

**MALAYSIAN SUSTAINABLE PALM OIL
MSPO OPMC Public Summary Report**

- Initial Assessment
- Annual Surveillance Assessment (4)
- Recertification Assessment (Choose an item.)
- Extension of Scope

SIME DARBY PLANTATION BERHAD
Client Company (HQ) Address: Head Office: Group Sustainability Department Level 11, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia
Certification Unit: SOU 3 Elphil Palm Oil Mill & Plantations: Elphil Estate, Kamuning Estate, Kinta Kellas Estate
Date of Final Report: 13/10/2022

Report prepared by:
Mohd Nazib Marwan (Lead Auditor)

Report Number: 3511593

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	Certification Unit	MPOB License No.	Expiry Date
	Elphil Palm Oil Mill	540132004000	31/05/2022
	Elphil Estate	529849002000	31/05/2022
	Kamuning Estate	524034002000	30/09/2022
	Kinta Kellas Estate	528648002000	31/03/2022
Address	Level 11, Main Block, Plantation Tower, No.2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia		
Management Representative	Mdm. Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM)		
Website	www.simedarbyplantation.com	E-mail	kks.elphil@simedarbyplantation.com
Telephone	03-78484379 (Head Office)	Facsimile	03-78484356 (Head Office)

1.2 Certification Information			
Certificate Number	Mill: MSPO 705883 Estate: MSPO 705885	Certificate Start Date	02/01/2019
Date of First Certification	25/03/2018	Certificate Expiry Date	24/03/2023
Scope of Certification	<input checked="" type="checkbox"/> Mill: Production of Sustainable Palm Oil and Palm Oil Products <input checked="" type="checkbox"/> Estate: Production of Sustainable Oil Palm Fruits		
Visit Objectives	<p>The objective of the assessment was to conduct an annual surveillance assessment 4 and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organization's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organization's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.</p>		
Standard	<input type="checkbox"/> MSPO MS 2530-2:2013 – General Principles for Independent Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		
Stage 1 Audit	Not Applicable (The Certification Unit is RSPO Certified)		
Stage 2 / Initial Assessment Visit Date (IAV)	20-22/11/2017		
Continuous Assessment Visit Date (CAV) 1	18-20/02/2019		

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Continuous Assessment Visit Date (CAV) 2	10-12/03/2020
Continuous Assessment Visit Date (CAV) 3	16-18/03/2021
Continuous Assessment Visit Date (CAV) 4	14-17/03/2022

1.3 Other Certifications

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 550180	RSPO Principles & Criteria for Sustainable Palm Oil Production; Malaysian National Interpretation: 2019	BSI Services Malaysia Sdn Bhd	17/06/2026
MSPO 717672	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018	BSI Services Malaysia Sdn Bhd	11/11/2024

1.4 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
Elphil Palm Oil Mill	Elphil Palm Oil Mill, Jalan Lintang, Sungai Siput Utara, 31100 Sungai Siput, Perak, Malaysia	4° 53' 24.30" N	101° 05' 38.70" E
Elphil Estate	Ladang Elphil, Bt. 6, Jalan Lintang, 31100 Sungai Siput(U), Perak, Malaysia	4° 53' 11.40" N	101° 06' 03.20" E
Kamuning Estate	Ladang Kamuning/Changkat Salak, 31100 Sungai Siput, Perak, Malaysia	4° 49' 34.40" N	101° 03' 44.40" E
Kinta Kellas Estate	Ladang Kinta Kellas, P.O. Box 31007, Batu Gajah, Perak, Malaysia	4° 27' 46.10" N	101° 04' 30.70" E

1.5 Certified Area

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Elphil Estate	1,660.33	26.53	176.92	1,863.78	89.08
Kamuning Estate	2,638.19	84.59	1,165.65	3,888.43	67.85
Kinta Kellas Estate	936.34	3.69	100.71	1,040.74	89.97
Total	5,234.86	114.81	1,443.28	6,792.95	77.06

Note:

Elphil Estate: Reduction 1.65Ha at total planted (Mature + Immature) due land acquisition for Biogas project on 2021.

Kinta Kellas Estate: Reduction 20Ha at total planted (Mature + Immature) due land acquisition for Solar project on Jan 2022.

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1.6 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Elphil Estate	218.63	373.26	156.91	892.43	19.10	1,441.70	218.63
Kamuning Estate	508.00	857.00	237.00	1,036.19	-	2,130.19	508.00
Kinta Kellas Estate	59.61	367.80	-	528.93	-	896.73	59.61
Total (ha)	786.24	1,598.06	393.91	2,457.55	19.10	4,468.62	786.24

1.7 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Mar 2021 - Feb 2022)	Actual (Mar 2021 - Feb 2022)	Forecast (Mar 2022 - Feb 2023)
Elphil Estate	31,428.00	28,855.72	31,772.80
Kamuning Estate	41,888.00	33,107.01	38,559.88
Kinta Kellas Estate	21,455.00	17,007.83	15,736.31
Total (mt)	94,771.00	78,970.56	86,068.99

1.8 Uncertified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Mar 2021 - Feb 2022)	Actual (Mar 2021 - Feb 2022)	Forecast (Mar 2022 - Feb 2023)
Tang Tatt	-	100,857.51	-
Eng Huat	-	39,357.74	-
Sg. Krudda	-	42.44	-
Sg. Siput	-	259.18	-
Dovenby	-	798.94	-
Kawasan Sg. Siput (U)	-	1,084.48	-
Total	-	142,400.29	-

1.9 Certified Tonnage			
Mill Capacity: 45 MT/hr	Estimated (Mar 2021 - Feb 2022)	Actual (Mar 2021 - Feb 2022)	Forecast (Mar 2022 - Feb 2023)
	FFB	FFB	FFB
SCC Model:	94,771.00	78,970.56	86,068.99
MB	CPO (OER: 20.60%)	CPO (OER: 20.84%)	CPO (OER: 20.75%)

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	19,522.83	16,457.47	17,859.32
	PK (KER: 5.50%)	PK (KER: 5.33%)	PK (KER: 5.40%)
	5,212.41	4,209.13	4,647.73

1.10 Actual Sold Volume (CPO)

CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
16,457.47	-	-	-	16,457.47	16,457.47

1.11 Actual Sold Volume (PK)

PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
4,209.13	-	-	-	4,209.13	4,209.13

Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 14-17/03/2022. The audit programme is included as Section 2.4. The approach to the audit was to treat the SOU 4 Elphil POM and Supply Bases (Elphil Estate, Kamuning Estate, and Kinta Kellas Estate) as a MSP0 Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with 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 Certification Unit were not using MSP0 certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSP0 Logo and related claims.

The estates or smallholders sample were determined based on formula $S = r\sqrt{n}$ where n is the number of estates while when applicable, the smallholders sample were determined following the MSP0 Certification Requirement. The sampling of smallholders were based on the formula $(r\sqrt{n})$; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix B.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.6.

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.

All the previous nonconformities are remains closed. The assessment findings from the initial assessment are detailed in Section 4.2. Major NC closure was conducted offsite based on evidence submitted.

This report was externally reviewed by MSP0 approved Peer Reviewer prior to certification and recertification decision by BSI. For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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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)
Elphil POM	✓	✓	✓	✓	✓
Elphil Estate	-	✓	✓	-	✓
Kamuning Estate	-	✓	-	✓	-
Kinta Kellas Estate	✓	-	✓	-	✓

Tentative Date of Next Visit: March 13, 2023 - March 16, 2023

Total No. of Mandays: 11 Mandays

2.1 BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Mohd Nazib Marwan (MNZ)	Team Leader	<p>Education: He holds Diploma in Mechanical Engineering graduated from Politeknik Sultan Salahuddin Abdul Aziz Shah in 2007.</p> <p>Work Experience: He has 5 years working experience with Department of Occupational Safety and Health Malaysia and has visited/audited many types of industries including plantation industry. He also has more than 11 years of experiences as auditor for several standards including ISO 9001, ISO 14001, ISO 45001, MSPO and RSPO with previous certification body.</p> <p>Training attended: ISO 9001, ISO 14001, ISO 45001, MSPO and RSPO.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of social, legal, workers & stakeholders' consultation.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English Language.</p>
Nor Halis Abu Zar (NHA)	Team Member	<p>Education: Bachelor of Science, Plantation Technology and Management, graduated from Universiti Teknologi Mara in 2012.</p> <p>Work Experience:</p>

		<p>He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for MS 2530:2013 and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p>Training attended: He has completed ISO IMS 9001 and 14001 Lead Auditor Course in January 2019, MSPO 2530:2013 Lead Auditor Course in February 2019, Endorsed RSPO Lead Auditor Course in October 2020, CQI and IRCA Certified ISO 45001 Lead Auditor Course in June 2021, ISO 9001:2015 Lead Auditor Course in April 2019, MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training on May 2021.</p> <p>Aspect covered in this audit: Legal requirements, traceability, occupational health and safety, GAP, training.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English Language.</p>
<p>Muhammad Naquiuddin Mazeli (MNM)</p>	<p>Team Member</p>	<p>Education: He holds Bachelor of Science Horticulture, graduated from University Putra Malaysia.</p> <p>Work Experience: He has 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO 9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme.</p> <p>Training attended: He is a trained as Safety and Health Officer, Food Safety System (FSSC and ISO 22000) for Mill and refineries, ISO 9001, ISO 45001 and already attend HCV training with Proforest.</p> <p>Aspect covered in this audit: Legal requirements, traceability, occupational health and safety, GAP, training.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English Language.</p>

2.2 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

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2.3 Accompanying Persons

No.	Name	Role
	N/A	

2.4 Assessment Plan

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

Date	Time	Subjects	MNZ	NHA	MNM
Sunday 13/03/2022	-	Travel from KL to Ipoh	√	√	√
Monday 14/03/2022 Kinta Kellas Estate	0830 - 0900	Opening Meeting MSPO: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan. 	√	√	√
	0900 - 1230	FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. laboratory, weighbridge, and palm product storage area, Document review (MS 2530 Part 4), Management commitment and responsibility, Transparency, Compliance to legal requirement, Social responsibility, health safety and employment condition, staff, workers and contractor interview, housing and facility inspection.	√	√	√
	1230 - 1330	Lunch	√	√	√
	1330 - 1630	FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. laboratory, weighbridge, and palm product storage area, Document review (MS 2530 Part 4), Management commitment and responsibility, Transparency, Compliance to legal requirement, Social responsibility, health safety and employment condition, staff, workers and contractor interview, housing and facility inspection.	√	√	√
	1630 - 1700	Interim Closing briefing	√	√	√

Date	Time	Subjects	MNZ	NHA	MNM
Tuesday 15/03/2022 Kinta Kellas Estate Elphil Estate	0830 - 1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Document review (MS 2530 Part 3), Management commitment and responsibility, Transparency, Compliance to legal requirement, Social responsibility, health safety and employment condition, staff, workers and contractor interview, housing and facility inspection,	√	√	√
	1230 - 1330	Lunch	√	√	√
	1330 - 1630	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Document review (MS 2530 Part 3), Management commitment and responsibility, Transparency, Compliance to legal requirement, Social responsibility, health safety and employment condition, staff, workers and contractor interview, housing and facility inspection,	√	√	√
	1600 - 1700	Interim Closing briefing	√	√	√
Wednesday 16/03/2022 Elphil Estate	0830 - 1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Document review (MS 2530 Part 3), Management commitment and responsibility, Transparency, Compliance to legal requirement, Social responsibility, health safety and employment condition, staff, workers and contractor interview, housing and facility inspection,	√	√	√
	1230 - 1330	Lunch	√	√	√

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Date	Time	Subjects	MNZ	NHA	MNM
	1330 - 1600	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc Document review (MS:2530 Part 3), Management commitment and responsibility, Transparency, Compliance to legal requirement, Social responsibility, health safety and employment condition, staff, workers and contractor interview, housing and facility inspection,	√	√	√
	1600 - 1700	Interim Closing briefing	√	√	√
Thursday 17/03/2022 Elphil POM	0830 - 1230	FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. laboratory, weighbridge, and palm product storage area, Document Review (MS 2530 Part 4), Management commitment and responsibility, Transparency, Compliance to legal requirement, Social responsibility, health safety and employment condition, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	-
	1230 - 1330	Lunch	√	√	-
	1330 - 1600	FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. laboratory, weighbridge, and palm product storage area, Document Review (MS:2530 Part 4), Management commitment and responsibility, Transparency, Compliance to legal requirement, Social responsibility, health safety and employment condition, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	-
	1600 - 1700	Interim Closing briefing	√	√	-
	1600 - 1700	Finalization of audit findings & preparation of closing meeting	√	√	-
	1700 - 1730	Closing meeting	√	√	√

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Date	Time	Subjects	MNZ	NHA	MNM
Friday 18/03/2022	-	Travelling back from Ipoh to Kuala Lumpur	√	√	√

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. The findings summary of the assessment by criteria are listed in Appendix A.

During the assessment there were two major (2) Major & no minor (0) Minor nonconformities and one OFI (1) raised. The SOU 3 Elphil POM and Supply Bases Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Non-conformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-Conformity Report			
NCR Ref #:	2183025-202203-M1	Issue Date:	17/03/2022
Due Date:	16/06/2022	Date of Closure:	16/06/2022
Area/Process:	Elphil POM	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.4.4.2 Major
Requirements:	The occupational safety and health plan should 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). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance with Occupational Safety Health (Classification Packaging and Labelling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.		
Statement of Nonconformity:	The occupational safety and health plan were not effectively implemented.		
Objective Evidence:	During site visit at Effluent Pond area Elphil POM, it was found one JCB Driver from contractor KRM Mawar Murni was doing maintenance job without wearing safety helmet and safety shoes (due to diabetic wound) when operating the JCB. It was not in line with Occupational Safety & Health manual Chapter 8 Personal Protective		

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	Equipment Version 1, Issue No. 1 dated 20/08/2008 section 11.0 Recommendation PPE for Operating Unit, Type of work Loading & Transporting / Driving & Riding). During site visit at Effluent area Elphil POM, it was found 1 worker who is ETP Chargehand was using modified drinking bottle for refilling petrol to the water pump engine when do maintenance job at that area. It was not in line Occupational Safety & Health manual Chapter 9 Chemical Safety Management Version 1, Issue No. 1 dated 20/08/2008 section 6.0 Procedures for handling.
Corrections:	<ol style="list-style-type: none"> 1. Immediately stop the contract work at effluent pond. 2. Conduct PPE, Chemical Safety Management and Handling briefing to our ETP charge hand and contract workers. 3. Issue and ensure the right PPE and proper tools to be used for water pump engine maintenance.
Root cause analysis:	<ol style="list-style-type: none"> 1. Monitoring of contractor worker's safety PPE is less effective. 2. ETP Chargehand did not use the proper tools provided to do maintenance job at water pump engine.
Corrective Actions:	<ol style="list-style-type: none"> 1. Before the work permit is issued our management, representative will brief the safety procedure. 2. Management representative or Auxiliary Police will verify PPE for all contract workers comply as per work permit before starting the work. 3. Mill management will ensure all workers to carry out job in line with Occupational Safety & Health & Chemical Safety Management. Mill will issue a warning letter to the contractors and will terminate their service if they continuously cannot comply with mill requirements on maintaining good safety.
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Safety procedure has been briefed before the work permit is given. Refer PPE, Chemical Safety Management and Handling Briefing dated 04/04/2022. 2. Inspection by Auxiliary Police has been conducted as per evidence inspection at ETP Elphil POM dated 05/05/2022 3. Control point to ensure the safe work condition has been monitored as per evidence Visitor Chit dated 05/05/2022 and Permit to Work form dated 05/05/2022. <p>The evidence has been implemented and Major NC was effectively closed on 16/06/2022.</p>

Non-Conformity Report			
NCR Ref #:	2183025-202203-M2	Issue Date:	17/03/2022
Due Date:	16/06/2022	Date of Closure:	16/06/2022
Area/Process:	Elphil POM	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.3.1.3 Major
Requirements:	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.		
Statement of Nonconformity:	The monitoring of legal requirements register was not effective.		
Objective Evidence:	Legal and other Requirements Register (LORR) – Summary of Compliance for Elphil POM reviewed on 03/03/2022 has shown that all legal and other requirements are		

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	<p>complied. However, there was some non-compliance identified during authority visit was not updated in the Legal and other Requirements Register as per notice issued below:</p> <ol style="list-style-type: none"> 1. Notice of Prohibition (S/N: 001651) and Arahan Pematuhan Akta Keselamatan dan Kesihatan Pekerjaan (AKKP) 1994 / Akta Kilang dan Jentera (AKJ) issued by DOSH Perak dated 11/02/2022. 2. Field Citation report dated 14/03/2022 which has stated non-compliance to the compliance schedule (License No: 001845, validity period: 01/07/2021 – 30/06/2022) items no: 8, 9, 24, 45 and 46.
Corrections:	To update noncompliance identified in legal and other requirements register as per notice issued by DOSH Perak and Field Citation report.
Root cause analysis:	<ol style="list-style-type: none"> 1. Monitoring & tracking on LORR documentations for MSPO not effective. 2. Immediate update on LORR non-compliance was not done.
Corrective Actions:	To update noncompliance identified in legal and other requirements register as per notice issued by DOSH Perak and Field Citation report.
Assessment Conclusion:	<p>New person in charge on monitoring the LORR has been nominated as per evidence letter dated 25/03/2022 to Assistant Manager. The LORR training by RSQM has been updated in the Training Plan 2022 to ensure the Assistant Manager and QA have good awareness on updating the LORR if any amendment on the Law and Regulation. The LORR has been updated according as per latest amendment.</p> <p>The evidence has been implemented and Major NC was effectively closed on 16/06/2022.</p>

Opportunity For Improvement			
Ref:	2183025-202203-I1	Clause:	MSPO 2530 Part 3: 4.4.4.2
Area/Process:	Ephil Estate & Kinta Kellas Estate		
Objective Evidence:	<ol style="list-style-type: none"> 1. The weaknesses or any opportunities for improvement while handling the accidents/incidents at the estates can be further improved. 2. Minimum quantity of items in the First Aid Box could be clearly determine and the monthly inspection records could be further improved. 		

