expected completion date										
Land Matter – Land title still under Austral Enterprise Berhad and Sime Darby Austral Holdings Berhad	To communicate with Land Management Department on the status of the estate land title	Jul 2020 – on going & continuously										
Stray dog surrounding workers quarters	To notify Majlis Daerah Lipis	Jul 2021 – on going										

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Criterion / Indicator		Assessment Findings	Compliance
		2. Additional piece-rate work for driver to deliver chemicals into fields with price to be told later 3. Pricing and payment for additional work to push lorry stuck in field roads However, these issues were not captured and identified its plan to mitigate the negative impacts. Hence, a Minor NC has been raised on the matter.	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	A flowchart and procedure on handling social issues ver.1 dated 01/11/2008 has been established to manage any internal complaints and grievance while a Procedure for External Communication; Appendix 5.5.3.2 was established for external complaints.	Complied
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	Based on the flowchart and procedure on handling social issues ver.1 dated 01/11/2008 that has been established to manage any internal complaints and grievance as well as Procedure for External Communication; Appendix 5.5.3.2 was established for external complaints, the system able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. Additionally, in case of land issues, a system established as Procedures for Handling Boundaries Disputes as per Sustainable Plantation Management System; Appendix 3; Flowchart and Procedures on Handling Land Disputes; Version 2; Issue # 1; Issue date: 1/11/2008.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	Complaints recorded in Bukit Puteri Estate Internal & External Complain Book where few available complains made by internal and external stakeholders sighted as following:	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Bad road condition to access Bukit Puteri Mill; by Outside Crop Purchase (OCP) supplier; Date complain: 6/7/2020; Date resolved: 31/7/2020 - Sickness and body ached complain by harvester & request to transfer to short palm from tall palm; Date complain: 9/3/2021; Date resolved: 10/3/2021. 	
4.4.2.4	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p> <p>- Minor compliance -</p>	The latest briefing for external stakeholders was done during stakeholder meeting on 6/7/2020 and 5/1/2021. Training for employees was latest conducted on 24/3/2021 as per records of muster roll-call training report entitled Induction Refresher Training/COBC/Policy/RSPO/MSPO/ERP; Venue: Bukit Puteri Estate Muster Ground.	Complied
4.4.2.5	<p>Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.</p> <p>- Major compliance -</p>	The complaints and resolutions records available for period more than 24 months dated back since 2008.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	<p>Growers should contribute to local development in consultation with the local communities.</p> <p>- Minor compliance -</p>	<p>Contribution made as per sample sighted as following RSPO/MSPO-Donation/Contribution to local communities:</p> <ul style="list-style-type: none"> - Transportation of Workers' School Children; March 2021 - Imam Wages; March 2021 - TNB Bill Surau Div. A; March 2021 - TNB Bill Masjid Div. B; March 2021 - Kindergarten Children food 11 children x RM 1.50 x 20 days 	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Sime Darby have established the Group Policy on Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 1st June 2020. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the estates.</p> <p>The GSM team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition.</p> <p>The estates have established Safety and Health Management Plan and documented in Environment, Safety and Health Plan FY 2021. The management plan includes the ESH risk management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring, Health monitoring.</p>	<p>Complied</p>
4.4.4.2	<p>The occupational safety and health plan shall cover the following:</p> <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as 	<ul style="list-style-type: none"> a) Sime Darby Plantation have established the Group Policy on Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 01/06/2020. 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. b) The estate has conducted assessment for risk on all the operations and documented in Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment has covered all the main and support operations such as harvesting & evacuation, spraying, manuring and replanting to name a few. The latest review of HIRARC was conducted on 05/04/2021 where the risk of COVID-19 was included. <ul style="list-style-type: none"> o Medical Surveillance was last conducted on 09/04/2021 for 5 	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance						
<p>identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>workers by a certified OHD. The purpose of the medical surveillance was to conduct a risk assessment to monitor the exposure to manganese, chlorine and mineral oils. Report was still pending at the time of this assessment. As for the pesticide sprayers, monthly medical check-up is conducted by the estate's MA. Records were maintained for verification.</p> <ul style="list-style-type: none"> o CHRA was conducted with a report (Ref No: HQ/14/ASS/00/00001-2020/13), dated 10/06/2020 available for verification by Registered DOSH Assessor (HQ/14/ASS/00/358). <p>c) The estate has established a training program for employees exposed to chemicals used at the palm oil estates to ensure continuous awareness to the employees. The training was conducted by the Manager, Asst. Manager and representative from the chemical suppliers to the supervisors and operators. Sighted the training records as follows:</p> <table border="1" data-bbox="1111 970 1848 1062"> <thead> <tr> <th>Training</th> <th>Date</th> <th>Participants</th> </tr> </thead> <tbody> <tr> <td>Spraying Training by Alion</td> <td>28/01/2021</td> <td>12</td> </tr> </tbody> </table> <p>d) The estates have provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC and CHRA recommendation. Sighted during site visit at the harvesting gang, spraying gang and workshop, the workers were provided with leather gloves, nitrile gloves mask, respirator, safety helmet and wellington boots and others required by the operations. The workers acknowledged that they are entitled to appropriate PPE, free of charge by the management. The workers understand the importance of wearing the appropriate PPE during</p>	Training	Date	Participants	Spraying Training by Alion	28/01/2021	12	
Training	Date	Participants						
Spraying Training by Alion	28/01/2021	12						

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Criterion / Indicator	Assessment Findings	Compliance
	<p>work as they are regularly briefed by the management. The PPE issuance records were also available for verification.</p> <p>e) Procedures of chemical handling is presented in several documents, such as Sime Darby Plantation, Chemical Safety Management; Document No. SD/SDP/PSQM (ESH)/202-OH4; dated 26/02/2015.</p> <p>f) The Manager was appointed to be the Chairman of OSH Committee at the estate. Estate management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, representatives from employer and representatives from employee as per appointment letter by the Estate Manager.</p> <p>g) The management conducted regular OSH committee meetings on quarterly basis and when necessary if there is any accident. Among the agenda discussed in the meeting were status of OSH committee objectives, accident statistic, SIMECARD report, legal compliance monitoring, HIRARC monitoring, OSH training, Pahang DOSH report, medical surveillance report, workplace inspection, and environmental issues. The last four minutes of OSH committee meeting were conducted on 16/03/2021, 21/01/2021, 01/10/2020 and 13/08/2020.</p> <p>h) Accident and emergency procedures are available in the ESH Management System Manual; Emergency Preparedness & Response Guidelines and Procedures; Doc No: SD/SDP/SQM (ESH)/001-2-6; Revision:0; Date 01.07.2012. Sighted during site visit, the workstation also equipped with fire extinguishers and first aid kits. Noted during the interview with employees shows the understanding regarding emergency and evacuation procedures. The estate has established an Emergency Response Team lead by the Estate Manager. The ERT chart and Fire Extinguisher Map were</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>displayed at several notice boards around the estate complex. Various trainings related to emergency were conducted as follows:</p> <ul style="list-style-type: none"> • Firefighting and evacuation drill – 15/10/2019 <p>i) First aiders were present at various workstations at the estate. The first aiders were responsible for first aid box at each workstation assigned to them by the management. The last training on first aid was conducted on 31/03/2021 by the Medical Assistant.</p> <p>j) Records of accidents were maintained by all estates and updated to the HQ on a monthly basis. Accidents that occur are also discussed in the quarterly held OSH Committee Meetings. Records of accidents were kept and maintained by the estate. The accidents are reviewed and discussed in the accident investigation meeting. Since the last assessment conducted by Care Certification International (M) Sdn Bhd., there was no accident case reported. The last accident was happened on 05/05/2019.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>The good social practices regarding human rights in respect of industrial harmony has been embedded in Sime Darby Plantation's established policy of "Group Sustainability & Quality Policy Statement" which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 2/12/2019.</p> <p>Policy re-briefing was conducted by Bukit Puteri Estate management to all employees on 22/1/2021.</p>	Complied
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment</p>	<p>Records of employments and interview conducted on-site with sampled internal and external stakeholders confirmed that the workers</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	and groups including local communities, women, and migrant workers have not been discriminated against.	
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	Based on agreements and pay slips sighted for sample employees as per indicator 4.4.5.6 below, management has ensured that employees' pay and conditions meet MAPA Circular No. 4/2020; The Malayan Agricultural Producers Association; Date: 30/1/2020; MAPA/NUPW Field And Other General Employees And Fringe Benefits Agreement, 2019. This were requirements in-line with the mandatory Minimum Wage Order 2020 enforced by the government.	Complied
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance -	The estate management ensured through obtaining the copies of the contractor workers' monthly salary payslips as per sample sighted for Contractor: Lin Sing Wah Enterprise; Contract: FFB Transportation as following samples: <ul style="list-style-type: none"> - Payslip for Month of Jan 2021; Employee # C7126128; Earning MT FFB: 1314.51 MT x RM 3/MT; Net Pay: 1314.51 - Payslip for Month of Feb 2021; Employee # C7126128; Earning MT FFB: [(230.87 MT x RM 3/MT = 692.61); MT FFB: (683.06 MT x RM 2.50/MT = 1707.05)]; Net Pay: 2399.66 - Payslip for Month of Mar 2021; Employee # C7126128; Earning MT FFB: [(495.00 MT x RM 3/MT = 1485.02); MT FFB: (600.00 MT x RM 2.50/MT = 1500.00)]; Net Pay: 2985.02 However, it was found for all 3 months sample, the salary was wrongly calculated and should be as following: <ul style="list-style-type: none"> - Payslip for Month of Jan 2021; Employee # C7126128; Earning MT FFB: 1314.51 MT x RM 3/MT; Net Pay: 3943.53 	Minor non-conformity

