

MALAYSIAN SUSTAINABLE PALM OIL
MSPO OPMC Public Summary Report

- Initial Assessment
- Annual Surveillance Assessment (Choose an item.)
- Recertification Assessment (RA 1)
- 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 2 Chersonese Palm Oil Mill & Plantations: Chersonese Estate, Kalumpang Estate, Holyrood Estate, and Tali Ayer Estate
Date of Final Report: 08/11/2022

Report prepared by:
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Report Number: 3511606

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
	Chersonese Palm Oil Mill	533667104000	30/10/2022
	Chersonese Estate	526593002000	31/01/2023
	Holyrood Estate	530733002000	30/06/2023
	Tali Ayer Estate	508238502000	09/01/2023
	Kalumpang Estate	524392002000	11/01/2023
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) Tn. Mr Mohd Riza Mohd Arif (Mill Manager)		
Website	www.simedarbyplantation.com	E-mail	kks.chersonese@simedarbyplantation.com
Telephone	03-7848 4379 (Head Office)	Facsimile	03-7848 4356 (Head Office)

1.2 Certification Information			
Certificate Number	Mill: MSPO 682039 Estate: MSPO 688334	Certificate Start Date	10/01/2023
Date of First Certification	10/01/2018	Certificate Expiry Date	09/01/2028
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 a recertification assessment 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		
Recertification (RAV)	25 - 28/07/2022		

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Continuous Assessment Visit Date (CAV) 1_1	-
Continuous Assessment Visit Date (CAV) 1_2	-
Continuous Assessment Visit Date (CAV) 1_3	-
Continuous Assessment Visit Date (CAV) 1_4	-

1.3 Other Certifications

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 590800	RSPO Principle & Criteria for Production of Palm Oil 2018 – Malaysian National Interpretation: 2019	BSI Services Malaysia Sdn Bhd	04/01/2026
MSPO 714137	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018	BSI Services Malaysia Sdn Bhd	20/11/2024

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
Chersonese Palm Oil Mill	Kilang Kelapa Sawit Chersonese, 34350 Kuala Kurau, Perak, Malaysia	4° 58' 39.30" N	100° 27' 41.00" E
Chersonese Estate	Ladang Chersonese, 34350 Kuala Kurau, Perak, Malaysia	4° 59' 04.00" N	100° 26' 59.00" E
Holyrood Estate	Ladang Holyrood, 34100 Selama, Perak, Malaysia	5° 07' 27.00" N	100° 42' 36.30" E
Tali Ayer Estate	Ladang Tali Ayer, 34300 Bagan Serai, Perak, Malaysia	5° 03' 30.30" N	100° 31' 20.60" E
Kalumpong Estate	Ladang Kalumpong/Byram, 34300 Bagan Serai, Perak, Malaysia	4° 58' 11.00" N	100° 36' 05.00" E

1.5 Certified Area

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Chersonese Estate	2,870.42*	25.87	397.43*	3,293.72	87.14
Holyrood Estate	1,222.28	12.19	98.27	1,332.74	91.71
Tali Ayer Estate	3,109.98**	24.24	647.74**	3,781.96	82.23
Kalumpong Estate	2,529.28	21.09	166.43	2,716.80	93.09
Total	9,731.96	83.39	1,309.87	11,125.22	87.48

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Note:

* Chersonese Estate: Reduce 25.90 ha from total planted and add at infrastructure & other due Oil Palm convert to Coconut planting

** Tali Ayer Estate: Increase 86.02ha at total planted, reduce 60.16ha at infrastructure & other and total area increase 25.86ha based survey conducted by PAU on 17/11/2021.

1.6 Plantings & Cycle

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Chersonese Estate	648.20	1,147.09	744.66	-	-	2,222.22	648.20
Holyrood Estate	154.32	606.76	461.20	-	-	1,164.58	57.70
Tali Ayer Estate	214.31	1,223.67	1,672.00	-	-	2,895.67	214.31
Kalumpong Estate	736.28	370.43	1,122.97	299.60	-	1,793.00	736.28
Total (ha)	1,753.11	3,347.95	4,000.83	299.60	-	8,075.47	1,656.49

1.7 Certified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Jul 2021 - Jun 2022)	Actual (Aug 2021 - Jun 2022)	Forecast (Jan 2023 - Dec 2023)
Chersonese Estate	49,679.94	38,456.40	51,106.25
Holyrood Estate	27,307.15	20,721.86	27,691.40
Tali Ayer Estate	50,999.25	33,814.89	46,970.00
Kalumpong Estate	40,218.00	34,103.24	44,845.00
Bukit Hijau Estate	-	75.72	-
Bkt Selarong Estate	-	171.09	-
Jentayu Estate	-	174.16	-
Padang Buloh Estate	-	447.32	-
Somme Estate	-	375.29	-
Total (mt)	168,204.34	128,339.97	170,612.65

Note: Crop diversion from Sime Darby Sg Dingin POM Supply Bases

1.8 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Jul 2021 - Jun 2022)	Actual (Aug 2021 - Jun 2022)	Forecast (Jan 2023 - Dec 2023)
Kupang Estate	-	433.31	-

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CWJ Estate	-	13,273.32	-
Sg Ahning Estate	-	944.90	-
Sg Tekai Estate	-	839.27	-
Soon Lee Estate	-	60.12	-
Tanah Merah Estate	-	773.43	-
Tang Tatt Estate	-	2,009.27	-
Total	-	18,333.62	-

1.9 Certified Tonnage

	Estimated (Jul 2021 - Jun 2022)	Actual (Aug 2021 - Jun 2022)	Forecast (Jan 2023 - Dec 2023)
	FFB	FFB	FFB
Mill Capacity: 45 MT/hr	168,204.34	128,339.97	170,612.65
SCC Model: MB	CPO (OER: 22.75%)	CPO (OER: 20.08 %)	CPO (OER: 20.59 %)
	38,266.49	25,770.55	35,129.15
	PK (KER: 5.50 %)	PK (KER: 5.35 %)	PK (KER: 5.43 %)
	9,251.24	6,866.19	9,264.27

Note: Previously Chersonese POM SCC Model was SG, change to MB due to receiving noncertified crop from non MSPO certified estate.

1.10 Actual Sold Volume (CPO)

CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
25,770.55	-	-	-	25,770.55	25,770.55

1.11 Actual Sold Volume (PK)

PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
6,866.19	-	-	-	25,770.55	6,866.19

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 25-28/07/2022. The audit programme is included as Section 2.4. The approach to the audit was to treat the Sime Darby SOU 2 Chersonese POM and Supply Bases (Chersonese Estate, Tali Ayer Estate, Kalumpong Estate and Holyrood Estate) as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities. 30 days prior to audit, public notification posted in the BSI website as per the following link:

<https://www.bsigroup.com/globalassets/localfiles/en-my/mspo/Public%20Notification/2022/07-1-mspo-public-notification-recertification-sime-darby-sou-2-chersonese-pom--supply-base-english.pdf>

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* MSPO certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSPO 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 MSPO Certification Requirement. The sampling of smallholders were based on the formula $(r\sqrt{n})$; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix B.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as 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 reassessment are detailed in Section 4.2. Major NC closure was conducted offsite based on evidence submitted.

This report was externally reviewed by MSPO 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 (Re-Certification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Chersonese POM	✓	✓	✓	✓	✓
Chersonese Estate	-	✓	✓	-	✓
Tali Ayer Estate	-	✓	-	✓	✓
Kalumpong Estate	✓	-	✓	-	-
Holyrood Estate	✓	-	-	✓	-

Tentative Date of Next Visit: July 25, 2023 - July 28, 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>
Nor Halis Abu Zar (NHA)	Team Leader	<p>Education: Bachelor of Science, Plantation Technology and Management, graduated from Universiti Teknologi Mara in 2012.</p> <p>Work Experience: 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 trained in SMETA Requirement Training on May 2021.</p> <p>Aspect covered in this audit:</p>

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Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
		<p>Legal requirements, traceability, occupational health and safety, GAP, training.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English Language.</p>
Mohd Nazib Marwan (MNZ)	Team Member	<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>
Amir Bahari (AB)	Team Member	<p>Education: B Sc Hons - Chemistry USM 1985 and Diploma Palm Oil Milling Tech & Management - MPOB 1996.</p> <p>Work Experience: Management experience with 9 years in rubber manufacturing, 8 years in palm oil mill, 12 years in oil palm estates and 7 years in RSPO/ MSPO auditing.</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 land rights, environmental, financial viability plan and best practices.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English Language.</p>
Mohd Sabre Salim (MSS)	Peer Reviewer	<p>Education: Masters in Business Administration (MBA) from UiTM in 2006 and Bachelor Science Agribusiness from UPM in 1986.</p> <p>Work Experience:</p>

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Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
		<p>He gained his working exposure in the plantation sector, serving as a Plantation Manager with Hap Seng Plantation Berhad and currently as consultant, free-lance lecturer, and trainer at MDV Management Sdn Bhd. He has more than 50 MSPO report that has been reviewed.</p> <p>Training attended: He has completed Endorsed Lead Auditor Course and Endorsed MSPO Lead Auditor Course and MSPO Peer Review certificate by MPOCC. He has attended MSPO Peer Reviewer 1 - 2017 by MPOCC.</p> <p>Expertise: General Management, Leadership & Financial Management, Occupational Safety & Health Management Plantation (Agriculture & Agribusiness) Management Malaysian Sustainable Palm Oil (MSPO).</p>
Muhammad Sufyan Azmi (MSA)	Peer Reviewer	<p>Education: Masters in Business Administration (MBA) from Open University Of Malaysia and Bachelor Degree in Bioindustry from UPM in 2006.</p> <p>Work Experience: He gained his working exposure in the plantation sector with 15 years' experience, currently serving as a Plantation Manager with TSH Resources Berhad and previously as an Audit Executive with Kulim Malaysia Berhad.</p> <p>Training attended: He has attended MSPO Peer Reviewer 2 - 2017 by MPOCC.</p> <p>Expertise: General Management, Auditing, Environment and Plantation Management.</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.

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	NHA	MNZ	AB
Sunday, 24/07/2022	-	Travelling from Kuala Lumpur to Taiping	√	√	√
Monday, 25/07/2022 Kalumpong Estate	08:30 - 09:00	Opening Meeting <ul style="list-style-type: none"> • Presentation by BSI Lead Auditor - introduction of team member and assessment agenda • Confirmation of assessment scope and finalizing audit scope 	√	√	√
	09:00 - 12:30	Estate assessment: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	12:30 - 13:30	Lunch break	√	√	√
	13:30 - 16:30	Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting	√	√	√
	16:30 - 17:00	Interim closing meeting	√	√	√
Tuesday, 26/07/2022 Kalumpong Estate (NHA) Holyrood Estate (MNM) & (AB)	09:00 - 12:30	Estate assessment: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	10:00 - 12:00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	12:30 - 13:30	Lunch break	√	√	√
	13:30 - 16:30	Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting	√	√	√

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Date	Time	Subjects	NHA	MNZ	AB
	16:30 - 17:00	Interim closing meeting	√	√	√
Wednesday, 27/07/2022 Holyrood Estate (NHA) & (MNM) Chersonese POM (AB)	09:00 - 12:30	Estate assessment: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc. Mill Assessment: Plant visit, FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	√
	12:30 - 13:30	Lunch break	√	√	√
	13:30 - 16:30	Document Review (MS 2530:2011 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting Document review (MS 2530:2013 Part 4): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices.	√	√	√
	16:30 - 17:00	Interim closing meeting	√	√	√
Thursday, 28/07/2022 Chersonese POM	09:00 - 12:30	Mill Assessment: Plant visit, FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	-
	12:30 - 13:30	Lunch break	√	√	-

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Date	Time	Subjects	NHA	MNZ	AB
	13:30 - 16:30	Document review (MS 2530:2013 Part 4): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices.	√	√	-
	16:30 - 17:00	Assessment team discussion and preparation and closing meeting	√	√	-

Section 3: Assessment Findings

3.1 Details of audit results

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

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

3.2 Details of Nonconformities and Opportunity for improvement

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

During the assessment there were One (1) Major & Two (2) Minor nonconformities and Zero (0) OFI raised. The Sime Darby SOU 2 Chersonese 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 #:	2230147-202207-M1	Issue Date:	28/07/2022
Due Date:	27/10/2022	Date of Closure:	23/10/2022
Area/Process:	Holyrood Estate & Kalumpung Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.5.4 Major
Requirements:	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.		
Statement of Nonconformity:	The contractor workers salary and overtime were not paid according to the employment contract agreed between the contractor and his employees and Employment Act 1955		
Objective Evidence:	Location: Holyrood Estate, Contractor: Resam Padu Enterprise 1. Based on the pay slip for the month of May and June 2022, the contractor workers (ID No: 040205-08-xxxx & 950426-08-xxxx) was found working on rest day (Sunday). Worker’s salary was paid based on the Minimum Wages Order 2022 which is about RM57.69 for normal working day and working on rest day shall be paid double (RM 115.38 per day). However, the contractor only paid RM100 for the working on rest day. 2. Employment contract has stated the lorry driver salary is paid based on tonnage per delivery / based on number of FFB delivered. However, the pay slip was not showing the tonnage delivered / number of deliveries of FFB for each worker.		

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	<p>Location: Kalumpong Estate and Holyrood Estate Contractor: JS Asas Maju Enterprise Worker's payslip does not mention the overtime, sick/annual leave, public holiday taken by workers as per working contract/agreement signed by contractors and their workers. Workers and contractor contribution to EPF and SOCSO was not paid based on the total gross salary. This issue has been raised by internal auditors. However, there was no evidence sighted that the correction has been made by the contractors. Both estate management has taken immediate an action by issued warning letter to the respective contractors on 21/05/2022. This indicator has been raised as minor non-compliance on the previous surveillance assessment. The non-compliance upgraded to major non-compliance during this assessment.</p>
Corrections:	To conduct refresher briefing to all contractor and ensure contractors comply with legal and others requirement. Contractors to submit documents and evidence related to estate management.
Root cause analysis:	Estate management has engaged with all contractors regarding legal and other requirements; however, these contractors still does not fully understand due to limitations of understanding.
Corrective Actions:	Estate management has appointed EIC (Executive In-Charge) and supported by SSSO to monitor contract workers documentation. Appointed EIC & SSSO will ensure hired contract & their workers should comply with Minimum Wages Order 2022, Employees' Social Security Act 1969, Employment Insurance Scheme Act 2017 and Employees Provident Fund Act 1991.
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. Person in in charge to monitor the contractor workers document has been appointed as per letter dated 01/08/2022 to Mr Amie Hafiz Azanan. 2. Training with contractor regarding with Government Bodies (JTK and PERKESO) related workers documentation has been conducted on 23/08/2022 and involved all respective contractors in the estate. Refer Training "Sesi Bersama Kontraktor, JTK, PERKESO dan Pihak Pengurusan Sime Darby SOU 2". Sighted attendance list evidence. 3. Person In Charge has conduct monthly monitoring on contractors document (Payslip, EPF, SOCSO, EIS) in order to ensure all contractors were follow the requirement in the law and regulation. <p>Based on the above evidence, the major non-Conformity is closed effectively on 23/10/2022. Continuous implementation will be further verified in the next assessment.</p>

Non-Conformity Report			
NCR Ref #:	2230147-202207-N1	Issue Date:	28/07/2022
Due Date:	Next Surveillance	Date of Closure:	Open
Area/Process:	Holyrood Estate & Kalumpong Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.4.2 (d)(e) Minor
Requirements:	The occupational safety and health plan shall cover the following:		

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	<p>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).</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 Labelling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p>
<p>Statement of Nonconformity:</p>	<p>The implementation of PPE usage was not in line with HIRARC Risk Control and SOP. The lubricant was stored in the container without labelling.</p>
<p>Objective Evidence:</p>	<p>During the site visit to Kalumpang Estate (Gedong Division) Field 02A2, it was found 1 Tractor driver (Employee ID 0000098263), who conducted in field FFB Collection was wearing wellington boot during driving the tractor. Based on interview, the driver has been issued the safety boots by the management and it was noticed that the area was post flooded. Safety Boots Type 8000 has been issued on 22/02/2022 based on PPE Issuance Record however the driver was used the Normal Wellington Boots. It was not in line with HIRARC dated 25/05/2022 Section FFB Transport (2) "Mengangkat Buah Sawit (Grabber) – Kawalan Risiko: Taklimat Keselamatan, Latihan Kesedaran Keselamatan, PPE yang betul (Topi Keselamatan, Kasut Keselamatan, Vest). Other than that, it also stated in the Standard Operating Procedure Tractor Driver dated 01/01/2021 with reference number KPE/SOP/018 Issue 18 Rev 02 "(1) Alat Perlindungan Diri yang di luluskan JKPP, Kasut Keselamatan, Topi Keselamatan, Baju Pemantul Cahaya".</p> <p>During site visit at Workshop Holyrood Estate, it was found that 1 unit of container store with lubricant oil without any labelling. It was not in line with Occupational safety and Health (Use and Standard of Exposure of Chemicals Hazardous To Health) Regulation 2000 Section Regulation 21: Relabeling (1) "When chemical hazardous to health is transferred to another container, other than that which is originally supplied, and the contents of the container are not used within a normal work shift, the employer shall ensure that the container is relabelled".</p>
<p>Corrections:</p>	<p>Kalumpang Estate Estate management conducted a refresher briefing to all drivers. Holyrood Estate Issued warning letter to the driver and substitute with proper container.</p>
<p>Root cause analysis:</p>	<p>Kalumpang Estate Management had provided the Wellington Boots Type 8000 (with steel toe cap). However, it was ignored by the worker despite that the area was post flooded. Holyrood Estate Negligence of the driver to follow "Use and Standard of Exposure Of Chemicals Hazardous To Health) Regulation 2000" pertaining to using water container for hazardous lubricant.</p>
<p>Corrective Actions:</p>	<p>Kalumpang Estate Estate management collect the wellington boot Type 7000 (without steel toe cap) and conduct monthly PPE inspection. Holyrood Estate</p>

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	To increase awareness by carrying out briefing/training to all employees dealing with chemicals and to conduct evaluation training.
Assessment Conclusion:	The correction and corrective action are accepted. The evidence of effective implementation shall be verified in the next assessment visit.