Noteworthy Positive Comments	
1	Good commitment and corporation from the management.
2	Generally, well implementation of Good Agricultural Practices (GAP).

3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
NCR Ref #:	2035345-202103-N1	Issue Date:	18/03/2021
Due Date:	Next Surveillance	Date of Closure:	17/03/2022
Area/Process:	Kinta Kellas Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.4.2 Minor

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Requirements:	The risks of all operations shall be assessed and documented.						
Statement of Nonconformity:	Existing Control stated in the Estate’s HIRARC Register was not implemented accordingly.						
Objective Evidence:	<p>With reference to the HIRARC Register as below: Estate: Kinta Kellas Estate Department: Workshop Section: Gas - Cutting (Using Oxygen and Acetylene Gas)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Job Step</th> <th style="width: 33%;">Hazards</th> <th style="width: 33%;">Existing Control</th> </tr> </thead> <tbody> <tr> <td>Closing Gas Valve</td> <td>Extinguish Flame Leaking Gas</td> <td>Flash Back Arrestor</td> </tr> </tbody> </table> <p>During the site visit to the workshop at Kinta Kellas Estate, it was noticed that the Oxygen and Acetylene tanks used for Welding Works were without Flashback Arrestors therefore the existing control that was supposed to be in place was not implemented effectively. Hence a minor non-conformity was raised.</p>	Job Step	Hazards	Existing Control	Closing Gas Valve	Extinguish Flame Leaking Gas	Flash Back Arrestor
Job Step	Hazards	Existing Control					
Closing Gas Valve	Extinguish Flame Leaking Gas	Flash Back Arrestor					
Corrections:	<ol style="list-style-type: none"> 1. Replace a new flashback arrestor immediately. 2. Briefing to be conducted on importance of flashback arrestors and SOP for Oxygen and Acetylene Tanks to Foreman and related personals. 						
Root cause analysis:	<ol style="list-style-type: none"> 1. The flashback arrestor had been removed due to defect and not replaced for the day. 2. Lack of knowledge on the importance of the use of flashback arrestor by personals. 						
Corrective Actions:	<ol style="list-style-type: none"> 1. Daily monitoring on the flashback arrestor by the Foreman. 2. PIC (Foreman) to inform and replace the flashback arrestors if there are any defects in the future. 3. Conduct periodic Safe Operating Procedures training of Workshop Tools for Foreman and related personals. 						
Assessment Conclusion:	CAP has been accepted and evidence of CAP effectiveness to be verified in the next assessment.						
Verification Statement:	From daily monitoring record on Feb 2022 by the foreman was available and updated monthly basis. During site verification at workshop found the flashback arrestor was available and maintain accordingly thus the Minor NC was effectively closed.						

Opportunity For Improvement			
Ref:	2035345-202103I1	Clause:	MSPO 2530 Part 3: 4.1.2.2
Area/Process:	Kinta Kellas Estate		
Objective Evidence:	Some findings for internal audits could be further elaborated its root cause of nonconformities, corrections taken to address the nonconformities and corrective actions taken to address the determined root cause.		
Verification Statement:	The management already establish internal audit procedure (SD/SDP/PSQM/IAP dated 01/11/2017) had been established and documented. The record was available verified on Kinta Kellas Estate, from the record there are 1 minor and 1 OFI was been issued by internal auditor based on MSPO checklist. The root cause and correction have been made as per verification.		

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Opportunity For Improvement			
Ref:	2035345-202103I2	Clause:	MSPO Part 3: 4.5.3.2
Area/Process:	Estates		
Objective Evidence:	Implementation of Waste Management Plan related to Used Contaminated PPE could be further improved to ensure its efficiency of recycling potential.		
Verification Statement:	Management plan on proper disposal of waste in accordance to SOP and legal requirement for Used PPE (Non washable / washable) has been recorded. Action on Non washable PPE was collected and disposed off the items through registered purchaser as schedule waste while for washable PPE was collect and disposed as recyclable waste after washing. Sighted record of non-washable and washable PPE has been maintained. Inventory of Used Contaminated PPE as schedule waste has been verified. Refer Fifth schedule, E Swiss Inventory March 2021, File reference number 647766-V already included under SW409 (Contaminated equipment Item with Schedule wastes).		

3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
M01- Part 3	4.3.1.1-Part 3 Major	23/11/2017	Closed on 22/01/2018
M02- Part 3	4.4.1.1-Part 3 Minor	23/11/2017	Closed on 20/02/2019
M03- Part 3	4.5.1.2-Part 3 Minor	23/11/2017	Closed on 20/02/2019
M04- Part 3	4.5.3.2-Part 3 Minor	23/11/2017	Closed on 20/02/2019
M05- Part 3	4.5.3.4-Part 3 Major	23/11/2017	Closed on 22/01/2018
M06- Part 3	4.5.5.1-Part 3 Minor	23/11/2017	Closed on 20/02/2019
M01- Part 4	4.4.1.1-Part 4 Minor	23/11/2017	Closed on 20/02/2019
M02- Part 4	4.4.4.1-Part 4 Minor	23/11/2017	Closed on 20/02/2019
M03- Part 4	4.5.3.1-Part 4 Minor	23/11/2017	Closed on 20/02/2019
M04- Part 4	4.5.4.1-Part 4 Minor	23/11/2017	Closed on 20/02/2019
M05- Part 4	4.5.5.1-Part 4 Minor	23/11/2017	Closed on 20/02/2019
1744125-201902-N1	4.5.3.3-Part 3 Minor	20/02/2019	Closed on 12/03/2020
1894208-202002-M1	4.4.2.5-Part 3 Major	12/03/2020	Closed on 12/06/2020
1894208-202002-M2	4.4.5.6-Part 3 Major	12/03/2020	Closed on 12/06/2020
1894208-202002-M3	4.6.4.1-Part 3 Major	12/03/2020	Closed on 12/06/2020
2035345-202103-N1	4.4.4.2-Part 3 Minor	18/03/2021	Closed on 17/03/2022
2183025-202203-M1	4.4.4.2-Part 4 Major	17/03/2022	Closed on 16/06/2022
2183025-202203-M2	4.3.1.2-Part 4 Major	17/03/2022	Closed on 16/06/2022

3.5 Issues Raised by Stakeholders


IS #	Description
1	<p>Issues: Local Village Representatives – Head Village Kampung Temin Interview was done via phone call with the village head. On-going issue with regards to illegal cow/cattle issue in the estate causing accident especially at night is the main concern.</p> <p>Management Responses: Will plan a meeting and discuss with cattle owner. The issue has been discussed in the stakeholder meeting and yet to be resolved and still in progress.</p> <p>Audit Team Findings: Noted that the cattle issue has been identified as social impact and included in the social management plan. The plan is still on going and to be verified in the next assessment.</p>
2	<p>Issues: Estate Contractor – AMUSU Management Service Sdn Bhd They informed that the payment was made promptly. They are aware of the complaint procedure and so far, they have no issue with the management.</p> <p>Management Responses: The management will ensure the payment will be made accordingly.</p> <p>Audit Team Findings: No further action required.</p>
3	<p>Issues: Local workers & foreign workers NUPW representatives No restrictions by management to all mill and estate employees to join union. Almost all local workers associated with NUPW while more than 50% foreign workers become member. Required fees paid by company with no issue.</p> <p>Management Responses: Estates management will continue good relationship with workers.</p> <p>Audit Team Findings: No further action required.</p>
4	<p>Issues: Gender Committee Representative No sexual harassment or violence case reported during the time of assessment. They are aware of the function of the committee and informed that no discrimination from the management regardless of gender.</p> <p>Management Responses: The management will continue to monitor if there is any case of sexual harassment or violence.</p> <p>Audit Team Findings: No further action required.</p>

5	<p>Issues: Labour Department Interview was done via phone call with the Labour Department officer. No issue reported so far from Sime Darby Estates namely Kamuning and Elphil estates which fall under Kuala Kangsar district. Effective date for the implementation of New Minimum Wages Order 2022 was on 1/5/2022.</p>
	<p>Management Responses: Will continue to communicate with Labour Department from time to time.</p>
	<p>Audit Team Findings: No further issue.</p>

3.6 List of Stakeholders Contacted

<p>Government Officer: Labour Department</p>	<p>Community/neighbouring village: Village/Community Head Kampung Temin</p>
<p>Suppliers/Contractors/Vendors: AMUSU Management Service Sdn Bhd</p>	<p>Worker’s Representative/Gender Committee: Local workers & foreign workers NUPW representatives Gender Committee</p>

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment Sime Darby SOU 3 Elphil POM and Supply Bases Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Sime Darby SOU 4 Elphil POM and Supply Bases Certification Unit is continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: RASHIDI MAAN	Name: MOHD NAZIB MARWAN
Company name: SIME DARBY PLANTATION BHD	Company name: BSI SERVICES MALAYSIA SDN BHD
Title: ESTATE MANAGER	Title: CLIENT MANAGER
Signature: SIME DARBY PLANTATION BERHAD (Company No: 647766-V) Ladang Kamuning  Rashidi Bin Maan Manager Date: 11/10/2022	Signature:  Date: 17/06/2022

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 -	Sime Darby Plantation Berhad has incorporated its policy on implementation of MSPO in the "Group Sustainability & Quality Policy Statement" mentioned in Indicator 4.1.1.2. Kinta Kellas Estate management was conducted policies briefing to its employees on 12/01/2022 (COBC & Policy Training) and 15/12/2021 (RSPO & MSPO Training).	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	Sime Darby Plantation Berhad has established a policy called "Group Sustainability & Quality Policy Statement" which was signed by the Group Managing Director (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 - Minimizing environmental harm - Delivering sustainability quality The policy is guided by three main documents i.e.: <ul style="list-style-type: none"> - Responsible Agriculture Charter - Human Rights Charter 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		- Innovation & Productivity Charter	
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 -	An internal audit procedure (SD/SDP/PSQM/IAP dated 01/11/2017) had been established and documented. Internal audit was planned to be conducted annually. Latest internal audit in Elphil Estate was conducted on 5/02/2022 by internal auditors’ team. MSPO Part 3 internal audit was conducted in combination with RSPO P&C requirement audit as well. Internal audit was planned and conducted by internal sustainability team, in Kinta Kellas Estate latest was on 4/2/2022.	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 management already establish internal audit procedure (SD/SDP/PSQM/IAP dated 01/11/2017) had been established and documented. The record was available verified on Kinta Kellas Estate, from the record there are 1 minor and 1 OFI has been issued by internal auditor based on MSPO checklist. The root cause and correction have been made as per verification.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The report was available for review. The minutes of meeting records for management review indicated report available in the review made for internal audit result status.	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.1.3 – Management Review			
4.1.3.1	<p>The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.</p> <p>- Major compliance -</p>	<p>The minutes of meeting records for the latest management review meeting conducted on 7/3/2022 chaired by the Kinta Kellas Estate Manager, the estate management team found sufficient review of continuous suitability, adequacy, and effectiveness of the requirements for effective implementation of MSPO. Decision available by management to maintain the well implementation of MSPO.</p>	Complied
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	<p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p>- Major compliance -</p>	<p>The latest Continual Improvement Plan for 2022 was adopted in the RSPO/MSPO CIP for both estates. The improvement plans include workers welfare, waste management, occupational health & safety and operations improvements. For example, a number of improvement projects have been initiated for the field operation and workers quarters. Among CIP verified were:</p> <ul style="list-style-type: none"> • M Plan FY 2022 • Replanting programme • Road maintenance programme 	Complied
4.1.4.2	<p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p>- Major compliance -</p>	<p>Mechanization for field operation has been introduced at both estates, which was sighted on site, for example the use of Mechanical Grabber for FFB evacuation, Control Droplet Applicator (CDA) for Pesticide Operations and ATV Mounted Sprayer for Pesticide Application. The estates have also moved towards chemical reduction and introducing more Integrated Pest Management in their practices. This could be verified through the sighting of beneficial plants all around the estates and the IPM Action Plans that were available for verification.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the RCEO and RGM are transacted during the monthly Managers meetings and emails.	
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	The action plan to provide the necessary resources for improvements have been adopted in the yearly budget and Management Plan for both estates. Where introduction of new machines and new work method, all level of employees will be trained to handle /implement the new techniques and work changes. Monitoring is made by the Estate Managers and Assistants throughout the on-the-job training and familiarization.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSP0 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 -	The management was sent memo to stakeholder as substitute with stakeholder meeting due to COVID-19 issue. The record was available dated 2/3/2022. Referring to the records of letter sent to stakeholder including Appendix A i.e. explanation on the intention of stakeholder consultation & Appendix B i.e. the stakeholder feedback forms.	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.	Management documents related to sustainability available at each operating unit visited during the on-site audit upon request including sustainability policies, procedures, social and environmental	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	assessments as well as management action plans etc. Furthermore, global documents accessible via company's website.	
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 management already establish the document regarding to communication to internal and external stakeholder under Sustainability Planation Management System (SPMS) under Appendix 5 Flowchart and Procedure on handling Social issues dated 1/11/2008. From this document they elaborate the standard procedure under Estate Quality Management System (EQMS); Standard Operation Manual (SOM) under Sub section 5.5 procedure for internal and external communication dated 1/11/2008 for estate. For Mill Quality Management System for Mill (MQMS) under SOM also dated 1/11/2008.	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 -	At each operating unit, the management have nominated person that responsible on social issue. Sampling in Kinta Kellas Estate, management officials nominated are the estate managers as per appointment letter for social management for manager Kinta Kellas Estate Mr Devanand a/l Vasu dated 1/1/2022.	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 -	List of stakeholders among internal and external parties maintained up to date as of January 2021. List of stakeholders among internal and external parties maintained up to date as of January 2021. Due to the multiple implementations of Movement Control Order by the government, Last communication was on 2/3/2022 to stakeholder using letter. No complaint been received as per verification.	Complied
Criterion 4.2.3 – Traceability			

Criterion / Indicator		Assessment Findings	Compliance
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>Procedure available as per Sustainability Plantation Management System Appendix 15; SOP for Sustainable Supply Chain and Traceability; Version 2; Year 2018; Issue # 5; Issue date: April 2019.</p> <p>Based on the SOP Para 6.0 Delivery of FFB From the Estate; Sub-para 6.3 Estate shall ensure sufficient information is stated on the weighbridge ticket or consignment note of all delivery FFB including:</p> <ul style="list-style-type: none"> i. RSPO, MSPO and ISCC Certificate number (where applicable) ii. MSPO Certificate Validity iii. Greenhouse gas (GHG) emission value (either disaggregated default or actual value) iv. Distance (from estate to respective oil mill – ISCC only) v. Country of origin (ISCC only) The functionality to include the relevant information in the weighbridge tickets for estates and mills is available in the SDP Weigh System. In the case of unavailability of the SDP Weigh System, the information under 6.3 still needs to be documented manually. 	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>Regular inspections of estates’ FFB productions and delivery conducted by estate management on daily basis and reported to HQ. Additionally, Internal audit conducted annually by internal auditors from the Regional Sustainability Team (RSQM).</p> <p>Sighted a sample of latest internal audit in Kamuning Estate conducted on 13/01/2021 by internal auditors’ team led by Mohammad Jannati Mat Yusoff.</p> <p>The MSPO Part 3 internal audit was conducted including with traceability requirements. Previous audit was conducted on 23/01/2020.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Performance Monitoring Visit at Kinta Kellas Estate dated 08/12/2021 and 03/07/2021 and for Elphil Estate dated 07/12/2021 and 26/05/2021 focusing on the immature assessment, manuring assessment, building & facilities management, EVIT Summary by Each vehicle, EVIT Summary by Type, Estate Cost, Overall Rating/Scoring Summary. Sighted also 2021/2022 Agronomic & Fertilizer Recommendations Report dated 26-27/01/2021.	
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	For Kinta Kellas Estate, the appointed PIC is Muhammad Hamdi Bin Ahmad Zani as per appointment letter dated 01/01/2022. Elphil Estate, Assistant Manager (Ali Faathir Bin Jamil) as per appointment letter dated 01/01/2022 approved by Estate Manager.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	Record of FFB deliveries to Mill is available as per sample sighted as follow: Kinta Kellas Estate Ticket No: 19259, Transporter: Gunasekaran, D/O No: 19259, Truck No: AGU7737, Seal No: 111393, 111394, 111395, 111396, Nett Weight: 11.640kg. Ticket No: 19242, Transporter: Alpha Meta, Lorry No: SYM3733, Remarks: Bin No. 4, Seal No: 111325, 111326, 111327, 111328, Nett Weight: 12,030kg. Elphil Estate Ticket No: 18015, Transporter: Gunasekaran, Lorry No: AHF4595, Seal No: 071157, Division: Kamiri, Nett Weight: 12,340kg. Ticket No: 18052, Transporter: Gunasekaran, Lorry No: AHG9255, Seal No: 071371, Division: Plang, Nett Weight: 3,850kg.	Complied
4.3 Principle 3: Compliance to legal requirements			