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Payslip for Month of Feb 2021; Employee # C7126128; Earning MT FFB: [(230.87 MT x RM 3/MT = 692.61); MT FFB: (683.06 MT x RM 2.50/MT = 1707.65)]; Net Pay: 2400.66 - Payslip for Month of Mar 2021; Employee # C7126128; Earning MT FFB: [(495.00 MT x RM 3/MT = 1485.00); MT FFB: (600.00 MT x RM 2.50/MT = 1500.00)]; Net Pay: 2985.00 <p>Furthermore, the employment contract agreed between the contractor and his employee was not available. Hence, a Minor NC has been raised on the matter.</p>	
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The established records of Employee Master list which available as a database in computerized Check roll System able to provide accurate account of all employees including their particulars of full names, gender, date of birth, date joined company, wages grade and position etc.</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>A total of 10 sample workers documents were checked as per sample as following:</p> <ul style="list-style-type: none"> - Employee # 127778; Employed date: 11/11/2016; Nationality: India; Gang: General - Employee # 138074; Employed date: 23/11/2017; Nationality: Indonesia; Gang: General - Employee # 158930; Employed date: 7/7/2020; Nationality: Malaysia; Gang: General - Employee # 068701; Employed date: 24/6/2011; Nationality: Indonesia; Gang: Harvester - Employee # 068702; Employed date: 24/6/2011; Nationality: Indonesia; Gang: Harvester 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Employee # 160991; Post: Gardener; Date joined: 26/11/2020; Nationality: Malaysia - Employee # 086574; Employed date: 1/1/2013; Nationality: Indonesia; Gang: Harvester - Employee # 141466; Employed date: 27/3/2018; Nationality: Indonesia; Gang: Harvester - Employee # 067286; Employed date: 1/6/2011; Nationality: India; Gang: Piece Rated Worker - Employee # 134518; Employed date: 16/6/2017; Nationality: India; Gang: General <p>The work agreements also attached with each workers' renewal of agreement to use new agreement (Foreign Workers) and Changes of terms & conditions due to Minimum Wage Order (MWO) revision use new agreement (Local Workers).</p>	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer. - Major compliance -	Attendance (out-turn) and work hours (normal time and overtime) recording system established in both manual and computerized check roll system which makes working hours and overtime transparent for both employees and employer.	Complied
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance -	Based on records of sample employees' sighted in indicator 4.4.5.6 above, the working hours found in compliance with employees' terms and conditions of MAPA Circular No. 4/2020; The Malayan Agricultural Producers Association; Date: 30/1/2020; MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019. This also in-line with Malaysia Employment Act 1955.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective	Based on records of sample employees' sighted in indicator 4.4.5.6 above, the pay slips found in compliance with employees' terms and	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	agreements. - Major compliance -	conditions of MAPA Circular No. 4/2020; The Malayan Agricultural Producers Association; Date: 30/1/2020; MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019. This also in-line with Malaysia Employment Act 1955.	
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - Minor compliance -	All local employees are provided with the mandatory Employee Provident Fund (EPF) contributions while both local and foreign employees contributed with Social Security Organization (SOCSO). Additionally, other benefits offered by the company including the following: <ul style="list-style-type: none"> - Productivity incentive - Out-turn incentive - Transport allowance - Telephone allowance - Motorcycle allowance 	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. - Major compliance -	All workers are provided with free housing facilities that included basic amenities such as clean water (25 gallons/month), community hall, sport facilities, etc. were provided to the workers. Electricity which is obtained from the national grid. The housing condition was in accordance to the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446). Weekly inspections by medical assistant were done to ensure cleanliness of the housing. Records were well maintained as per sample Bukit Puteri Estate VMO Visit Book, latest visit by VMO conducted on 18/2/2021 by Dr. Hasnizadila of Klinik Zara Kuala Lipis. Medical Assistant (MA) at Bukit Puteri Estate conducted weekly line-site inspection as per records of Housing Complex/Nest/Community	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Hall Weekly Inspections (PIOA) forms which was latest done on 5/4/2021 for both Div. A & Div. B of Bukit Puteri Estate.	
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Policy to prevent all forms of sexual harassment and violence in workplace has been embedded in Sime Darby Plantation’s established policy of “Group Sustainability & Quality Policy Statement” which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 2/12/2019. Communications made mainly during gender committee meeting as per sample latest Bukit Puteri Estate Gender committee meeting 1/2021; Date: 8/3/2021.	Complied
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in 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. - Major compliance -	Policy to respect the rights of all employees has been embedded in Sime Darby Plantation’s established policy of “Group Sustainability & Quality Policy Statement” which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 2/12/2019. Employees were given freedom to associate and bargain collectively with company and to organize among themselves through association meetings as per sample sighted for Bukit Puteri Estate NUPW members and foreign workers representatives meeting with management meeting was last conducted on 26/2/2021.	Complied
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. 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. - Major compliance -	Policy to protect children and young person has been embedded in Sime Darby Plantation’s established policy of “Group Sustainability & Quality Policy Statement” which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 2/12/2019. Based on the interview and sighted records of employees’ master lists data, no young person below 18 years old employed within all operating units within SOU 10.	Complied

Criterion / Indicator		Assessment Findings	Compliance																
Criterion 4.4.6: Training and competency																			
4.4.6.1	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p>- Major compliance -</p>	<p>The estates trainings were held/organized as per annual training programme. Generally, the issues discussed/briefed were related to estate operations, environmental and safety compliance. These training records were maintained and verified during the audit:</p> <table border="1"> <thead> <tr> <th>Subjects</th> <th>Date conducted</th> </tr> </thead> <tbody> <tr> <td>PPE usage refresher training (harvester)</td> <td>13/12/2020</td> </tr> <tr> <td>Induction refresher training</td> <td>24/03/2021</td> </tr> <tr> <td>COBC/Policy/RSPO/MSPO/ERP</td> <td></td> </tr> <tr> <td>Tractor driver training & safety</td> <td>10/03/2021</td> </tr> <tr> <td>Training kerja-kerja "raking"</td> <td>19/02/2021</td> </tr> <tr> <td>Training kerja-kerja membaja</td> <td>26/02/2021</td> </tr> <tr> <td>Training kerja-kerja rat baiting</td> <td>06/03/2021</td> </tr> </tbody> </table>	Subjects	Date conducted	PPE usage refresher training (harvester)	13/12/2020	Induction refresher training	24/03/2021	COBC/Policy/RSPO/MSPO/ERP		Tractor driver training & safety	10/03/2021	Training kerja-kerja "raking"	19/02/2021	Training kerja-kerja membaja	26/02/2021	Training kerja-kerja rat baiting	06/03/2021	Complied
Subjects	Date conducted																		
PPE usage refresher training (harvester)	13/12/2020																		
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Training kerja-kerja rat baiting	06/03/2021																		
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>Methods for identifying the training needs are used by the estate. The details of the training needs include categories of:</p> <ul style="list-style-type: none"> a) Job Descriptions b) Sections c) Employees' group <p>This training programme subjects are generally related to:</p> <ul style="list-style-type: none"> a) Environment E.G. Environmental, Safety & Health Policy, b) Scheduled Waste Management, c) Environmental Responsibility, HCV & Biodiversity Training, d) Field Activities/Operations, e) Equipment handling, vehicles maintenance etc 	Complied																

Criterion / Indicator		Assessment Findings	Compliance
4.4.6.3	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure. - Minor compliance -	Formal training programs for year 2021 that covered aspects of the MSPO with regular assessments of training needs were available. A training need identification matrix has been established with target dates for the training identified.	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	Sime Darby Plantation have established the Group Policy on Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 01/06/2020. 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.	Complied
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. - Major compliance -	The Environmental Impact Plan and Pollution Prevention Plan was established based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation. The plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. <ul style="list-style-type: none"> EAI was reviewed in Jan 2021 and approved by the Estate Manager EIE was reviewed in Jan 2021 and approved by the Estate Manager 	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance -	The estate has established the environmental plan based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation in various management plan such as pollution prevention plan, water management plan, wastes management plan and HCV management plan. The plans were reviewed on annual basis.	Complied
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	The estate has established the environmental management plan based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation. The estate continues to promote activities that gives positive impact to the environment by continuously provided awareness to the employee. The promotion was communicated through training, briefing and signage.	Complied
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	Training programme was available for verification and it is reviewed on a yearly basis as per the management requirement. Included in this program are subjects related to environment e.g. environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training. Guidance was provided by the SQM prior to the approval and implementation by the estates. Training records related to environment subjects were well maintained.	Complied
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	The estate discusses environmental issues and performance concurrently with the OSH Meetings. The meetings are held on a quarterly basis as follows: 16/03/2021, 21/01/2021, 01/10/2020 and 13/08/2020.	Complied
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			

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4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There 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. - Major compliance -	The plan to optimise the usage of diesel is documented in the Energy Management Plan 2021. Among the action plans implemented are by doing regular maintenance of diesel-powered machinery and educational programme for the operators on fuel saving. The fossil fuel consumption is recorded as part of monitoring.	Complied
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estimate of direct usage of non-renewable energy is addressed in the estate's annual budget. Based on the monitoring diesel usage records, the estate has recorded the following: 2020: 1.84 lt/mt FFB 2021: 2.67 lt/mt FFB (as at March)	Complied
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	There was no opportunity identified to apply the use of renewable energy.	Complied
Criterion 4.5.3: Waste management and disposal			
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Wastes products were identified through the environmental aspect and impact evaluation. Generally, among the types of waste identified were scheduled wastes, domestic wastes and recyclable wastes. The breakdown of the wastes was documented in the waste management plan.	Complied
4.5.3.2	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution	Wastes management plan is developed through the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. Generally, the scheduled wastes were disposed through licensed vendors, organic wastes were disposed	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p>- Major compliance -</p>	<p>through the municipal council and recyclable wastes were sent to recycle centres.</p>	
4.5.3.3	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>The procedures for handling used chemicals classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by Head Office personnel and implemented in all estates and mills for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows:</p> <ul style="list-style-type: none"> i) Management of class 2 (and higher) chemical containers. ii) Management of fertilizer bags 	Complied
4.5.3.4	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p>- Major compliance -</p>	<p>The guidelines and practice for handling empty pesticides containers are as established in the operational control procedure established as given in 4.5.3.3.</p> <ul style="list-style-type: none"> • All class 2 and above containers are tripled rinsed and holes punctured at the bottom only if the waste generator is to dispose as non-scheduled waste. • Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process. <p>These guidelines are based on Department of Agriculture ref 91/120/038/014 dated 07/11/2002. During the site visit this has been adhered mainly containers are tripled rinsed and holes punctured at the container base. Empty containers were despatched to authorised collector. However, during the visit on circle spraying at field no. 2012C, it was observed that an empty herbicide container was used to keep the workers food. The container was mounted to a mini tractor</p>	Major non-conformity