Non-Conformity Report			
NCR Ref #:	2230147-202207-N2	Issue Date:	28/07/2022
Due Date:	Next Surveillance	Date of Closure:	Open
Area/Process:	Chersonese POM	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.5.1.2 Minor
Requirements:	The environmental management plan shall cover the following: a) An environmental policy and objectives b) The aspects and impacts analysis of all operations		
Statement of Nonconformity:	The FFB oil dripping sourced from the old FFB crop was not identified/listed in the environmental impact assessment.		
Objective Evidence:	The mill EIA was compiled in the "Environmental Aspects and Impact Identification Form ref serial no EAI/2012-13/002/B annually reviewed recent on 19/01/2022. During site visit it was noticed that there were traces of FFB oil dripping/spillages dripping from FFB old crop underneath the ramp hopper onto the concrete ground. The perimeter drain within the vicinity is also silted with palm fruitlet and debris. However, these issues were not described in the EIA Impacts. Thus, nonconformity was raised for this lapse.		
Corrections:	To conduct EIE/EAI for abnormal situations FFB Receiving.		
Root cause analysis:	Environmental Aspect & Impact Identification was reviewed by Mill Management, however, not include abnormal and non-routine situations		
Corrective Actions:	Review EIE/EAI by Mill Management. Verified by RSQM-NTR.		
Assessment Conclusion:	The correction and corrective action are accepted. The evidence of effective implementation shall be verified in the next assessment visit.		

Opportunity For Improvement			
Ref:	N/A	Clause:	MSPO Part __:
Area/Process:	N/A		
Objective Evidence:	N/A		

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 #:	2088605-202107-N1	Issue Date:	04/08/2021																																						
Due Date:	28/05/2022	Date of Closure:	28/07/2022																																						
Area/Process:	Kalumpang Estate and Holyrood Estate	Clause & Category: (Major / Minor)	MSP0 2530 Part 3: 4.4.5.4 Minor																																						
Requirements:	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.																																								
Statement of Nonconformity:	Compliance of legal requirements were not implemented effectively by the contractors.																																								
Objective Evidence:	Compliance of legal requirements were not implemented effectively by the contractors. The contractor Bagan Samak Enterprise at Kalumpang Estate, JS Asas Maju Enterprise and Resam Padu Enterprise at Holyrood Estate did not make the correct amount of SOCSO contribution according to Employees' Social Security Act 1969 (Act 4) as per checking of employees of contractors pay slip month of Dec 2020, March 2021, and June 2021.																																								
	<table border="1"> <thead> <tr> <th>ID No.</th> <th>Salary/ Month</th> <th>Amount of Contribution Made</th> <th>Actual Amount of Contribution</th> </tr> </thead> <tbody> <tr> <td colspan="4">Kalumpang Estate – Bagan Samak Enterprise – Both contribution</td> </tr> <tr> <td rowspan="2">Bala 761123-XX-XXXX</td> <td>RM 1646.00 (Dec 2020)</td> <td>RM 23.60 Employer: RM 18.35 Employee: RM 5.25</td> <td>RM 37.10 Employer: RM 28.85 Employee: RM 8.25</td> </tr> <tr> <td>RM 2220.00 (June 2021)</td> <td>RM 23.60 Employer: RM 18.35 Employee: RM 5.25</td> <td>RM 50.50 Employer: RM 39.35 Employee: RM 11.25</td> </tr> <tr> <td rowspan="2">Saiful 831125-XX-XXXX</td> <td>RM 2210.00 (Dec 2020)</td> <td>RM 23.60 Employer: RM 18.35 Employee: RM 5.25</td> <td>RM 50.60 Employer: RM 39.35 Employee: RM 11.25</td> </tr> <tr> <td>RM 2476.00 (June 2021)</td> <td>RM 23.60 Employer: RM 18.35 Employee: RM 5.25</td> <td>RM 55.10 Employer: RM 42.85 Employee: RM 12.25</td> </tr> <tr> <td colspan="4">Holyrood Estate – JS Asas Maju Enterprise – Only Employer contribution</td> </tr> <tr> <td>Taufik 890613-XX-XXXX</td> <td>RM 1100.00 (Mar 2021)</td> <td>RM 23.60 Employer: RM 23.60 Employee: RM 0.00</td> <td>RM 14.40 Employer: RM 14.40 Employee: RM 0.00</td> </tr> <tr> <td colspan="4">Holyrood Estate – Resam Padu Enterprise – Both contribution</td> </tr> <tr> <td>Mohandas 891026-XX-XXXX</td> <td>RM 2498.07 (June 2021)</td> <td>RM 57.40 Employer: RM 12.75 Employee: RM 44.65</td> <td>RM 55.10 Employer: RM 42.85 Employee: RM 12.25</td> </tr> </tbody> </table>			ID No.	Salary/ Month	Amount of Contribution Made	Actual Amount of Contribution	Kalumpang Estate – Bagan Samak Enterprise – Both contribution				Bala 761123-XX-XXXX	RM 1646.00 (Dec 2020)	RM 23.60 Employer: RM 18.35 Employee: RM 5.25	RM 37.10 Employer: RM 28.85 Employee: RM 8.25	RM 2220.00 (June 2021)	RM 23.60 Employer: RM 18.35 Employee: RM 5.25	RM 50.50 Employer: RM 39.35 Employee: RM 11.25	Saiful 831125-XX-XXXX	RM 2210.00 (Dec 2020)	RM 23.60 Employer: RM 18.35 Employee: RM 5.25	RM 50.60 Employer: RM 39.35 Employee: RM 11.25	RM 2476.00 (June 2021)	RM 23.60 Employer: RM 18.35 Employee: RM 5.25	RM 55.10 Employer: RM 42.85 Employee: RM 12.25	Holyrood Estate – JS Asas Maju Enterprise – Only Employer contribution				Taufik 890613-XX-XXXX	RM 1100.00 (Mar 2021)	RM 23.60 Employer: RM 23.60 Employee: RM 0.00	RM 14.40 Employer: RM 14.40 Employee: RM 0.00	Holyrood Estate – Resam Padu Enterprise – Both contribution				Mohandas 891026-XX-XXXX	RM 2498.07 (June 2021)	RM 57.40 Employer: RM 12.75 Employee: RM 44.65	RM 55.10 Employer: RM 42.85 Employee: RM 12.25
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Corrections:	Brief to all contractor and ensure contractors comply with legal and others requirement. Contractors to submit documents and evidence related to estate management.																																								
Root cause analysis:	1. Monitoring on contract workers documentation not effective.																																								

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	2. No responsible person in charge to monitor documentation of legal due diligence.
Corrective Actions:	<ol style="list-style-type: none"> Estate management together with RSQM-NTR department will conduct a briefing on Employment Regulation 1957 to all the contractors. Estate management has appointed PIC (Assistant manager & CC) to monitor contract workers documentation. Appointed PIC will ensure hired contract & their workers should comply with Employment Regulation 1957 and Akta Keselamatan Sosial Pekerja 1969 and documented. The legal due diligence of contractor's documents will be put on the list for monitoring and tracking on monthly basis.
Assessment Conclusion:	CAP has been accepted on 20/08/2021 and evidence of CAP effectiveness to be verified in the next assessment.
Verification Statement:	<ol style="list-style-type: none"> HQ has been conducted awareness briefing to the respective contractor and explained the Employment Regulation 1957 to them. PIC has been assigned on monitoring the contractor's issue. <p>However, minor NC has been upgraded to major NC due to raise another issue in the same indicator during this assessment.</p>

Opportunity For Improvement			
Ref:	N/A	Clause:	MSP0 Part __:
Area/Process:	N/A		
Objective Evidence:	N/A		
Verification Statement:	N/A		

3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
2230147-202207-M1	4.4.5.4 Part 3: Major	28/07/2022	Close out on 23/10/2022
2230147-202207-N1	4.4.4.2 (d)(e) Part 3: Minor	28/07/2022	Open
2230147-202207-N2	4.5.1.2 Part 4: Minor	28/07/2022	Open

3.5 Issues Raised by Stakeholders

IS #	Description
1	<p>Issues:</p> <p>Contractors (KS Tasvina Enterprise, Sg. Dungun Enterprise, Hau Sin Huang Enterprise, Mano BS Enterprise, JS Asas Maju Enterprise, Bagan Samak Enterprise, Rajan Excavator)</p> <p>Contract agreement detailing all term has been signed by both parties and confirmed that stakeholders understand content of the agreement. Payment has been made normally with period around 7-10 days after invoice submitted. Due to new Minimum Wages Order 2022 and increase of other cost, contractors hope the contract price could be increase. No other issues raised.</p>



	<p>Management Responses: The management noted with the respond and will try to improve in the future.</p> <p>Audit Team Findings: No further action needed.</p>
2	<p>Issues: School (SJK(T) Ladang Sg. Dogak) School representatives appreciate on the contribution and support given by the estate management. No other issue raised.</p> <p>Management Responses: The management will continue to contribute on local and community development.</p> <p>Audit Team Findings: No further action needed.</p>
3	<p>Issues: Temple Representative (P. Rajenthiran) Temple representatives appreciate on the contribution and support given by the estate management. No other issue raised.</p> <p>Management Responses: The management will continue to contribute on local and community development.</p> <p>Audit Team Findings: No further action needed.</p>
4	<p>Issues: Union Representative (K. Santherkumar) The estates management support any activities conducted and persuade any workers to join any Union as per mentioned in their own policy. Good relationship and easy to communicate with the management on any issues arise. No other issues raised.</p> <p>Management Responses: The management will maintain good relationship and frequently communicate with stakeholders through all channel available.</p> <p>Audit Team Findings: No further action needed.</p>
5	<p>Issues: Department of Environment, Taiping So far, Chersonese POM has complied with EQA 1974 and its regulations. No written notice or compound/legal action during this visit. However, DOE Officer hope that the POM always monitors the compliance status according to compliance schedule issued by DOE and update if there are any new regulations/requirements. No other issues raised.</p> <p>Management Responses: The management will ensure all legal requirements is monitored and comply with the requirements.</p> <p>Audit Team Findings: No further action needed.</p>
6	<p>Issues: Worker’s representatives Sample of local and foreign workers has been interviewed. As per interview, there are no issues has been raised. Policy and procedure have been communicated to all workers. Salary payment is in line with local regulations. All workers interviewed satisfied with accommodation provided by the company.</p> <p>Management Responses: The management noted with the respond and will continue provide adequate housing and amenities to workers.</p>

	Audit Team Findings: No further action needed.
7	<p>Issues: Gender Committee Representatives 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 noted with the respond and will continue provide awareness to workers.</p> <p>Audit Team Findings: No further action needed.</p>

3.6 List of Stakeholders Contacted

<p>Government Officer: Department of Environment, Taiping School (SJK(T) Ladang Sg. Dogak)</p>	<p>Community/ neighbouring village: Temple Representative (P. Rajenthiran)</p>
<p>Suppliers/Contractors/Vendors: KS Tasvina Enterprise Sg. Dungun Enterprise Hau Sin Huang Enterprise Mano BS Enterprise JS Asas Maju Enterprise Bagan Samak Enterprise Rajan Excavator</p>	<p>Worker’s Representative/Gender Committee: Union Representative (K. Santherkumar) Foreign Workers 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 2 Chersonese 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 2 Chersonese POM and Supply Bases Certification Unit is continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: BUKHARI YUSOF AZUDDIN	Name: NOR HALIS ABU ZAR
Company name: KKS CHERSONESE SIME DARBY PLANTATION BERHAD	Company name: BSI SERVICES MALAYSIA SDN BHD
Title: MILL MANAGER	Title: CLIENT MANAGER
Signature: Sime Darby Plantation Berhad (Company No: 200401009263) Kilang Kelapa Sawit Chersonese 	Signature: 
Date: 05/10/2022 Bukhar Yusof Azuddin Mill Manager	Date: 23/10/2022

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 -	Group Sustainability & Quality Policy Statement has been established dated 02/12/2019 signed by Group Managing Director Mr. Mohamad Helmi Othman Basha.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The policy established mention that Sime Darby Plantation Berhad 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			

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Criterion / Indicator		Assessment Findings	Compliance
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Internal audit for estates was planned at least once a year. Latest internal audit was conducted by Sustainability Compliance Unit, GSD Which has covered RSPO, MSPO and MSPO SCCS. Internal audit was conducted at each estate as follows: <ul style="list-style-type: none"> • Kalumpong Estate – Internal audit was conducted on 14/06/2022 • Holyrood Estate – Internal audit was conducted on 14/06/2022 	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 -	Sime Darby Plantation Berhad has maintained the Internal Audit Procedure, Doc. No.: SD/SDP/PSQM/IAP, Rev. 2 dated 01/09/2017. The audit results recorded in Internal Audit Results has include detail of nonconformities/findings, root cause, correction and corrective action plan. Total of findings raised for estates audited is as follows: <ul style="list-style-type: none"> • Kalumpong Estate – 2 major and 1 minor nonconformances were raised. • Holyrood Estate – 2 major, 2 minor and 2 OFIs were raised. 	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The internal audit report is available to the estate management for their review. The Management Representative has acknowledged on the Internal Audit Report for each estate audited.	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 -	Management review was planned to be conducted at least once a year after the internal audit. Latest management review meeting was conducted at each estate as follow: <ol style="list-style-type: none"> 1. Kalumpong Estate – meeting was conducted on 09/07/2022 2. Holyrood Estate – meeting was conducted on 15/06/2022 & 04/06/2022 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Meeting minutes is available where the agenda discussed in the meeting is as follow:</p> <ol style="list-style-type: none"> 1. Review on matter arise from previous management review minutes 2. Objective/management program 3. Process performance and product conformity 4. Results of RSPO and MSPO internal audit 5. Nonconformity, Corrective and Preventive Action 6. Customers/Stakeholders Feedback/Complaints 7. Resource Needs 8. Changes that could affect the management systems 9. Recommendations for improvement 	
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 continual improvement plans were established. The documents we're being maintained and updated with the assistance and guide from Sustainability Department. Sime Darby Plantation Berhad is committed to utilise the established system to regularly monitor and review their key activities at the estates. Relevant action plans were initiated to continuously improve its key areas of operations, environmental, safety, health and welfare of the workers as well as social contribution to the community. Among others the continual improvement plans reviewed were:</p> <ul style="list-style-type: none"> • Pollution Prevention Plan – 2022 • Identification and Management of Wastewater – 2022 • Waste Management Plan – 2022 • Environmental Improvement Plan - 2022 	Complied

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Criterion / Indicator		Assessment Findings				Compliance																														
		<ul style="list-style-type: none"> Water reduction Plan - 2022 Safety and Health Program - 2022 <p>In SOU 2 the yield performance, extraction ratios and production costs have always been in utmost priority in ensuring long-term economic and financial viability. In general, various efforts had been made to optimize the yield of the plantation among others.</p> <ul style="list-style-type: none"> Maximizing crop recovery, optimum ripeness Standard (harvest ripe bunches only and 100% loose fruit collection) The soil fertility was maintained and planting only high yielding planting material To mechanize operation where feasible to reduce reliance of labour. <p>The estates had the following plans of new infrastructure / facilities installation for the improvement relating to the environmental, process improvement pollution and energy conservation for current and forthcoming year 2022-2026. Projects among others include the following.</p> <table border="1"> <thead> <tr> <th></th> <th>Holyrood</th> <th>Improvement Plan</th> <th>Project Cost</th> <th>Planned year</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Safety Estate</td> <td>Sprayers washing room</td> <td>150K</td> <td>2023</td> </tr> <tr> <td>2</td> <td>Housing</td> <td>Upgrading Workers Quarters</td> <td>522K</td> <td>2023</td> </tr> <tr> <td>3</td> <td>Housing</td> <td>Rehabilitation 10 units workers Q</td> <td>400K</td> <td>2023</td> </tr> <tr> <td>4</td> <td>Operation</td> <td>Tide / water gates 2 units</td> <td>150K</td> <td>2023</td> </tr> <tr> <td>5</td> <td>Safety</td> <td>Boundary fencing 2.4 km</td> <td>48K</td> <td>2023</td> </tr> </tbody> </table>					Holyrood	Improvement Plan	Project Cost	Planned year	1	Safety Estate	Sprayers washing room	150K	2023	2	Housing	Upgrading Workers Quarters	522K	2023	3	Housing	Rehabilitation 10 units workers Q	400K	2023	4	Operation	Tide / water gates 2 units	150K	2023	5	Safety	Boundary fencing 2.4 km	48K	2023	
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Criterion / Indicator		Assessment Findings					Compliance
			Kalumpang	Improvement Plan	Project Cost	Planned year	
		1	Housing	Shop Lot Kalumpang Div	500K	2023	
		2	Operation	Canteen Kalumpang Div	150K	2022	
		3	Housing	New Surau	403K	2023	
		4	Housing	Housing Area - Road Upgrading	1.1M	2023	
		5	Operation	Upgrading perimeter drain	85K	2022	
		6	Housing	Upgrading Workers Quarters	30K	2022	
		7	Housing	Replacement of WQ roofing	201K	2022	
		8	Operation	Trailer low bed field operations	50K	2023	
		9	Operation	5 units - 10 mt bins	50K	2023	
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. - Major compliance -	<p>This is being made upon confirmation of any new projects.</p> <ul style="list-style-type: none"> • 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. 					Complied
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	<p>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.</p> <ul style="list-style-type: none"> • Monitoring is made by the Estate Managers and Assistants throughout the on-the-job training and familiarisation. 					Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> All projects are tabulated in CAPEX list with timeline and costing. The financial procedure will be initiated prior to the project commissioning. Training for awareness and allocation of duties will be made in accordingly. Details in 4.4.6.1 	
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	<p>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.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has maintained its Standard Operation Manual (SOM) – Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/04/2008 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the estate.</p> <p>Timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation. Manager is responsible for address the communication and requests.</p>	Complied
4.2.1.2	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>The management has disseminated the information of the documents that made publicly available such as management plan, OSH plan, audit reports and land titles upon request during the stakeholder meetings. Besides, internal and external stakeholders could access to the company's website (http://www.simedarbyplantation.com) to obtain information such as policies, annual report and complaint procedures.</p>	Complied
Criterion 4.2.2 – Transparent method of communication and consultation			