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	<p>All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>Estates were continuously monitored the compliance with legal requirements. Permit and licenses were verified as follows:</p> <p>Kinta Kellas Estate</p> <ol style="list-style-type: none"> 1. Weighbridge Ticket (S/N: B521963024), Sticker No: DE17 000231, Capacity: 40,000kg x 10kg, Manufacturer: Mettler Toledo, Model No: IND246, Calibration date: 23/12/2021 2. Air Compressor (Air Receiver) Certificate of Fitness Registration Number: PK PMT 951; Cert Number: PMT-PK/22 74222. Valid until: 08/05/2023 3. MPOB License; License Number: 528648002000; Estate Area: 1061.93; License Validity Period: 19/04/2021 – 31/03/2022. 4. Permit Barang Kawalan Berjadual (Diesel); Reference Number: SK/018/14(D)/KPDN.HEP.PK; Diesel Storage capacity: 8,500 Liters; License Validity: 18/07/2021 – 17/07/2024. <p>Elphil Estate</p> <ol style="list-style-type: none"> 1. Salary deduction permit from JTKSM (Ref No: P.P. 3/7/0111 dated August 2005 2. Housing approval from JTK (Ref No: PCF 1080320120003 – Main Div, PCF 1080320120004 – Plang Div) dated 23/02/2012 & CF dated 27/05/2013 and PCF1080320130005 – Kamiri Div) 3. MPOB License (License No: 529849002000 valid from 29/09/2021 until 31/05/2022) for 1871.26 Ha 4. Permit to use own treated water (S/N: 2021/0011, Ref No: JTK. PK(1) 42/16 Jld. 6(52), dated: 21/09/2021) valid until 25/10/2023 	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		5. Air Receiver CF from DOSH Perak (PK PMT 5694 for S/N: 11160867, PK PMT 6619 for S/N: 13161304 & PK PMT 5693 for S/N: 08145732) valid until 25/07/2022 6. Diesel Storage License (Ref No: SK/93/ B.PGK.KK, S/N: A001940) for Diesel Euro 2M, Capacity: 5600 liter valid from 25/11/2020 until 24/11/2023 7. Weighbridge calibration certificate (S/N: C128144794, Sticker No: DE18 004607, Location: Plang Division, Capacity: 60,000kg x 10kg, dated 26/01/2022	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	A documented procedure has been established and maintained. Procedure for Legal and Other Requirements dated 10/12/2008. (Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4). All legal requirements were documented in Legal and Other Requirement Register available at the estates. The register is reviewed regularly and updated as and when there are new or amended legal requirements that are applicable to the estate operations. The latest review is as below; Kinta Kellas Estate – 03/01/2022 Elphil Estate – 02/03/2022	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 -	A documented procedure has been established and maintained. Procedure for Legal and Other Requirements dated 10/12/2008 (Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4). Applicable legal and other requirements were identified and documented in Legal and Other Requirement Register. Compliance to each applicable law and regulation is monitored by each operating unit. The legal register at all sites were reviewed/updated on a yearly basis as and when needed for new updates/licenses. The compliance status was monitored and	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>documented in "Evaluation of Compliance Score Card". The document listed the applicable laws and amendments, revision dates and acknowledgement by the management as follow:</p> <ol style="list-style-type: none"> 1. Kinta Kellas Estate – reviewed on 03/01/2022 2. Elphil Estate - reviewed on 03/01/2022 <p>All the legal and other requirements were registered accordingly and documented in the legal requirement register. No new regulations coming into force identified since last assessment.</p>	
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p>- Minor compliance -</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 verification indicates that the system is appropriate to the operations. Tracking system on any changes in the law is well implemented.</p> <p>For Kinta Kellas Estate, the management has appointed the Assistant Manager, (Muhammad Hamdi Bin Ahmad Zani as per appointment letter dated 04/09/2020) and for Elphil Estate, Assistant Manager (Ali Faathir Bin Jamil) as per appointment letter dated 01/01/2022 approved by Estate Manager as the PIC to monitor any changes on the LORR and update as and when necessary.</p>	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>No issues of land dispute issue occur in all estates within SOU 3 that involved other land user rights since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.3.2.2 The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land.</p> <p>- Major compliance -</p>	<p>Management of all estates visited on-site provided the company’s legal ownership of the estate land.</p> <p>As sample, sighted that Elphil Estate hold a total of 21 land titles. Copies of land titles available as per sample sighted as following: –</p> <ul style="list-style-type: none"> • Title # 1176; Lot # 923; District: Kuala Kangsar; Sub-district: Mukim Sungai Siput; Area: 2.0498 ha • Title # 1614; Lot # 1222; District: Kuala Kangsar; Sub-district: Mukim Pulau Kamiri; Area: 81.2706 ha • Title # 11988; Lot # 1329; District: Kuala Kangsar; Subdistrict: Mukim Sungai Siput; Area: 52.0073 ha <p>For Kinta Kellas Estate total of land title were 14 land titles. Copies of land titles available as per sample sighted as following: –</p> <ul style="list-style-type: none"> • Title # PN2242; Lot 2257; District Kinta; Sub-district: Mukim Sungai Terap; Area: 2.382 Ha • Title # PN150078; Lot 6103; District Kinta; Sub-district: Mukim Sungai Terap; Area: 3.007 Ha • Title #Geran49243; Lot20233; District Kinta; Sub-district: Mukim Sungai Terap; Area: 0.867 Ha 	<p>Complied</p>
<p>4.3.2.3 Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	<p>Elphil Estate</p> <p>Legal boundaries at the estate were clearly demarcated with red and white colour concrete poles, fences and security trenches. Sighted during site visit at the estate’s boundaries at Field P99P (Concrete Pole – 4.82472, 101.10949).</p> <p>Kinta Kellas Estate</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p>Legal boundaries at the estates were clearly demarcated with fences, security trenches and roads. Sighted the boundary markers during the sight visit at the estate’s boundary.</p> <p>Both estate maps clearly showing the estates boundary. Demarcation at Kinta Kellas Estate and Elphil Estate was by using concrete pegging and boundary trenching.</p>	
4.3.2.4	<p>Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC).</p> <p>- Minor compliance -</p>	No issues of land dispute issue occur in all estates within SOU 3 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	<p>Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.</p> <p>- Major compliance -</p>	There is no land encumbered by customary rights under Elphil certification units’ estates.	N/A
4.3.3.2	<p>Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available.</p> <p>- Minor compliance -</p>	There is no land encumbered by customary rights under Elphil certification units’ estates.	N/A
4.3.3.3	<p>Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.</p> <p>- Major compliance -</p>	There is no land encumbered by customary rights under Elphil certification units’ estates.	N/A
4.4 Principle 4: Social responsibility, health, safety and employment condition			

Criterion / Indicator		Assessment Findings				Compliance																
Criterion 4.4.1: Social Impact Assessment (SIA)																						
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	<p>The social management plan was available, dated 5/1/2022. The detail as per below:-</p> <table border="1"> <thead> <tr> <th>Issue</th> <th>Action plan</th> <th>Status</th> <th>Completion date</th> </tr> </thead> <tbody> <tr> <td>Kampung Sri Jaya – to use backhoe for drain cleaning</td> <td>Management will send to clearing the drain.</td> <td>Already clear the drain</td> <td>March 2022</td> </tr> <tr> <td>NUPW – request to upgrading their house</td> <td>The building still need more time to finish.</td> <td>To transfer the En. Badrun to another house</td> <td>In progress</td> </tr> <tr> <td>Workers- need more explanation regarding to wages been pay during quarantine</td> <td>The management will pay the wages for quarantine</td> <td>The payment was done accordingly</td> <td>In progress</td> </tr> </tbody> </table>				Issue	Action plan	Status	Completion date	Kampung Sri Jaya – to use backhoe for drain cleaning	Management will send to clearing the drain.	Already clear the drain	March 2022	NUPW – request to upgrading their house	The building still need more time to finish.	To transfer the En. Badrun to another house	In progress	Workers- need more explanation regarding to wages been pay during quarantine	The management will pay the wages for quarantine	The payment was done accordingly	In progress	Complied
Issue	Action plan	Status	Completion date																			
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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 -	Both Elphil Estate and Kinta Kellas Estate established the Complaint Book (Internal), Complaint/Feedback Form (External) and Communication Book Internal & External to records the communication and complaints. Most of complaints made by internal stakeholders among workers were related to the housing repair which based on the records were taken action and resolved immediately by the estate management. For Complaint/Feedback Form by external				Complied																

Criterion / Indicator		Assessment Findings	Compliance
		<p>stakeholders, action taken by the management was acknowledged by the complainant to be resolved within agreed timeframe.</p> <p>Sime Darby Plantation Berhad has established system to handled issue regarding to social as per below;-</p> <p>a) <u>Suara Kami (using social dialogue tool kit)</u></p> <p>This session is about management and workers engagement between representative of workers, and employer (operating unit management) to resolve workplace and living condition issues through social dialogue. This dialogue frequency will handle every 2 weeks once. The issue that been raised during this dialogue will be recorded under tracker. This tracker will be captured in the dashboard and available to RGM, RCEO, ILO WG. This system rolls out on 22/12/2021 (Phase 3 & Phase 4) to operating unit. From the verification the latest record was on 4/3/2022 and previously was on 28/2/2022.</p> <p>b) Oil Palm Pal (OPP)</p> <p>Establish and start been using on 4/12/2021 in SOU 3 Elphil. This OPP was a digitalized data management to capture all complaint/request for repair of workers houses and monitor progress of repair works to completion. The latest record of OPP in Elphil Estate was on 4/2/2022 regarding to bathroom lighting and hall was need repair. The issue raised on 5/2/2022 and solved on 5/2/2022. From the previous record no issue was solved more than 3 days.</p>	
4.4.2.2	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p>- Major compliance -</p>	<p>Most of complaints made by internal stakeholders among workers were related to the housing repair which based on the records were taken action and resolved immediately by the estate management. For Complaint/Feedback Form by external stakeholders, action taken by</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		the management was acknowledged by the complainant to be resolved within agreed timeframe.	
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 -	For Complaint/Feedback Form by external stakeholders, action taken by the management was acknowledged by the complainant to be resolved within agreed timeframe. Sighted a sample latest complaint received by Elphil Estate recorded in the SDTS Issue Tracking Dated on 4/03/2022 been resolved immediately dated on 4/3/2022.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	The regional management i.e. Northern Region CEO Tn. Hj. Ramlan Bin Ramli conducted the briefing on the awareness that complaints or suggestions can be made any time on 10/03/2021 in each estate main division to all employees. Due to the multiple implementations of Movement Control Order by the government, Elphil Estate unable to conduct the stakeholder meeting with external stakeholders hence sending mails and emails to external stakeholders to seek for any feedbacks while Kinta Kellas Estate conducted on 2/03/2022. Referring to the records of letter sent to stakeholder including Appendix A i.e. explanation on the intention of stakeholder consultation & Appendix B i.e. the stakeholder feedback forms.	Complied
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	The complaint was available and can be track back since 2008. Form the record no record for 2021 at the sampling estate.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities.	Contributions made by estates based in consultation with stakeholders among local communities as per sample sighted as following:	Complied

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Criterion / Indicator		Assessment Findings				Compliance
	- Minor compliance -	Estate	Date	Activity	Cost	
		Kinta Kellas	26/4/2021	Sri Maha Mariamman festival	RM 500	
			13/5/2021	Chicken donation to workers during Hari Raya Aidilfitri	RM 1200	
Criterion 4.4.4: Employees safety and health						
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	Sime Darby Plantation Berhad have established the Group Policy for Upstream Malaysia on Health, Safety & Environment (HSE) Policy Statement signed by the CEO of Upstream Malaysia dated 01/06/2020. The HSE policy was communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the estates.				Complied
4.4.4.2	The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices 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	Each individual estate has established Safety and Health Management Plan and documented in Environment, Safety and Health Plan FY 2022. The management plan includes the OSH risk management, Emergency Response Procedure, Contractor Safety Management, Chemical Safety Management, Noise Boundary Monitoring, Health monitoring and etc. The occupational safety and health plan cover the following: a) Sime Darby Plantation Berhad have established the Group Policy for Upstream Malaysia on Health, Safety & Environment (HSE) Policy Statement signed by the CEO of Upstream Malaysia on 01/06/2020. The HSE policy was communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the estates. b) Sime Darby Plantation Berhad have established Standard Operating Procedure for OSH Risk Management Procedure				OFI

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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>(UM/HSE/SP/01 dated 09/03/2021, UM HSE Management System) and documented in EQMS/SOM sub-section 5.4, Appendix 5.4.1a.</p> <p>Risk assessments for all the operations at the estates audited was documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment covers all main operations and support operations. HIRARC for each operation was identified such as general work, harvesting, manuring, pest & disease, pruning and sanitation, spraying, transporting FFB/water/workers, etc.</p> <p>Kinta Kellas Estate – HIRARC reviewed on 01/09/2021 with one (1) accident recorded on 24/08/2021 during loading loose fruits has been reviewed. Training on HIRARC was conducted on 14/12/2021</p> <p>CHRA was conducted on 24/08/2020 (Report No: HQ/09/ASS/00/124-2020/0032) and Noise Risk Assessment was conducted on 25/06/2020.</p> <p>Medical Surveillance was conducted on 16/12/2021 (2 workers) for Chromium (Foreman and Fitter) and Audiometric Test was conducted on 15/04/2021 for 3 workers (MTG Driver)</p> <p>Elphil Estate</p> <p>HIRARC reviewed on 11/01/2022 was approved by Estate Manager. New risk assessment was documented in "Daftar Penilaian Risiko KKP" (e.g. Activity: Harvesting, dated 12/01/2022). Risk assessment has covered activities such as spraying, manuring, machinery maintenance, grass cutting, manual weeding, office work, ramp despatch and etc</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>CHRA was conducted on 27/08/2020 (Report No:HQ/09/A55/00/124-2020/0035 and Noise Risk Assessment was conducted on 26/06/2020.</p> <p>Medical surveillance was conducted to eight (8) workers on 06/07/2021 and one (1) worker on 14/02/2022 for chemical: Cypermethrin. Audiometric test (Baseline Audiometry) was conducted on 15/04/2021 for nine (9) workers with five (5) workers detected with hearing impairment. Re-test was conducted on 12/11/2021 and yearly audiometry examination was recommended by the OHD.</p> <p>c) Estates visited have established training programs for management team, workers and contractors including pesticides applicator, programmed throughout the year. The trainings were conducted by those with knowledge in chemical handling.</p> <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 Pictorial Safety Standard (PSS) Palm Oil Estates dated 17/03/2008. Sighted during site visit at the spraying gang, manuring gang and workshop, the workers were provided with leather gloves, nitrile gloves mask, respirator, safety helmet and wellington boots and others as 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. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Kinta Kellas Estate – Record Personal Protective Equipment Distribution for Wellington Boot, Safety Shoes, Nitrile Gloves, Dupont Apron, Mask-3M, etc.</p> <p>e) Standard Operating Procedures for Handling of Chemicals were available in several documents such as: -</p> <p>Sime Darby Plantation Berhad, Chemical Safety Management; Document No. SD/SDP/PSQM (ESH)/202-OH4; dated 26/02/2015. Pesticides were found stored in the estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations.</p> <p>The stores were at all times locked and at the time of visit the store clerk was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p> <p>Register of Chemicals Hazardous to Health was updated on 01/01/2022 with chemicals identified such as Ammonium Chloride, Muriate of Potash, Borate, Egyptian Rock Phosphate, Magnesium Sulphate, Bayfolan, etc.</p> <p>Safety Data Sheet (SDS) is available at store are but some SDS such as Sebatian 45, Fertibor and Egyptian Rock Phosphate displayed at the store area is only in English language. SDS at the chemical store could be more accessible and not blockage by chemical container.</p> <p>Ventilation system at the chemical store could be further improved</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Elphil Estate</p> <p>Register of Chemicals Hazardous to Health was updated on 01/01/2022 with chemicals identified such as Ammonium Chloride, Muriate of Potash, Borate, German Kieserite, Compound NK1, CCM 25 and etc</p> <p>f) Kinta Kellas Estate</p> <p>The Estate Manager (Mr. Devanand a/l Vasu) was appointed to be the Chairman of OSH Committee at the estate as stated in the appointment letter dated 01/01/2022 approved by the Regional CEO. 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>Estate Manager of Elphil Estate (Ahmad Yuzi Bin Mardini) was appointed as Chairman of OSH Committee was verified as per appointment letter dated 01/01/2022 approved by Northern Region CEO. Committee members for OSH Committee was appointed as per appointment letter dated 13/12/2021</p> <p>g) The management conducted regular OSH committee meetings on quarterly basis as per Safety and Health Committee Procedures (UM/HSE/OCP/08 dated 17/11/2021. The meeting discussed issues on employees' safety, health and welfare such as operational risks and health achievement report, estate security, safety compliance by contractors, workplace inspection, legal compliance, safety and health training. Sighted the latest OSH Meeting Minutes as follows.</p> <p>Kinta Kellas Estate – 12/03/2022, 02/12/2021, 28/09/2021, 05/07/2021, 02/03/2021</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Elphil Estate – 09/03/2022, 18/01/2022, 19/11/2021, 28/07/2021, 08/04/2021</p> <p>h) Emergency Response Plans were available to manage emergencies such as fire, flood, disease outbreak, food poisoning, chemical spillage, accidents, etc. Emergency Preparedness & Response Procedures (UM/HSE/SP/02 dated 17/11/2021) approved by CEO (Roslin Azmy Hassan). There was a formation of Emergency Response Team to attend to emergencies with regular trainings and drill being conducted for the team and the rest of the workers. Emergency Response Training was conducted as below:</p> <p>Kinta Kellas Estate: 22/12/2021-Fire extinguisher at the chemical store was found due for BOMBA inspection</p> <p>Elphil Estate-Fire and Evacuation Drill was conducted on 12/02/2022.</p> <p>The weaknesses or any opportunities for improvement while handling the accidents/incidents at the estates can be further improved, thus OFI was raised.</p> <p>i) First Aiders were present at all operations within the estate. Interview with the selected first aiders indicated they were well aware and trained on measures to be taken during emergencies. First aid boxes were available at the operations as well. Inspected the first aid boxes to be filled with adequate items to be used during the emergencies. The first aid box holders were trained for SOU 3 Northern Region on 21-22/10/2021 (Basic Outbreak First Aid, CPR & AED). The training was attended by all estate (e.g. Kamuning Estate – 6 personnel, 6 Elphil POM, Kinta Kellas Estate – 5 personnel, and Elphil Estate – 10 personnel). Minimum quantity</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>of items in the First Aid Box could be clearly determine and the monthly inspection records could be further improved, thus OFI was raised.</p> <p>j) The estates visited recorded all accidents reports and reported to HQ using the PSQM-ESH Monthly update Form online through GSQM ESH Portal. (HSE Reporting System - Rapid 4). The accident occurred was reviewed on quarterly basis during OSH committee meeting.</p> <p>Kinta Kellas Estate – Yearly accident reporting was submitted to DOSH on 21/01/2022 (Ref No: JKPP 8/101373/2021) with total of 277,440 mandays and average of 102 employees for 2021. One (1) lost man -day accidents of recorded. The incident was reported to DOSH through MyKKP and JKPP 6 was sighted. (e.g. Accident dated 24/08/2021, reported to DOSH on 30/08/2021, Workers: Bhadra Bahadur, Passport No: 10618338).</p> <p>Elphil Estate – Yearly accident reporting was submitted to DOSH via MyKKP portal on 29/01/2022 (Ref No: JKPP 8/105350/2021) with total of 268,488 mandays and average of 113 workers recorded for 2021. Two accident cases reported with 216 lost man days recorded. The incident was reported to DOSH through MyKKP and JKPP6 is available for verification (e.g. accident dated 21/04/2021 and reported to DOSH on 29/04/2021, Ref No: PK/SKEM/21/02844).</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The	Sime Darby Plantation Berhad has established Group Sustainability & Quality Policy Statement dated 2/12/2019 by Group Managing Director where the company is respecting, upholding & no-exploitation of	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) last revised 2020.</p> <p>Besides, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/3/2020. Sime Darby Plantation respect and safeguard human rights, notion of democracy and its institution. They recognize that Human Rights Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with Sime Darby Plantation Berhad. This Policy is applied to all stakeholders affected by the business activities and relationships</p> <p>including directors, employees, counterparties, business partners, workers in our operations and supply chains, and communities surrounding our operations. The policies were communicated to the employees during induction training for new employees and morning muster.</p>	
<p>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.</p> <p>- Major compliance -</p>	<p>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.</p>	Complied
<p>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.</p>	<p>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: 30/01/2020; MAPA/NUPW Field and Other General Employees And Fringe Benefits Agreement,</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	2019. This were requirements in-line with the mandatory Minimum Wage Order 2020 enforced by the government.	
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 -	Based on the sample contractors' agreements sighted in Kinta Kellas Estate Adhoc Contract for the Transportation of Fresh Fruit Bunches ("Contract"); Contractor Alpha Meta Agencies Sdn Bhd; Duration of contract: 15/1/2022 – 14/04/2022, it was confirmed that the estate management-maintained records of contractor's employees Workers Register Forms, Monthly Salary Records and Deduction accordingly.	Complied
4.4.5.5	The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	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.	Complied
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records. - Major compliance -	Copies of fair contracts that have been signed by both employee and employer were provided to each employee as per records in Elphil Estate and Kinta Kellas as per sample as following: Elphil Estate Id Workers: 24906, 166480, 151793, 155960, 117230, 147627, 135542 Kinta Kellas Estate: 22550, 159831, 153672, 86581, 141258, 116765 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).	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 -	As per verification on 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 agreements. - Major compliance -	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: 30/01/2020; MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019. This also in-line with Malaysia Employment Act 1955.	Complied
4.4.5.10	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