Criterion / Indicator		Assessment Findings	Compliance										
		which was used to transport the pre-mixed herbicides. Thus, a nonconformity was raised due to this lapse.											
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	Domestic wastes are disposed through landfill located at 4°10'37" N, 101°53'41" E. The establishment and utilisation of the landfill were guided by the Landfill Management in Estate procedure [SD/SDP/PSQM(ESH)/203-EN7, rev. 0, dated 13/03/2017].	Complied										
Criterion 4.5.4: Reduction of pollution and emission													
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	Assessment of all polluting activities was done through environment aspect and impact evaluation. The environmental aspect includes generation of greenhouse gas, scheduled wastes, and solid wastes.	Complied										
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Mitigation measures were documented in Pollution Preventive Plan FY 2021. Examples of pollutions and their mitigation measures implemented are as follows: <table border="1" data-bbox="1048 986 1870 1350"> <thead> <tr> <th>Types of pollution</th> <th>Mitigation measures</th> </tr> </thead> <tbody> <tr> <td>Air</td> <td>- Installation of exhaust filters in tractors - Scheduled maintenance for tractors - Road maintenance</td> </tr> <tr> <td>Noise</td> <td>- Scheduled maintenance for tractors - Checking of noise generated from machinery</td> </tr> <tr> <td>Water</td> <td>- Proper disposal of wastes - Maintain buffer zone areas</td> </tr> <tr> <td>Soil</td> <td>- To establish cover crop in replanting area - To construct terraces at slope areas</td> </tr> </tbody> </table>	Types of pollution	Mitigation measures	Air	- Installation of exhaust filters in tractors - Scheduled maintenance for tractors - Road maintenance	Noise	- Scheduled maintenance for tractors - Checking of noise generated from machinery	Water	- Proper disposal of wastes - Maintain buffer zone areas	Soil	- To establish cover crop in replanting area - To construct terraces at slope areas	Complied
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Soil	- To establish cover crop in replanting area - To construct terraces at slope areas												

Criterion / Indicator	Assessment Findings	Compliance
Criterion 4.5.5: Natural water resources		
<p>4.5.5.1 The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate. e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. <p>- Major compliance -</p>	<p>Water management and action plan at all the estate for year 2021 was available. Among the objectives of the management plan are:</p> <ul style="list-style-type: none"> • water contingency during dry spell • to reduce wastage of water • to prevent pollution <p>Among the action plan established to achieve the above objectives are:</p> <ul style="list-style-type: none"> • To purchase water from the public domain supplier • To educate employees on water saving • To repair pipelines therefore reduce leakage • Rainwater harvesting • Minimise soil erosion during replanting • Maintaining riparian zones <p>However, during the visit at the riparian zone at field no. 14, it was observed that there was trace of herbicide application within the allocated riparian zone despite the planted signage “No Spraying”. This is not in-line with the estate’s “Biodiversity Management Programme FY 2021”. Thus, a non-conformity report was assigned due to this lapse.</p> <p>There was no borewell used for water supply. Water supply is obtained from the public domain.</p>	<p>Major non-conformity</p>

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Criterion / Indicator		Assessment Findings	Compliance															
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	There was no construction of bunds, weirs and dams across main rivers or waterways passing through the estate observed.	Complied															
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). - Minor compliance -	Water harvesting is practiced by the estates by placing water containers at strategic locations to collect rainwater and using rainwater collected through rain gutter for washing purposes.	Complied															
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value																		
4.5.6.1	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover: a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. - Major compliance -	The status of rare, threatened, or endangered species and high biodiversity value was addressed in High Conservation Value (HCV) Re-assessment for Pahang Zone: SOU 10 – Bukit Puteri, SOU 11 – Kerduau and SOU 12 – Jabor. The assessment was conducted by PSQM Department, Sime Darby Plantation Sdn. Bhd. and a report dated March 2016 was available for verification. The assessment has identified only HCV 4 (Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes) at Bukit Puteri Estate as follows: <table border="1" data-bbox="1048 1082 1870 1284"> <thead> <tr> <th>No.</th> <th>Assessment area</th> <th>Ha</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>River reserve (Sg Telang)</td> <td>17.77</td> <td>Promote soil conservation and prevent soil erosion</td> </tr> <tr> <td>2</td> <td>Water catchment</td> <td>2.81</td> <td rowspan="2">Provide basic service (water resources) for critical situations</td> </tr> <tr> <td>3</td> <td>Pond</td> <td>0.78</td> </tr> </tbody> </table>	No.	Assessment area	Ha	Remarks	1	River reserve (Sg Telang)	17.77	Promote soil conservation and prevent soil erosion	2	Water catchment	2.81	Provide basic service (water resources) for critical situations	3	Pond	0.78	Complied
No.	Assessment area	Ha	Remarks															
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2	Water catchment	2.81	Provide basic service (water resources) for critical situations															
3	Pond	0.78																
4.5.6.2	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:	Based on the HCV report, there was no RTE species identified. Species identified. Nonetheless, signage of hunting restriction was available at various strategic places including at Sg Telang buffer zone. Among	Complied															

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Criterion / Indicator		Assessment Findings	Compliance
	a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. - Major compliance -	other HCV identified are river reserve (Talang River), water catchment pond and unplatable area at slope >25 deg.	
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. - Major compliance -	Biodiversity Management Programme FY2021 was available for verification. Among the action plans established were: <ul style="list-style-type: none"> - To educate sprayers not to spray at riparian zone - Frequent checking and maintenance of riparian zone including signage - To ensure no encroachment of water catchment pond - To communicate to employees and stakeholders od restriction of encroachment at the unplatable slope areas 	Complied
Criterion 4.5.7: Zero burning practices			
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -	There was no use of fire for waste disposal and for preparing land for oil palm cultivation or replanting observed during the site visit.	Complied
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance -	NA as no special approval from the relevant authorities.	NA

Criterion / Indicator		Assessment Findings	Compliance
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	NA as no special approval from the relevant authorities.	NA
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	SOP was established for the Estates. & Agricultural Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units as a guidance document to conduct estate operation. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation, etc. Sime Darby has established mechanism to monitor the implementation of their procedure by Plantation Advisor Visit, Performance Monitoring Visit and Agronomist Visit. The visit focusing on Yield Improvement, Crop Recovery, Replanting and Immature Palms Maintenance and Mature Upkeep. Also sighted the latest addition of SOP Communicable Disease (COVID-19) Prevention & Control Procedure available. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP,	Minor non-conformity

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Criterion / Indicator		Assessment Findings	Compliance
		<p>the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.</p> <p>However, during the visit on circle spraying at field no. 2012C, it was observed that all the three spraying workers tucked their long pants inside their Wellington boots (PPE). This is not in-line with the SOP <i>Menyembur Racun</i> (Herbicides Spraying) [doc. No. BPE/SOP/011], Clause no. 5, which reads, "<i>Pastikan baju berlengan panjang dan memakai seluar panjang yang menutupi kasut getah sepanjang masa.</i>" (Ensure long-sleeve shirt is worn and long pants are covering the Wellington boots at all time.). Thus, a non-conformity report was assigned due to this lapse.</p>	
4.6.1.2	<p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p>- Major compliance -</p>	<p>Sime Darby has established policy on slope protection and documented in Slope and River Protection Policy signed by the Managing Director in Jan 2015.</p> <p>The policy stated for slope more than 25 degree must be exclude from any new plantation development and replanting program. All the existing crop and vegetation shall be maintained accordingly.</p> <p>The estate complied with this policy to not plant on slopes above 25° and Buffer Zone.</p> <p>The policy was communicated to the employee during master briefing, townhall training and displayed in several notice board in the estate.</p>	Complied
4.6.1.3	<p>A visual identification or reference system shall be established for each field.</p> <p>- Major compliance -</p>	<p>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 signboards as sighted in the fields.</p>	Complied
Criterion 4.6.2: Economic and financial viability plan			

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Criterion / Indicator		Assessment Findings	Compliance														
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	The business or management plan is address in the estate’s annual budget. It is available for 5 years projection. Among the information available in the document is types of operation, budgeted finance, budgeted crop and area statement.	Complied														
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance -	The estate has established a replanting program projected for 5 years. The programme is as follows: <table border="1" data-bbox="1048 667 1473 1018"> <thead> <tr> <th>Year</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>0</td> </tr> <tr> <td>2022</td> <td>105.88</td> </tr> <tr> <td>2023</td> <td>255.10</td> </tr> <tr> <td>2024</td> <td>202.24</td> </tr> <tr> <td>2025</td> <td>203.55</td> </tr> <tr> <td>2026</td> <td>185.16</td> </tr> </tbody> </table>	Year	Ha	2021	0	2022	105.88	2023	255.10	2024	202.24	2025	203.55	2026	185.16	Complied
Year	Ha																
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2026	185.16																
4.6.2.3	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment - Major compliance -	The business and management plans were addressed in the annual budget. The annual budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO & MSPO compliance etc. The budgets included projections on yield/ha, and total cost of production per MT & per ha.	Complied														