Criterion / Indicator		Assessment Findings	Compliance
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has developed Standard Operation Manual (SOM) – Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/04/2008 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the estate. Timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation.</p>	Complied
4.2.2.2	<p>A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.</p> <p>- Minor compliance -</p>	<p>As stated in the procedure, the Mill/Estate Managers are responsible to deal with the external communication for the respective estates under their management. Managers of each estate were delegated the responsibility for issues related to Indicator 1 as follow:</p> <p>For Kalumpang Estate, Chief Clerk has been appointed as person in-charge for stakeholder communication & relation as per appointment letter dated 01/01/2022 approved by Estate Manager.</p> <p>For Holyrood Estate, Assistant Manager (Muhammad Amirul Fariz Amir) as per appointment letter dated 01/01/2022 approved by Estate Manager.</p>	Complied
4.2.2.3	<p>List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.</p> <p>- Major compliance -</p>	<p>List of stakeholders were updated at each estate has includes authorities, local communities, contractors and vendors/suppliers. Internal stakeholders among all employees including local and foreign workers also available as per List of Local Workers and List of Foreign Workers. Records of communication including confirmation of receipt available as part of publicly available documents including records of Social Impact Assessment (SIA) Report, Management Plan on Social Impact Assessment, Complaint Book (Internal), Complaint Book (External) and stakeholder minutes of meeting.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Consultation and communication with stakeholders were recorded as follows:</p> <ol style="list-style-type: none"> 1. Kalumpang Estate – meeting with stakeholders were conducted on 13/06/2022 at Gedong Division. Meeting was attended by representative from nearby village, school, Pos Malaysia, contractor and chieftain. 2. Holyrood Estate has send “Feedback Form” to stakeholders and received 5 feedbacks. The feedback received were compiled in the Action Plan. Estates has send invitation for stakeholder meeting on 10/08/2022. 	
Criterion 4.2.3 – Traceability			
4.2.3.1	<p>The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s).</p> <p>- Major compliance -</p>	<p>The Sustainable Plantation Management System Appendix 15 dated March 2016 documented the procedure for traceability. The procedure requires validation of certificate of supplying estate. The current traceability system is Sime Weigh System.</p>	Complied
4.2.3.2	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p>- Major compliance -</p>	<p>The Sustainable Plantation Management System, Appendix 15, SOP for Sustainable Supply Chain and Traceability Version 2, 2018, issue no 5 dated April 2019 documented the procedure for traceability. Procedure has combined all related sustainability standard requirements of RSPO/ISCC/MSPO. The current traceability system is Sime Weigh System. Regular inspection was conducted on daily basis from checking by mandora, staff and verified by Assistant Manager and Manager. The document check roll, FFB daily production was referred.</p>	Complied
4.2.3.3	<p>The management should identify and assign suitable employees to implement and maintain the traceability system.</p> <p>- Minor compliance -</p>	<p>The overall personal in charge for the traceability is the Estate Manager and this is addressed in the established procedure [ref.: Clause 4 of SOP for Sustainable Supply Chain and Traceability].</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																																
		<p>Sighted appointment letter for Mr Hairulnizam Bin Khalil dated 03/01/2022 for Environmental/Quality Management system for Kalumpong Estate.</p> <p>Sighted appointment letter for Mr Muhammad Amirul Fariz Amir dated 01/01/2022 for person in charge Environmental/Quality Management system for Holyrood Estate.</p>																																	
4.2.3.4	<p>Records of sales, delivery or transportation of FFB shall be maintained.</p> <p>- Major compliance -</p>	<p>Records of FFB sales & delivery including FFB Weighbridge Tickets together with FFB Delivery Note (DO Chit) and Daily Record (Daily FFB Despatch Summary Logbook) were maintained based on Standard Operating Procedure; Effective date: 2/5/2012; Chapter 7: Sales of Produce Ex-Estate/Mill Procedures; Section 7.1 FFB Sales and Despatches & Chapter 13: Retention of Documents which specified a minimum retention period of 7 years prior of disposal. Sighted samples record available as following:</p> <p><u>Kalumpong Estate</u></p> <table border="1"> <tr> <td>Date</td> <td>14/12/2021</td> <td>19/03/2022</td> <td>26/06/2022</td> </tr> <tr> <td>DO / Chit No.</td> <td>19756</td> <td>20192</td> <td>20671</td> </tr> <tr> <td>Lorry No.</td> <td>RM8557 KP19</td> <td>SYG9557 KP25</td> <td>RM8557 KP21</td> </tr> <tr> <td>Weight, MT</td> <td>9.70</td> <td>11.21</td> <td>11.27</td> </tr> </table> <p>Holyrood Estate</p> <table border="1"> <tr> <td>Date</td> <td>31/01/2022</td> <td>02/07/2022</td> <td>01/04/2022</td> </tr> <tr> <td>DO / Chit No.</td> <td>22464</td> <td>23134</td> <td>22818</td> </tr> <tr> <td>Lorry No.</td> <td>BHX3792 R08</td> <td>BGN5529 R1</td> <td>PMB6851 R10</td> </tr> <tr> <td>Weight, MT</td> <td>11.58</td> <td>4.73</td> <td>12.03</td> </tr> </table>	Date	14/12/2021	19/03/2022	26/06/2022	DO / Chit No.	19756	20192	20671	Lorry No.	RM8557 KP19	SYG9557 KP25	RM8557 KP21	Weight, MT	9.70	11.21	11.27	Date	31/01/2022	02/07/2022	01/04/2022	DO / Chit No.	22464	23134	22818	Lorry No.	BHX3792 R08	BGN5529 R1	PMB6851 R10	Weight, MT	11.58	4.73	12.03	Complied
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4.3 Principle 3: Compliance to legal requirements																																			

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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 had continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and SQM sustainability team. Estates had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were: -</p> <p><u>Kalumpong Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License #524392002000 valid from 18/11/2021 to 31/10/2022 2. MPOB License #542021011000 valid from 01/09/2021 to 31/08/2022 3. Air compressor #PK PMT116519 valid until 24/08/2023 4. Air Compressor #PK PMT 4079 valid until 24/08/2023 5. Diesel License #A000740 valid from 16/01/2022 to 15/12/2023 6. Weighbridge Gedong Division #D019040 inspected on 21/04/2022 7. Weighbridge Kalumpong Division #D018795 inspected on 06/01/2022 <p><u>Holyrood Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License #530733002000 valid from 01/07/2022 to 30/06/2023 2. SW Handler (Edgenta Mediserve Sdn Bhd) DOE License #006253 valid until 30/04/2023 3. Diesel License #A003670 (6000 Liter) valid until 19/12/2022 4. Air Compressor #PMT PK/22 7923 valid until 12/09/2023 5. Weighbridge Holyrood Estate #DE17003238 valid until 05/01/2023 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.3.1.2	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>Documented procedure has 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. Refer document LORR Legal and Other Requirement for Kalumpong Estate and Holyrood Estate updated in July 2022.</p> <p>Sighted sample of new laws and regulation.</p> <ol style="list-style-type: none"> 1. Akta Pencegahan Dan Pengawalan Penyakit Berjangkit 1988 (Amendment 2020) 2. Minimum wages Order (Amendment 2022) 3. Workers Minimum Standard of Housing and Amenities Act 1990 (Amendment 2020) 	Complied
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 2. PSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance. 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> <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 been well implemented. E.g., regular notification by Head Office and regular updates from the DOE/DOSH websites as well as from MAPA</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance															
		circulars.																
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance -	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. Tracking system on any changes in the law been well implemented. E.g., regular notification by Head Office and regular updates from the DOE/DOSH websites as well as from MAPA circulars. Sighted appointment letter for Mr Hairulnizam Bin Khalil dated 03/01/2022 for person in charge Legal & Other Requirement Register (LORR) for Kalumpong Estate. Sighted appointment letter for Mr Muhammad Amirul Fariz Amir dated 01/01/2022 for person in charge Legal & Other Requirement Register (LORR) for Holyrood Estate.	Complied															
Criterion 4.3.2 – Lands use rights																		
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	The usage of all land titles area is for agriculture purposes with no restriction on the land use right. There was no land encroachment being reported nor claimed form any external parties.	Complied															
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	Both the estates have documents of land titles to show legal ownership. Details as summarised below. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="5">Kalumpong Estate</th> </tr> <tr> <th></th> <th>Division</th> <th>Lot no</th> <th>Ha</th> <th>Lease period</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Main 5 Grant</td> <td>159/3026/5822/ 7658/ 9158</td> <td>1400.7646</td> <td>Legal Ownership Freehold Land Use Agriculture</td> </tr> </tbody> </table>	Kalumpong Estate						Division	Lot no	Ha	Lease period	1	Main 5 Grant	159/3026/5822/ 7658/ 9158	1400.7646	Legal Ownership Freehold Land Use Agriculture	Complied
Kalumpong Estate																		
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Criterion / Indicator		Assessment Findings				Compliance	
		2	Gedung 9 Grant	5961/5962/1776/1883/2458/3293-3296	1361.8195	Legal Ownership Freehold Land Use Agriculture	
Holyrood Estate							
			Division	Lot no	Ha	Lease period	
		1	Main Bkt Rhona Div 13 Grant	781/803/1457/2044/2332-2334/46364-46366/2330/2331/2815/3046	1,342.0049	Legal Ownership Freehold Land Use Agriculture	
		The land is for the purpose of cultivation of oil palm. All documents were sighted and verified.					
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The Estates have maps showing the locations of boundary stones that have been physically located and marked. Boundaries stones/markers/trenching at the 2 estates, during the audit visits confirmed that they were clearly marked and maintained.				Complied	
			Estate	Boundary	Neighbouring		
		1	Kalumpang	P19C, P19B	Mangroves Reserves		
		2	Kalumpang	P20A	Kg Kalumpang		
		3	Kalumpang	P02A	Smallholders		
		4	Kalumpang	P01A3	Kg Tersusun		
		5	Kalumpang	P05	Sungai Kurau		
		6	Holyrood	P2010A	Smallholder		
		7	Holyrood	P09M	Smallholder/main road		
		8	Holyrood	P19A	Main Road Bagan Baharu		
		9	Holyrood	P10A1	Ldg Yayasan Negeri Perak		

Criterion / Indicator		Assessment Findings	Compliance
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute recorded. This was verified with stakeholders' consultation (Kalumpong Estate dated 13/06/2022 and 10/03/2021) (Holyrood Estate dated 10/08/2022 and 29/03/2022) and documents review. The organisation had a procedure in dealing with matters land dispute (if applicable) via procedure Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008.	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no land encumbered by customary rights under Chersonese certification unit's estates.	N/A
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	There is no land encumbered by customary rights under Chersonese certification unit's estates.	N/A
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There is no land encumbered by customary rights under Chersonese certification unit's estates.	N/A
4.4 Principle 4: Social responsibility, health, safety and employment condition			
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 -	Social impacts were identified based on the Social Impact Assessment as documented in the SIA Report SOU 2 Chersonese; Assessment Date: 14-17/6/2015; Assessment by Sustainability Strategy Unit PSQM Department. Based on the assessment, management plan was	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>established with annual review upon consultation with relevant stakeholders</p> <p>Management Plan on Social Impact Assessment for Kalumpong Estate was updated on 31/05/2022 with some issue highlighted from NUPW such as request for street lighting at the main road to the muster ground area and request for transportation (bus) for workers at Kalumpong Division to mosque for Friday praying. Both issues have been adequately addressed by the estate management.</p> <p>Social Impact Assessment for Holyrood Estate was combined with SOU 1 Sungai Dingin which has been conducted on 23/02/2015 – 05/03/2015. Action Plan / Social Management Action Plan for Holyrood Estate was reviewed and updated on 20/07/2022. Action Plan has included issues arise from stakeholder meeting such as Boustead Plantation informed that at boundary Bukit Rhona Division, there are drain that connecting to their main drain and shop has stop their operation at Holyrood Estate.</p>	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>A Standard Operating Manual (SOM) was established and maintained. (Sime Darby Plantation Estate Quality Management System) and system for dealing with complaints and grievance was defined in Sub-section 5.5 Management Responsibility, Appendix 5.5.3.2 Procedure for External Communication, version 2, issue 0, dated 25/5/2015.</p> <p>The complaints and grievances are open to effected parties including internal and external stakeholders. The time frame to deal with external communications should be within two weeks of the date of receipt for communication requiring direct feedback (Clause 6.3 of the procedure)</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>and within one week of the completion of the investigation, for communication required investigation.</p> <p>Grievance channels was stated in the employment contract (Item 21) as follows: -</p> <ul style="list-style-type: none"> • Union representative at operating unit • Workers helpline at 0162991411 (via WhatsApp) and call toll free number 1800819741 • Suara Kami at 1800818771 or SMS 01130116031 • Whistleblowing channel at 1800223388 or +60192797553 (08.30 am – 17.30 pm) or email to whistleblowing@simedarbyplantation.com 	
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>Based on complaints record on housing defects received through Ulula application, it was verified that all complaints and action able to be resolved in effective, timely and appropriate manner. Verification of resolution by the Assistant Manager and Manager sighted.</p> <p>Social dialogue, Gender Committee, Union meeting and OSH Committee meeting also recorded any resolution for workers concern or disputes.</p>	Complied
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p>- Minor compliance -</p>	<p>Complaint forms or logbook is available for external stakeholder. However, workers can make complaints via mobile apps (Oil Palm Poll) to record any defects related to housing facilities.</p> <p>Social dialogue, Gender Committee, Union meeting and OSH Committee meeting also recorded any resolution for workers concern or disputes.</p>	Complied
4.4.2.4	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p> <p>- Minor compliance -</p>	<p>Based on interview with the stakeholders such as contractors, local communities and workers, it has shown that the stakeholders are aware of how to forward their complaints or suggestions.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Employees are aware that complaints can be made through “Suara Kami” & Worker helpline - Ulula portal (toll free – 1800819741 or Whatsapp +60162991411 for grievance), Whistleblowing (through website) “Oil Palm Poll (OPP)”, communication book/morning briefing and Social Dialog.	
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	Record review found that previous complaints and requests including the resolution for the past 24 months were still available to affected stakeholders upon request.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	Estate management has contributed to local development in consultation with local communities. SOU 2 has organized cleaning activities at Ban Pecah, Tanjung Piandang on 15/07/2022 with participation from all estates and POM. Record sighted as follow: <ol style="list-style-type: none"> 1. Kalumpong Estate <ul style="list-style-type: none"> - Post flood assistance to Kampung Orang Asli Kurau, Carey Island - Grass cutting at SJK(T) Ladang Gedong - Supply soil to SJK(T) Ladang Kalumpong 2. Holyrood Estate - Food contribution to the villagers at Ulu Selama area & career briefing on 07/04/2022 	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.	The Group Upstream Malaysia Safety, Health and Environmental Policy Statement had been established and implemented.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>a) The policy was signed by the Chief Operation Officer Upstream Malaysia in June 2020 and displayed prominently on notice boards in English and local language Bahasa Malaysia.</p> <p>b) The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH Manager from Head Office.</p> <p>c) Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors.</p> <p>Procedure has been established. Refer Health, Safety and Environment Management (HSEMS) Manual dated 09/03/2021 with reference number UM/HSE/MS/01.</p>	
4.4.4.2	<p>The occupational safety and health plan shall cover the following:</p> <p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risks of all operations shall be assessed and documented.</p> <p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied <p>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).</p>	<p>The occupational safety and health plan cover the following:</p> <p>a) 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 staffs and workers through induction training for new workers, morning briefing and displayed at various notice boards within the estate. The policy has been briefed to all workers on:</p> <ul style="list-style-type: none"> • Kalumpung Estate: 07/02/2022 • Holyrood Estate: 30/03/2022 <p>b) Sime Darby Plantation Berhad have established Standard Operating Procedure for Risk Assessment and documented in EQMS/SOM sub-section 5.4, Appendix 5.4.1a. Estates sampled have conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment covers all main operations and support operations. Among the activities verified in the HIRARC included Loading FFB,</p>	Minor Non-Conformities