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Criterion / Indicator	Assessment Findings	Compliance
<p>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.</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. Verification in Kinta Kellas Estate, latest record was on 26/2/2022. Appointment letter for person in-charge for housing inspection (Muhammad Sofian Nurudin) was available dated 2/1/2022.</p>	<p>Complied</p>
<p>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.</p> <p>- Major compliance -</p>	<p>Training conducted on sexual harassment and violence to workers and women in Elphil Estate dated 10/3/2022.</p> <p>The meeting for Gender conducted on 14/2/2022 attended by 6 persons.</p> <p>The management establish of Term of Reference for Gender Representatives and Gender Committees on March 2021. The meeting was conducted by 2 monthly once.</p> <p>Appointment letter for Gender committee was available dated 1/1/2022 for all included Puan Nalini A/P P. Perumal as Chairman.</p>	<p>Complied</p>
<p>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</p>	<p>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.</p> <p>Employees were given freedom to associate and bargain collectively with company and to organize among themselves through association meetings as per sample sighted as per sample latest minutes of</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance								
	work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	meeting between Management and NUPW representatives. Last meeting for worker (Wakil Kebajikan Pekerja (WKP)) was conducted on 3/12/2021.									
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 3.	Complied								
Criterion 4.4.6: Training and competency											
4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept. - Major compliance -	All planned training activities were implemented either as a whole SOU 3 group or by individual operating units and its records were maintained and available for verification. COVID-19 training and briefings were sighted at the mill and estates. Interview with the workers and staff indicated that they were aware on the SOP during the RMCO such as social distancing, regular sanitization and use of PPE (Face Mask). Records of trainings were maintained by the mill and estates as below: Kinta Kellas Estate <table border="1" data-bbox="1048 1198 1872 1399"> <thead> <tr> <th>Training Topic</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>First Aid Training attended by Nagandaran, Logan Raj, Tapab Sandor, Hariyadi</td> <td>10/03/2022,</td> </tr> <tr> <td>Chemical Spraying</td> <td>12/08/2021</td> </tr> <tr> <td>Emergency Response Plan Training</td> <td>22/12/2021</td> </tr> </tbody> </table>	Training Topic	Date	First Aid Training attended by Nagandaran, Logan Raj, Tapab Sandor, Hariyadi	10/03/2022,	Chemical Spraying	12/08/2021	Emergency Response Plan Training	22/12/2021	Complied
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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>Training need for all employees, management and contractors were identified based on the job designation and training required by the job type such as policy, OSH, Environmental and etc. Sighted the Training Requirement for Operating Units (Estates) (e.g. SOU 3 – Kinta Kellas Estate FY2021) approved by Estate Manager.</p>		Complied																						
4.4.6.3	<p>A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>A training programme has been planned and documented in the "Training Requirement for Operating Units (Estate) – Kinta Kellas Estate 2022 and Elphil Estate FY2022. The trainings were sighted to have also included Policy Training, OSH, Environmental, Gender Specific Training and involves staffs, workers and contractors.</p>		Complied																						
Criterion 4.5.1: Environmental Management Plan																										

Criterion / Indicator		Assessment Findings	Compliance
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 Berhad 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. Documents associated with the trainings and briefing were available for verification dated as below. Policy training has been given on 12/01/2022 at Kinta Kellas Estate while at Elphil Estate on 21/01/2022.	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 estates have established the environmental plan based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation. The management plan was established for the activity which give significant impact for the environment and documented in Pollution Prevention Plan. The EAI and EIE were reviewed annually basis by the EAI/EIE review team. The Environmental Management Plan for the year 2022 consist of subcategorised plans such as below. 1. Waste Management Plan 2. Energy Management Plan 3. Water Management Plan 4. HCV Management Plan 5. Pollution Prevention Plan 6. Chemical Reduction Plan 7. Integrated Pest Management Plan	Complied
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.	The estates sampled has established the environmental plan based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation. The management plan was established for the	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>activity which give significant impact for the environment. The EAI and EIE were reviewed annually basis.</p> <p>The management plan stated the objectives of the environmental issue, mitigating measures, person responsible and monitoring period. The progress of the plan was monitored on quarterly basis. The plan was reviewed on annually basis. The management plan stated the Environmental management Plan, Objectives, Category, Location, Mitigation Plan, and Monitoring frequency.</p>	
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>All the estates sampled has established the environmental management plan based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation.</p> <p>All the estates continue to promote activities that gives positive impact to the environment by continuously provided awareness to the employees which was communicated through training, briefing and signages.</p>	Complied
4.5.1.5	<p>An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.</p> <p>- Major compliance -</p>	<p>Training program is available in the estates Training Program updated on a yearly basis or revised 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. Trainings conducted in relation to environmental and its improvement plan are shown as follows.</p> <p><u>Elphil Estate</u></p> <ul style="list-style-type: none"> • 3R Recycle Training dated 09/02/2022 • HCV Training 09/02/2022 	Complied

Criterion / Indicator		Assessment Findings	Compliance																				
		<ul style="list-style-type: none"> IPM Training dated 03/02/2022EIE, EAI and Water Sampling training dated 02/03/2022 																					
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	Both estates discuss environmental related issues in the JKKP Meetings that are conducted on a quarterly basis. The Environmental Issues were included in the meeting agenda and sighted in the meeting minutes.	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 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 -	Verified Energy & GHG Management plan for the year 2022. Among objectives discussed were: <ul style="list-style-type: none"> Efficiency the usage of non-renewable energy To reduce diesel usage by backhoe To reduce fossil fuel (diesel) consumption from company owner fuel-using vehicle To reduce emission from backhoe The monitoring of non-renewable energy usage is done on a monthly basis. Sighted the sampled monitoring records for diesel usage per FFB production for FY 2021 and 2022 as follows: <p>Kinta Kellas Estate</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Diesel, L</th> <th>FFB, Mt</th> <th>Diesel / FFB</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>43417.00</td> <td>19732.36</td> <td>2.20</td> </tr> <tr> <td>As @Feb 2022</td> <td>6572.00</td> <td>2401.11</td> <td>2.74</td> </tr> </tbody> </table> <p>Elphil Estate</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Diesel, L</th> <th>FFB, Mt</th> <th>Diesel / FFB</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>37857.00</td> <td>29697.00</td> <td>1.27</td> </tr> </tbody> </table>	Year	Diesel, L	FFB, Mt	Diesel / FFB	2021	43417.00	19732.36	2.20	As @Feb 2022	6572.00	2401.11	2.74	Year	Diesel, L	FFB, Mt	Diesel / FFB	2021	37857.00	29697.00	1.27	Complied
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Criterion / Indicator		Assessment Findings				Compliance
		As @Feb 2022	7878.00	3423.00	2.30	
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 for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets.				Complied
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	No renewable energy used in the estate.				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 -	All the estates sampled has identified the waste products and source pollution and documented in the Waste Management Plan 2022. The type of wastes been identified are Scheduled waste (SW306, SW305, SW102, SW410, SW409, SW404, Scrap Iron), Domestic waste (rubbish, garden waste and sewage), Recycle waste (tires), Clinical waste (syringe) and Industrial waste (scrap iron).				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 b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products - Major compliance -	All the estates have established the waste management plan and the plan was reviewed on annually basis. All the sampled estates have identified all waste products and source of pollution and documented in the Waste Management Plan. The waste identified has been categorized as follows: - Domestic Waste – Household Waste, Organic Waste - Industrial Waste – Scrap Metal - Scheduled Waste Generated from Estate Operation – Used Hydraulic, Clinical Waste, Oil Filter.				Complied

Criterion / Indicator	Assessment Findings	Compliance
	<p>- Recyclable Waste – Empty pesticide Containers.</p> <p>In the management plan stated the type of waste, source of waste, mitigation plan and person responsible.</p> <p>Management plan on proper disposal of waste in accordance to SOP and legal requirement for Used PPE (Non washable / washable) has been recorded. Action on Non washable PPE was collected and disposed off the items through registered purchaser as schedule waste while for washable PPE was collect and disposed as recyclable waste after washing. Sighted record of non-washable and washable PPE has been maintained.</p> <p>Inventory of Used Contaminated PPE as schedule waste has been verified. Refer Fifth schedule, E-Swiss Inventory March 2021, File reference number 647766-V already included under SW409 (Contaminated equipment Item with Schedule wastes).</p>	
<p>4.5.3.3</p>	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p> <p>Procedure for Scheduled Waste Management was established (SD/SDP/PSQM (ESH)/203-EN1) dated 26/02/2016. Proper disposal of waste material is carried out as per the company procedures. The procedures are fully understood by workers and managers.</p> <p>All the sampled estates have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>All the records were found adequate as per required by EQ (Scheduled Waste) Regulations 2005.</p> <p>Sighted the sampled scheduled waste inventory and disposal as below: <u>Kinta Kellas Estate</u> <u>Inventory</u></p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>Date: 03/03/2022 File reference no: A11/123/000/025 Inventory no: 0801A0432019E32022 SW: SW404 <u>Disposal</u> <u>Sample 1</u> Date: 11/02/2022 Consignment note: 2022021111VYRTQZ SW: SW305 – Spent lubricant 0.085 Mt by SP Metro (M) Sdn Bhd <u>Sample 2</u> Date: 11/02/2022 Consignment note: 20220211110319FZ SW: SW410 – Used oil filter and empty container 0.0967 Mt by EDSA Solutions Sdn Bhd <u>Elphil Estate</u> <u>Inventory</u> Date: 01/03/2022 File reference no: 647766-V Inventory no: 20220301113UI4JG SW: SW305, SW306, SW404, SW409, SW410 <u>Disposal</u> <u>Sample 1</u> Date: 07/03/2022 Consignment note: 2022030711QB0GF7</p>	

Criterion / Indicator		Assessment Findings	Compliance
		SW: SW305 – Spent lubricant 0.2500 Mt by Pentas Flora (Ipoh) Sdn Bhd <u>Sample 2</u> Date: 07/03/2022 Consignment note: 2022030711RNWDHQ SW: SW306 – Spent hydraulic oil 0.1500 Mt by Pentas Flora (Ipoh) Sdn Bhd	
4.5.3.4	Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer’s labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers. - Major compliance -	Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through scheduled waste contractor as below: Kinta Kellas Estate Date: 11/02/2022; Contractor: EDSHA Solutions Sdn Bhd; Quantity: 0.1955 Mt. Elphil Estate Date: 07/03/2022; Contractor Pentas Flora (Ipoh) Sdn Bhd; Quantity: 0.1580 Mt.	Complied
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	Collection and disposal of domestic waste is via licensed 3 rd party contractor, Sri As Pushpah Enterprise. The contract between Elphil Estate and Sri As Pushpah Enterprise dated 01/03/2022 was available for verification. The Contractor collects the domestic waste twice a week at the estate and disposes them at their Municipal Council Bins. The latest tax invoice for rubbish collection was verified dated 01/02/2022 (Invoice Number: 4300576779).	Complied
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	An assessment of all polluting activities shall be conducted,	All the sampled estates have established Environmental Management	Complied

Criterion / Indicator		Assessment Findings	Compliance
	including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	Plan, Pollution Prevention Plan and Chemical Reduction Plan based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation. The plan was reviewed on annual basis. In the plan stated the objectives on the environmental issue, mitigating measures and person responsible. The plan was monitored on monthly basis. Among issues discussed were: <ul style="list-style-type: none"> • Leakage of pesticides during chemical mixing and washing into outside line • Oil spillage during fuel fill up • Oil leakage from oil trap • Schedule waste (SW) disposal monitoring. 	
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance –	Verified the implementation of Pollution Prevention Plan at all the sampled estates. Mitigation measures, action by, time frame and status has been documented and available for verification.	Complied
Criterion 4.5.5: Natural water resources			
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: <ol 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. 	<ol style="list-style-type: none"> a. The Water Management Plan for the estates has been established. This is compiled on Group basis and amended to meet demands of specific issue in Operating Units. It was reviewed annually for the 2022 plan. Water for domestic use is obtained from Lembaga Air Perak (LAP) and provided to all houses for daily usage. Monitoring of water usage is done monthly and data is provided. b. Monitoring of outgoing water has been monitored. Refer water sampling report by R&D. Test report no. PL127/2022 dated 	Complied