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Criterion / Indicator		Assessment Findings	Compliance
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	The 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, Plantation Advisor Visit Reports and Performance Unit Report.	Complied
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Pricing mechanism is available in the guidelines LOA (limit of authority) and revised sourcing method for plantation upstream Malaysia dated 11/7/2017. All tender and pricing exercises are handled by the HQ management. Projects are tendered from the approved vendors registered with HQ. Payments are processed and made by HQ through system named MEX. This is made upon job verification by the operating units' personnel and also representatives from HQ for major projects.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Fair, legal and transparent contracts available as per sample sighted as following: <ul style="list-style-type: none"> - Memorandum of Agreement – Land Preparation Works for Oil Palm to Oil Palm Replanting 2020A – 86.00 ha (ex-field 97A) between The China Engineers (Malaysia) Sdn. Bhd. (Bukit Puteri Estate) and Jasa Awah Enterprise; Date: 23/6/2020 - Memorandum of Agreement – Land Preparation Works for Oil Palm to Oil Palm Replanting 2020B – 49.28 ha (ex-field 97A1) between The China Engineers (Malaysia) Sdn. Bhd. (Bukit Puteri Estate) and Jasa Awah Enterprise; Date: 23/6/2020 	Complied
Criterion 4.6.4: Contractor			

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Criterion / Indicator		Assessment Findings	Compliance
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	All engaged vendors were made to understand the MSPO requirements and provided the required documentation and information through Vendor Integrity Pledge (VIP) signing as per sample sighted as following: Vendor/contractor: Ling San Wah @ Lin Sin Wah; Category: FFB Transporter; Date: 18/2/2021	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Evidence of agreed contracts with the contractor provided as per sample sighted in indicator 4.6.3.2 above.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	The requirement of accepting MSPO accredited auditors to audit against the contractors are being mentioned in the Vendor Integrity Pledge (VIP) signing as per sample sighted in indicator 4.6.4.1 above.	Complied
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	All works performed by the contractors at the estates are checked and verified by the estates' personnel. Projects where tenders are issued by HQ are checked by representative from HQ usually from the Engineering Dept.	Complied
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			
4.7.1.1	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. - Major compliance -	NA as no development of new planting.	NA

Criterion / Indicator		Assessment Findings	Compliance
4.7.1.2	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. - Major compliance -	NA as no development of new planting.	NA
Criterion 4.7.2: Peat Land			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	NA as no development of new planting.	NA
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	NA as no development of new planting.	NA
4.7.3.2	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. - Major compliance -	NA as no development of new planting.	NA

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Criterion / Indicator		Assessment Findings	Compliance
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	NA as no development of new planting.	NA
4.7.3.4	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. - Minor compliance -	NA as no development of new planting.	NA
Criterion 4.7.4: Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	NA as no development of new planting.	NA
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	NA as no development of new planting.	NA
Criterion 4.7.5: 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. - Major compliance -	NA as no development of new planting.	NA

Criterion / Indicator		Assessment Findings	Compliance
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. - Major compliance -	NA as no development of new planting.	NA
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	NA as no development of new planting.	NA
Criterion 4.7.6: 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 institutions. - Major compliance -	NA as no development of new planting.	NA
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	NA as no development of new planting.	NA
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. - Major compliance -	NA as no development of new planting.	NA

Criterion / Indicator		Assessment Findings	Compliance
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. - Major compliance -	NA as no development of new planting.	NA
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	NA as no development of new planting.	NA
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	NA as no development of new planting.	NA
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	NA as no development of new planting.	NA
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	NA as no development of new planting.	NA

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	SDPB has incorporated its policy on implementation of MSPO in the “Group Sustainability & Quality Policy Statement” mentioned in Indicator 4.1.1.2.	Complied
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	Sime Darby Plantation has established a policy called “Group Sustainability & Quality Policy Statement” which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 2/12/2019. The policy covers commitment to: <ul style="list-style-type: none"> – Promoting good governance and transparency – Contributing to a better society – Minimising environmental harm – Delivering sustainability quality – The policy is guided by three main documents i.e.: – Responsible Agriculture Charter – Human Rights Charter – Innovation & Productivity Charter All the above documents and the policy statement are made available on Sime Darby’s website.	Complied
Criterion 4.1.2 – Internal Audit			

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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. - Major compliance -	The Internal Audit Procedure (SD/SDP/PSQM/IAP) dated 01/11/2017 documented the process to conduct internal audit. The internal audit schedule for 2021 has been planned and communicated by Regional SQM to all the Central East Region estates and mills. The last internal audit for sustainable palm oil was conducted on 16/03/2021. The internal audit had covered all the MSPO MS2530-4:2013 elements. It was conducted by 3 auditors from an internal department called GSD Malaysia and Central East RSQM. There were 5 Major, 2 Minor NCR and 1 OFI raised as a result of the internal audit. The mill has closed all the NCRs.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	The internal audit report dated 16/03/2021 had included the root cause analysis and corrective action plan. Based on the identified root cause recorded in the internal audit report, generally it has guided the organisation to provide effective corrections and corrective actions to prevent recurrence of non-conformity.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The internal audit report was available and had also been one of the agenda discussed in the management review.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	The latest MSPO Management Review was conducted on 30/03/2021 which was chaired by Sr Manager Kerdu Estate and attended by 12 key personnel. It was a combined meeting between SOU 10 and SOU 11. Based on the minutes of meeting, among the agendas discussed were: - Results of the internal audits covering RSPO and MSPO SCCS	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Customer feedback - Status of preventive and corrective actions - Follow up action from management review - Changes that could affect the management system - Recommendations for improvement - Improvement of the effectiveness of the management system - Resources needs 	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	<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>- Major compliance -</p>	<p>The action plan for continual improvement with regards to social and environment impacts, and opportunities were available in the mill in various forms such as social action plan, environmental management plan, and master initiative list to name a few. The plan clearly states the possible issues, action to be taken, person in charge, time frame and status of action.</p>	Complied
4.1.4.2	<p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.</p> <p>- Major compliance -</p>	<p>Bukit Puteri POM continuously ensures there are improvement practices in line with new information and techniques introduced in the workforce. Kaizen Charter is introduced to ensure improvement projects are in place. Lean Six Sigma is used to minimize waste (money, time, manpower, etc) where improved methods are introduced in the management system. There has been no opportunity for the mill to adopt any new technology since the last assessment.</p>	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			

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Criterion / Indicator		Assessment Findings	Compliance
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	SOU 10 implemented the Procedure for External Communication dated 01/11/2008 established to communicate the information requested by the relevant stakeholders through various means including consultation meeting. Latest external stakeholder meeting was conducted on 6/7/2020 in combination for both Bukit Puteri Estate & Palm Oil Mill with attendance from wide range of external stakeholders among local authorities, local community representatives, neighbours, vendors etc. Bukit Puteri Estate has also conducted a specific meeting with cattle owners among villagers of Kampung LKPP Sungai Ular on 5/1/2021 that attended by a total of 8 cattle owners.	Complied
4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance -	The Procedure for External Communication dated 01/11/2008 included the method for the public to obtain information from the company. The procedure was introduced to the local stakeholders during the stakeholder engagement. Policies of the company is published on their website and copies of the polices can be seen posted on notice board within the vicinity of the mill.	Complied
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	The Procedure for External Communication dated 01/11/2008 is established. Latest external stakeholder meeting was conducted on 6/7/2020 in combination for both Bukit Puteri Estate & Palm Oil Mill with attendance from wide range of external stakeholders among local authorities, local community representatives, neighbours and vendors etc. Bukit Puteri Estate has also conducted a specific meeting with cattle owners among	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		villagers of Kampung LKPP Sungai Ular on 5/1/2021 that attended by a total of 8 cattle owners.	
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	The mill manager has been identified to be responsible to receive and manage all internal & external communications whom also appointed assistant manager, Mr. Ahmad Lutfi Bin Salahuddin to assist as per letter dated 4/1/2021.	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance -	Bukit Puteri POM has established a List of Stakeholders 2021 SOU 10 which registered all relevant stakeholders among multiple categories of local authorities, local community heads, neighbours and vendors etc. Records of consultation available including minutes of meeting, feedbacks and requests as per sample sighted as following: <ul style="list-style-type: none"> - Letter to Pejabat Perhilitan Daerah Lipis on complaint of wild boar within line-site by workers; dated on 1/4/2021 - Letter to Majlis Daerah Lipis on complaint of stray dogs within line-site by workers; dated on 24/3/2021 - Minutes of meeting with cattle owners among villagers of Kampung LKPP Sungai Ular; dated on 5/1/2021 	Complied
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance -	Ref.: Sustainable Plantation Management System (SPMS), Appendix 15, SOP for Sustainable Supply Chain and Traceability, ver. 2, 2018; issue no. 5, April 2019. Bukit Puteri POM is receiving FFB mainly from its own supply base – Bukit Puteri Estate. FFB from third party suppliers comprise around 30% of the total FFB received. Among the relevant documents to ensure traceability are as follows:	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<p>For own supply base: The weighbridge ticket provided the following details:</p> <ul style="list-style-type: none"> - Supplied from which estate - Product (FFB or Loose fruit) - Delivery note from estates stating the weight and fruit grade (A or B). - D.O Number - Weight of the shipment - Date of the shipment <p>For despatch of CPO, the weighbridge ticket includes the following information to ensure traceability:</p> <ul style="list-style-type: none"> - Customer Name - Destination of the CPO - Product - DO number - PO number - Weight of the product. <p>For external FFB suppliers, they have their own delivery notes. All the external suppliers have to be approved by signing contract agreement and registered in the system before they are able to send their crop to mill.</p>	