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Criterion / Indicator	Assessment Findings	Compliance
<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>P&D Circle Application, Harvesting (Carriers), Gardening, etc. HIRARC is reviewed on annually and as and when there are any accidents that occur in the estate. Verified the latest review of HIRARC for the estates as below.</p> <ul style="list-style-type: none"> • Kalumpong Estate: 01/09/2022 – Manuring & Harvesting • Holyrood Estate: 29/06/2022 – Frond Stacking & Carabao <p>Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The CHRA reports were available in the sampled estates as below:</p> <ul style="list-style-type: none"> • Kalumpong Estate: The Chemical Health Risk Assessment Report (Ref. Number: HQ/09/ASS/00/124 – 2020/0014) conducted by Global Advance Training and Consultancy (DOSH Registration: HQ/09/ASS/00/124) on 20/02/2020. • Holyrood Estate: The Chemical Health Risk Assessment Report (Ref. Number: HQ/09/ASS/00/124 – 2020/0015) conducted by Global Advance Training and Consultancy (DOSH Registration: HQ/09/ASS/00/124) on 21/02/2020. <p>Medical Surveillance was conducted for workers exposed to chemicals and welding fumes in the estate as recommended in the CHRA. The medical surveillance was conducted to monitor the level of exposure on the workers towards the chemicals and fumes.</p> <ul style="list-style-type: none"> • Kalumpong Estate - Medical Surveillance was conducted from 17/03/2022 at Klinik Vijay Sdn Bhd for 26 estate workers, namely sprayers, workshop attendants, mandores, trunk injectors, and manurers who have been exposed to chemicals 	

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	<p>and fumes. Results indicates all fit to work</p> <ul style="list-style-type: none"> • Holyrood Estate - Medical Surveillance was conducted from 22/07/2022 by Klinik Vijay Sdn Bhd, for 11 workers exposed to pesticides and organophosphate in the estate. Results were yet to receive. <p>Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the estates. The NRA Reports were available in the sampled estates as below.</p> <ul style="list-style-type: none"> • Kalumpong Estate – Assessment conducted on 23/06/2022 by SH Safety Consultancy Sdn Bhd. The assessment report was available for verification. • Holyrood Estate – Assessment conducted on 24/06/2020 by SH Safety Consultancy Sdn Bhd. The assessment report was available for verification. <p>Audiometric Test was conducted in the estates as per the recommendation in the Noise Risk Assessment as below.</p> <ul style="list-style-type: none"> • Kalumpong Estate - Refer Section 9.0 Conclusion, since the exposure monitoring below the Noise Exposure Limit (LEX 85.0 dBA) over 8.00 hours workday as stipulated in the Noise Exposure Regulation no further action is required. • Holyrood Estate - Audiometric Programme was conducted by Eurofins NM Laboratory Sdn Bhd on 11/04/2022. A total of 35 workers had undergone the audiometric test. Result indicates that 10 of workers fall under Hearing Impairment and 23 workers fall under Hearing Loss. There are no workers fall under Permanent Standard Threshold Shift (STS). <p>c) Estates sampled have established a training program for employees</p>	

Criterion / Indicator		Assessment Findings	Compliance
		<p>exposed to chemicals used at the palm oil estates to ensure continuous awareness to the employees. The training was conducted by the Manager, Asst. Manager, and representative from the chemical suppliers to the supervisors and operators. Sighted the training records as follows</p> <ul style="list-style-type: none"> • Kalumpong Estate - Training and awareness on Buffer Zone, Chemical Handling and PPE dated 06/04/2022 • Holyrood Estate – HIRARC Training 01/07/2022 and MSPO Brieding on 30/06/2022 <p>d) SOP on PPE has established as per document Operating Control Procedure Personal Protective Equipment with reference number SD/SDP/PSQM(ESH)/201-OS16 dated 26/02/2015. 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 the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>The implementation of PPE usage was not in line with HIRARC Risk Control and SOP. During the site visit to Kalumpong Estate (Gedong Division) Field 02A2, it was found 1 Tractor driver (Employee ID 0000098263), who conducted in field FFB Collection was wearing wellington boot during driving the tractor. Safety Boots Type 8000 has been issued on 22/02/2022 based on PPE Issuance Record however the driver was used the Normal Wellington Boots. It was not in line with HIRARC dated 25/05/2022 Section FFB Transport (2) "Mengangkat Buah Sawit (Grabber) – Kawalan Risiko: Taklimat Keselamatan, Latihan Kesedaran Keselamatan, PPE yang betul (Topi Keselamatan, Kasut Keselamatan, Vest). Other than that, it also stated in the Standard Operating Procedure Tractor Driver dated</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>01/01/2021 with reference number KPE/SOP/018 Issue 18 Rev 02 "(1) Alat Perlindungan Diri yang di luluskan JKPP, Kasut Keselamatan, Topi Keselamatan, Baju Pemantul Cahaya". Thus, Minor NC was raised.</p> <p>e) Standard Operating Procedures for Handling of Chemicals were available in several documents such as Sime Darby Plantation, Chemical Safety Management; Document No. SD/SDP/PSQM (ESH)/202-OH4; dated 26/02/2015. SDS were placed in the Chemical and Fertilizer store. Emergency eye wash and portable eye wash were functioned well during inspection. Safety warning and signage were placed at strategic area in order to control the hazard. Chemical register was checked and found in order.</p> <p>The lubricant was stored in the container without labelling. During site visit at Workshop Holyrood Estate, it was found that 1 unit of container store with lubricant oil without any labeling. It was not in line with Occupational safety and Health (Use and Standard Of Exposure Of Chemicals Hazardous To Health) Regulation 2000 Section Regulation 21: Relabeling (1) "When chemical hazardous to health is transferred to another container, other than that which is originally supplied, and the contents of the container are not used within a normal work shift, the employer shall ensure that the container is relabeled". Thus, Minor NC was raised.</p> <p>f) <u>Holyrood Estate</u> The Estate Manager, Mr Batumalasamy A/L Subrahmonion was appointed to be the Chairman of OSH Committee at the estate as stated in the appointment letter dated 01/01/2022 undersigned by the Regional CEO, Northern Region. Estate management has appointed Safety Committee Members consists of OSH Coordinator,</p>	

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Criterion / Indicator	Assessment Findings	Compliance																		
	<p>Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate Manager.</p> <p><u>Kalumpong Estate</u></p> <p>The Estate Manager, Mr Mohammad Fakhrolrodzi Bin Aziz was appointed to be the Chairman of OSH Committee at the estate as stated in the appointment letter dated 01/01/2022 undersigned by the Regional CEO, Northern Region. Estate management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate Manager.</p> <p>g) The management conducted regular OSH committee meetings on quarterly basis and when necessary due to accidents that occur. 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 OSH Meeting Minutes dated as follows:</p> <table border="1" data-bbox="1099 1010 1883 1214"> <thead> <tr> <th>OSH Meeting 2022</th> <th>Kalumpong Estate</th> <th>Holyrood Estate</th> </tr> </thead> <tbody> <tr> <td>1st Quarter</td> <td>17/03/2022</td> <td>29/03/2022</td> </tr> <tr> <td>2nd Quarter</td> <td>17/06/2022</td> <td>29/06/2022</td> </tr> <tr> <th>OSH Meeting 2021</th> <th>Kalumpong Estate</th> <th>Holyrood Estate</th> </tr> <tr> <td>4th Quarter</td> <td>20/12/2021</td> <td>29/12/2021</td> </tr> <tr> <td>3rd Quarter</td> <td>23/09/2021</td> <td>25/10/2021</td> </tr> </tbody> </table> <p>h) Accident and Emergency procedures were available in the ESH Management System Manual; Emergency Preparedness & Response Guidelines and Procedures; Doc No: SD/SDP/SQM (ESH)/001-2-6; Revision:0; Date 01/07/2012. The estates have established</p>	OSH Meeting 2022	Kalumpong Estate	Holyrood Estate	1 st Quarter	17/03/2022	29/03/2022	2 nd Quarter	17/06/2022	29/06/2022	OSH Meeting 2021	Kalumpong Estate	Holyrood Estate	4 th Quarter	20/12/2021	29/12/2021	3 rd Quarter	23/09/2021	25/10/2021	
OSH Meeting 2022	Kalumpong Estate	Holyrood Estate																		
1 st Quarter	17/03/2022	29/03/2022																		
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4 th Quarter	20/12/2021	29/12/2021																		
3 rd Quarter	23/09/2021	25/10/2021																		

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	<p>Emergency Response Team lead by the Estate Managers. The ERT chart and Fire Extinguisher Map was also available and verified. Emergency Response Training was conducted as below:</p> <p>Kalumpong Estate: 10/01/2022 Holyrood Estate: 23/07/2022</p> <p>i) Refer First Aid in the workplace Procedure dated 09/03/2021 with reference number UM/HSE/OCP/01. First aiders were assigned to various workstation at the estates. The mandores and staffs were responsible for first aid boxes at each workstation assigned to them by the management. The first aid box was recently replenished with all stated items available in the box. First Aid trainings were conducted regularly at the sampled estates and documents of trainings were verified as below.</p> <p>Kalumpong Estate: 21/07/2022 Holyrood Estate: 20/07/2022</p> <p>j) The estates sampled recorded all accidents reports and reported to HQ using the PSQM-ESH Monthly update form via online through GSQM ESH Portal. The accident occurred was reviewed on quarterly basis during OSH committee meeting.</p> <p><u>Kalumpong Estate</u></p> <p>There were no accident cases recorded for the year 2021 reported in the estate. The JKKP 8 form has been submitted to DOSH for the year ending 2021 on 26/01/2022 with reference number JKKP 8/108982/2021 and documents available for verification.</p> <p>For the year 2022 there were 5 accident cases reported with Medical Leaves recorded. Accident investigations, HIRARC Review and Retraining records were available for verification.</p>	

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		<p><u>Holyrood Estate</u></p> <p>There were 1 accident cases with 8 days TLA recorded for the year 2021 reported in the estate. The JKPP 8 form has been submitted to DOSH for the year ending 2021 on 20/01/2022 with reference number JKPP 8/105161/2021 and documents available for verification.</p> <p>For the year 2022 there were 2 accident cases reported with Medical Leaves recorded. Accident investigations, HIRARC Review and Retraining records were available for verification.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has established Group Sustainability & Quality Policy Statement dated 02/12/2019 approved by Group Managing Director where the company is respecting, upholding & no exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) last revised 2020.</p> <p>Besides, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/03/2020. Sime Darby Plantation Berhad 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.</p> <p>The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
<p>4.4.5.2</p>	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They promote diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity union membership, political affiliation or age. The policy has been briefed to all the employees and stakeholders. The policy could be downloaded from Sime Darby Plantation Berhad website.</p>	<p>Complied</p>
<p>4.4.5.3</p>	<p>Management shall ensure that employees’ pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>Employment contracts and offer letters for local workers and foreign workers is available. Pay and conditions are documented and achieved the Minimum Wage Order 2022. Sampled of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Employment Act 1955 which have been signed by the worker.</p> <p>Sampled of pay slips for December 2021, February 2022 and May 2022 found that all the workers were paid according to Minimum Wages Order 2022. Samples of pay slip verified is as follows:</p> <p>Kalumpung Estate - Employee ID: 56528, 592110, 117318, 126029, 146459, 147344, 147348, 152503, 159017 and 160890.</p> <p>Holyrood Estate - Employee ID: 155349, 141052, 107656, 166431, 108878, 131145, 117779 and 168813</p>	<p>Complied</p>
<p>4.4.5.4</p>	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the</p>	<p>The management for sampled estates ensured that the employees of the contractors are paid according to these standard requirements by</p>	<p>Major Non-Conformities</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>obtaining the pay slips from the contractor. The copies of pay slips were available at the estates for verification as follows:</p> <p>Kalumpong Estate</p> <ul style="list-style-type: none"> • JS Asas Maju Enterprise – Workers ID No: 831104-12-XXXX and 970520-08-XXXX. • Bagan Samak Enterprise – Workers ID No: 761123-08-XXXX, 830106-08-XXXX, 831125-12-XXXX, 900426-08-XXXX, 791116-08-XXXX, 910304-08-XXXX <p>Holyrood Estate</p> <ul style="list-style-type: none"> • Alfa Krian Enterprise - Workers ID: 901024-08-XXXX • Resam Padu Enterprise - Workers ID: 950426-08-XXXX, 891026-08-XXXX, 980103-38-XXXX, 040205-08-XXXX and 950426-08-XXXX • Safwan PA Enterprise - Workers ID: 95011-08-XXXX, 810501-08-XXXX and 000319-08-XXXX <p>The contractor workers salary and overtime were not paid according to the employment contract agreed between the contractor and his employees and Employment Act 1955.</p> <p>Location: Holyrood Estate, Contractor: Resam Padu Enterprise</p> <ol style="list-style-type: none"> 1. Based on the pay slip for the month of May and June 2022, the contractor workers (ID No: 040205-08-xxxx & 950426-08-xxxx) was found working on rest day (Sunday). Worker’s salary was paid based on the Minimum Wages Order 2022 which is about RM57.69 for normal working day and working on rest day shall be paid double (RM 115.38 per day). However, the contractor only paid RM100 for the working on rest day. 2. Employment contract has stated the lorry driver salary is paid based on tonnage per delivery / based on number of FFB delivered. 	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>However, the pay slip was not showing the tonnage delivered / number of deliveries of FFB for each worker.</p> <p>Location: Kalumpong Estate and Holyrood Estate Contractor: JS Asas Maju Enterprise</p> <p>Worker's payslip does not mention the overtime, sick/annual leave, public holiday taken by workers as per working contract/agreement signed by contractors and their workers.</p> <p>Workers and contractor contribution to EPF and SOCSO was not paid based on the total gross salary. This issue has been raised by internal auditors. However, there was no evidence sighted that the correction has been made by the contractors.</p> <p>Both estate management has taken immediate an action by issued warning letter to the respective contractors on 21/05/2022. This indicator has been raised as minor non-compliance on the previous surveillance assessment. The non-compliance upgraded to Major NC during this assessment.</p>	
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The estates' management has registered all their workers into Employee Master Details Listing in SEMUA system where personal details such as full name, gender, date of birth, date join company, race, designation and wages were recorded.</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>The estates' management has employed local and foreign workers from Indonesia, India, Nepal and Bangladesh. They are all under direct employment to the estates. Sampled of employment contracts and all of them have signed on the employment contract prior to work and extension contract where the original contract has expired. Terms and</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		conditions were according to Collective Agreement and Employment Act 1955.	
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 -	Estate Daily Attendance Report updated on monthly basis to record the number of days work/ total tonnage and hours of overtime work. The report was generated from the daily data recorded in Daily Attendance Form.	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 -	Interviewed with the workers confirmed that they were given rest time in between of the working hours. Overtimes were paid according to the rate stated in the agreement and regulatory requirements. The overtime offered upon mutually agreement.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Pay slips of all employees (check roll) are available as evidence of salary payment. The pay slip contains the following information: 1. Earnings - Basic Salary (Daily Rated Work, Work on Rest Day and Work on Holiday), Overtime (Weekdays, Rest days and Holiday). 2. Deduction - Union fee (NUPW & AMESU), SOCSO, EPF, electricity deduction and others. Observed that the wages and overtime payment documented on the pay slips are in line with legal requirement and as stated in the employment contract. Sampled of pay slips for December 2021, February 2022 and May 2022 found that all the workers were paid according to Minimum Wages Order 2022. Samples of pay slip verified is as follows: Kalumpong Estate - Employee ID: 56528, 592110, 117318, 126029, 146459, 147344, 147348, 152503, 159017 and 160890.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Holyrood Estate - Employee ID: 155349, 141052, 107656, 166431, 108878, 131145, 117779 and 168813	
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 -	Workers and their family are provided with free housing facilities and free medical facilities. The workers are entitled with allowance based on the work such as phone allowance of RM5 per month, price bonus, free water up to 35 gallons per employee per day, 10kg of rice once in every two months.	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. - Major compliance -	Based on document checking and interview with the worker, confirmed that the estates provide adequate housing, water supplies, medical, educational and welfare amenities in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446). There is on-going upgrading of housing. Water is supplied to workers housing through LAP piping while electricity is via TNB grid supply. Access to food supply for the workers are considered adequately and sufficiently as the estate is very near to the town. Line site inspection was done weekly by Executive and recorded in the logbook. Weekly summary reported via checklist for Estate housing inspection i.e. housing complex/NEST/Community Hall Inspections records shown latest inspection done by Medical Assistant or appointed person in charge. At Holyrood Estate, Employee Welfare Committee was established, and meeting was conducted quarterly. Meeting minutes is sighted, and meeting was conducted on 01/06/2022, 14/03/2022 and 24/12/2021. Linesite inspection was conducted on weekly basis and recorded in Housing Complex/Nest/Community Hall Weekly Inspection.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
<p>4.4.5.12</p>	<p>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>Sime Darby Plantation Berhad maintained its Human Rights Charter where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They seek to create a working environment with zero tolerance for sexual harassment and abuse and in which violence is never used to resolve issues or conflict.</p> <p>Sime Darby Plantation Berhad has implemented Sexual Harassment Policy dated 01/11/2019 signed by Mr Mohamad Helmy Othman Basha, Group Managing Director Sime Darby Plantation Berhad. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate.</p> <p>Gender Committee meeting for SOU level (SOU 02) was conducted on 27/06/2022. Training on Sexual Harassment Training was conducted on 11/03/2022 at Gedong Division. At Estate level, meeting was conducted as follow:</p> <ul style="list-style-type: none"> • Kalumpong Estate – 15/07/2022, 20/05/2022. • Holyrood Estate - 27/04/2022, 11/03/2022, 26/02/2022 	<p>Complied</p>
<p>4.4.5.13</p>	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p>	<p>Sime Darby Plantation Berhad has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They respect the rights of their employees to form and join unions and bargain collectively.</p> <p>Sime Darby Plantation Berhad has implemented The Group Sustainability & Quality Policy Statement which signed on 02/12/2019 where the management is respecting Freedom of Association. Sighted</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance						
	- Major compliance -	Human Right Charter Revised 2020 has been established to cover on Human Right consist of Preamble, Scope, Commitments, Approach, Implementation and Responsibilities & Reporting. Refer section 3.2 stated respect the rights of employees to join and form organizations of their own choice and to bargain collectively. The NUPW minute meeting for Kalumpong Estate was sighted conducted on 21/07/2022 and for Holyrood Estate was conducted on 07/03/2022.							
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 –	Sime Darby Plantation Berhad has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornograph. They are eradicating child labour in all their supply chain and not employ anyone underage of 18 years.	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 -	<p>Training was provided during musters and in session held in the estate community hall. The following training made for the employees were recorded as follows. Subjects extracted were mainly related to ESH, SOP, and Environment. Estates have established a training program for all workers based on the training need analysis conducted on a yearly basis. Records of trainings were maintained by the estates as below: -</p> <p>Kalumpong Estate</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 70%;">Training</th> <th style="width: 30%;">Date</th> </tr> </thead> <tbody> <tr> <td>Policy Briefing MSPO (SDP Policies)</td> <td style="text-align: center;">07/02/2022</td> </tr> <tr> <td>MSPO & RSPO Certification</td> <td style="text-align: center;">07/03/2022</td> </tr> </tbody> </table>	Training	Date	Policy Briefing MSPO (SDP Policies)	07/02/2022	MSPO & RSPO Certification	07/03/2022	Complied
Training	Date								
Policy Briefing MSPO (SDP Policies)	07/02/2022								
MSPO & RSPO Certification	07/03/2022								