Criterion / Indicator	Assessment Findings	Compliance														
<p>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.).</p> <p>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>	<p>11/02/2022 for Kinta Kellas Estate. For Elphil Estate Test report no. IE1281/2021 dated 20/12/2021 was verified.</p> <p>c. Ways to optimize water and nutrient usage to reduce wastage has been documented in the water management plan 2022. Among plan to optimize water usage were:</p> <ul style="list-style-type: none"> - Collect wastewater in sump for re use for premixing - Use water harvesting for general cleaning, operation and gardening <p>d. Documented in Sime Darby Plantation Berhad Slope and River Protection Policy dated 15/01/2015 signed by the Managing Director stated that buffer zone shall be maintained on both side of the riverbanks.</p> <table border="1" data-bbox="1093 855 1856 1093"> <thead> <tr> <th>River Width</th> <th>Buffer Zone</th> </tr> </thead> <tbody> <tr> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>< 5 meters</td> <td>5 meters</td> </tr> <tr> <td>* > 3 meters</td> <td>20 meters</td> </tr> </tbody> </table> <p>* for Sabah Plantations Only</p> <p>e. There is no removal of natural vegetation at the buffer zone area. It was confirmed by the site visit. Riparian zone were properly marked with pole and awareness signage on prohibited illegal activities such as manuring, spraying and fishing was installed.</p> <p>f. There is no use of bore well at the sampled estate.</p>	River Width	Buffer Zone	> 40 meters	50 meters	20 to 40 meters	40 meters	10 to 20 meters	20 meters	5 to 10 meters	10 meters	< 5 meters	5 meters	* > 3 meters	20 meters	
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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 -	Verified through site visit at river area, there is no construction of bunds, weirs and damn cross main rivers or waterways through an estate.	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 -	The practice of water harvesting was evident in the Action plan to Reduce Fresh Water Usage for Financial Year 2022. The action plan was stated as below. Rainwater Collection <ul style="list-style-type: none"> • Use for general cleaning, operation, gardening etc. • To collect wastewater in sump for re-use for pre-mixing 	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: <ol style="list-style-type: none"> Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. 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 -	<p>PSQM Department has conducted HCV assessment for SOU 3 on February 2017. HCV for estate has been identified and documented in the HCV Re-Assessment for SOU 3 – Elphil, Version 2, February 2017. Common wildlife found during the assessment were documented in Table 10 in the HCV Re-Assessment for SOU 3 – Elphil, Version 2, February 2017. Summary of HCV area as below:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>No</th> <th>Assessment Area</th> <th>Ha</th> <th>Present HCV</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Elphil Estate</td> <td>1</td> <td>Slope/ Rocky area</td> <td>54.33</td> <td rowspan="4">HCV 4</td> </tr> <tr> <td>2</td> <td>River reserve (Sg Nyamuk)</td> <td>3.66</td> </tr> <tr> <td>3</td> <td>Water catchment area</td> <td>9.25</td> </tr> <tr> <td>4</td> <td>Isolated remnant forest</td> <td>17.35</td> </tr> <tr> <td>Kinta Kellas Estate</td> <td>1</td> <td>River reserve (Sg Raya)</td> <td>2.83</td> <td>HCV 4</td> </tr> </tbody> </table>	Estate	No	Assessment Area	Ha	Present HCV	Elphil Estate	1	Slope/ Rocky area	54.33	HCV 4	2	River reserve (Sg Nyamuk)	3.66	3	Water catchment area	9.25	4	Isolated remnant forest	17.35	Kinta Kellas Estate	1	River reserve (Sg Raya)	2.83	HCV 4	Complied
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Criterion / Indicator		Assessment Findings				Compliance
			2	Water catchment area	0.86	
		No RTE species were identified during the assessment. Monitoring of HCV has been conducted regularly by the management. Observation involved of Disputes, RTE visual, Pollution / erosion and others. Latest monitoring record on 19/01/2021 was verified.				
4.5.6.2	<p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p>- Major compliance -</p>	<p>The high biodiversity is included in the HCV Re-assessment report dated February 2017. Birds, mammals, reptiles, insect (least concern and vulnerable) and totally protected and protected wildlife were identified based on the latest HCV report. For example, vulnerable animal; bearded pig (mammals) under category totally protected.</p> <p>There is no RTE recorded. Evidence during site verification, discourage illegal or hunting, fishing or collecting activities signboard were maintained and implemented. Monitoring of HCV has been conducted regularly by the management. Observation involved of Disputes, RTE visual, Pollution / erosion and others. Latest monitoring record on 19/01/2021 was verified.</p>				Complied
4.5.6.3	<p>A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p>- Major compliance -</p>	<p>All operating units have developed Management Plan for the HCV and conservation area to protect from any encroachment. Habitat protection includes prevention of disturbance by workers through awareness campaigns and regular patrols of the area. The estates have installed signboards at prominent areas to prohibit hunting, disturbance of protected areas and the lighting of fires.</p> <p>Interview of residents confirmed workers were aware of the company policy that prohibits hunting and collecting activities. Monitoring is carried out by the security and staff in charge for the respective area.</p> <p>Sime Darby Plantation Berhad in addition established their own disciplinary measures if found any staff or workers found to capture,</p>				Complied

Criterion / Indicator		Assessment Findings	Compliance
		harm, collect or kill the RTE species in the estate. On-going monitoring for HCV areas for all Estates has been verified. The monitoring was conducted on monthly basis.	
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 -	Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law – EQA and Regulations 1974.	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 -	Visit to the estate confirmed that no previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop hence, no special approval been obtained so far. Hence this requirement is not applicable.	N/A
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 -	Since no special approval been obtained so far for burning, hence this requirement is not applicable.	N/A
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	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			

Criterion / Indicator		Assessment Findings	Compliance
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 Reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU 3 Elphil as a guidance document to conduct estate operation. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc. Sime Darby Plantation Berhad 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.	Complied
4.6.1.2	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. - Major compliance -	Sime Darby Plantation Berhad has established policy on slope protection and documented in Slope and River Protection Policy signed by the Managing Director in Jan 2015. 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. Landscapes of Kamuning Estate are steep and undulating. Sime Darby Plantation Berhad has established policy on slope protection and documented in Slope and River Protection Policy signed by the Managing Director in Jan 2015. 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. Sighted that the areas with steep slopes are planted with Rubber and Jungle Trees.	Complied
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	Both Estates visited had a visual identification/reference system for each established field/block and maps established. Field numbers and hectare were marked on palms and in some areas on concrete slaps.	Complied

Criterion / Indicator		Assessment Findings	Compliance																		
Criterion 4.6.2: Economic and financial viability plan																					
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	Business planning to ensure long-term economic and financial viability was evident. The annual budgets for the period 2021 to 2026 were sighted. The budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO/MSP0 compliance etc. The budgets included projections on yield/ha, and total cost of production per MT & per ha. CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses	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 –	All estates established a replanting program spanned over a 5-year period till 2025. All programs were available for verification. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Year</th> <th>Kinta Kellas Estate</th> <th>Elphil Estate</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>63.01</td> <td>168.45</td> </tr> <tr> <td>2023</td> <td>169.03</td> <td>83.53</td> </tr> <tr> <td>2024</td> <td>121.53</td> <td>211.31</td> </tr> <tr> <td>2025</td> <td>122.99</td> <td>198.92</td> </tr> <tr> <td>2026</td> <td>52.37</td> <td>161.86</td> </tr> </tbody> </table>	Year	Kinta Kellas Estate	Elphil Estate	2022	63.01	168.45	2023	169.03	83.53	2024	121.53	211.31	2025	122.99	198.92	2026	52.37	161.86	Complied
Year	Kinta Kellas Estate	Elphil Estate																			
2022	63.01	168.45																			
2023	169.03	83.53																			
2024	121.53	211.31																			
2025	122.99	198.92																			
2026	52.37	161.86																			

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.2.3 The business or management plan may contain:</p> <ul style="list-style-type: none"> 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 <p>- Major compliance –</p>	<p>The business and management plans were available in the annual budget. The annual budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO & MSP0 compliance etc. The budgets included projections on yield/ha, and total cost of production per MT & per ha.</p>	<p>Complied</p>
<p>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.</p> <p>- Major compliance -</p>	<p>The estates performance is recorded in the monthly progress report.</p> <ul style="list-style-type: none"> a. Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein. b. The management also provides variance report on the performance and reviewed on a monthly basis. c. The supervisory personnel maintained a daily cost for the field operations. <p>The SOU meeting involving the Managers sits monthly with the Regional CEO for the performance review.</p>	<p>Complied</p>
<p>Criterion 4.6.3: Transparent and fair price dealing</p>		
<p>4.6.3.1 Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p>- Major compliance –</p>	<p>Pricing mechanism is available in the contract under Transport Rate adjustment mechanism (appendix 2). All tender and pricing exercises are handled by the HQ management. Projects are tendered from the approved vendors registered with HQ.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		Payments are processed and made by HQ through system by MEX. This is made upon job verification by the operating units' personnel and also representatives from HQ for major projects.	
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 sighted as per sample agreed contracts available in Kinta Kellas Estate Adhoc Contract for the Transportation of Fresh Fruit Bunches ("Contract"); Contractor Alpha Meta Agencies Sdn Bhd; Duration of contract: 15/1/2022 – 14/04/2022. Payment made on monthly basis as agreed between both contracting parties.	Complied
Criterion 4.6.4: Contractor			
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 contractors engaged by estates were bound to understand and comply to their contractual agreements that includes MSPO requirements through signing of Vendor Integrity Pledge (VIP) which enable accredited CB to audit them. Verification in Kinta Kellas Estate on Alpha Meta Agencies Sdn Bhd dated 20/1/2022. The briefing already been conducted 26/1/2022 to Alpha Meta Agencies Sdn Bhd.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Agreed contracts available as per sample provided by the management in Kinta Kellas Estate i.e. Adhoc Contract for the Transportation of Fresh Fruit Bunches ("Contract"); Contractor Alpha Meta Agencies Sdn Bhd; Duration of contract: 15/1/2022 – 14/04/2022.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	All contractors engaged by estates were bound to understand and comply to their contractual agreements that includes MSPO requirements through signing of Vendor Integrity Pledge (VIP) which enable accredited CB to audit them.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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.	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 -	There is no development of new planting at both visited estates.	N/A
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 -	There is no development of new planting at both visited estates.	N/A
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.	There is no development of new planting at both visited estates.	N/A

Criterion / Indicator		Assessment Findings	Compliance
- Major compliance -			
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 -	There is no development of new planting at both visited estates.	N/A
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 -	There is no development of new planting at both visited estates.	N/A
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 -	There is no development of new planting at both visited estates.	N/A
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 -	There is no development of new planting at both visited estates.	N/A
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.	There is no development of new planting at both visited estates.	N/A

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
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 -	There is no development of new planting at both visited estates.	N/A
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 -	There is no development of new planting at both visited estates.	N/A
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	There is no development of new planting at both visited estates.	N/A
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	There is no development of new planting at both visited estates.	N/A
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.	There is no development of new planting at both visited estates.	N/A

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

Criterion / Indicator		Assessment Findings	Compliance
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 -	There is no development of new planting at both visited estates.	N/A

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

Criterion / Indicator		Assessment Findings	Compliance
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 -	Sighted Group Sustainability & Quality Policy Statement dated 02/12/2019 signed by Group Managing Director Mr. Mohamad Helmi Othman Basha.	Complied
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	The policy established mention that Sime Darby are committed to making: 1. Promoting Good Governance and Transparency 2. Contributing to a better society 3. Minimizing environmental harm 4. Delivering sustainability quality This policy shall be guided by the commitment spelt out in the company's: 1. Responsible Agriculture Charter (RAC) 2. Human Right Charter (HRC) 3. Innovation & Productivity Charter (IPC)	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	The internal audit conducted once a year, from the planning for all internal audit was verified as per record. The MSPO Part 4 internal audit was conducted in combination with RSPO P&C requirement audit as well.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Elphil POM adopted Sime Darby Plantation’s established Standard Operating Procedure entitled Internal Audit Procedure; Doc. # SD/SDP/PSQM/IAP; Date: 1/11/2017 for internal audit implementation including for SCCS. Based on the procedure, internal audit planned to be conducted once a year. The root-causes of the NCR have been identified and recorded in the corrective action plan. All of the NCRs were satisfactorily closed within the timeframe dated 3/3/2022.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The report of internal audit was available dated 3/2/2022 with 2 finding from the verification. The root-causes of the NCR have been identified and recorded in the corrective action plan. All of the NCRs were satisfactorily closed within the timeframe dated 3/3/2022.	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 Management Review meeting was last conducted on 9/2/2022. The meetings were chaired by the mill manager and attended by the Assistant, supervisor, staff and others. The output from Management Review include as all the input discussed in management review as below: 1. Improvement in the effectiveness of the MSPO SCCS system and its processes; action taken in the management review include improvement in management system and resources needed. 2. Resources needed: so far, no resource need for the current operation.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	The continual improvement plan includes environmental, occupational health and safety and operation improvement. Continual Improvement Plan for Elphil POM, established on 25/02/2022 which includes items such as: <ol style="list-style-type: none"> 1. Social management plan 2. Pollution prevention plan 3. Waste Management plan 4. Water management plan 	Complied
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - Major compliance -	This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the RCEO and RGM are transacted during the monthly Managers meetings and emails. Verified new technology has been implemented which is 3D Trasar Boiler. Agreement was sighted between Elphil POM with Nalco Water dated 15/11/2021. Planning has been made and the project will be implemented on year of 2022.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSP0 requirements			

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 -	From the site verification the communication for the employee was available at board in the mill and office. The manager is responsible to communicate on information matter with top management of Sime Darby Plantation Berhad and relevant regulatory authorities. The information was available in dual language for workers and for external stakeholder the meeting was conducted on 3/3/2022.	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 -	Management documents related to sustainability available at each operating unit visited during the on-site audit upon request including sustainability policies, procedures, social and environmental assessments as well as management action plans etc. Furthermore, global documents accessible via company's website.	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 procedures established referred Standard Operation Manual (SOM) Subsection 5.5, appendix 5.5.3.2, Title: Procedure for external communication version: 1, dated 1/11/2008. This procedure was communicated with external stakeholders through stakeholder meeting of consultation on 03/03/2022 by Elphil POM. Internal stakeholders' communication was done during policies and procedures re-briefing conducted on 14/2/2022 by Elphil POM management to all its employees.	Complied
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	Management officials nominated are the mill manager and senior assistant manager as per inter-office mail letter of appointment by the Regional CEO dated 02/01/2021.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 -	List of stakeholders among internal and external parties maintained up to date as of January 2022. The latest stakeholder meeting was 3/3/2022	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 -	<p>Procedure available as per Sustainability Plantation Management System Appendix 15; SOP for Sustainable Supply Chain and Traceability; Version 2; Year 2018; Issue # 5; Issue date: April 2019. Based on the SOP Para 6.0 Delivery of FFB From the Estate; Sub-para 6.3 Estate shall ensure sufficient information is stated on the weighbridge ticket or consignment note of all delivery FFB including:</p> <ul style="list-style-type: none"> i. RSPO, MSPO and ISCC Certificate number (where applicable) ii. MSPO Certificate Validity iii. Greenhouse gas (GHG) emission value (either disaggregated default or actual value) iv. Distance (from estate to respective oil mill – ISCC only) v. Country of origin (ISCC only) The functionality to include the relevant information in the weighbridge tickets for estates and mills is available in the SDP Weigh System. In the case of unavailability of the SDP Weigh System, the information under 6.3 still needs to be documented manually. <p>Under Para 7.0 Receiving FFB At The Mill; 7.1 Mill shall receive from pre-determined supplying estates as per Appendix 15c: List of Supply Base and Crop Diversion of SOUs.; 7.2 Mill shall</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>maintain the list of certified FFB suppliers (with RSPO, MSPO and/or ISCC Certificate Number and validity period) at the premise. This also applies to certified third party FFB suppliers.;</p> <p>7.6 Mill shall verify the information on Supplying Estates based on Table 2: Information for Verification</p> <p>7.7 For materials received with insufficient information for verification, or any error in incoming documents shall be treated as non-conforming documents and shall be referred to 10.0 Non-Conforming Products and/or Documents. 11.5 For materials received with insufficient information for verification, or any error in incoming documents shall be treated as non-conforming documents. The documents shall be investigated, verified and corrected in order to allow processing of material. Release of such material for processing shall be authorized by the Mill Manager or Assistant Engineer.</p>	
4.2.3.2	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p>- Major compliance -</p>	<p>Regular inspections of estates' FFB productions and delivery conducted by estate management on daily basis and reported to HQ. Additionally, Internal audit conducted annually by internal auditors from the Regional Sustainability Team (RSQM). Sighted a sample of latest internal audit in Elphil POM was conducted on 14/1/2021 by internal auditors' team led by Mohd. Yusri Yusoff @ Saud. The MSPO Part 4 internal audit was conducted including with traceability requirements. Previous audit was conducted on 20/1/2020.</p>	Complied
4.2.3.3	<p>The management shall identified and assign suitable employees to implement and maintain traceability system.</p> <p>- Minor compliance -</p>	<p>Based on the company's traceability procedure, the overall personal in charge for the traceability is the Mill Manager. The responsibility is stated in the job description. For daily monitoring,</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance															
		mill has assigned person in charge for Environmental / Quality Management System.																
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	Records of CPO & PK sales & delivery including Weighbridge Tickets together with sales Delivery Note (DO Chit) and Daily Record (Daily CPO/PK Despatch Summary Logbook) were maintained based on Standard Operating Procedure. Sample of ticket as below: - <table border="1" data-bbox="1086 678 1848 845"> <thead> <tr> <th>CPO</th> <th>Sample 1</th> <th>Sample 2</th> </tr> </thead> <tbody> <tr> <td>Date</td> <td>30/03/2022</td> <td>27/06/2022</td> </tr> <tr> <td>Chit No.</td> <td>112945</td> <td>114604</td> </tr> <tr> <td>Lorry No.</td> <td>BLB5142</td> <td>MDD7767</td> </tr> <tr> <td>Weight, MT</td> <td>38.64</td> <td>40.17</td> </tr> </tbody> </table>	CPO	Sample 1	Sample 2	Date	30/03/2022	27/06/2022	Chit No.	112945	114604	Lorry No.	BLB5142	MDD7767	Weight, MT	38.64	40.17	Complied
CPO	Sample 1	Sample 2																
Date	30/03/2022	27/06/2022																
Chit No.	112945	114604																
Lorry No.	BLB5142	MDD7767																
Weight, MT	38.64	40.17																
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 -	Elphil POM continues to comply with the legal requirements as per indicator. The mill management and PSQM sustainability team monitor compliance to each applicable law and regulation. Elphil POM had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were as below: <ol style="list-style-type: none"> MPOB License; License Number: 540132004000; Processing Capacity Permitted: 216,000 mt FFB/Year; License Validity: 26/10/2021 till 31/05/2022. DOE License (Compliance Schedule); License Number: 001845, Ref No: AS(B)A31/152/000/055, Maximum Processing Capacity: 45mt per hour; License Validity: 01/07/2021 till 30/06/2022. 	Complied															