Criterion / Indicator		Assessment Findings	Compliance
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The method of inspection is by SCCS internal audit which was last conducted on 16/03/2021. Based on the inspection, there was no NCR raised on the implementation of traceability procedure.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	The overall personal in charge for the traceability is the Head of Operating Unit (in this case, the Mill Manager) [ref.: Clause 4 of SOP for Sustainable Supply Chain and Traceability].	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	Stock of CSPO is recorded Mass Balancing Records for Oil Mills. For the period under review, the mill has dispatched 5,522.76 mt of CSPO and 1,325.31 mt of CSPK as conventional. To-date, there has been no sales as MSPO certified.	Complied
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	Bukit Puteri POM continues to demonstrate their commitment towards compliance with legal requirements. Among the evidence of compliance verified were: <ul style="list-style-type: none"> - Environmental Compliance Audit Report, conducted on 23/11/2020 by Lead Auditor #EA0101, CESSWI 3756, DOE Tracking No.: AS:C(L)31/31/152/000/072 (78) (004160), results: no NCR - DOE License No. 004160, validity 01/07/2020 to 30/06/2021 - Authorised Gas Tester (AGTES), cert. no.: #AGT096933-19, serial no.: NW-HQ-AGT-0481-R, valid until 30/07/2021 - Engineer (Steam) Grade 2, No. Perakuan: 049/2009, 23/04/2009 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Engine Driver Grade 1, No. Perakuan PA/05/2014, dated 28/01/2014 - Engine Driver Grade 1, No. Perakuan PA/49/2015, dated 09/09/2015 - JTK letter of approval for application of overtime work limit; Ref. # BHG.PU/9/134 JLD 9 (11); Date: 27/3/2017; Approved limit: 130 hours - JTK letter of approval for PTPTN loan payment and Tabung Haji saving deductions from salary; Ref. # JTKS(E)6/115.Jld 36-20(2); Date: 30/5/2018 - JTK letter of approval for electricity payments deductions from salary; Ref. # BHG.PU/9/129 JLD 33(53); Date: 6/7/2017 - Pahang Water and Energy Resources Sdn. Bhd.; Sijil Kebenaran Penggunaan Sumber Air; Cert. # 121/2020; Effective period: 1/1/2020 – 31/12/2020. 	
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -	Bukit Puteri POM listed all its applicable legal requirements in the Estate/Mill – Upstream Malaysia Legal & Other Requirements Register (LORR); Group Sustainability & Quality Management (GSQM); Updated Jan 2021.	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	The LORR was last reviewed on 20/1/2021. The evaluation of compliance score card result shown summary of overall percentage of 100% as reviewed by Assistant Manager and approved by Mill Manager.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.	A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality	Minor non-conformity

Criterion / Indicator	Assessment Findings	Compliance
<p>- Minor compliance -</p>	<p>Management System) under Standard Operation Manual distributed to all operating units under SOU 10.</p> <p>Regional PSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance as per Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10/12/2008.</p> <p>Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations.</p> <p>Tracking system on any changes in the law been well implemented. E.g. regular notification by Head Office and regular updates from the DOE/DOSH websites as well as from MAPA circulars.</p> <p>However, the monitoring of legal compliance was not satisfactorily demonstrated as the following lapses was found:</p> <ul style="list-style-type: none"> i) The recorded videos from the CCTV to monitor the boiler's chimney for the past six months were insufficient. The oldest record was on 04/01/2021. This is not in-line with the Clause no. 20 stipulated in the "Jadual Pematuhan" (Compliance Schedule) of the DOE's License No. 004160. ii) The Safety Data Sheets (SDS) for most of the chemicals in the mill's chemical store were more than 5 years. Among the chemicals are Alum 3276, Soda Ash, Nalco 3935, Nalco 214, Nalco 19PULV and Nalco 22312. The last review of those SDS was in 2015. This 	

Criterion / Indicator		Assessment Findings	Compliance
		is not in-line with Occupational safety and health (classification, labelling and safety data sheet of hazardous chemicals) Regulations 2013, Reg. 4(b). Thus, a non-conformity report was assigned due to this lapse.	
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	Bukit Puteri POM located within Bukit Puteri Estate land area and ensured that their oil palm milling activities do not diminish the land use rights of other users. Bukit Puteri Estate hold a total of 7 land titles as per sample copies of titles sighted as following: <ul style="list-style-type: none"> - Title # PN 27191; District: Lipis; Sub-district: Mukim Telang; Lot # 2760; Area: 125.3 ha - Title # HSD 30; District: Lipis; Sub-district: Mukim Batu Yon; Lot # PT 856; Area: 809.37 ha - Title # PN 27193; District: Lipis; Sub-district: Mukim Batu Yon; Lot # 2998; Area: 374.9 ha - Title # HSD 237; District: Lipis; Sub-district: Mukim Telang; Lot # PT 976; Area: 1092.6495 ha 	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	Documents showing legal ownership shown as per indicator 4.3.2.1 above. Among the land titles, earliest registered date was as early as 14/2/1975 under name of Austral Enterprises Berhad and latest registered was on 21/5/2017 under name of Sime Darby Austral Holdings Berhad.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The mill is not adjacent to any third party and occupies approximately around 10 Ha of the area of Bukit Puteri Estate's land title and therefore demarcation of boundary is not necessary.	Complied
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute recorded. This was verified with stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the process will be based on system established as Procedures for Handling Boundaries Disputes as per Sustainable Plantation Management System; Appendix 3; Flowchart and Procedures on Handling Land Disputes; Version 2; Issue # 1; Issue date: 1/11/2008.	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	Bukit Puteri POM located within Bukit Puteri Estate land area and there is no land encumbered by customary rights within Bukit Puteri Estate as the only estate of SOU 10.	Complied
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	Bukit Puteri POM located within Bukit Puteri Estate land area and maps available as per sighted Bukit Puteri Estate Stakeholder Map; Data Source: GPS Surveyed; Datum WGS 1984 which include the information of field boundary point, block number and info of stakeholder/neighbour etc.	Complied
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	Bukit Puteri POM located within Bukit Puteri Estate land area and there is no negotiation and FPIC recorded. This was verified with stakeholders' consultation.	Complied

Criterion / Indicator		Assessment Findings	Compliance									
		In case of any, the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the FPIC process.										
4.4 Principle 4: Social responsibility, health, safety and employment condition												
Criterion 4.4.1: Social Impact Assessment (SIA)												
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	<p>SIA identified as per records of Social Impact Assessment (SIA) Report SOU 10 Bukit Puteri; Operating Units: Bukit Puteri Palm Oil Mill & Bukit Puteri Estate; Assessment Date: 17-18 September 2015; Assessment by: Social & Environment Projects Unit, PSQM Department. Implementation to mitigate the negative impacts and promote positive ones established in records of Management Plan for Social Impact Assessment FY 2021; Date: 13/1/2021. Sighted some sample of the management plan as following:</p> <table border="1"> <thead> <tr> <th>Area of concerns</th> <th>Action plan</th> <th>Expected completion date</th> </tr> </thead> <tbody> <tr> <td>Program Saringan COVID-19 kepada semua pekerja asing/tempatan</td> <td>To conduct test for all foreign workers. To enforce on local workers too.</td> <td>March 2021</td> </tr> <tr> <td>Housing area regular "gotong-royong" program</td> <td>To conduct every month end</td> <td>Continuous</td> </tr> </tbody> </table>	Area of concerns	Action plan	Expected completion date	Program Saringan COVID-19 kepada semua pekerja asing/tempatan	To conduct test for all foreign workers. To enforce on local workers too.	March 2021	Housing area regular "gotong-royong" program	To conduct every month end	Continuous	Complied
Area of concerns	Action plan	Expected completion date										
Program Saringan COVID-19 kepada semua pekerja asing/tempatan	To conduct test for all foreign workers. To enforce on local workers too.	March 2021										
Housing area regular "gotong-royong" program	To conduct every month end	Continuous										
Criterion 4.4.2: Complaints and grievances												
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	A flowchart and procedure on handling social issues ver.1 dated 01/11/2008 has been established to manage any internal complaints	Complied									

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		and grievance while a Procedure for External Communication; Appendix 5.5.3.2 was established for external complaints.	
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	Based on the flowchart and procedure on handling social issues ver.1 dated 01/11/2008 that has been established to manage any internal complaints and grievance as well as Procedure for External Communication; Appendix 5.5.3.2 was established for external complaints, the system able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. Additionally, in case of land issues, a system established as Procedures for Handling Boundaries Disputes as per Sustainable Plantation Management System; Appendix 3; Flowchart and Procedures on Handling Land Disputes; Version 2; Issue # 1; Issue date: 1/11/2008.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	Complaints recorded in Bukit Puteri Estate Internal & External Complain Book where few available complains made by internal and external stakeholders sighted as following: <ul style="list-style-type: none"> - Bad road condition to access Bukit Puteri Mill; by Outside Crop Purchase (OCP) supplier; Date complain: 6/7/2020; Date resolved: 31/7/2020 - Buku kerosakan rumah pekerja, latest complaint received on 13/2/2021 and resolved on 20/2/2021. 	Complied
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -	The latest briefing for external stakeholders was done during stakeholder meeting on 6/7/2020 and 5/1/2021. Training for employees was latest conducted on 24/3/2021 as per records of muster roll-call training report entitled Induction Refresher Training/COBC/Policy/RSPO/MSPO/ERP.	Complied
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders	The complaints and resolutions records available for period more than 24 months dated back since 2008.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	upon request. - Major compliance -		
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance -	Contribution made as per sample sighted as following RSPO/MSPO-Donation/Contribution to local communities: <ul style="list-style-type: none"> - Donation of face masks to Klinik Kesihatan Bukit Betong; Date: 23/4/2020 - Donation of face masks to Klinik Kesihatan Sungai Koyan; Date: 23/4/2020 - Donation to Kampung Orang Asli Beletik villagers by SOU 10 on 21/12/2020 - Central East Region (CER) – Pahang Zone round-up contributions; CER: Spirit of Giving; June 2020; Beneficiaries: Pertubuhan Kebajikan Anak-anak Yatim Islam Al-Ihsan Kuala Lipis (SOU 10), Kompleks Tahfiz Al Quran & Anak Yatim A Qardhawi Kuala Krau (SOU 11), Rumah Sejahtera Bangau Tanjung Temerloh (SOU 11), Rumah Kanak-kanak Yatim Tengku Ampuan Fatimah Kuantan (SOU 12) 	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. - Major compliance -	Sime Darby have established the Group Policy on Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 1 st June 2020. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the estates. The GSM team is also committed in establishing various working	Complied