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Criterion / Indicator		Assessment Findings		Compliance		
		Buffer Zone Training	06/04/2022			
		Chemical Handling Training	06/04/2022			
		PPE Training	06/04/2022			
		Schedule Waste Management	04/07/2022			
		Fire Extinguisher Training	10/01/2022			
		Contractor and Vendor Training	14/06/2022			
		Briefing & Notification Accident	15/06/2022			
		Housing and Social Issue Training	16/06/2022			
		COBC Training	29-30/03/2022			
		First Aid Training	21/07/2022			
		Pest and Disease Training	26/01/2022			
		Nursery Training	26/01/2022			
		Holyrood Estate				
		Training	Date			
		Training CARABAO	08/01/2022			
		Chemical Handling Management	22/04/2022			
		Schedule Waste Management	22/04/2022			
		HIRARC Briefing	01/07/2022			
		RSPO & MSPO Briefing	30/06/2022			
		COBC & SDP Policy	30/03/2022			
		Induction Training	20/06/2022			
		Passport Safe Keeping & Locker	08/06/2022			
		IPM Training	25/07/2022			
		Safety and Frond Stacking - Harvester	09/07/2022			
		Spraying Training - MyCorp	22/06/2022			
		PPE & Safety Training - Manuring	07/07/2022			
		Workshop Training	06/07/2022			
NRA, PPE and Tractor Driver Training	08/06/2022					

Criterion / Indicator		Assessment Findings		Compliance
		First Aid Training	20/07/2022	
		ERP Training	23/07/2022	
4.4.6.2	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. - Major compliance -	The estates have 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 Estate: Recommended Training Needs for the year 2022 for all estates.		Complied
4.4.6.3	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure. - Minor compliance -	A training programme has been developed and available in the Annual Sustainability Programme 2022. The trainings were sighted to have been sub categorised to trainings on Environmental, GAP, SOP, Social and OSH.		Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services				
Criterion 4.5.1: Environmental Management Plan				
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	The Group Upstream Malaysia Safety, Health and Environmental Policy Statement had been established and implemented. The policy was signed by the Chief Operation Officer Upstream Malaysia in June 2020 and displayed prominently on notice boards in English and local language Bahasa Malaysia. Therein among others has stated that the Company is committed to protecting the environment and conserving biodiversity through minimizing environmental harms a) Protecting and enhancing biodiversity and the ecosystem b) No deforestation and no new development on peat soil c) Enhancing resilience against climate change impact		Complied

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Criterion / Indicator		Assessment Findings	Compliance																				
		<p>d) Adopting responsible consumption and production. This policy is prominently displayed in the office along with other Company's Policies. It is communicated to the employees via training and weekly briefing session among others as follows;</p> <table border="1"> <thead> <tr> <th></th> <th>Subject</th> <th>Holyrood</th> <th>Kalumpong</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Company Policies Briefing</td> <td>30/03/2022</td> <td>17/03/2022</td> </tr> <tr> <td>2</td> <td>RSPO Briefing to employees</td> <td>01/07/2022</td> <td>07/2/2022</td> </tr> <tr> <td>3</td> <td>Scheduled Waste Management</td> <td>22/04/2022</td> <td>04/07/2022</td> </tr> <tr> <td>4</td> <td>EAI/EIE Refresher</td> <td>23/09/2021</td> <td>23/09/2021</td> </tr> </tbody> </table> <p>Subjects on environmental are included the annual training program related to "Environmental Responsibility & Biodiversity-Environmental Aspect Impact Assessment".</p>		Subject	Holyrood	Kalumpong	1	Company Policies Briefing	30/03/2022	17/03/2022	2	RSPO Briefing to employees	01/07/2022	07/2/2022	3	Scheduled Waste Management	22/04/2022	04/07/2022	4	EAI/EIE Refresher	23/09/2021	23/09/2021	
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4	EAI/EIE Refresher	23/09/2021	23/09/2021																				
4.5.1.2	<p>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 -</p>	<p>The Environmental Policy has been established as described in 4.5.1.1 above. The objectives of the environmental management plan among others include the following;</p> <ul style="list-style-type: none"> • Implement and comply all prevailing statutory environmental laws • Plantation development emphasizing zero burning practices • Compliance of DOE - to minimize pollution of land/ water/ air • To control and practice GAP systems in both mineral/ peat soils • Identification of HCV and preserving riparian zones <p>The aspects and impacts had been provided in the Environmental Impact Assessment reviewed on Jan 2022 compiled internally. The analysis covered the following activities; a) Harvesting/ weeding/ fertilizer application b) Mulching/ road upkeep/ ramp</p>	Complied																				

Criterion / Indicator		Assessment Findings	Compliance								
		<p>c) Workshop/ chemical store Operations d) Lubricant store/ fertilizer store e) Oil Palm Tree Removal/ Pest & Disease Control f) Impact of field operations activities towards environmental g) Identification of riparian zone h) All the relevant positive/ negative impact and mitigation plan, The plans and impact assessments relating to environmental impacts based on documents for both estates and the mill are elaborated in the following records:</p> <p>a) Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, (version 1; year 2008 Issue no. 1; dated 1 April 2009 Register) b) Appendix 5.4.1c - Environmental Aspect and Impact Identification form (version 1; year 2008 Issue no. 1; dated 1 April 2009; MR-01/EAI) c) Appendix 5.4.1d – Environmental Impacts Evaluation form (version 1; year 2008 issue no. 1; dated 1 April 2009; MR-02/EIE) The latest register being reviewed dated Jan 2022 to include the following changes and continued being formalised for 2022.</p>									
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance -</p>	<p>The environmental improvement plans are identified the Environmental Impact Assessment 2022 having details of mitigation of the negative impacts. They are summarized and among others as shown below;</p> <table border="1"> <thead> <tr> <th></th> <th>Activities</th> <th>Impacts</th> <th>Mitigation plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Harvesting</td> <td>Promote positive impact to soil structure through</td> <td>Practice proper frond stacking. EFB applied to improve nutrient & biomass</td> </tr> </tbody> </table>		Activities	Impacts	Mitigation plan	1	Harvesting	Promote positive impact to soil structure through	Practice proper frond stacking. EFB applied to improve nutrient & biomass	Complied
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Criterion / Indicator		Assessment Findings		Compliance
			biomass frond & EFB mulching.	
		2 Weeding	Negative impact as polluting the soil with usage of chemicals.	Dosage of chemicals is monitored & calibrated. Manual weeding practiced at certain areas to reduce reliance of chemical.
		3 Manuring	Over usage of chemical & fertilizer affecting soil toxicity causing leaching/ wash off	Identify buffer zones and to prevent leaching of fertilizer and chemicals. Application along frond stacking rows.
		4 Road upkeep	Damages through grading and chambering	Water collected at drain pits is collected to maximize moisture of nearest palm.
		5 Loading Bay	FFB transportation of lorries in minimizing leakages of fuel	Education to drivers and monitoring of vehicles movements.
		6 Workshop	Spillage to prevent pollution	Availability of spill kit and health surveillance for welding personnel
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	This is available as elaborated in indicator 4.5.1.3 above. Improvement planned for both short and long terms are detailed along with the identified issues.		Complied
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.	Training program is available in the SOU 02 Training Program 2022 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		Complied

Criterion / Indicator		Assessment Findings					Compliance																																																					
	- Major compliance -	waste management, environmental responsibility, HCV & Biodiversity training. <table border="1" style="margin-top: 10px;"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Subjects</th> <th colspan="3">Month</th> </tr> <tr> <th>1-4</th> <th>5-8</th> <th>9-12</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>ESH Legal & Other requirements</td> <td>/</td> <td>-</td> <td>-</td> </tr> <tr> <td>2</td> <td>ERP Chemical spill, poisoning, Fire</td> <td>/</td> <td>-</td> <td>/</td> </tr> <tr> <td>3</td> <td>Scheduled waste management</td> <td>/</td> <td>/</td> <td>-</td> </tr> <tr> <td>4</td> <td>Safe Work Procedure for All Stations.</td> <td>/</td> <td>-</td> <td>/</td> </tr> <tr> <td>5</td> <td>Policy Training</td> <td>/</td> <td>-</td> <td>/</td> </tr> <tr> <td>6</td> <td>HCV Training for Region</td> <td>-</td> <td>/</td> <td>/</td> </tr> <tr> <td>7</td> <td>Safe handling of Electrical Equipment</td> <td>/</td> <td>-</td> <td>/</td> </tr> <tr> <td>8</td> <td>MSDS/CSDS</td> <td>/</td> <td>-</td> <td>/</td> </tr> <tr> <td>9</td> <td>Triple rinsing</td> <td>/</td> <td>/</td> <td>-</td> </tr> </tbody> </table>						Subjects	Month			1-4	5-8	9-12	1	ESH Legal & Other requirements	/	-	-	2	ERP Chemical spill, poisoning, Fire	/	-	/	3	Scheduled waste management	/	/	-	4	Safe Work Procedure for All Stations.	/	-	/	5	Policy Training	/	-	/	6	HCV Training for Region	-	/	/	7	Safe handling of Electrical Equipment	/	-	/	8	MSDS/CSDS	/	-	/	9	Triple rinsing	/	/	-	
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4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	The forum used in the estates are the quarterly ESH meeting and the annual management review meeting. <ul style="list-style-type: none"> a) The latter emphasized more on issues on water management plan, electricity use, diesel consumption, waste management, SIA plan, renewable energy, aspect/impact. b) The Environmental Performance Monitoring Committee is setup to comply with the DOE requirement of Guidance Self-Regulation (GSR). The meetings review the environmental performance within the SOU 2 OU. c) The operating unit level dialogue/ safety meeting/briefing during muster are forums used by the management in disseminating issues relating to environment <table border="1" style="margin-top: 10px;"> <thead> <tr> <th></th> <th>Estate</th> <th>Date</th> <th>Date</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kalumpong</td> <td>17/06/22</td> <td>17/03/22</td> <td>20/12/21</td> <td>23/09/21</td> </tr> </tbody> </table>						Estate	Date	Date	Date	Date	1	Kalumpong	17/06/22	17/03/22	20/12/21	23/09/21	Complied																																									
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		2	Holyrood	29/06/22	05/04/22	29/03/22	29/12/21																	
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																								
4.5.2.1	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p>- Major compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2022. The document was reviewed/updated on Jan 2022. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1"> <thead> <tr> <th></th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Backhoe tractor</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel</td> </tr> <tr> <td>2</td> <td>Van/ vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.</td> </tr> <tr> <td>3</td> <td>Electrical supply</td> <td>To reduce reliance on gen-sets for power supply</td> <td>Utilization of TNB sources</td> </tr> </tbody> </table> <p>The utilization of fossil fuel in 2022 is being monitored with records shown below:</p>							Target	Objective	Action plan	1	Backhoe tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel	2	Van/ vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.	3	Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources	Complied
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Criterion / Indicator		Assessment Findings						Compliance
		Site	H/rood	K/mpong	Site	H/rood	K/mpong	
		Jan	1.50	6.71	July	1.14	1.99	
		Feb	1.26	2.58	Aug	1.11	4.40	
		Mac	1.39	2.25	Sep	1.13	2.98	
		Apr	1.35	2.32	Oct	1.49	7.72	
		May	1.12	3.94	Nov	1.32	9.90	
		Jun	1.27	2.74	Dec	1.50	5.92	
		<p>The estates record/monitor the diesel utilization over the running hours of machines and other vehicles running.</p> <p>Performance variation in view of several factors i.e.</p> <ul style="list-style-type: none"> a) Infrastructure of estates, b) Community size / no of gen-sets, c) No. of vehicles / age of machine. d) Weather interference / crop production volume <p>Baseline for Kalumpong Estate and Holyrood Estate is 3.00 and 1.27 respectively.</p>						
4.5.2.2	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p>- Major compliance -</p>	<p>The 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 in all transport and machinery operations was available in the respective estate yearly budgets.</p>						Complied
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p>	<p>There was no opportunity to use renewable energy (shell/ fiber/ EFB) in the estate with the present technology and facilities within the industry.</p>						Complied

Criterion / Indicator		Assessment Findings				Compliance	
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 waste products and sources of pollution has been identified and documented. Details as follows;				Complied	
			Activities	Source	Waste/ Pollution		Affected Environment
		1	Gen store	Petrol oil, lubricant Chemical	Spillage & contamination		Land, water
		2	SW store	Scheduled waste	All type of SW		Environmental
		3	Office	Domestic/office waste	Paper plastic		Land, water
				Toilet & kitchen	Sewage		
		4	W/shop	Used oil & grease	Spillage		Recycled
				Metal waste	Wastage		
				Oil drum/tank			
		5	Labour line	Domestic waste	Solid waste	Land, water	
				Toilet/kitchen waste	Sewage		
		6	Field activities	Operation waste	Palm frond, FFB stalk	Land/ water	
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	The estates had established the waste and pollution management plan as shown below. The PIC and time frame was also shown in the management plan.				Complied	
			Activities	Source	Waste /Pollution		Affected Environment
		1	Gen store	Petrol oil, lubricant Chemical	Spillage & contamination		Land, water
		2	SW store	Scheduled waste	All type of SW	Environmental	

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Criterion / Indicator		Assessment Findings				Compliance																																					
- Major compliance -		3	Office	Domestic/ office waste	Paper plastic	Land, water																																					
				Toilet & kitchen	Sewage																																						
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Criterion / Indicator		Assessment Findings				Compliance		
		6	Labour line	Toilet & kitchen waste	Ensure no accidental spillage	Cease using facilities in event of non-functional		
		The waste management plan review date was sighted and verified with records as follows:						
			Estate	Review date	Issues			
		1	Kalumpang	04/01/2022	Changes updated in the management plan			
		2	Holyrood	08/01/2022	Changes updated in the management plan			
4.5.3.3	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>The SOP on Scheduled Waste disposal is established and implemented. Details as provided in Sime Darby Plantation Berhad MQMS Standard Operating Procedure Section VII- Scheduled Waste (Hazardous Waste) Management ref no. SD/SDP/PSQM (ESH) /203-EN1 dated 26/2/2015.</p> <p>The inventory of the waste generated is recorded using the "E-SWISS" inventory system. Methodology of SW disposal is also described in indicator 4.5.3.2 above. All SW are disposed to Edgenta Mediserve Sdn Bhd for the SW 404 (Holyrood Estate) and SDI - Sime Kubota Malaysia Sdn Bhd for the workshop lubricant and others waste. The estates scheduled wastes are disposed to SDI collection upon completion of machine/vehicles servicing and maintenance.</p>				Complied		
			Estate	Date	SW410	SW305	Date	SW404
		1	Kalumpang	14/4/22	0.006	0.078	23/07/22	0.0080
		2	Kalumpang	13/04/22	0.008	0.117	16/04/22	0.2347
		3	Holyrood	18/07/22	0.015	0.129	13/06/22	0.0010
		4	Holyrood	22/03/22	0.017	0.090	22/12/21	0.0010
		Letter form DOE Putrajaya dated 13/04/2022 on the approval for Sime Kubota Malaysia Sdn Bhd for collection and disposal management of						