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Criterion / Indicator		Assessment Findings	Compliance
		<ol style="list-style-type: none"> 3. Fire Certificate; Serial Number: 318725; License Number: JBPM: PK/7/3/2013; Certificate Validity: 13/12/2020 till 12/12/2021. 4. Energy Commission License; S/N: 009711/2021, Installation Number: ST(PIP)P/S/PRK/00429; License Valid for 1 year from 30/12/2021. 5. Penjaga Jentera from Energy Commission (Rahmat Bin Md Tahir, Reg No: PJ-T-4-B-0153-2021, Cert No: PJ 11902546, Category: A4) 6. Weighbridge calibration certificate (e.g. S/N: 01264406 KK, Sticker No: PE18 000534, Capacity: 70,000kg x 10kg, Manufacturer: Mettler Toledo, calibration date: 20/10/2021 valid for 1 year). 7. Steam Engineer (Grade 1) – Muhammad Irsan Bin Azmi (Reg No: 050/2013, Issued date: 08/04/2013) 8. Certificate of Fitness for Machinery from DOSH Perak as follows: <ul style="list-style-type: none"> - BI Drum Water Tube Boiler (PK PMD 80023) - Air Receiver (S/N: TH232283, Reg No: PK PMT 80178) - Sterilizer (S/N: ESE/PV-2009/0003, Reg No: PK PMT 3880) 	
4.3.1.2	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>Documented Procedures have been established and implemented; refer to 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>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		All legal requirements were documented in Legal and Other Requirement Register available at the mill.	
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 -	<p>Documented procedures have been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10/12/2008. All legal requirements were documented in Legal and Other Requirement Register. Compliance to each applicable law and regulation is monitored by the mill.</p> <p>The legal register at the mill were reviewed/updated on a yearly basis / as and when needed for new updates/licenses. Sighted the document 'Summary of Compliance' available at the mill undersigned by the Top Management updated on 04/01/2021. The document lists the latest applicable laws and amendments, revision dates and acknowledgement by the management.</p> <p>All the legal and other requirements were registered accordingly and documented in the legal requirement register including new updates for Workers Minimum Standards of Housing and Amenities (Amendment) Act 2019, Minimum Wages Order 2020 and Auxiliary Police Regulations 1970 (Amendment), Movement Control Order 2020 & Akta Pencegahan & Pengawalan Penyakit Berjangkit 1988.</p> <p>Legal and Other Requirements Register (LORR) – Summary of Compliance reviewed on 03/03/2022 has shown that all legal and other requirements are complied. However, there was some breach/potential breach on legal requirements was not identified by Elphil POM as per evidence sighted as follow.</p>	Major Non-Conformity

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Criterion / Indicator		Assessment Findings	Compliance
		<p>1. Notice of Prohibition (S/N: 001651) and issued by DOSH Perak dated 11/02/2022 and Arahan Pematuhan Akta Keselamatan dan Kesihatan Pekerjaan (AKKP) 1994 / Akta Kilang dan Jentera (AKJ).</p> <p>2. Field Citation report dated 14/03/2022 which has stated non-compliance to the compliance schedule (License No: 001845, validity period: 01/07/2021 – 30/06/2022) items no: 8, 9, 24, 45 and 46.</p> <p>Thus, Major NC was raised.</p>	
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p>- Minor compliance -</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. Tracking system on any changes in the law is well implemented.</p> <p>Elphil POM has appointed Assistant Manager (Dzul Hakim Bin Zahir) as per appointment letter dated 09/02/2022 and QA Supervisor (Mohd Aini Bin Shariff) as per appointment letter dated 11/02/2022 as responsible person to monitor compliance and to track update the changes in regulatory requirements approved by Mill Manager</p>	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>The management ensure that their oil palm cultivation activities do not diminish the land use rights of other users by ensuring the legal boundary is correct through land survey during the development.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 -	The mill located within Elphil Estate land area occupying two lots as following: – Title # 45690; Lot # 1195; District: Kuala Kangsar; Sub-district: Mukim Pulau Kamiri; Area: 11.918 ha – Title # 47879; Lot # 1223; District: Kuala Kangsar; Sub-district: Mukim Pulau Kamiri; Area: 7.2742 ha	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Elphil POM is located within land owned by Elphil Estate. The Mill boundary is clearly demarcated by fences erected surrounding the mill area.	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 -	No issues of land dispute issue occur in Elphil POM as well as all estates within SOU 3 Elphil that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	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 evidence that the land on which the Mill is situated is encumbered by customary rights.	N/A
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	There is no evidence that the land on which the Mill is situated is encumbered by customary rights.	N/A
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available.	There is no evidence that the land on which the Mill is situated is encumbered by customary rights.	N/A

Criterion / Indicator		Assessment Findings	Compliance								
- Major compliance -											
4.4 Principle 4: Social responsibility, health, safety and employment condition											
Criterion 4.4.1: Social Impact Assessment (SIA)											
4.4.1.1	<p>Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.</p> <p>- Minor compliance -</p>	<p>The last Social Impact Assessment was conducted on 24-27/8/2015 by the Social & Environment Projects Unit, PSQM Department of Sime Darby Plantation as per SIA Report for SOU 3 Elphil consists of Elphil POM, Elphil Estate, Kamuning Estate and Kinta Kellas Estate. Each operating units established their individual Management Plan on Social Impact Assessment as per sample sighted in Elphil POM as following:</p> <table border="1"> <thead> <tr> <th>Area of concern</th> <th>Action Plan</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>OCP supplier, KRM and Oons</td> <td>To brief regarding to force labour to the contractor and OCP supplier.</td> <td rowspan="2">In progress</td> </tr> <tr> <td>1. ILO briefing 2. Issue pertaining to EPF, and SOCSO</td> <td>To ensure all workers that been hired by the contractor or OCP must followed as per legal and other requirement such as Minimum wages 2020.</td> </tr> </tbody> </table>	Area of concern	Action Plan	Status	OCP supplier, KRM and Oons	To brief regarding to force labour to the contractor and OCP supplier.	In progress	1. ILO briefing 2. Issue pertaining to EPF, and SOCSO	To ensure all workers that been hired by the contractor or OCP must followed as per legal and other requirement such as Minimum wages 2020.	Complied
Area of concern	Action Plan	Status									
OCP supplier, KRM and Oons	To brief regarding to force labour to the contractor and OCP supplier.	In progress									
1. ILO briefing 2. Issue pertaining to EPF, and SOCSO	To ensure all workers that been hired by the contractor or OCP must followed as per legal and other requirement such as Minimum wages 2020.										

Criterion / Indicator		Assessment Findings			Compliance
		Housing repaired	The management establish the bar code and paste at each house to ensure the Oil Palm Pal was been used and updated to workers.	In progress	
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 -	<p>Sime Darby Plantation Berhad established the Complaint Book (Internal), Complaint/Feedback Form (External) and Communication Book Internal & External to records the communication and complaints. Most of complaints made by internal stakeholders among workers were related to the housing repair which based on the records were taken action and resolved immediately by the estate management. For Complaint/Feedback Form by external stakeholders, action taken by the management was acknowledged by the complainant to be resolved within agreed timeframe.</p> <p>Sime Darby Plantation Berhad have established system to handled issue regarding to social as per below;-</p> <p>a) <u>Suara Kami</u> (using social dialogue tool kit)</p> <p>This session is about management and workers engagement between representative of workers, and employer (operating unit management) to resolve workplace and living condition issues through social dialogue. This dialogue frequency will handle every 2 weeks once. The issue that been raised during this dialogue will be recorded under tracker. This tracker will be captured in the dashboard and available to RGM, RCEO,</p>			Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>ILO WG. This system rolls out on 22/12/2021 (Phase 3 & Phase 4) to operating unit. From the verification the latest record was on 4/3/2022 and previously was on 28/2/2022.</p> <p>b) Oil Palm Palm (OPP)</p> <p>Establish and start been using on 4/12/2021 in SOU Elphil. This OPP was a digitalized data management to capture all complaint/request for repair of workers houses and monitor progress of repair works to completion. The latest record of OPP in Elphil Estate was on 4/2/2022 regarding to bathroom lighting and hall was need repair. The issue raised on 5/2/2022 and solved on 5/2/2022. From the previous record no issue was solved more than 3 days.</p>	
4.4.2.2	<p>The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties.</p> <p>- Major compliance -</p>	<p>Most of complaints made by internal stakeholders among workers were related to the housing repair which based on the records were taken action and resolved immediately by the estate management. For Complaint/Feedback Form by external stakeholders, action taken by the management was acknowledged by the complainant to be resolved within agreed timeframe.</p>	Complied
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.</p> <p>- Minor compliance -</p>	<p>For Complaint/Feedback Form by external stakeholders, action taken by the management was acknowledged by the complainant to be resolved within agreed timeframe. The record was available as per verification dated Jan 2022.</p>	Complied
4.4.2.4	<p>Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time.</p> <p>- Minor compliance -</p>	<p>The regional management i.e. Northern Region CEO Tn. Hj. Ramlan Bin Ramli conducted the briefing on the awareness that complaints or suggestions can be made any time on 10/03/2021 in each estate main division to all employees.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Due to the multiple implementations of Movement Control Order by the government, Elphil POM unable to conduct the stakeholder meeting with external stakeholders hence sending mails and emails to external stakeholders to seek for any feedbacks on 2/03/2022.</p> <p>Referring to the records of letter sent to stakeholder including Appendix A i.e. explanation on the intention of stakeholder consultation & Appendix B i.e. the stakeholder feedback forms.</p>	
4.4.2.5	<p>Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.</p> <p>- Major compliance -</p>	<p>The complaint was available and can be track back since 2008. Form the record no record for 2021 at the sampling mill.</p>	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	<p>Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.</p> <p>- Minor compliance -</p>	<p>Based on consultation with relevant stakeholders among internal and external including local communities, the mill made few contributions amongst all as per sample as following:</p> <ul style="list-style-type: none"> - Majlis Berbuka Puasa (28/4/2021) - Vaccination programmed to all employees on 28/9/2021 - Donations to school programs i.e. SJKT Ladang Elphil 	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p>	<p>Sime Darby Plantation Berhad have established the Group Policy for Upstream Malaysia on Health, Safety & Environment (HSE) Policy Statement signed by the CEO of Upstream Malaysia dated 01/06/2020. The HSE policy was communicated to the workers through induction training for new workers, morning briefing and</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
	- Major compliance -	displayed at various notice boards within the Mill.
<p>4.4.4.2</p> <p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> f) A safety and health policy, which is communicated and implemented. g) The risk of all operations shall be assessed and documented. h) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; i) 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). j) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. k) 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>The mill has established safety and health plan and documented in OSH and Other Requirement Plan Year 2022 (Elphil POM). The plan covers Safety and Health Committee, ESH reporting, Risk Management, First Aid, Machinery Inspection, Chemical Management, Factories and Machinery, etc. The latest review was conducted on 02/03/2022.</p> <ul style="list-style-type: none"> a) Sime Darby Plantation Berhad has established the Group Policy on Health and Safety signed by the Managing Director on Jan 2015. 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. The OSH Policy Training was conducted on 21/01/2021 for all staffs and workers. b) Sime Darby Plantation Berhad have established Standard Operating Procedure for OSH Risk Management Procedure (UM/HSE/SP/01 dated 09/03/2021, UM HSE Management System). Risk assessments for all the operations at the estates audited was documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment covers all main operations and support operations. <p>CHRA assessment was conducted on 25/08/2020 by Gatconst Sdn. Bhd. The CHRA Report (Report Number: HQ/09/ASS/00 124 – 2020/0033) was available for verification. Baseline Noise Risk Assessment was done in compliance with the Occupational Safety & Health (Noise Exposure) Regulations</p>	<p>Major Non Conformity</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>l) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept and the concerns of employees and any remedial actions taken shall be recorded.</p> <p>m) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>n) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>o) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>2019. The assessment was conducted on 21 – 22/12/2020 by SH Safety Consultancy Sdn Bhd (HQ/09/PEB/00/97).</p> <p>Audiometric test was conducted on 04/01/2022 by Procoma Environmental to 72 workers with 13 workers were detected with abnormal audiogram result. Appointment with OHD was made as per appointment letter dated 11/03/2022 to do proper examination.</p> <p>Medical surveillance was conducted on 29/12/2021 to 12 workers for (manganese) and 3 workers for (N-Hexane) with normal result.</p> <p>HIRARC was available to assess all risks associated to the operations and works in the mill. Control measures were available in the HIRARC to ensure the risks of all operations are minimized. HIRARC is reviewed on an annual basis and as and when there are any related accidents that occur. HIRARC was reviewed on 07/09/2021 for all operations such as weighbridge, reception/ramp, fruit handling, sterilization, threshing station, pressing station, clarification, kernel plant, boiler station, engine room, CPO Storage Tank, Kernel Storage, Laboratory, Water Treatment Plant, Effluent Treatment Plant, Workshop, Store, Mill Compound, Security, Office and General. Chemical Health Risk Assessment was conducted to assess the risk associated with the usage of hazardous chemicals in the mill.</p> <p>c) The mill has established a training and awareness program for employees exposed to chemicals used at the palm oil mill to ensure continuous awareness to the employees. The training was conducted by the Manager, Asst. Manager and</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>representative form the chemical suppliers to the supervisors and operators. Sighted the training records as follows:</p> <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 dated 17/03/2008. Sighted 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. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>During site visit at Effluent Pond area Elphil POM, it was found one JCB Driver from contractor KRM Mawar Murni was doing maintenance job without wearing safety helmet and safety shoes when do a job. It was not in line with Occupational Safety & Health manual Chapter 8 Personal Protective Equipment Version 1, Issue No. 1 dated 20/08/2008 section 11.0 Recommendation PPE for Operating Unit, Type of work Loading & Transporting / Driving & Riding).</p> <p>During site visit at Effluent area Elphil POM, it was found 1 worker who is ETP Chargehand was using modified drinking bottle for refilling petrol to the water pump engine when do maintenance job at that area. It was not in line Occupational Safety & Health manual Chapter 9 Chemical Safety</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Management Version 1, Issue No. 1 dated 20/08/2008 section 6.0 Procedures for handling. Thus, Major NC was raised.</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) Mill Manager, Mr. Muhammad Irsan Bin Azmi was appointed by the management to be the Chairman of OSH Committee at the mill as per letter signed by the Regional CEO dated 02/01/2021. Mill management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, eight representatives from Employer and eight representatives from Employee as per appointment letter by the Mill Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. The OHS Chairman and Secretary are in coordination with PSQM Head Quarter Officer for any update national regulations and collective agreements.</p> <p>g) The management conducted OSH committee meeting on quarterly basis. In the meeting discussed issue on employees' safety, health and welfare such as mill safety and health achievement report, mill security, safety compliance by contractors, workplace audit report, legal compliance, safety and health training, etc. Sighted the minutes meeting for OSH committee. Meeting was conducted on 20/12/2021, 25/10/2021, 27/08/2021, 22/03/2021</p>	

Criterion / Indicator		Assessment Findings	Compliance
		<p>h) Emergency Response Plans were available to manage emergencies such as fire, flood, disease outbreak, food poisoning, chemical spillage, accidents, etc. Emergency Preparedness & Response Procedures (UM/HSE/SP/02 dated 17/11/2021) approved by CEO (Roslin Azmy Hassan). There was a formation of Emergency Response Team to attend to emergencies with regular trainings and drill being conducted for the team and the rest of the workers. Emergency Response Training was conducted on 14/10/2021 with total of 48 personnel participated.</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. During the interview with the fireman, electrician and engine driver, shows the awareness regarding the emergency procedure if accidents occur, person responsible of every first aid box and the location of the nearest first aid box. The first aid box was recently replenished with all stated items available in the box.</p> <p>j) Yearly accident reporting was submitted to DOSH via MyKKP portal on 07/01/2022 (Ref No: JKPP 8/954493/2021) with total of 292,000 man days and average of 100 workers recorded for 2021. Four (4) accident cases reported with 42 lost man days and 1 occupational disease recorded. JKPP 6 and JKPP 7 is available for verification.</p>	
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	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	Complied

Criterion / Indicator		Assessment Findings	Compliance
	shall be signed by the top management and communicated to the employees. - Major compliance -	Policy Statement" which was signed by the Group Managing Director (Mr. Mohamad Helmy Othman Basha), dated 2/12/2019.	
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. This verified as per interview with gender committee and workers representatives.	Complied
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	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: 30/01/2020; 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 mill kept records of contractor's workers agreement, attendance and pay slips as per records sighted for the mill composting contractor i.e. Oons Enterprise. Employees as following: Employee ID # 920211-XX-XXXX (Uththiran); Employed date: 1/10/2021; Nationality: Malaysian Employee ID # 900511-XX-XXXX (Sanderan Saigeran); Employed date: 3/5/2021; Nationality: Malaysian.	Complied
4.4.5.5	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and	The established records of Employee Masterlist which available as a database in computerized Checkroll System able to provide	Complied