Criterion / Indicator		Assessment Findings	Compliance
		standards through procedures or pictorial method to improve safe working condition. The estates have established Safety and Health Management Plan and documented in Environment, Safety and Health Plan FY 2020. The management plan includes the ESH risk management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring, Health monitoring.	
4.4.4.2	The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labelling)	a) Sime Darby Plantation have established the Group Policy on Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 01/06/2020. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the mill. b) The mill has conducted assessment for risk on all the operations and documented in Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment has covered all the main and support operations such as boiler house area, engine room, pressing, threshing, sterilizing to name a few. The latest review of HIRARC was conducted on 15/03/2021 where the risk of COVID-19 was included. <ul style="list-style-type: none"> o Medical Surveillance was conducted on 11/02/2021 for 8 workers mainly from the laboratory and workshop stations as recommended by CHRA assessor. The purpose of the medical surveillance was to conduct a risk assessment to monitor the exposure to chemical (N-Hexane & Sulphuric acid) and manganese welding fume. The results of the test are still pending from the clinic (DOSHS Reg No.: HQ/14/DOC/00/369). o CHRA was conducted with a report (Ref No: HQ/14/ASS/00/00001-2020/8), dated 10/06/2020 available 	Complied

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Criterion / Indicator	Assessment Findings	Compliance				
<p>Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>for verification by Registered DOSH Assessor (HQ/14/ASS/00/358).</p> <p>c) The mill has established a training program for employees exposed to chemicals used at the mill to ensure continuous awareness to the employees. The training was conducted by the management to the supervisors and operators. Verified the training records as follows:</p> <table border="1" data-bbox="1111 675 1809 762"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>SOP bahan kimia (chemical handling)</td> <td>16/02/2021</td> </tr> </tbody> </table> <p>d) The mill has provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC and Pictorial Safety Standard (PSS) Palm Oil Mill.</p> <p>Verified during site visit at boiler station, engine station and workshop, the workers were provided with leather gloves, earplugs, respirators, safety helmets, safety shoes and others required by the operations. The workers acknowledged that they are entitled to appropriate PPE, free of charge by the management. The workers understand the importance of wearing the appropriate PPEs during work as they are regularly briefed by the management. Verified the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>e) Procedures of chemical handling is presented in several documents, such as Sime Darby Plantation, Chemical Safety Management; Document No. SD/SDP/PSQM (ESH)/202-OH4; dated 26/02/2015.</p>	Training	Date	SOP bahan kimia (chemical handling)	16/02/2021	
Training	Date					
SOP bahan kimia (chemical handling)	16/02/2021					

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	<p>f) The Manager was appointed to be the Chairman of OSH Committee at the mill. Mill management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, representatives from employer and representatives from employee as per appointment letter by the Mill Manager.</p> <p>g) The management conducted regular OSH committee meetings on quarterly basis and when necessary if there is any accident. Among the agenda discussed in the meeting were status of OSH committee objectives, accident statistic, SIMECARD report, legal compliance monitoring, HIRARC monitoring, OSH training, Pahang DOSH report, medical surveillance report, workplace inspection, and environmental issues. The last three minutes of OSH committee meeting were conducted on 27/01/2021, 28/10/2020, 23/07/2020 and 27/01/2020. The second quarter of 2020 was not able to be conducted due to the movement control order (MCO).</p> <p>h) Accident and emergency procedures are available in Estate and Mill Quality Management System Standard Operation manual dated November 1st, 2008. Flowchart of emergency handling was presented in Appendix 5.5.3.3. Sighted during site visit at the mill that the compound was equipped with fire extinguishers, fire hydrant. Noted during the interview with employees shows the understanding regarding emergency and evacuation procedures. The mill has established Emergency Response Team lead by the Mill Manager. Verified during site visit, the ERT chart and Fire Extinguisher Map were displayed at several notice boards around the mill complex. The last fire drill was conducted 18/082020.</p> <p>i) First aiders were present at various workstations at the mill. The first aiders were responsible for first aid box at each workstation assigned to them by the management. The last training on first</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		aid was conducted on 31/03/2021 by the Medical Assistant. j) Records of accidents were maintained by the mill and updated to the HQ on a monthly basis. Accidents that occur are also discussed in the quarterly held OSH Committee Meetings. Records of accidents were kept and maintained by the mill. The accidents are reviewed and discussed in the accident investigation meeting. Since the last assessment conducted by Care Certification International (M) Sdn Bhd., there was no accident case reported. The last accident was happened on 24/09/2019.	
Criterion 4.4.5: Employment conditions			
4.4.5.1	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. - Major compliance -	The good social practices regarding human rights in respect of industrial harmony has been embedded in Sime Darby Plantation's established policy of "Group Sustainability & Quality Policy Statement" which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 2/12/2019. Policy re-briefing was conducted by Bukit Puteri POM management to all employees on 22/1/2021 which also including the Gender Committee & Reproductive Rights Refresher Training SQM Malaysia.	Complied
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	Records of employments and interview conducted on-site with sampled internal and external stakeholders confirmed that the workers and groups including local communities, women, and migrant workers have not been discriminated against.	Complied
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective	For CS & NCS, based on Industrial Court Case # 11/2-13/18 Between MAPA and AMESU; MAPA/AMESU Agreement, 2018. For workers,	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<p>Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>based on MAPA/NUPW Palm Oil Mill Employees' Agreement, 2019. For estate MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2011.</p>	
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>Evidence available that employees of contractors been ensured to be paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee as per sample sighted for 5 employees of Bestro Engineer Sdn. Bhd. (contract effective date 1 July 2020 with two years validity)</p>	Complied
4.4.5.5	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The established records of Employee Masterlist which available as a database in computerized Checkroll System able to provide accurate account of all employees including their particulars of full names, gender, date of birth, date joined company, wages grade and position etc.</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>A total of 9 sample workers documents were checked as per sample as following:</p> <ul style="list-style-type: none"> - Employee # 161674; Post: AP; Date joined: 11/1/2021; Nationality: Malaysia - Employee # 152704; Post: Press Operator; Date joined: 23/7/2019; Nationality: Indonesia - Employee # 156279; Post: Threshing Operator; Date joined: 1/11/2019; Nationality: Malaysia - Employee # 152707; Post: Kernel Plant Operator; Date joined: 23/7/2019; Nationality: Indonesia 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>- Employee # 160991; Post: Gardener; Date joined: 26/11/2020; Nationality: Malaysia</p> <p>The work agreements also attached with each workers' renewal of agreement to use new agreement (Foreign Workers) and Changes of terms & conditions due to Minimum Wage Order (MWO) revision use new agreement (Local Workers).</p>	
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p>- Major compliance -</p>	<p>Attendance (out-turn) and work hours (normal time and overtime) recording system established in both manual and computerized checkroll system which makes working hours and overtime transparent for both employees and employer.</p>	Complied
4.4.5.8	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p>- Major compliance -</p>	<p>Based on records of sample employees' sighted in indicator 4.4.5.6 above, the working hours found in compliance with employees' terms and conditions of MAPA Circular No. 4/2020; The Malayan Agricultural Producers Association; Date: 30/1/2020; MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019. This also in-line with Malaysia Employment Act 1955.</p>	Complied
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p>	<p>Based on records of sample employees' sighted in indicator 4.4.5.6 above, the pay slips found in compliance with employees' terms and conditions of MAPA Circular No. 4/2020; The Malayan Agricultural Producers Association; Date: 30/1/2020; MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019. This also in-line with Malaysia Employment Act 1955.</p>	Complied
4.4.5.10	<p>Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.</p>	<p>All local employees are provided with the mandatory Employee Provident Fund (EPF) contributions while both local and foreign employees contributed with Social Security Organization (SOCSO). Additionally, other benefits offered by the company including the following:</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	<ul style="list-style-type: none"> - Productivity incentive - Out-turn incentive - Transport allowance - Telephone allowance - Shift allowance 	
4.4.5.11	<p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p> <p>- Major compliance -</p>	<p>All workers are provided with free housing facilities that included basic amenities such as clean water (25 gallons/month), community hall, sport facilities, etc. were provided to the workers.</p> <p>Electricity which is obtained from the national grid. The housing condition was in accordance to the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446).</p> <p>Weekly inspections by medical assistant were done to ensure cleanliness of the housing. Records were well maintained as per sample Bukit Puteri Estate VMO Visit Book, latest visit by VMO conducted on 18/2/2021 by Dr. Hasnizadila of Klinik Zara Kuala Lipis. Medical Assistant (MA) at Bukit Puteri Estate conducted weekly line-site inspection as per records of Housing Complex/Nest/Community Hall Weekly as well as internal Inspections (PIOA) forms which was latest done on 5/4/2021 for both Div. A & Div. B of Bukit Puteri Estate. Housing Complex/Nest/Community Hall Weekly Inspections (PIOA) latest dated on 9/4/2021. Total Score = 86%</p>	Complied
4.4.5.12	<p>The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>The briefing on prevention of sexual harassment and violence in workplace was latest conducted on 25/9/2019 which was based on the Gender Committee & Reproductive Rights Refresher Training modules by Sime Darby Plantation HQ SQM Malaysia. There's also Gender Committee Handbook First Edition established by PSQM Department.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance										
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers’ own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	Policy to respect the rights of all employees has been embedded in Sime Darby Plantation’s established policy of “Group Sustainability & Quality Policy Statement” which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 2/12/2019. Employees were given freedom to associate and bargain collectively with company and to organize among themselves through association meetings as per sample sighted for Bukit Puteri POM NUPW members as per minutes of meeting records for management & employee meeting latest conducted on 7/4/2021.	Complied										
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. - Major compliance -	Policy to protect children and young person has been embedded in Sime Darby Plantation’s established policy of “Group Sustainability & Quality Policy Statement” which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 2/12/2019. Based on the interview and sighted records of employees’ master lists data, no young person below 18 years old employed within all operating units within SOU 10.	Complied										
Criterion 4.4.6: Training and competency													
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance -	The mill trainings were held/organized as per annual training programme. Generally, the issues discussed/briefed were related to mill operations, environmental and safety compliance. These training records were maintained and verified during the audit: <table border="1" data-bbox="1048 1209 1865 1382"> <thead> <tr> <th>Subjects</th> <th>Date conducted</th> </tr> </thead> <tbody> <tr> <td>Hearing conservation training</td> <td>18/01/2021</td> </tr> <tr> <td>Hearing conservation training</td> <td>26/01/2021</td> </tr> <tr> <td>Training policy</td> <td>11/01/2021</td> </tr> <tr> <td>Training basic occupational first aid</td> <td>11/01/2021</td> </tr> </tbody> </table>	Subjects	Date conducted	Hearing conservation training	18/01/2021	Hearing conservation training	26/01/2021	Training policy	11/01/2021	Training basic occupational first aid	11/01/2021	Complied
Subjects	Date conducted												
Hearing conservation training	18/01/2021												
Hearing conservation training	26/01/2021												
Training policy	11/01/2021												
Training basic occupational first aid	11/01/2021												