Criterion / Indicator		Assessment Findings	Compliance																
		scheduled waste from machine/vehicle servicing and maintenance was sighted and verified.																	
4.5.3.4	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer’s labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p>- Major compliance -</p>	<p>The SOP of disposal pesticide container is described in the estates in procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established. Content includes the triple rinsing procedures and the relevant training to be conducted. Under the operational control procedure established as given in 4.5.3.3 above the guideline and practice for handling empty pesticides containers are as follows.</p> <p>a) All class 2 and above containers are tripled rinsed and holes punctured at the bottom only if the waste generator is to dispose as non-scheduled waste.</p> <p>b) Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process.</p> <p>c) Empty containers were tripled rinsed, pierced and delivered to a registered recycler company M/s E-Idaman Sdn Bhd approved by DOE. Others were used recycled for chemical containers for spraying purposes.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Date</th> <th>Empty Containers</th> <th>500 g bottle</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kalumpong</td> <td>21/06/20</td> <td>325</td> <td>239</td> </tr> <tr> <td>2</td> <td>Holyrood</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>		Estate	Date	Empty Containers	500 g bottle	1	Kalumpong	21/06/20	325	239	2	Holyrood	-	-	-	Complied	
	Estate	Date	Empty Containers	500 g bottle															
1	Kalumpong	21/06/20	325	239															
2	Holyrood	-	-	-															
4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p>	<p>Domestic waste for the operating units in SOU 02 was disposed as follows.</p> <table border="1"> <thead> <tr> <th></th> <th colspan="2">Disposal site</th> <th>Remarks</th> </tr> <tr> <th></th> <th>Estate</th> <th>External</th> <th></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kalumpong</td> <td>-</td> <td>MD Kerian Collection 2/3 x week</td> </tr> <tr> <td>2</td> <td>Holyrood</td> <td>-</td> <td>MD Kerian Collection 2/3 x week</td> </tr> </tbody> </table>		Disposal site		Remarks		Estate	External		1	Kalumpong	-	MD Kerian Collection 2/3 x week	2	Holyrood	-	MD Kerian Collection 2/3 x week	Complied
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Criterion / Indicator		Assessment Findings	Compliance
		Bill no 0714008 dated 14/07/2022 amounting RM130 charged to the Kalumpong Estate was sighted and verified. Holyrood commenced disposal to MD Selama effective July 2022. Payment for the initial arrangement dated 15/01/2022 RM 29095.00 ref no 1004214 was sighted and verified.	
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	The SOP of disposal pesticide container is described in the estates in SOU 11, procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established. Content includes the triple rinsing procedures and the relevant training to be conducted. Under the operational control procedure established as given in 4.5.3.3 above the guideline and practice for handling empty pesticides containers are as follows. a) All class 2 and above containers are tripled rinsed, and holes punctured at the bottom only if the waste generator is to dispose as non-scheduled waste. b) Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process. c) Empty containers were tripled rinsed, pierced and delivered to a registered recycler company M/s E-Idaman Sdn Bhd approved by DOE.	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	Details as described in 4.5.3. and 4.5.4.1.	Complied
Criterion 4.5.5: Natural water resources			

Criterion / Indicator	Assessment Findings	Compliance																												
<p>4.5.5.1 The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate. e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of the ground water table should be measured at IChersonese annually. <p>- Major compliance -</p>	<p>SOU 02 estates had established its Water Management Plan 2022 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as.</p> <ul style="list-style-type: none"> • Implementation of rain water harvest, • Construction of water gate and scheduled water pumping for effective management of field drains and field water level. • daily monitoring of bund / scheduled maintenance • Establishment of mucuna bracteata to prevent erosion, • Side drains at field road to control water, frond stacking, • Enhancement of ground vegetation at bare ground area. <p>a. Assessment of water usage and sources of supply.</p> <table border="1" data-bbox="1048 898 1883 1316"> <thead> <tr> <th></th> <th>Water source</th> <th>Usage</th> <th>Monitoring</th> <th>Freq</th> <th>PIC</th> <th>Review status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>LAP</td> <td>Purchased for domestic consumption</td> <td>Monitoring water supply</td> <td>Mth</td> <td>AM Mgr</td> <td>Liaison with Authority</td> </tr> <tr> <td>2</td> <td>Rainwater</td> <td>Domestic use Workshop Chemical mixing</td> <td>Rain fall data</td> <td>On-going</td> <td>AM Mgr</td> <td>Water harvesting for general washing</td> </tr> <tr> <td>3</td> <td>Water tank</td> <td>Emergency water supply</td> <td>-</td> <td>-</td> <td>AM Mgr</td> <td>Request water supply from other estates</td> </tr> </tbody> </table>		Water source	Usage	Monitoring	Freq	PIC	Review status	1	LAP	Purchased for domestic consumption	Monitoring water supply	Mth	AM Mgr	Liaison with Authority	2	Rainwater	Domestic use Workshop Chemical mixing	Rain fall data	On-going	AM Mgr	Water harvesting for general washing	3	Water tank	Emergency water supply	-	-	AM Mgr	Request water supply from other estates	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance															
		<p>b. Monitoring to optimize water usage has been tabulated in the table below:</p> <table border="1"> <thead> <tr> <th></th> <th>Incident</th> <th>Action steps</th> <th>PIC</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water shortage/ prolonged dry season</td> <td> To obtain water from local authority/ Mill catchment To train/ educate staff/ workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP </td> <td>Manager AM/ Mill Engineer</td> <td>As and when required</td> </tr> <tr> <td>2</td> <td>Severe water pollution/ Contamination</td> <td> To obtain water from LAP To train/ educate staff/ workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP </td> <td>Manager AM/ Mill Engineer</td> <td>As and when required</td> </tr> </tbody> </table>					Incident	Action steps	PIC	Status	1	Water shortage/ prolonged dry season	To obtain water from local authority/ Mill catchment To train/ educate staff/ workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP	Manager AM/ Mill Engineer	As and when required	2	Severe water pollution/ Contamination	To obtain water from LAP To train/ educate staff/ workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP	Manager AM/ Mill Engineer	As and when required	
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		<p>c. The Estates had implemented water managements plans which covered:</p> <ul style="list-style-type: none"> • Water shortage contingencies • Water pollution prevention • Reduce wastage • Identification & management of waste waters • Monitoring rainfall • Regular water quality analysis. 																			

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		<p>d. Water management plan review date was sighted and verified with records as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Review date</th> <th>Issues</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kalumpong</td> <td>04/01/2022</td> <td>No changes</td> </tr> <tr> <td>2</td> <td>Holyrood</td> <td>08/01/2022</td> <td>No changes</td> </tr> </tbody> </table> <p>The water reduction plan is shown below.</p> <table border="1"> <thead> <tr> <th></th> <th>Action Steps</th> <th>PIC</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Large containers are to be placed at strategic locations to collect rainwater The rainwater shall be recycled for washing heavy machinery</td> <td>AM/Field staff</td> <td>On-going</td> </tr> <tr> <td>2</td> <td>Frequent inspection to detect leakage Fix any leakage</td> <td>AM/Field staff</td> <td>On-going</td> </tr> <tr> <td>3</td> <td>To conserve level of soil moisture To minimize water stress during dry season</td> <td>AM/Field staff</td> <td>On-going</td> </tr> <tr> <td>4</td> <td>To recycle water spillage while mixing of chemical at mixing area</td> <td>AM/Field staff</td> <td>On-going</td> </tr> <tr> <td>5</td> <td>Avoid excessive usage during cleaning Close pipe to prevent water dripping</td> <td>AM/Field staff</td> <td>On-going</td> </tr> </tbody> </table> <p>e. The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby</p>		Estate	Review date	Issues	1	Kalumpong	04/01/2022	No changes	2	Holyrood	08/01/2022	No changes		Action Steps	PIC	Status	1	Large containers are to be placed at strategic locations to collect rainwater The rainwater shall be recycled for washing heavy machinery	AM/Field staff	On-going	2	Frequent inspection to detect leakage Fix any leakage	AM/Field staff	On-going	3	To conserve level of soil moisture To minimize water stress during dry season	AM/Field staff	On-going	4	To recycle water spillage while mixing of chemical at mixing area	AM/Field staff	On-going	5	Avoid excessive usage during cleaning Close pipe to prevent water dripping	AM/Field staff	On-going	
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		<p>Plantation dated April 2014). The guideline was issued by the GSD Unit with latest revision dated on 13/06/2011. There was no spraying activities or signs left in such an area. The buffer zones identified at the estates and established are as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>River width</th> <th>Buffer zone</th> <th></th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>> 40 m</td> <td>50 m</td> <td>4</td> <td>5 - 10 m</td> <td>10 m</td> </tr> <tr> <td>2</td> <td>20 - 40 m</td> <td>40 m</td> <td>5</td> <td>< 5 m</td> <td>5 m</td> </tr> <tr> <td>3</td> <td>10 - 20 m</td> <td>20 m</td> <td>-</td> <td></td> <td>-</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Buffer zone area</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kalumpong</td> <td>Gedung - Water P01A, P14D, P21A Kalumpong - WG02 - P04B, P05B, P19D</td> </tr> <tr> <td>2</td> <td>Holyrood</td> <td>River reserve Sg Segar</td> </tr> </tbody> </table> <p>f. There is no use of Bore Well at the sampled estates.</p>		River width	Buffer zone		River width	Buffer zone	1	> 40 m	50 m	4	5 - 10 m	10 m	2	20 - 40 m	40 m	5	< 5 m	5 m	3	10 - 20 m	20 m	-		-		Estate	Buffer zone area	1	Kalumpong	Gedung - Water P01A, P14D, P21A Kalumpong - WG02 - P04B, P05B, P19D	2	Holyrood	River reserve Sg Segar	
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4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	Interviews and feedback received from stakeholders confirmed that there was no construction of bunds, weirs and dams across main rivers or waterways passing through both the estates.	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 -	Practices on water harvesting such as roadside drains had been constructed and water has been directed to conservation terraces, pruned fronds were stacked along the palm row. Practices of water harvesting are mainly constructed on flat areas. Roadside pits were also available at every 3 palm rows, to divert in event of water overflowing and also to benefit the nearest palm at the pit end to obtain additional moisture. This is part of the common practices introduced within the Sime Darby Plantation Group Agriculture Procedures.	Complied																																	
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value																																				

Criterion / Indicator	Assessment Findings	Compliance																																													
<p>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:</p> <ul style="list-style-type: none"> a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. <p>- Major compliance -</p>	<p>The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest.</p> <p>Hence the current HCV assessment of the estates remains valid. The recent HCV assessment for the entire SOU 2 covering all the 4 estates and the mill was performed in September 2016 by the PSQM personnel. Methodology is through site observation, interviews, stakeholders' consultation and desktop review on available secondary data. The assessment among others covers the following areas.</p> <ul style="list-style-type: none"> a) Overview of HCV assessment. b) Description of assessment areas. c) Finding and discussion, landscape context d) HCV criteria and application to agriculture e) HCV monitoring and management <p>In summary the areas covered within the SOU 2 landholdings 11, 83.39 ha and the HCV areas presence as summarized as follows.</p> <table border="1" data-bbox="1048 986 1883 1382"> <thead> <tr> <th></th> <th>Estate</th> <th>HCV area</th> <th>Area</th> <th>Type</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tali Ayer</td> <td>Bund Samagagah River</td> <td>3.88</td> <td>HCV 4</td> </tr> <tr> <td></td> <td></td> <td>Sg Semang River reserve</td> <td>5.50</td> <td>HCV 4</td> </tr> <tr> <td></td> <td></td> <td>Bung Sg Kerian</td> <td>0.21</td> <td>HCV 4</td> </tr> <tr> <td></td> <td></td> <td>Monkey Island</td> <td>14.65</td> <td>HCV 4</td> </tr> <tr> <td>2</td> <td>Chersonese</td> <td>Bund (Sg Kurau)</td> <td>10.82</td> <td>HCV 4</td> </tr> <tr> <td></td> <td></td> <td>Bund Teluk Rubiah mangrove forest</td> <td>6.77</td> <td>HCV 4</td> </tr> <tr> <td></td> <td></td> <td>Bund Sg Kurau Jin Seng Divison</td> <td>2.99</td> <td>HCV 4</td> </tr> <tr> <td></td> <td></td> <td>Mill water catchment</td> <td>5.29</td> <td>HCV 4</td> </tr> </tbody> </table>		Estate	HCV area	Area	Type	1	Tali Ayer	Bund Samagagah River	3.88	HCV 4			Sg Semang River reserve	5.50	HCV 4			Bung Sg Kerian	0.21	HCV 4			Monkey Island	14.65	HCV 4	2	Chersonese	Bund (Sg Kurau)	10.82	HCV 4			Bund Teluk Rubiah mangrove forest	6.77	HCV 4			Bund Sg Kurau Jin Seng Divison	2.99	HCV 4			Mill water catchment	5.29	HCV 4	<p>Complied</p>
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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> <ul style="list-style-type: none"> a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. <p>- Major compliance -</p>	<p>There was no RTE recorded. Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented. Signage as well as routine patrolling activities were utilised as part of creating awareness among employees and maintain HCV. The estates had established an HCV action plan for FY2022 such as;</p> <ul style="list-style-type: none"> a) Ensuring all legal requirements to the protection of species/habitat are met b) Controlling any illegal /inappropriate hunting, fishing and developing 				Complied																														

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Criterion / Indicator		Assessment Findings	Compliance																
		<p>measures to resolve human-wildlife conflicts</p> <p>c) Protection of buffers zones for respective rivers as identified in the HCV assessment. Communications are made to all employees, contractors, suppliers and neighbors informing that encroachment and hunting are not allowed.</p> <p>There were programs held by the estates to all employees in pertaining to the awareness of HCV areas and RTE species. Interview with the employees concluded that training and briefing made during the ad hoc session and morning muster. This is also emphasized during the training held by SQM programs. Employees are aware of the following measures.</p> <p>a) An offence to capture, harm, kills any wildlife.</p> <p>b) Disciplinary measures shall be taken if found violating company rules.</p> <p>c) Riparian buffer zone to be free from any chemical's application/pollution</p> <p>Training in relation to the HCV management are provided to the employees as follows.</p> <table border="1"> <thead> <tr> <th></th> <th>Subject</th> <th>Holyrood</th> <th>Kalumpong</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Company Policies Briefing</td> <td>30/03/22</td> <td>17/03/22</td> </tr> <tr> <td>2</td> <td>RSPO Briefing to employees</td> <td>01/07/22</td> <td>07/02/22</td> </tr> <tr> <td>3</td> <td>Protection - HCV riparian zone</td> <td>30/03/22</td> <td>06/04/22</td> </tr> </tbody> </table>		Subject	Holyrood	Kalumpong	1	Company Policies Briefing	30/03/22	17/03/22	2	RSPO Briefing to employees	01/07/22	07/02/22	3	Protection - HCV riparian zone	30/03/22	06/04/22	
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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.</p> <p>a) Habitat protection includes prevention of disturbance by workers through awareness campaigns and regular patrols of the area.</p> <p>b) The estates have installed signboards at prominent areas to prohibit hunting, disturbance of protected areas and the lighting of</p>	Complied																

Criterion / Indicator		Assessment Findings	Compliance																		
		<p>fires.</p> <p>c) Inspection of housing areas and interview of residents confirmed workers were aware of the company policy that prohibits hunting and collecting activities.</p> <p>d) Monitoring is carried out by the security and staff in charge for the respective area.</p> <p>e) Sime Darby Plantation Berhad in addition established their own disciplinary measures if found any staff or workers found to capture, harm, collect or kill the RTE species in the estate.</p> <p>f) On-going monitoring for HCV areas for both Estates has been verified. The monitoring was conducted on monthly basis. Dates as sampled below</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Date</th> <th>Date</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kalumpong</td> <td>23/05/22</td> <td>11/04/22</td> <td>02/03/22</td> <td>16/02/22</td> </tr> <tr> <td>2</td> <td>Holyrood</td> <td>17/06/22</td> <td>13/05/22</td> <td>06/04/22</td> <td>16/03/22</td> </tr> </tbody> </table>		Estate	Date	Date	Date	Date	1	Kalumpong	23/05/22	11/04/22	02/03/22	16/02/22	2	Holyrood	17/06/22	13/05/22	06/04/22	16/03/22	
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Criterion 4.5.7: Zero burning practices																					
4.5.7.1	<p>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.</p> <p>- Major compliance -</p>	<p>The Group policy of "Zero open burning" is enforced since July 2008. The operating units adhered to the policy of "Zero open burning" for any replanting. Interviews with the workers there is no open burning being practiced in the estates. Both estates had replanting program spanned over the forthcoming years. Refer details in 4.6.2.2. In addition, Sime Darby Plantation assigned 1 person based in HQ being in charge to detect any open fire in the Company's fields using the Global Spot Watch.</p>	Complied																		

Criterion / Indicator		Assessment Findings	Compliance
		<p>There was no land preparation of existence or new planting in SOU 02 Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> EQMS-SOP-Section B2 - Under felling/clearing & land preparation Carbon Policy <p>As advocated, the estates practiced zero burning. All palms were felled, shredded, windrow-ed and left to decompose.</p>	
4.5.7.2	<p>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.</p> <p>- Major compliance -</p>	<p>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.</p>	N/A
4.5.7.3	<p>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.</p> <p>- Major compliance -</p>	<p>Since no special approval been obtained so far for burning, hence this requirement is not applicable.</p>	N/A
4.5.7.4	<p>Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.</p> <p>- Minor compliance -</p>	<p>This is included in the specification of work orders in event of land preparation during a replanting. It is a standard practice in Sime Darby Plantation. However, there are variations of practices between inland and coastal estates. Trunks are felled and chipped without having to shred and windrowed in certain conditions. Adjustment of work requirement are finalised from the directive of the replanting unit and the Region office.</p>	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			