Criterion / Indicator		Assessment Findings	Compliance
	subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	accurate account of all employees including their particulars of full names, gender, date of birth, date joined company, wages grade and position etc. as per Semua - Employee Master Listing; Company: Sime Darby Plantation Berhad; Op. Unit: KKS Elphil; Dated 16/03/2022.	
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records. - Major compliance -	Copies of fair contracts that have been signed by both employee and employer were provided to each employee as per sample records as following: Employee # 66677; Employed date: 21/5/2011; Nationality: Malaysia; Gang: Shift B Employee # 82084; Employed date: 01/08/2012; Nationality: Malaysia; Gang: General Employee # 147699; Employed date: 7/1/2019; Nationality: Malaysia; Gang: General Employee # 150977; Employed date: 1/6/2019; Nationality: Malaysia; Gang: Shift A Employee # 151773; Employed date: 25/6/2019; Nationality: Malaysia; Gang: Shift B Employee # 161660; Employed date: 12/1/2021; Nationality: Malaysia; Gang: General Employee # 154364; Employed date: 01/06/2018; Nationality: Malaysia; Gang: Non-clerical	Complied
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	Attendance (out-turn) and work hours (normal time & overtime) recording system established in both manual and computerized checkroll system which makes working hours and overtime transparent for both employees and employer.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. - Major compliance -	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: 30/01/2020; 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 agreements. - Major compliance -	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: 30/01/2020; MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019. This also in-line with Malaysia Employment Act 1955.	Complied
4.4.5.10	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. - 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 Others benefit the management also provided to workers rice (10kg) for every 2 months once and 35-gallon water subsidy every month. The record was available during audit.	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.	All workers are provided with free housing facilities that included basic amenities such as clean water (35 gallons/month),	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	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. Latest record verified on 24/2/2022, the score showed that implementation was 100 percent.	
4.4.5.12	The management shall establish a policy 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 Elphil POM Gender committee meeting; Date: 14/2/2022.	Complied
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective 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 02/12/2019. Employees were given freedom to associate and bargain collectively with company and to organize among themselves through association meetings as per sample latest sighted minutes of meeting Elphil POM NUPW meeting dated 1/3/2022.	Complied

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Criterion / Indicator		Assessment Findings	Compliance																						
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 02/12/2019. 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 3.	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 -	Elphil POM have established a training program for the year 2021 for all workers based on the training need analysis conducted on a yearly basis. <table border="1"> <thead> <tr> <th>Training Topic</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Raw & Boiler Water Treatment Process Control & Monitoring Nalco</td> <td>15/11/2021</td> </tr> <tr> <td>Lab Training SOP/Chemical Handling</td> <td>19/11/2021</td> </tr> <tr> <td>PPE Training</td> <td>20/11/2021</td> </tr> <tr> <td>ILO Indicator Force Labour</td> <td>25/11/2021</td> </tr> <tr> <td>Safety & SOP Briefing</td> <td>26/11/2021</td> </tr> <tr> <td>Chemical Handling (WTP, Kernel, Boiler, Lab)</td> <td>12/02/2022</td> </tr> <tr> <td>Noise Exposure</td> <td>12/02/2022</td> </tr> <tr> <td>Basic Occupational First Aid, CPR & AED Training</td> <td>21/10/2021</td> </tr> <tr> <td>Medical & Shift Time Briefing for Workers</td> <td>09/10/2021</td> </tr> <tr> <td>Medical Access, Leaving at Workplace Training (Workshop)</td> <td>15/10/2021</td> </tr> </tbody> </table>	Training Topic	Date	Raw & Boiler Water Treatment Process Control & Monitoring Nalco	15/11/2021	Lab Training SOP/Chemical Handling	19/11/2021	PPE Training	20/11/2021	ILO Indicator Force Labour	25/11/2021	Safety & SOP Briefing	26/11/2021	Chemical Handling (WTP, Kernel, Boiler, Lab)	12/02/2022	Noise Exposure	12/02/2022	Basic Occupational First Aid, CPR & AED Training	21/10/2021	Medical & Shift Time Briefing for Workers	09/10/2021	Medical Access, Leaving at Workplace Training (Workshop)	15/10/2021	Complied
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Criterion / Indicator		Assessment Findings	Compliance
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>Elphil POM has conducted training need analysis for all employees, management and contractors. The training need analysis was conducted based on the job designation and training required by the job type. Sighted the Training Need Analysis for the year 2022 for verification.</p>	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>A training programme has been developed and available in the Training Requirement for Elphil POM ESH Activities for 2021. The trainings were sighted to have also included Gender Specific Training and involves staffs, workers and contractors.</p>	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	<p>An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad 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 boards within the mill.</p> <p>The GSM team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition. The policy has been briefed to all workers on 14/02/2022.</p>	Complied
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p>	<p>The Environmental Impact Plan and Pollution Prevention Plan was established based on the Environmental Aspect Impact Identification and Environmental Impact Evaluation. The plan</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	b) The aspects and impacts analysis of all operations - Major compliance -	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. Last reviewed was done on 11/02/2022.	
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 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.	Complied
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	The Continual Improvement Plan has incorporated various programmes to promote the positive impacts towards the environment and was available in the Environment Management Plan that had been subcategorized to Waste Management, Water Management, HCV Area / Biodiversity, Energy Management, GHG Reductions and Pollution Preventions.	Complied
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - Major compliance -	The mill management has established annual ESH Training Plan from FY 2022 which covers the environmental awareness and compliance related trainings to the executives, staffs and workers. Among the awareness and trainings verified were: 1. Schedule waste raining dated 22/01/2022 2. Chemical/ waste handling training dated 12/02/2022	Complied

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Criterion / Indicator		Assessment Findings	Compliance																														
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	Elphil POM conducts quarterly Environment Performance Monitoring Committee (EPMC) Meetings to address the environment quality, issues and opportunity for improvements. The EPMC Meeting Minutes for the year 2021 were available for verification.	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 -	<p>Management Plan on Reduce Fossil (Diesel) or Elphil POM was available dated 08/01/2022 as below:</p> <ul style="list-style-type: none"> Monitoring any leaking regarding fuel diesel Schedule services by Tractor Malaysia <p>Elphil POM maintains records of energy usage, which is reported monthly to head office through SAP system. The use of the steam turbine for electricity generation has been optimized in order to reduce the dependence on diesel fossil fuel.</p> <table border="1"> <thead> <tr> <th rowspan="2">Year</th> <th rowspan="2">FFB Processed</th> <th colspan="2">TNB</th> <th colspan="2">Turbine No 1</th> <th colspan="2">Turbine No 2</th> </tr> <tr> <th>KWH</th> <th>Running HRS</th> <th>KWH</th> <th>Running HRS</th> <th>KWH</th> <th>Running HRS</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>227627.04</td> <td>1362210</td> <td>5623.62</td> <td>22502.52</td> <td>2764.76</td> <td>23418.93</td> <td>2633.21</td> </tr> <tr> <td>@Feb 2022</td> <td>26921.44</td> <td>176141.00</td> <td>950.33</td> <td>1589.40</td> <td>229.24</td> <td>4104.80</td> <td>493.46</td> </tr> </tbody> </table>	Year	FFB Processed	TNB		Turbine No 1		Turbine No 2		KWH	Running HRS	KWH	Running HRS	KWH	Running HRS	2021	227627.04	1362210	5623.62	22502.52	2764.76	23418.93	2633.21	@Feb 2022	26921.44	176141.00	950.33	1589.40	229.24	4104.80	493.46	Complied
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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.	Elphil POM has established baseline for non-renewable energy base on average of last 3 years usage/FFB produce. The monitoring of non-renewable energy usage was conducted annually.	Complied																														

Criterion / Indicator		Assessment Findings	Compliance																				
	- Major compliance -	<p>Elphil POM has estimation of total energy required. This estimation was compared to the actual usage on a monthly basis and reported to the head office for monitoring and comparison purposes. The estimation of total energy required is available in the annual budget prepared by the management of Elphil POM.</p> <table border="1"> <thead> <tr> <th>No</th> <th>Year/Month</th> <th>Diesel/L</th> <th>FFB processed</th> <th>Diesel/FFB</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2021</td> <td>18260.00</td> <td>227627.04</td> <td>0.08</td> </tr> <tr> <td>2</td> <td>@Feb 2022</td> <td>1940.00</td> <td>26921.44</td> <td>0.07</td> </tr> </tbody> </table>	No	Year/Month	Diesel/L	FFB processed	Diesel/FFB	1	2021	18260.00	227627.04	0.08	2	@Feb 2022	1940.00	26921.44	0.07						
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1	2021	18260.00	227627.04	0.08																			
2	@Feb 2022	1940.00	26921.44	0.07																			
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p>	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Apart from use of diesel for electricity, palm fiber and shells were also used to generate electricity through steam turbine and boiler.</p> <p>The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through steam turbine and boiler where Palm fibre and PK shells were used as renewable energy/fuel. Monthly records of energy consumption of non-renewable and renewable fuel per metric ton of palm product at the Mill were available.</p> <table border="1"> <thead> <tr> <th colspan="5">Fibre Usage</th> </tr> <tr> <th>No</th> <th>Year/Month</th> <th>Fibre, Mt</th> <th>FFB processed</th> <th>Fibre/FFB</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2021</td> <td>37558.46</td> <td>227627.04</td> <td>0.16</td> </tr> <tr> <td>2</td> <td>@Feb 2022</td> <td>4442.04</td> <td>26921.44</td> <td>0.17</td> </tr> </tbody> </table> <p>Shell Usage</p>	Fibre Usage					No	Year/Month	Fibre, Mt	FFB processed	Fibre/FFB	1	2021	37558.46	227627.04	0.16	2	@Feb 2022	4442.04	26921.44	0.17	Complied
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		No	Year/Month	Shell, Mt	FFB processed	Shell/FFB	
		1	2021	6828.81	227627.04	0.03	
		2	@Feb 2022	807.64	26921.44	0.03	
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 -	Elphil POM has identified the waste products and source pollution and documented in the Waste Management Plan 2022. The waste has been identified as follows: 1. Domestic Waste – Household waste, Organic Waste, Sewage 2. Industrial Waste – Scrap Metal 3. Scheduled Waste from Mill Operation – Used Hydraulic, Lubricant, Used chemical Containers, Electric Waste, used chemical Waste, cotton Rag from workshop and process. 4. Recyclable Waste – POME, EFB Records on the usage and disposal were well recorded and documented. Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be well maintained.					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 identified the waste products and source pollution and documented in Waste Management Plan 2022. The waste has been identified as follows: 1. Domestic Waste – Household waste, Organic Waste, Sewage 2. Industrial Waste – Scrap Metal					Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>3. Scheduled Waste from Mill Operation – Used Hydraulic, Lubricant, Used chemical Containers, Electric Waste, used chemical Waste, cotton Rag from workshop and process.</p> <p>4. Recyclable Waste – POME, EFB</p> <p>In the management plan stated the type of waste, source of waste, mitigation plan and person responsible. Among action to be taken were:</p> <p>Schedule waste</p> <ul style="list-style-type: none"> • Collect and record used lubricant and disposed off the items through registered contractor • Collect and record empty container and disposed through Pentas Flora (Ipoh) Sdn Bhd <p>Domestic waste</p> <ul style="list-style-type: none"> • Establish collection schedule and person in charge • Monitoring of linesite cleanliness <p>Recycled waste</p> <ul style="list-style-type: none"> • Monitoring POME application • Maintenance of furrows / conservation trench 	
4.5.3.3	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p>- Major compliance -</p>	<p>Procedure for Scheduled Waste Management was established (SD/SDP/PSQM (ESH)/203-EN1 dated 26/02/2016. Proper disposal of waste material is carried out as per the company procedures. The procedures are fully understood by workers staffs and executives.</p> <p>Elphil POM also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
	<p>and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>Observed during interview with storekeeper shows the understanding of the proper disposal of waste as all used lubricant and contaminated spill kit will be collected as Scheduled Waste and stored in designated storage area prior to disposal.</p> <p>All the records were found adequate as per required by EQ (Scheduled Waste) Regulations 2005.</p> <p>Sample of E-Swiss inventory record and disposal records as below:</p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> • File reference Number: A31/152/000/055 • Date Reporting: 02/03/2022 • Waste Generated: SW109, SW110, SW305, SW306, SW409, SW410, SW418 <p><u>Disposal</u></p> <p>Sample 1</p> <ul style="list-style-type: none"> • Disposal consignment note: 2022030310YJXBQD • Date Disposal: 03/03/2022 • SW 305 – Spent Lubricating Oil: 0.1100 MT by Pentas Flora (IPOH) Sdn Bhd <p>Sample 2</p> <ul style="list-style-type: none"> • Disposal consignment note: 20220303115X2JYH • Date Disposal: 03/03/2022 	

Criterion / Indicator		Assessment Findings	Compliance															
		SW 418 – Discarded or off specification inks, paints, pigments, lacquer, dye or varnish products containing solvent: 0.0331 MT by Pentas Flora (IPOH) Sdn Bhd																
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	Domestic waste was managed by Elphil Estate. Domestic waste was collected by contractor and disposed to the Municipal Council collection bins.	Complied															
Criterion 4.5.4: Reduction of pollution and emission																		
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	<p>An assessment plan for all identified polluting activities was established based on the Environment Aspect and Impact assessment. Polluting activities were monitored based on DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling. Besides that, the mill also monitors the Green House Gas emission and recyclable waste.</p> <p>Observed the dust emission monitoring report conducted by Environmental Science (M) Sdn. Bhd. as follows:</p> <table border="1"> <thead> <tr> <th>Descriptions</th> <th>Stack 2 – Boiler PK PMD 80023</th> <th>Stack 1 – Boiler PK PMD 745</th> </tr> </thead> <tbody> <tr> <td>Report No.</td> <td>L-PG-AC2104CSD-0115</td> <td>L-PG-AC2102CSD-0406</td> </tr> <tr> <td>Report Date</td> <td>27/04/2021</td> <td>09/03/2021</td> </tr> <tr> <td>Average Dust Concentration (mg/Nm³, dry, @ 6.6% CO₂)</td> <td>0.79</td> <td>44.1</td> </tr> <tr> <td>Average Dust Concentration (mg/Nm³, dry, @ 12.06% CO₂)</td> <td>88.8</td> <td>98.9</td> </tr> </tbody> </table>	Descriptions	Stack 2 – Boiler PK PMD 80023	Stack 1 – Boiler PK PMD 745	Report No.	L-PG-AC2104CSD-0115	L-PG-AC2102CSD-0406	Report Date	27/04/2021	09/03/2021	Average Dust Concentration (mg/Nm ³ , dry, @ 6.6% CO ₂)	0.79	44.1	Average Dust Concentration (mg/Nm ³ , dry, @ 12.06% CO ₂)	88.8	98.9	Complied
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		Environmental Quality (Clean Air) Regulations, 2014 (mg/m3)	150	150																								
		<p>The emission level of Total Particulate matter @ 12% CO₂ for the boilers monitored were within the Malaysian Environmental Quality (Clean Air) Regulations 2014.</p> <p>Verified Palm GHG Emission from field application of organic fertilizer, emission from POME and CH₄ report data as below:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>FFB Process</th> <th>POME Produced</th> <th>Applied to Land irrigation</th> <th>EFB Produced</th> <th>Compost</th> <th>CH₄, Mt</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>227627.041</td> <td>111815.943</td> <td>133485.00</td> <td>47801.68</td> <td>65993.00</td> <td>2012.69</td> </tr> <tr> <td>@Feb 2022</td> <td>26921.441</td> <td>14229.384</td> <td>2169.10</td> <td>5653.50</td> <td>5686.00</td> <td>256.13</td> </tr> </tbody> </table>					Year	FFB Process	POME Produced	Applied to Land irrigation	EFB Produced	Compost	CH ₄ , Mt	2021	227627.041	111815.943	133485.00	47801.68	65993.00	2012.69	@Feb 2022	26921.441	14229.384	2169.10	5653.50	5686.00	256.13	
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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>A Pollution Prevention Plan – Year 2021 (KKS Elphil) was available in the mill where all sources of pollution were identified and the mitigation methods (action plan) available to reduce the pollutions. The pollution prevention plan updated on 01/02/2021 were as below:</p> <p>Elphil POM have established a GHG Reduction Plan for the year 2021. The plan has identified the possible issues within the mill that may lead towards pollution. The plan consists of the issues, action plan to be taken, person in charge to monitor the action plan, time frame and status of compliance.</p> <p>Among the pollution issues identified are as follows:</p> <ol style="list-style-type: none"> 1. Diesel - Optimization of diesel usage for the tractors available. 					Complied																					