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Criterion / Indicator		Assessment Findings		Compliance
		Training LOTO	18/12/2020	
		Introduction to NIR	16/12/2020	
		Safe & standard operating procedure	12/10/2020	
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>Methods for identifying the training needs are used by the mill. The details of the training needs include categories of:</p> <ul style="list-style-type: none"> a) Job descriptions b) Sections c) Employees' group <p>This training programme subjects are generally related to:</p> <ul style="list-style-type: none"> a) Environment e.g. Environmental, safety & health policy, b) Scheduled waste management, c) Environmental responsibility, HCV & biodiversity training, d) Mill activities/operations, e) Equipment handling, machinery maintenance etc 	Complied	
4.4.6.3	<p>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>Formal training programs for year 2021 that covered aspects of the MSPO with regular assessments of training needs were available. A training need identification matrix has been established with target dates for the training identified.</p>	Complied	
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services				
Criterion 4.5.1: Environmental Management Plan				

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Criterion / Indicator		Assessment Findings	Compliance
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	Sime Darby Plantation have established the Group Policy on Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 01/06/2020. 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.	Complied
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations - Major compliance -	The Environmental Impact Plan and Pollution Prevention Plan was established based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation. The plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. <ul style="list-style-type: none"> EAI was reviewed in Jan 2021 and approved by the Mill Manager EIE was reviewed in Jan 2021 and approved by the Mill Manager 	Complied
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -	The mill has established the environmental plan based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation in various management plan such as pollution prevention plan, water management plan and wastes management plan. The plans were reviewed on annual basis.	Complied
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	The mill has established the environmental management plan based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation. The mill continues to promote activities that gives positive impact to the environment by continuously provided awareness to the employee. The promotion was communicated through training, briefing and signage.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - Major compliance -	Training programme was available for verification and it is reviewed on a yearly basis as per the management requirement. Included in this program are subjects related to environment e.g. environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training. Guidance was provided by the SQM prior to the approval and implementation by the estates. Training records related to environment subjects were well maintained.	Complied
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	The estate discusses environmental issues and performance concurrently with the OSH Meetings. The meetings are held on a quarterly basis as follows: 27/01/2021, 28/10/2020, 23/07/2020 and 27/01/2020.	Complied
Criterion 4.5.2: Efficiency of energy use and use of renewable energy			
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period - Major compliance -	The plan to optimise the consumption of non-renewable energy is addressed in the continuous improvement plan.	Complied
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estimate of direct usage of non-renewable energy is addressed in the mill's annual budget. Based on the monitoring diesel usage records, the estate has recorded the following: 2020: 0.15 lt/mt FFB 2021: 0.10 lt/mt FFB (as at March)	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	The by-products from the mill process i.e. shell & fibre were used as biofuel for boiler operation. Records of usage were well maintained.	Complied
Criterion 4.5.3: Waste management and disposal			
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	The mill has identified the waste products and source pollution and documented in the Waste Management Plan 2021. Among the identified wastes are scheduled waste, domestic waste and recyclable wastes.	Complied
4.5.3.2	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for: a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. - Major compliance -	The mill has established a wastes management plan for 2021. The recording of the disposal of waste such as scheduled wastes and scrap iron can be verified through inventory records and consignment notes. Wastes from the mill operation such as EFB, shell and fibre were used for other beneficial purposes such as EFB mulching at the estate and used as biofuel for boiler operation.	Complied
4.5.3.3	The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005 - Major compliance -	SW disposed through licensed contractors which were verifiable through eSwis. The latest notification to DOE on types of scheduled waste was on 18/02/2014. Examples of Consignment notes verified: #2021022616SRDWKV – SW322 - dated 26/02/2021 #2021022616MPU802 – SW409 - dated 26/02/2021 #2021022616KBCH50 – SW410 - dated 26/02/2021 #20210226163L78IP – SW306 - dated 26/02/2021	Complied
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.	Domestic waste from the mill housing is handled by Bukit Puteri Estate management through utilisation of landfill.	Complied

Criterion / Indicator		Assessment Findings	Compliance
- Minor compliance -			
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p>	<p>The polluting activities are identified and documented in the Environmental Aspect & Impact Identification. From the EAI, it will be evaluated for the impact and any impact will be included in the management plan. The evaluation is documented in the Environmental Impact Evaluation. Among the polluting activities identified and evaluated were dark smoke emission from boilers' chimneys, effluent discharge (including GHG emission), generation of solid wastes and scheduled wastes.</p> <p>Latest two stack sampling report verified:</p> <p>i) ref.: ALM/TECHINA/0720/5985, dated 27/7/2020, Boiler #2, result 57 mg/m³</p> <p>ii) ref.: ALM/TECHINA/1120/6458, dated 02/01/2020, Boiler #1 result 42 mg/m³</p>	Complied
4.5.4.2	<p>An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p>- Major compliance -</p>	<p>Action plan to reduce identified significant pollutants and emissions was addressed in Pollutions Preventive Management Plan 2021. Generally, among the mitigation plans implemented were:</p> <ul style="list-style-type: none"> - Provision of secondary containment to prevent spillage of oil and chemicals - Regular service and maintenance for vehicles and machinery - Effective treatment of effluent - Good practice using shell & fibre as biofuel at boiler operation to minimise dark smoke emission 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.5.4.3	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p>- Major compliance -</p>	<p>The mill applies the biological system with anaerobic lagoon in series for its treatment of effluent. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Based on quarterly report to the DOE, the mill has complied with the regulated limit.</p>	Complied
Criterion 4.5.5: Natural water resources			
4.5.5.1	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>Water management plan for 2021 has been established. Among the implemented plans were:</p> <ul style="list-style-type: none"> a) Monitoring of water abstraction from surface water (Sungai Sertang). The measuring was done by using flowmeter. 2020 – recorded 221,044 m³ Water usage/mtffb: 2021 – 1.63 m³/mt FFB (as at March) 2020 – 1.93 m³/mt FFB b) Monitoring of ETP discharge quality is done on weekly basis. The results were submitted to the DOE on quarterly basis. c) Having contingency plan during water shortage 2021 – by educating employees on water saving and purchase water from public domain. 	Complied
4.5.5.2	<p>Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.</p> <p>- Major compliance -</p>	<p>Consideration about phasing out the POME discharge to water course is undertaken at the corporate level since it is involving significant financial budget.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance	
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Mill Management			
4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>The mill processing system is documented in the Sustainability Plantation Management System MQMS/SQM/08 v 1 dated 01/11/2008 which includes:</p> <ul style="list-style-type: none"> a) The mill SOP b) The Mill Quality Management Manual v.1 2008/MQMS/QMM/08. <p>These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from:</p> <ul style="list-style-type: none"> a) the reception, sterilization, threshing, pressing, b) clarification, depericarping (nut polishing) station, c) effluent, laboratory, workshop, dispatches etc. <p>Sighted the SOP Communicable Disease (COVID-19) Prevention & Control Procedure; Document ID: SDPB/USM/HSE/001; Date 04/05/2020 available as the latest addition to the SOPs.</p> <p>In addition, there are also manuals available within the industry and MPOB that are used as guidelines.</p> <p>Sime Darby has established a system to monitor the mill operation. The Mill advisor, Structured Oil Recovery Assessment (SORA) and Performance Monitoring Unit (PMU) visits the operating units on timely</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		basis. Their reports cover on all aspect of operation where they rate the performance of the mill and estates.	
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	The monitoring of the mill process is made through the shift supervision headed by assistant mill managers. All process parameters are documented and summarized in a daily report. The external monitoring is made through visits by Regional General Manager, Mill Advisor, SQM and GCAD. This is to ensure compliance with policies, procedures in relation mill operations, financial, OSH, welfare to name a few.	Complied
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	The annual business plan is available. The document is in the form of annual budget and the projection for 5 years (2021-2026) 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 2021 was made available for verification which include the calculation of seeking the profitability	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		quantum. This is a standard format provided from the Regional CEO to the Manager and treated in high confidentiality.	
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	The pricing mechanisms for Outside Crop Purchase (OCP) was not adequately documented together with purchase agreement although it was mentioned in the agreement terms paragraph # 8. Pricing of The FFB – 8.1 The Pricing of the FFB shall be calculated and determined in the manner shown in the Third Schedule hereto.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Fair, legal and transparent contracts documents available for all external FFB suppliers among Outside Crop Purchase (OCP) from smallholders and collection centers as per sample as following: - FFB Purchase Agreement # P/C/1220/FFB02545L between The China Engineers Malaysia Sdn. Bhd. and Green Agro Pyramid Business Trading; Effective date: 1/1/2021; Completion date: 31/12/2021 - FFB Purchase Agreement # P/C/1220/FFB02547L between The China Engineers Malaysia Sdn. Bhd. and Noor Azlan Bin Kasmani; Effective date: 1/1/2021; Completion date: 31/12/2021	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	The contractors were made understand of MSPO requirements through briefing and signing of Vendor Integrity Pledge (VIP) upon registration with the company. Sighted some samples of VIP as following: - Signed by: Datin Mawar Binti Badaruddin (Director); Vendor: MXF Gemilang Enterprise	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		- Signed by Lim Tow Wah (Director); Vendor: Pertiwi Palms Sdn. Bhd.	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Evidence of agreed contracts with the contractor provided as per sample sighted in indicator 4.6.3.2 above.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	The requirement of accepting MSPO accredited auditors to audit against the contractors are being mentioned in the Vendor Integrity Pledge (VIP) signing as per sample sighted in indicator 4.6.4.1 above.	Complied