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Criterion / Indicator		Assessment Findings	Compliance
4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>Estates has a SOP which is SOP EQMS, Pictorial safety Standard, Estate Quality Management System and Agricultural Manual reference. Manual that covered planting material, nursery technique, replanting and preparation, planting density, canopy management and etc. was available for verification. Agricultural Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units as a guidance document to conduct estate operation.</p> <p>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. Refer PA visit to Kalumpang Estate on 22-25/07/2022 with reference document NTR/SOU2/KPE/02-2022 and also Estate Structured Crop Recovery Assessment Report dated 04/07/2022. For Holyrood Estate, refer Estate Structured Crop Recovery Assessment Report dated 01/07/2022.</p> <p>Interview with workers and stakeholders confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.</p>	Complied
4.6.1.2	<p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has established policy on slope protection and documented in Slope and River Protection Policy signed by the Managing Director in Jan 2015.</p> <p>The policy stated for slope more than 25 degree must be exclude from any new plantation development and replanting program. All the existing crop and vegetation shall be maintained accordingly. All estates</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		had complied with this policy to not plant on slopes above 25° and Buffer Zone. The policy was communicated to the employee during master briefing, townhall training and displayed in several notice board in the estate.	
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	Estates audited had a visual identification/reference system for each established field/block and maps established. Field numbers and hectare were marked on palms and in some areas on signboards as sighted in the fields.	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 estates continued to achieve long term economic and financial viability through documented management plan projected to year 2025. Since there are no smallholders in this Business Unit, therefore a business case for scheme smallholders is not considered. a) A Management Plan including crop forecast, capital expenditure, operational expenditure, general charges, profit and loss covering the period of 2022 to 2026 had been prepared for all the estates as well as the POM and made available to the audit team. b) This plan had also included mature area and also for the forecasted FFB production per hectare for the period 2022 to 2026. c) All the estates had a standard budgeting format. The records were reviewed during the audit. The Business Plan also included a 5-year budget/forecast financial plan (i.e. 2022-2026) with allocation on the following: - Crop yielding area / Prime mature - Total mature / Cost/ha - General charges/upkeep/collection/depreciation	Complied

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		<ul style="list-style-type: none"> - CAPEX d) The component of the budget comprises of the following items; <ul style="list-style-type: none"> - Labour statement / Allocation of wages - Labour benefit summary / Labour reconciliation - Yield statement oil palm - Summary of vehicle and running schedule - Job allocation for vehicles / Summary of workshop running schedule - Summary if budget / Summary of general charges - CAPEX, oil palm mature and young mature <p>Format of estates summary expenditure is as per the following content. Figures for P/L were extracted out for reason of confidentiality.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Year - Kalumpang</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Mature Ha</td> <td>1925.28</td> <td>2138.54</td> <td>2086.47</td> <td>2088.51</td> <td>2064.81</td> </tr> <tr> <td>Immature Ha</td> <td>604</td> <td>390.74</td> <td>442.81</td> <td>440.77</td> <td>464.47</td> </tr> <tr> <td>Total Planted Ha</td> <td>2529.28</td> <td>2529.28</td> <td>2529.28</td> <td>2529.28</td> <td>2529.28</td> </tr> <tr> <td>FFB Tons</td> <td>37902</td> <td>44923</td> <td>47040</td> <td>48406</td> <td>48846</td> </tr> <tr> <td>Yield /Ha</td> <td>20.14</td> <td>21.01</td> <td>22.55</td> <td>23.18</td> <td>23.66</td> </tr> <tr> <td>RM/mt FFB</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM//Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> </tbody> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Year - Holyrood</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Mature Ha</td> <td>1132.37</td> <td>1169.39</td> <td>1222.28</td> <td>1211.90</td> <td>1204.49</td> </tr> <tr> <td>Immature Ha</td> <td>89.91</td> <td>52.89</td> <td>0.00</td> <td>10.38</td> <td>17.79</td> </tr> <tr> <td>Total Planted Ha</td> <td>1222.28</td> <td>1222.28</td> <td>1222.28</td> <td>1222.28</td> <td>1222.28</td> </tr> <tr> <td>FFB Tons</td> <td>26943</td> <td>28999</td> <td>30185</td> <td>30477</td> <td>30833</td> </tr> <tr> <td>Yield /Ha</td> <td>23.79</td> <td>24.80</td> <td>24.70</td> <td>25.15</td> <td>25.60</td> </tr> </tbody> </table>					Year - Kalumpang	2022	2023	2024	2025	2026	Mature Ha	1925.28	2138.54	2086.47	2088.51	2064.81	Immature Ha	604	390.74	442.81	440.77	464.47	Total Planted Ha	2529.28	2529.28	2529.28	2529.28	2529.28	FFB Tons	37902	44923	47040	48406	48846	Yield /Ha	20.14	21.01	22.55	23.18	23.66	RM/mt FFB	x	x	x	x	x	RM//Ha	x	x	x	x	x	Year - Holyrood	2022	2023	2024	2025	2026	Mature Ha	1132.37	1169.39	1222.28	1211.90	1204.49	Immature Ha	89.91	52.89	0.00	10.38	17.79	Total Planted Ha	1222.28	1222.28	1222.28	1222.28	1222.28	FFB Tons	26943	28999	30185	30477	30833	Yield /Ha	23.79	24.80	24.70	25.15	25.60	
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Criterion / Indicator		Assessment Findings					Compliance																		
		RM/mt FFB	x	x	x	x	x																		
		RM//Ha	x	x	x	x	x																		
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 –	<p>The replanting program for the 2 estates is compiled as follows. The program is reviewable on annual basis which is subject to amendment. All figures in ha otherwise stated.</p> <table border="1"> <thead> <tr> <th>Year</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>Kalumpong</td> <td>62.51</td> <td>166.03</td> <td>171.47</td> <td>166.78</td> <td>173.45</td> </tr> <tr> <td>Holyrood</td> <td>0</td> <td>0</td> <td>17.97</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p>Sizes of fields identified for replanting varies subject to factors i.e hilly, yield etc. All replanting program and planning in all the Group Estates are monitored by the Replanting Unit. Assistance and audit are performed as and when required and necessary.</p>					Year	2023	2024	2025	2026	2027	Kalumpong	62.51	166.03	171.47	166.78	173.45	Holyrood	0	0	17.97	0	0	Complied
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4.6.2.3	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment - Major compliance –	<p>The Business Management Plan also known as Projected Cash flow Statement contained the following details;</p> <p>a) FFB Crop Production and yield per ha b) Crop projection from 2022 until year 2026 c) Cost per mt FFB with estimated in 2022 RM/FFB d) Price forecast e) Financial indicators</p>					Complied																		
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	<p>This is reviewed on a monthly and annual basis.</p> <p>a) All estates performance is established in P/L report. However, this is limited to a higher-level management from RCEO/RGM and above.</p>					Complied																		

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Criterion / Indicator		Assessment Findings	Compliance
		b) The costing is provided in the estate’s monthly accounts. Variation if significant from the budgeted amount is justified with reasons.	
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance –	The documentation of price mechanism for services received from contractors are contained in the respective contracts. For transporter, the group procurement of SDP has revised the transportation rates as per memorandum dated 01/07/2022, “New Rates for Land Transportation Services for Sime Darby Plantation Berhad (SDPB) Palm Products (FFB, CPO and PK) in relation to working on Sundays, and Public Holidays” and acknowledged by all FFB transportation contractor as the estates.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Sample of contract between Sime Darby Plantation Berhad and contractor is available for verification as follow: Kalumpang Estate <ul style="list-style-type: none"> Contractor: YIH Construction Sdn. Bhd., Description: Replant Job Order on Land Preparation and Related Works for (Oil Palm) Replanting Field No: 2021A dated 01/12/2020 Field No: 2021B dated 01/05/2021 Field No: 2022A dated 27/12/2021 Contractor: JS Asas Maju Enterprise. Description: Rental of Lorry and Machineries (Agreement No: E162/2021/003) dated 01/06/2021. Rate agreed: IOM CEOUM/031/06/2021 – Fixed Contract Rates, 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Holyrood Estate</p> <ul style="list-style-type: none"> Contractor: Alfa Krian Enterprise, Resam Padu Enterprise, Description: Fresh Fruit Bunch Transportation Services for Sime Darby Plantation Berhad's Estates dated 22/01/2022 Contractor: Safwan PA Enterprise, Contract Description: <ul style="list-style-type: none"> Loose Fruit Loading from Platform including Transportation & LF Cleaning (Ref No: OPXHLE/E140/003/2020) dated 01/03/2022. Grass Cutting at Linesite Compound Main Division (Ref No: OPX/HLE/E140/001/2020) dated 01/03/2022 	
Criterion 4.6.4: Contractor			
4.6.4.1	<p>Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p>	<p>The contractors engaged by the estate management has signed on a letter with subject RSPO/ ISCC/ MSPO/ SCCS dated 02/01/2021. Briefing of sustainability were given to contractors on during LOA awards at estate office.</p> <p>Contractors was provided with "Kod Etika Kerja Vendor".</p> <p>Briefing on RSPO/MSPO requirements, reminder on ILO matters to contractor including contractor agreement, minimum wages, double pay, EPF contribution, SOCSO & EIS contribution, PPE and Grievance Channel (Suara Kami, Ulula & Whistle Blowing) was conducted at Holyrood Estate on 11/05/2022 and RSPO/MSPO Awareness training was conducted on 04/01/2022.</p>	Complied
4.6.4.2	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p>- Major compliance -</p>	<p>Sample of contract between SDP and contractor is available for verification as follow:</p> <p>Kalumpong Estate</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Contractor: YIH Construction Sdn. Bhd., Description: Replant Job Order on Land Preparation and Related Works for (Oil Palm) Replanting Field No: 2021A dated 01/12/2020 Field No: 2021B dated 01/05/2021 Field No: 2022A dated 27/12/2021 • Contractor: JS Asas Maju Enterprise. Description: Rental of Lorry and Machineries (Agreement No: E162/2021/003) dated 01/06/2021. Rate agreed: IOM CEOUM/031/06/2021 – Fixed Contract Rates, Holyrood Estate • Contractor: Alfa Krian Enterprise, Resam Padu Enterprise, Description: Fresh Fruit Bunch Transportation Services for Sime Darby Plantation Berhad’s Estates dated 22/01/2022 • Contractor: Safwan PA Enterprise, Contract Description: <ul style="list-style-type: none"> - Loose Fruit Loading from Platform including Transportation & LF Cleaning (Ref No: OPXHLE/E140/003/2020) dated 01/03/2022. - Grass Cutting at Linesite Compound Main Division (Ref No: OPX/HLE/E140/001/2020) dated 01/03/2022 	
4.6.4.3	<p>The management shall accept MSP0 approved auditors to verify assessments through a physical inspection if required.</p> <p>- Minor compliance -</p>	<p>All contractors shall provide access to the RSPO/ ISCC/ MSP0/ SCCS auditors to contractors’ operation site(s) and employees whenever deemed necessary. The contractors have agreed, understood, and acknowledged on the letter.</p> <p>Sighted evidence of agreement doc number RSPO/ISCC/MSP0/SCCS dated 01/01/2022.</p>	Complied

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 at the estates are checked and verified by the estate’s personnel. Projects where tenders are issued by HQ are checked by representative from HQ. Sime Darby Plantation Berhad has established “Contractor & Vendor Management Procedure” dated 17/11/2021. Estates has conducted “Contractor Key Performance Indicator (KPI) Evaluation on monthly basis and acknowledged by Estate Manager.	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			

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Criterion / Indicator		Assessment Findings	Compliance
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	There is no development of new planting at both visited estates.	N/A
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 / Indicator		Assessment Findings	Compliance
Criterion 4.7.4: Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	There is no development of new planting at both visited estates.	N/A
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			

Criterion / Indicator		Assessment Findings	Compliance
4.7.6.1	No new plantings are established on recognised customary land without the owners’ free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance -	There is no development of new planting at both visited estates.	N/A
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

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Criterion / Indicator		Assessment Findings	Compliance
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
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 Plantation Berhad 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 -	Internal audit for Chersonese POM was planned on yearly basis. Latest internal audit was conducted on 13/06/2022 has covered RSPO, MSPO and MSPO SCCS. Internal audit was conducted by	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Sustainability Compliance Unit, Group Sustainability Department (GSD).	
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	Sime Darby Plantation Berhad has established internal audit procedure and documented in SD/SDP/PSQM/IAP Rev 2 dated 01/11/2017. The audit results were documented in Internal System Audit Report Summary with total of 6 major and 1 minor nonconformances were detected. The NCR status, details of nonconformities raised, root cause, corrective action plan, evidence acceptance and NCR closed. All non-conformity raised during the audit has been addressed by the mill. Root cause analysis and correction and corrective action plan was submitted to the internal auditors for review and closed.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The RSPO + MSPO Internal Audit Report for SOU 2 Chersonese POM was acknowledged by Mill Manager on 13/06/2022 and discussed during management review meeting conducted on 18/07/2022.	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 -	Management review was planned on yearly basis. Latest management review for Chersonese POM was conducted on 18/07/2022. Meeting was chaired by the Mill Manager and attended by key personnel. Management review has discussed on issues as follow: <ol style="list-style-type: none"> 1. Review on previous MSPO/SCCS audit 2. Customer feedback 3. Process conformance & product conformity 4. Corrective/Preventive Actions 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		5. Action from previous management review 6. Changes affecting management system	
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 -	Chersonese POM is currently with a project of installation VORSEP - ESP Boiler station for the improvement relating to the pollution and energy conservation in the current financial year 2022. The project has yet to be commissioned entirely to the mill management. a) Projects in relation to the continual improvement are made through allocation in Capital Expenditure b) The mill in addition had the following plans of new infrastructure / facilities installation for the improvement relating to the environmental, process improvement pollution and energy conservation for current and forthcoming year 2022-2026.	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. a) Employees were briefed of any new development in basic understanding during the weekly briefings. b) The management team will be informed of such development during the monthly management meetings. c) Dissemination of information by the RCEO and RGM are transacted during the monthly Managers meetings and emails. d) The management continuously reviewed the estates performance and work method for a continual improvement to achieve better results.	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
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 adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (subsection 5.5, Appendix 5.5.3.2). The time frame to provide feedback to the stakeholder is documented to be 2 weeks of the date receiving the queries. The Mill Manager is responsible to address all communication and request for documentations that could be made available to public/stakeholders.	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 -	Sime Darby Plantation Berhad continued to use the group website for disseminating public information. The Sustainability Report and Group Annual report is available in website. Information relating to land titles, safety and health plans, pollution prevention plans, and annual report are available at the estate. In addition to the website, the policies were also displayed at various locations including the main notice boards of the estates and muster ground notice boards for employees and visitors to view. Procedure for complaints and grievances were available through Sime Darby Plantation Berhad website at: http://www.simedarbyplantation.com/Sustainability	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 Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues)	Complied

Criterion / Indicator		Assessment Findings	Compliance
		dated 01/11/2008 documented the process for handling communication regarding social issues.	
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	The Mill Manager are responsible to deal with the external stakeholders as stated in the procedure. However, Mill Manager has appointed Assistant Managers (Wan Ahmad Hafifuddin Bin Wan Sabri) were delegated to be responsible for issues related to Indicator as per appointment letter dated 01/05/2021 for Chersonese POM.	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance -	Latest list of stakeholders was updated on 01/01/2022 has included nearby village head (PSKT Kuala Gula), temple, surau, school, NUPW, AMESU, government agencies/authorities, embassy, nearby estates, vendors and customers. Meeting with stakeholders was conducted on 20/06/2022 and attended by representatives from BOMBA Kuala Kurau, Supplier, AMESU, school, Police Kuala Kurau and etc. Issues raised during stakeholder meeting was recorded such as stray dog population increased at Chersonese Mill and Estates and Police Officer Kuala Kurau has highlighted to be vigilant due to robbery cases especially at night.	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 -	Sustainability Supply Chain and Traceability Procedure has been established with reference number SD/SDP/GSD/SCCS/0522/01 dated 01/06/2022. The weighbridge ticket provided the following details: <ul style="list-style-type: none"> - Supplied from which estate - Product (FFB or Loose fruit) 	Complied

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		<ul style="list-style-type: none"> - Delivery note from estates stating the weight and fruit grade (A or B). - D.O Number - Weight of the shipment - Date of the shipment <p>For despatch of CPO & PK, the weighbridge ticket includes the following information to enable the customer to trace the CPO source: -</p> <ul style="list-style-type: none"> - Customer Name - Destination of the CPO - Product - DO number - PO number - Weight of the product. 	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The procedure had identified critical control points to prevent contamination of non-certified FFB. The current traceability system is Sime Weigh System.	Complied
4.2.3.3	The management shall identified and assign suitable employees to implement and maintain traceability system. - Minor compliance -	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, mill has assigned person in charge for Environmental / Quality Management System to Mr Mohd Ridhwan Ravindran dated 01/07/2020.	Complied
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	Complied