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		2. Diesel - Monitoring on the usage of diesel use. 3. Electricity - To optimize the usage of electricity and reduce wastage 4. Reduction of GHG emission																															
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>Management Action Plan 2022 is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly.</p> <p>Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. Effluent Analysis conducted by accredited laboratory and submitted to DOE every 3 months through OER (Online Environmental Report) and in compliance with mill’s compliance schedule for quarterly submission. First Schedule (regulation 10(2)) Quarterly Return Form Report.</p> <p>The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. DOE standards. Monthly and quarterly report was submitted to DOE accordingly. Sighted the Analysis Test Report Results as follows:</p> <table border="1"> <thead> <tr> <th>Qtr.</th> <th>Period</th> <th>Report Date</th> <th colspan="3">BOD Limit <5000</th> </tr> </thead> <tbody> <tr> <td>1st</td> <td>01/01-31/03/2021</td> <td>05/04/2021</td> <td>71</td> <td>115</td> <td>93</td> </tr> <tr> <td>2nd</td> <td>01/04-31/06/2021</td> <td>06/07/2021</td> <td>328</td> <td>589</td> <td>245</td> </tr> <tr> <td>3rd</td> <td>01/07-30/09/2021</td> <td>06/10/2021</td> <td>167</td> <td>331</td> <td>216</td> </tr> <tr> <td>4th</td> <td>01/10-31/12/2021</td> <td>06/01/2022</td> <td>320</td> <td>285</td> <td>253</td> </tr> </tbody> </table> <p>As prescribed under DOE’s Compliance Schedule, the mill is obliged to conduct stack sampling minimum once a year. Below are the verified reports:</p>	Qtr.	Period	Report Date	BOD Limit <5000			1 st	01/01-31/03/2021	05/04/2021	71	115	93	2 nd	01/04-31/06/2021	06/07/2021	328	589	245	3 rd	01/07-30/09/2021	06/10/2021	167	331	216	4 th	01/10-31/12/2021	06/01/2022	320	285	253	Complied
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Criterion / Indicator		Assessment Findings			Compliance
		Descriptions	Stack 2 – Boiler PK PMD 80023	Stack 1 – Boiler PK PMD 745	
		Report No.	L-PG-AC2104CSD-0115	L-PG-AC2102CSD-0406	
		Report Date	27/04/2021	09/03/2021	
		Average Dust Concentration (mg/Nm ³ , dry, @ 6.6% CO ₂)	0.79	44.1	
		Average Dust Concentration (mg/Nm ³ , dry, @ 12.06% CO ₂)	88.8	98.9	
		Environmental Quality (Clean Air) Regulations, 2014 (mg/m ³)	150	150	
		<p>Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were in progress for Dark smoke emissions monitored.</p> <p>Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per Jadual Pematuhan AS(B)A31/152/000/055, Licence No. 001845 with validity until 30/06/2022.</p>			
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> <p>a) Assessment of water usage and sources.</p>	<p>a) Water source was from own treated water plant. Sighted monitoring record on water quality by frequently sampling test by their lab. Refer Result of water quality analysis (Natural waterways). Standard was according to INWQS standard. Report dated 25/01/2022 was referred. Domestic use of water for line site area from Lembaga Air Perak (LAP).</p>			Complied

Criterion / Indicator		Assessment Findings	Compliance												
	<p>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</p> <p>c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>- Major compliance -</p>	<p>Water use record for processing FFB tabulated under the table below:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>FFB Processed</th> <th>Water/L</th> <th>Water/FFB</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>227627.041</td> <td>254288.00</td> <td>1.12</td> </tr> <tr> <td>@Feb 2022</td> <td>26921.441</td> <td>7600.00</td> <td>0.28</td> </tr> </tbody> </table> <p>b) Effluent water analysis was conducted for 3 sampling points which is Point 1: Sg Kerдах, Point 2: Mill Reservoir and Point 3: Mill drain. Water analysis report dated 21/01/2022, Report No: IE103/2022 was conducted in order to monitoring of outgoing water which may have negative impacts into the natural waterways.</p> <p>c) Action to reduce water usage was documented in the water management plan. Among actions to be taken were:</p> <ol style="list-style-type: none"> 1. Use condensate water as dilution water for daily process 2. Turbine cooler water mix to water treatment were use for Boiler operation, Mill operation and cleaning 3. Dry cleaning – Cleaning mill without using any water 	Year	FFB Processed	Water/L	Water/FFB	2021	227627.041	254288.00	1.12	@Feb 2022	26921.441	7600.00	0.28	
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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>POME is discharged through Land Application via Farrows at Elphil Estate from the Final Discharge Holding Pond as stated in the DOE Compliance Schedule.</p> <p>Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. Effluent Analysis conducted by accredited laboratory and submitted to DOE every 3 months through OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly</p>	Complied												

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Criterion / Indicator		Assessment Findings	Compliance																														
		<p>submission. First Schedule (regulation 10(2)) Quarterly Return Form Report.</p> <p>The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. DOE standards. Monthly and quarterly report was submitted to DOE accordingly. Sighted the Analysis Test Report Results as follows:</p> <table border="1"> <thead> <tr> <th>Qtr.</th> <th>Period</th> <th>Report Date</th> <th colspan="3">BOD Limit <5000</th> </tr> </thead> <tbody> <tr> <td>1st</td> <td>01/01-31/03/2021</td> <td>05/04/2021</td> <td>71</td> <td>115</td> <td>93</td> </tr> <tr> <td>2nd</td> <td>01/04-31/06/2021</td> <td>06/07/2021</td> <td>328</td> <td>589</td> <td>245</td> </tr> <tr> <td>3rd</td> <td>01/07-30/09/2021</td> <td>06/10/2021</td> <td>167</td> <td>331</td> <td>216</td> </tr> <tr> <td>4th</td> <td>01/10-31/12/2021</td> <td>06/01/2022</td> <td>320</td> <td>285</td> <td>253</td> </tr> </tbody> </table>	Qtr.	Period	Report Date	BOD Limit <5000			1 st	01/01-31/03/2021	05/04/2021	71	115	93	2 nd	01/04-31/06/2021	06/07/2021	328	589	245	3 rd	01/07-30/09/2021	06/10/2021	167	331	216	4 th	01/10-31/12/2021	06/01/2022	320	285	253	
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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; a) The mill SOP, b) The Mill Quality Management Manual v.1 2008/MQMS/QMM/08. These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from; a) the reception, sterilization, threshing, pressing, b) clarification, depericarping (nut polishing) station, c) effluent, laboratory, workshop, dispatches etc.</p> <p>Sime Darby Plantation Berhad 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 basis. Their reports</p>	Complied																														

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Criterion / Indicator		Assessment Findings	Compliance
		cover on all aspect of operation where they rate the performance of the mill and estates. SORA visit dated 22-26/11/2021 and 1-4/06/2021 was referred.	
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 An Engineer. All process parameters are documented and summarized in a daily report. The external monitoring is made through visits by Regional CEO, Mill Advisor, SQM and GCAD. This is to ensure compliance to Policies, procedures in relation mill operations, financial, OSH, welfare among others.	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 (Budget year, PY2, PY3, PY4, PY5) prepared as guidance for future planning. The business plan contains. <ul style="list-style-type: none"> • FFB processed production of CPO & CPK. • 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 2022 was sighted and verified. A calculation of seeking the profitability quantum was also sighted. This is a standard format provided from the Regional CEO to the Manager and treated in high confidentiality	Complied
Criterion 4.6.3: Transparent and fair price dealing			

Criterion / Indicator		Assessment Findings	Compliance
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 11/07/2017. 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 sighted as per sample agreed contracts agreement between Sime Darby Plantation Berhad and the contractor (transporter) i.e. Mayang Bayumas Sdn Bhd. Reference Number: T/SDPB/PEN/CPO/0720/003; Date: 12/12/2020.	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSP0 requirements and shall provide the required documentation and information. - Major compliance -	All contractors engaged by estates were bound to understand and comply to their contractual agreements that includes MSP0 requirements through signing of Vendor Integrity Pledge (VIP) which enable accredited CB to audit them.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Agreed contracts provided by the management as per sample contracts agreement between Sime Darby Plantation Berhad and the contractor (transporter) i.e. Mayang Bayumas Sdn Bhd. Reference Number: T/SDPB/PEN/CPO/0720/003; Date: 12/12/2020.	Complied
4.6.4.3	The management shall accept MSP0 approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	All contractors engaged by the mill were bound to understand and comply to their contractual agreements that includes MSP0	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	requirements through signing of Vendor Integrity Pledge (VIP) which enable accredited CB to audit them.	

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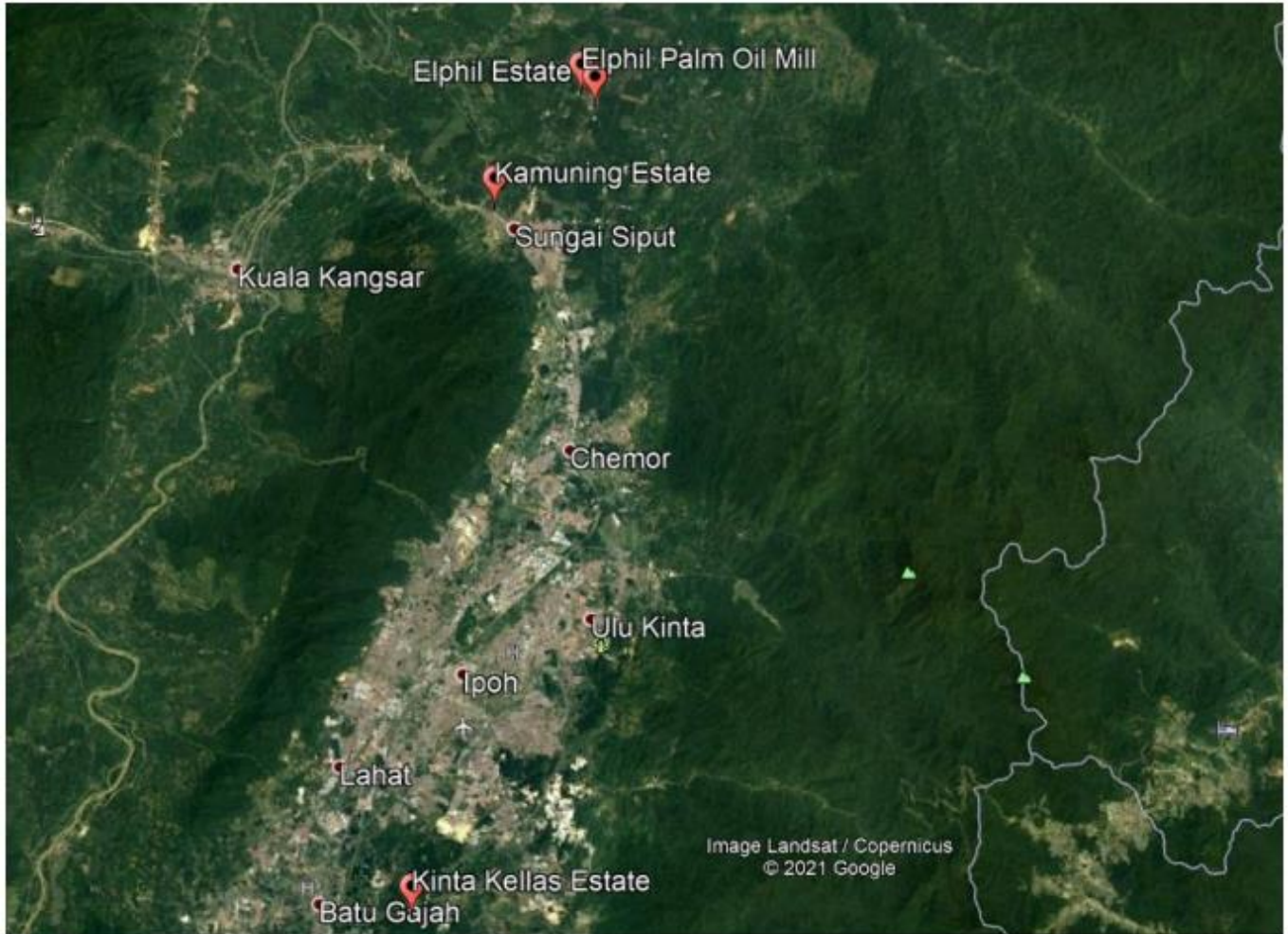
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Appendix B: Smallholder Member Details

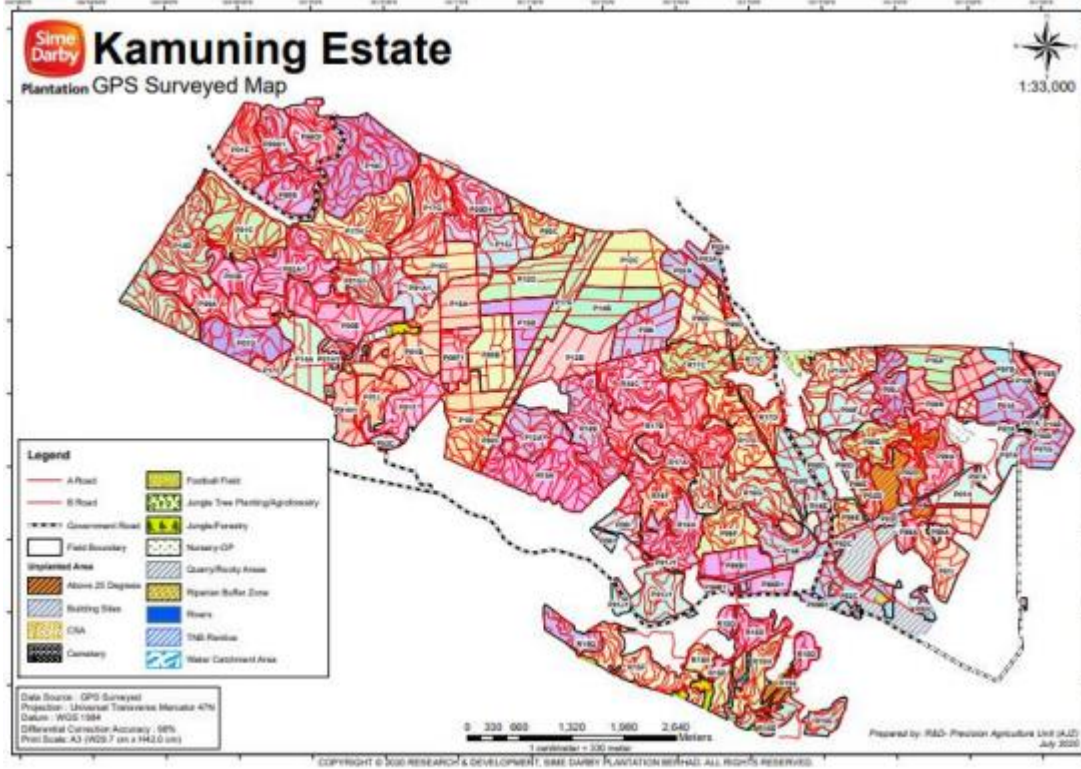
No.	Smallholder		Location of Planted Area (District)	GPS Coordinates		Certified Area (ha)	Planted Area (ha)
	Name	MPOB License Number		Latitude	Longitude		
	N/A						

Appendix C: Location and Field Map

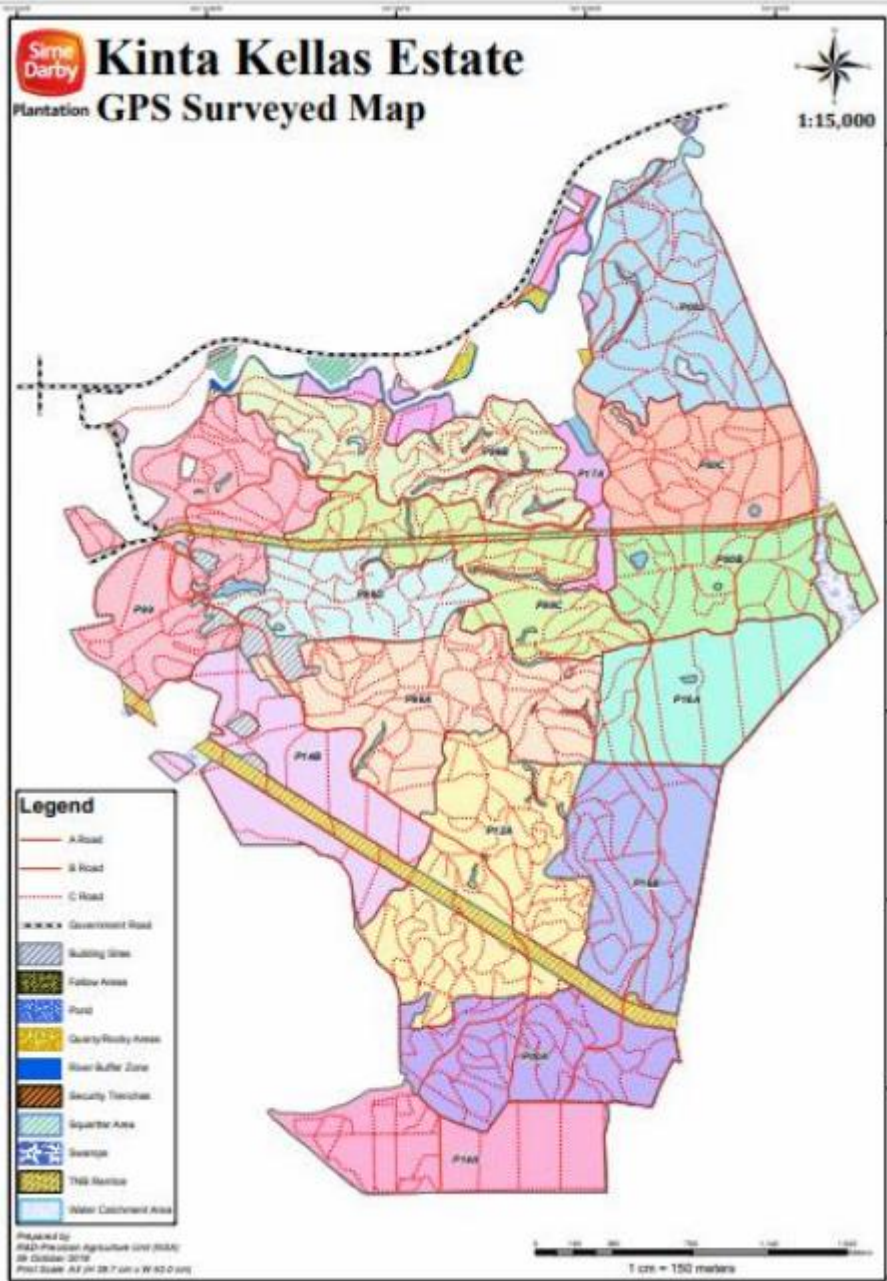
SOU 3 Map



Kamuning Estate



Kinta Kellas Estate



Appendix D: 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