Appendix B: List of Stakeholders Contacted

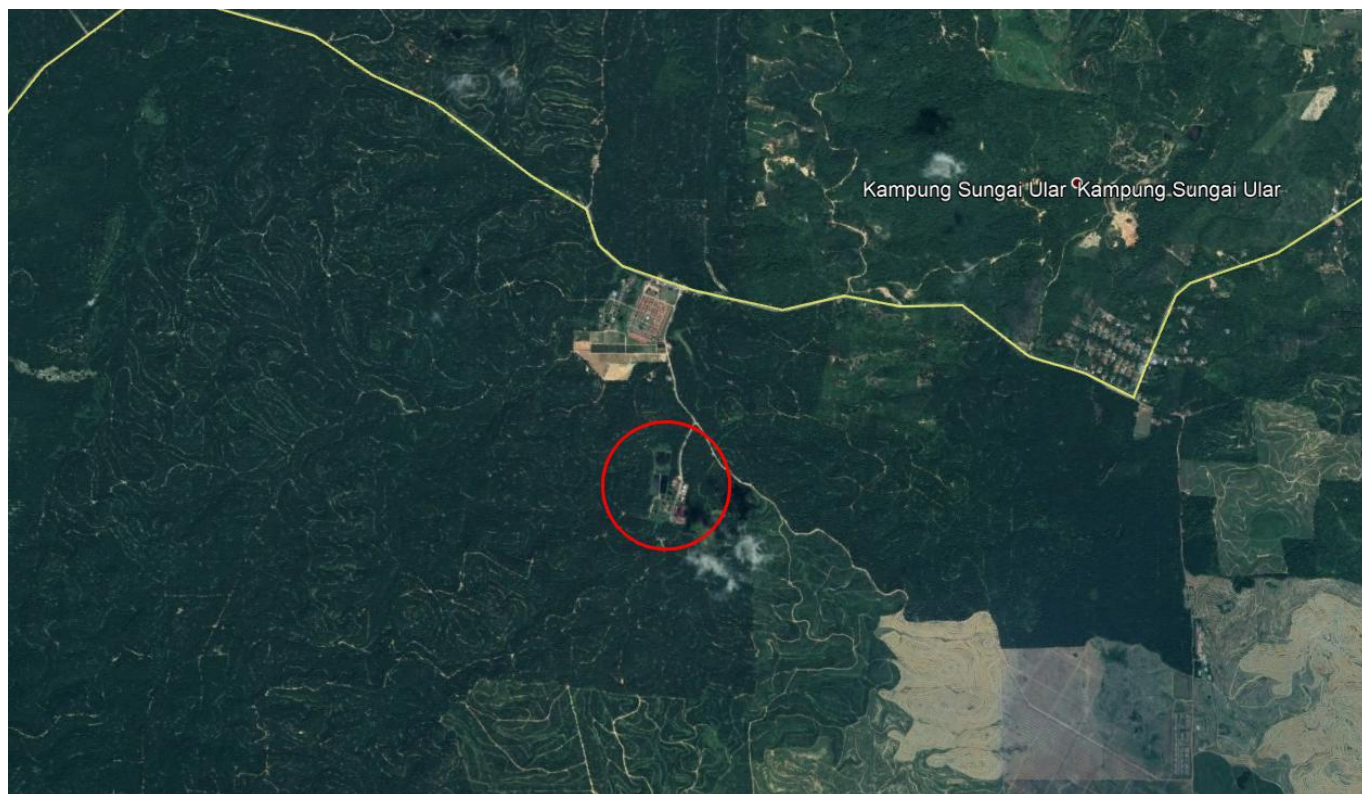
Government Officer: Nil	Community/neighbouring village: Nil
Suppliers/Contractors/Vendors: Vendors	Worker’s Representative/Gender Committee: Estate Medical Assistant AMESU, NUPW & Gender representative Foreign workers Representatives

Appendix C: Smallholder Member Details

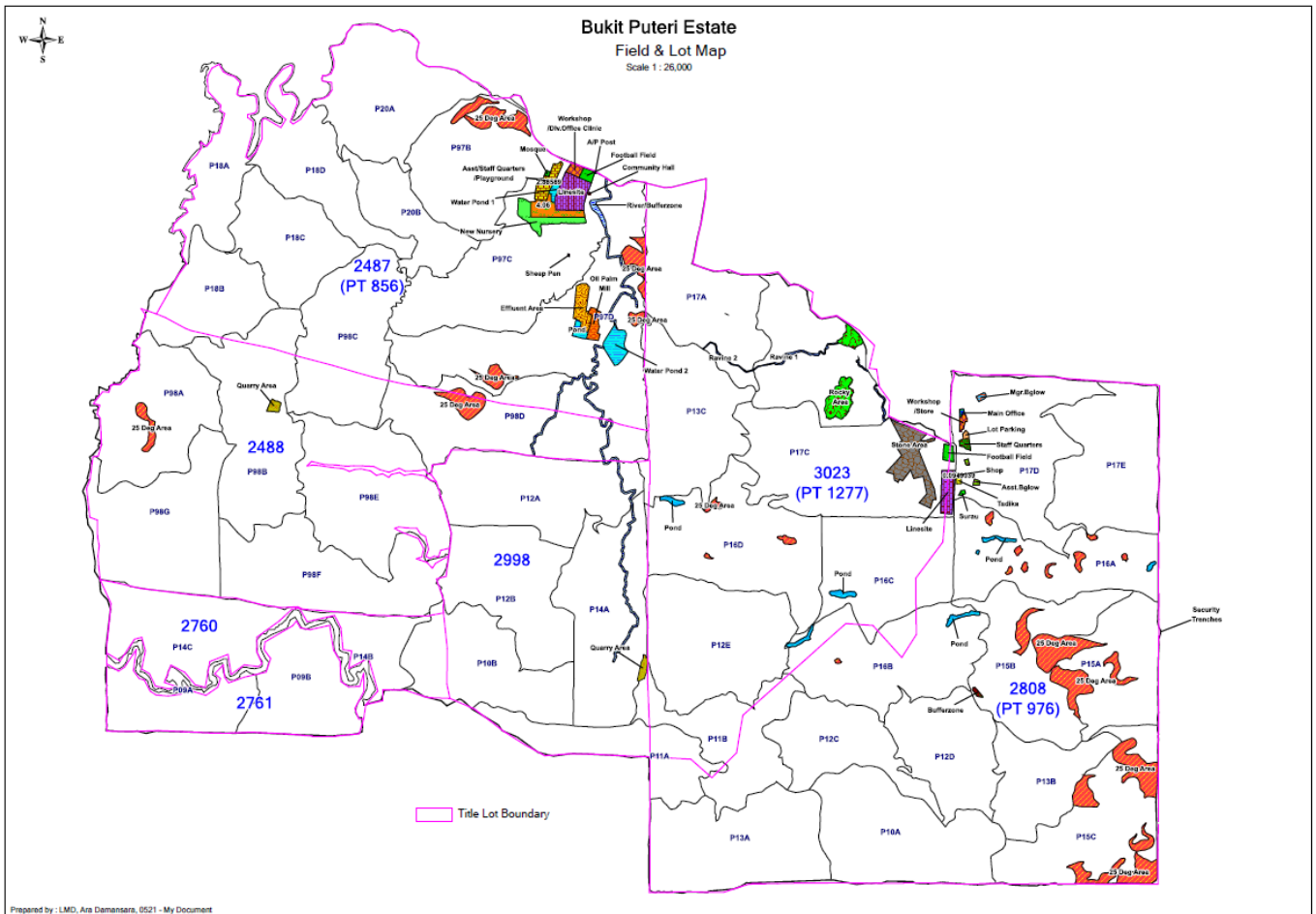
No.	Smallholder		Location of Planted Area (District)	GPS Coordinates	Certified Area (ha)	Planted Area (ha)
	Name	MPOB License Number				
	Not applicable					

Appendix D: Location and Field Map

Bukit Puteri POM



Bukit Puteri Estate



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