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Criterion / Indicator		Assessment Findings	Compliance																														
		<p>CPO/PK Despatch Summary Logbook) were maintained based on Standard Operating Procedure. Sample of ticket as below: -</p> <table border="1"> <thead> <tr> <th>CPO</th> <th>Sample 1</th> <th>Sample 2</th> </tr> </thead> <tbody> <tr> <td>Date</td> <td>26/07/2022</td> <td>26/04/2022</td> </tr> <tr> <td>Chit No.</td> <td>014777</td> <td>014466</td> </tr> <tr> <td>Lorry No.</td> <td>CEM2526</td> <td>CEH2526</td> </tr> <tr> <td>Weight, MT</td> <td>40.25</td> <td>39.94</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>PK</th> <th>Sample 1</th> <th>Sample 2</th> </tr> </thead> <tbody> <tr> <td>Date</td> <td>18/07/2022</td> <td>18/04/2022</td> </tr> <tr> <td>Chit No.</td> <td>014744</td> <td>014435</td> </tr> <tr> <td>Lorry No.</td> <td>PNV9989</td> <td>PKV5591</td> </tr> <tr> <td>Weight, MT</td> <td>39.29</td> <td>41.37</td> </tr> </tbody> </table>	CPO	Sample 1	Sample 2	Date	26/07/2022	26/04/2022	Chit No.	014777	014466	Lorry No.	CEM2526	CEH2526	Weight, MT	40.25	39.94	PK	Sample 1	Sample 2	Date	18/07/2022	18/04/2022	Chit No.	014744	014435	Lorry No.	PNV9989	PKV5591	Weight, MT	39.29	41.37	
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4.3 Principle 3: Compliance to legal requirements																																	
Criterion 4.3.1 – Regulatory requirements																																	
4.3.1.1	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>Chersonese POM had continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and SQM sustainability team. Mill had obtained and renewed license and permits as required by the law. Last update on 20/07/2022. Among others the licenses/permit viewed were: -</p> <ol style="list-style-type: none"> MPOB License #533667104000 valid from 01/11/2021 to 21/10/2022 Environmental Prescribed Premises (POME) #004229 valid from 01/07/2022 to 30/06/2023 	Complied																														

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Criterion / Indicator		Assessment Findings	Compliance
		3. Environmental Prescribed Premises (Stack Emission) #005448 valid from 01/08/2021 to 31/12/2021 (Renewal Process) 4. Diesel Permit (9100 liters) #A000754 valid from 14/12/2021 to 13/12/2022 5. Private Electrical Installations #2022/54643 valid from 12/03/2022 to 11/03/2023 6. Measurement & Weighing Certificate #D018796 valid from 06/01/2022 to 06/01/2023 7. Measurement & Weighing Certificate #D019127 valid from 08/02/2022 to 08/03/2023 8. Air compressor #PK PMT 82467 valid until 27/06/2023 9. Air Receiver Tank #PKPMT 83219 valid until 23/08/2023 10. Thermal Deaerator #PK PMT 80880 valid until 27/06/2023	
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -	Documented procedure has 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. The mill has established list of all relevant laws and requirement and documented in Legal and Requirement Register. The list was updated on annually basis or new updates on the register. Latest updated on 15/07/2022. Among the new LRR were: 1. Perintah Pencegahan dan Pengawasan Penyakit Berjangkit Peraturan-Peraturan Pencegahan Pengawasan Penyakit berjangkit (Pindaan 2020) 2. Workers Minimum Standard of Housing and Amenities (Amendment) Act 2019	Complied

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		3. Minimum Wages Order (Amendment 2022) 4. Occupational Safety and Health (Noise Exposure) Regulation 2019 5. Pesticide (Amendment of First Schedule) Order 2019.	
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	<p>A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU8. PSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance. 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> <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 been well implemented. E.g. regular notification by Head Office and regular updates from the DOE/DOSH websites as well as from MAPA circulars.</p>	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - Minor compliance -	Management has assigned person responsible to compliance of Law and Regulation. Refer appointment letter person in charge for Environmental / Quality Management System to Mr Mohd Ridhwan Ravindran dated 01/07/2020.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	Chersonese POM is operating on a legal land right and not diminishing land rights of other parties supported by the results of documentations and stakeholder consultation i.e dated 20/06/22 and 11/05/21 (Remote via feedback mode).	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	The following land title is applicable to Chersonese POM situated in Chersonese Estate as the host estate. a) Grant number 71380 - File No PTG.PK.33/9-109 b) Lot 4647 - 652.1 ha c) registered to Sime Darby Plantation Sdn Bhd - now known as Sime Darby Plantation Berhad effective 26/04/1993.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Fencing parameters established around the mill building complex to separate the management boundary of estate and the mill. The housing and other recreational facilities are located within the same vicinity for ease of employees' management.	Complied
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no claim nor disputes recorded/received since the commissioning of the property to date concluded from the verification of documentations and stakeholder consultation. There is a procedure documented to address any issues pertaining to any claim via Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
Criterion 4.3.3 – Customary rights			

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Criterion / Indicator		Assessment Findings	Compliance
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. - Major compliance -	There is no evidence that the land on which the Mill is situated is encumbered by customary rights.	N/A
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Social impacts were identified based on the Social Impact Assessment as documented in the SIA Report SOU 2 Chersonese; Assessment Date: 14-17/6/2015; Assessment by Sustainability Strategy Unit PSQM Department. Based on the assessment, management plan was established with annual review upon consultation with relevant stakeholders. Social Management & Action Plan FY2022 was updated and acknowledged by Mill Manager with issues identified from feedback received during stakeholder consultation, EWC meeting, Suara Kami and etc such as low water pressure supply to mill's housing complex, stray dogs, deficient road conditions at housing complex, installation of mosquito netting for Mill's staff & NCS housing complex.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>A Standard Operating Manual (SOM) was established and maintained. (Sime Darby Plantation Estate Quality Management System) and system for dealing with complaints and grievance was defined in Sub-section 5.5 Management Responsibility, Appendix 5.5.3.2 Procedure for External Communication, version 2, issue 0, dated 25/5/2015.</p> <p>The complaints and grievances are open to effected parties including internal and external stakeholders. The time frame to deal with external communications should be within two weeks of the date of receipt for communication requiring direct feedback (Clause 6.3 of the procedure) and within one week of the completion of the investigation, for communication required investigation.</p> <p>Grievance channels was stated in the employment contract (Item 21) as follows: -</p> <ul style="list-style-type: none"> • Union representative at operating unit. • Worker’s helpline at 0162991411 (via WhatsApp) and call toll free number 1800819741. • Suara Kami at 1800818771 or SMS 01130116031. • Whistleblowing channel at 1800223388 or +60192797553 (08.30 am – 17.30 pm) or email to whistleblowing@simedarbyplantation.com 	<p>Complied</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>Based on complaints record on housing defects received through OPP application, it was verified that all complaints and action able to be resolved in effective, timely and appropriate manner.</p>	<p>Complied</p>

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		Verification of resolution by the Assistant Manager and Manager sighted. Social dialogue, Gender Committee, Union meeting and OSH Committee meeting also recorded any resolution for workers concern or disputes.	
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	Complaint forms or logbook is available for external stakeholder. However, workers can make complaints via mobile apps (Oil Palm Poll) to record any defects related to housing facilities. Social dialogue, Gender Committee, Union meeting and OSH Committee meeting also recorded any resolution for workers concern or disputes.	Complied
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -	Based on interview with the stakeholders such as contractors, local communities and workers, it has shown that the stakeholders are aware of how to forward their complaints or suggestions. Employees are aware that complaints can be made through "Suara Kami" & Worker helpline - Ulula portal (toll free – 1800819741 or Whatsapp +60162991411 for grievance), Whistleblowing (through website) "Oil Palm Poll (OPP)", communication book/morning briefing and Social Dialog.	Complied
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	Record review found that previous complaints and requests including the resolution for the past 24 months were still available to affected stakeholders upon request.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of	Chersonese POM management has contributed to local development in consultation with local communities. SOU 2 has	Complied

Criterion / Indicator		Assessment Findings	Compliance
	plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance -	organized cleaning activities at Ban Pecah, Tanjung Piandang on 15/07/2022 with participation from all estates and POM.	
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. - Major compliance -	Sime Darby 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. The GSM team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition. Chersonese POM has established Safety and Health Management Plan and documented in Environment, Safety and Health Plan FY 2022. The management plan includes the ESH risk management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring and Health monitoring.	Complied
4.4.4.2	The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: ii. All employees involved are adequately trained on safe working practices;	The occupational safety and health plan cover the following: a) Sime Darby Plantation Berhad have established the Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 01/06/2020. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the mill. The policy has been briefed to all workers on 14/06/2022. b) OSH Risk Management Procedure has been established with reference number UM/HSE/SP/01 dated 09/03/2021. HIRARC	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<ul style="list-style-type: none"> iii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements. g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept and the concerns of employees and any remedial actions taken shall be recorded. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite. 	<p>was available for all operations within the Mill to identify the hazards, assess and recommended control measures to minimize the risks. Among the HIRARC sampled were Boiler Operation dated 24/11/2021, Sterilizer Operation dated 24/11/2021, and Nut & Kernel Recovery dated 24/11/2021.</p> <p>Chemical Health Risk Assessment (CHRA) was conducted in compliance with Occupational Safety and Health (USECHH) regulation 2000 on 24/02/2020 by DOSH Registered Assessor, Hj Shaari Chin (HQ/09/ASS/00/124) with the CHRA Report available for verification. The CHRA Report (Report Ref Number: HQ/09/ASS/00/124 – 2020/0017) was available for verification.</p> <p>Medical Surveillance was not required as per recommendation by the CHRA Assessor however mill has conduct monthly health monitoring by the Hospital Assistant. In addition, additional chemical exposure monitoring has been done. Refer Report of Additional Personal Chemical Exposure Monitoring dated 30/06/2022 by Renzo Ventures. LEV inspection has been done. Refer Engineering Control Examination Report, Periodic Inspection, Examination and Testing dated 27/04/2022 by Renzo Ventures.</p> <p>Noise Risk Assessment was conducted by Earwright Services & Consultants on 29/01/2020 for Chersonese POM by a Noise Risk Assessor, Mr Sugunish A/L Sukumaran (NRA Reg: HQ/18/PEB/00/00026). The NRA Report (Ref. No: HQ/18/PEB/00/00026-2020/007) was available for verification.</p> <p>Annual & Baseline Audiometric Testing was conducted for the year of 2022 for all workers exposed to excessive noise in the mill by Klinik Vijay Sdn Bhd. Refer Baseline and Annual</p>	

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<p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>Audiometric Testing with reference number AUD/0322/098 dated 28/03/2022. 43 workers were examined, and result indicates that 24 workers have normal result, 10 workers fall under hearing impairment and noise induced hearing loss and 1 worker fall under Standard Threshold Shift. Medical examination and retest have been conducted on 24/06/2022 and report was yet to receive.</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 representative form the chemical suppliers to the supervisors and operators.</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 the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation. Refer inventory of Safety Equipment as June 2022.</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. SDS were placed at the chemical store.</p> <p>f) The Mill Manager, Mr Mohd Riza Mohd Arif was appointed to be the Chairman of OSH Committee at the Mill as stated in the appointment letter dated January 2021 undersigned by the Regional CEO Northern Region. Estate management has appointed Safety Committee Members consists of OSH</p>	

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	<p>Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Mill Manager.</p> <p>g) The Mill Management conducted regular OSH committee meetings on quarterly basis and when necessary due to accidents that occur. 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 inspection, legal compliance, safety and health training. Refer OSH Minutes of as below:</p> <table border="1" data-bbox="1137 767 1848 938"> <thead> <tr> <th>OSH Meeting</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>2nd Quarter 2022</td> <td>25/05/2022</td> </tr> <tr> <td>1st Quarter 2022</td> <td>25/02/2022</td> </tr> <tr> <td>4th Quarter 2021</td> <td>10/11/2021</td> </tr> <tr> <td>3rd Quarter 2021</td> <td>10/08/2021</td> </tr> </tbody> </table> <p>h) Accident and emergency procedures are available in the ESH Management System Manual; Emergency Preparedness & Response Guidelines and Procedures; Doc No: SD/SDP/SQM (ESH)/001-2-6; Revision: 0; Date 01/07/2012. The mill has established Emergency Response Team lead by the Mill Engineer. ERP Training has been conducted on 02/02/2022 and 21/07/2022.</p> <p>i) First aiders were present at various workstations at the mill such as ramp, boiler station and workshop. The first aiders were responsible for first aid box at each workstation assigned to them by the management. The first aid box was recently replenished with records of monthly monitoring available for verification. The latest First Aid Training was conducted on</p>	OSH Meeting	Date	2 nd Quarter 2022	25/05/2022	1 st Quarter 2022	25/02/2022	4 th Quarter 2021	10/11/2021	3 rd Quarter 2021	10/08/2021	
OSH Meeting	Date											
2 nd Quarter 2022	25/05/2022											
1 st Quarter 2022	25/02/2022											
4 th Quarter 2021	10/11/2021											
3 rd Quarter 2021	10/08/2021											

Criterion / Indicator		Assessment Findings	Compliance
		<p>12/11/2021.</p> <p>j) Accident records are recorded and maintained in the mill and discussed during the quarterly held JKPP Meetings. There were 7 reported accidents for the year 2021 in the workplace involved 54 LTA. The accident investigation report was available for verification. Sighted the JKPP 8 form submission to JKPP for the year 2021 as well, submitted on 28/01/2022 with reference number JKPP8/111091/2021. The JKPP6 forms have been submitted to DOSH accordingly and were available for verification.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has established Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) last revised 2020.</p> <p>Besides, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/03/2020. Sime Darby Plantation respect and safeguard human rights, notion of democracy and its institution. They recognize that Human Rights Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with SDP.</p> <p>The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the POM.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<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>Sime Darby Plantation Berhad has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They promote diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity union membership, political affiliation or age.</p> <p>The policy has been briefed to all the employees and stakeholders. The policy could be downloaded from Sime Darby Plantation Berhad website.</p>	<p>Complied</p>
<p>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.</p> <p>- Major compliance -</p>	<p>Employment contracts and offer letters for local workers and foreign workers is available. Pay and conditions are documented and achieved the Minimum Wage Order 2022. Sampled of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Employment Act 1955 which have been signed by the worker.</p> <p>Sampled of pay slips for December 2021, February 2022 and May 2022 found that all the workers were paid according to Minimum Wages Order 2022.</p> <p>Samples of pay slip verified is as follows: Employee ID: 26709, 26741, 52708, 148195, 149105, 162552, 163713, 164543, 165061, 168801, 170349, 166018, 26667, 26735, 164608.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>Employment contract between the contractors and their workers have been made available to the audit team. It was confirmed that the pay for the contractor’s worker has meet the Minimum Wages Order 2022.</p> <p>Sample of contractor workers payslips verified such as for contractor: Dynamic Attraction Enterprise - Employee ID: 021021-08-XXXX, 021113-08-XXXX, 021025-08-XXXX, 010929-08-XXXX, 011015-08-XXXX.</p>	Complied
4.4.5.5	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The estates’ management has registered all their workers into Employee Master Details Listing in SEMUA system where personal details such as full name, gender, date of birth, date join company, race, designation and wages were recorded.</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>The mill management only employed local workers. They are all under direct employment to the estates. Sampled of employment contracts and all of them have signed on the employment contract prior to work and extension contract where the original contract has expired. Terms and conditions were according to Collective Agreement and Employment Act 1955.</p>	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p>- Major compliance -</p>	<p>Mill Daily Attendance Report updated on monthly basis to record the number of days work, shift and hours of overtime work. The report was generated from the daily data recorded in punch card.</p>	Complied
4.4.5.8	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective</p>	<p>Interviewed with the workers confirmed that they were given rest time in between of the working hours. Overtimes were paid</p>	Complied

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	<p>agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p>- Major compliance -</p>	<p>according to the rate stated in the agreement and regulatory requirements. The overtime offered upon mutually agreement.</p>	
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p>	<p>Pay slips of all employees (check roll) are available as evidence of salary payment. The pay slip contains the following information:</p> <ol style="list-style-type: none"> 1. Earnings - Basic Salary (Daily Rated Work, Work on Rest Day and Work on Holiday), Overtime (Weekdays, Rest days and Holiday). 2. Deduction - Union fee (NUPW & AMESU), SOCSO, EPF, electricity deduction and others. <p>Observed that the wages and overtime payment documented on the pay slips are in line with legal requirement and as stated in the employment contract. Sighted and verified the sampled of payslip for employee with ID no. for the month of December 2021, March 2022 and May 2022 as follows:</p> <p>Employee ID: 26709, 26741, 52708, 148195, 149105, 162552, 163713, 164543, 165061, 168801, 170349, 166018, 26667, 26735, 164608.</p>	Complied
4.4.5.10	<p>Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.</p> <p>- Minor compliance -</p>	<p>All the workers and their family are provided with free housing facilities and free medical facilities. The workers are entitled with allowance based on the work such as phone allowance of RM5 per month, price bonus, free water up to 35 gallons per employee per day, 10kg of rice once in every two months.</p>	Complied
4.4.5.11	<p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p>	<p>Based on document checking and interview with the worker, confirmed that the estates provide adequate housing, water supplies, medical, educational and welfare amenities in accordance</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446). There is on-going upgrading of housing. Water is supplied to workers housing through LAP piping while electricity is via TNB grid supply. Access to food supply for the workers are considered adequately and sufficiently as the estate is very near to the town.</p> <p>Line site inspection was done weekly by Executive and recorded in the logbook. Weekly summary reported via checklist for Mill housing inspection - Housing complex/NEST/Community Hall Inspections records shown latest inspection done by Medical Assistant or appointed person in charge.</p>	
4.4.5.12	<p>The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad maintained its Human Rights Charter where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They seek to create a working environment with zero tolerance for sexual harassment and abuse and in which violence is never used to resolve issues or conflict.</p> <p>Sime Darby Plantation Berhad has implemented Sexual Harassment Policy dated 01/11/2019 signed by Mr Mohamad Helmy Othman Basha, Group Managing Director Sime Darby Plantation Berhad. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate.</p> <p>Gender Committee meeting for SOU level (SOU 02) was conducted on 27/06/2022, 27/04/2022 and meeting for Mill level was conducted on 12/04/2022.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Training on Sexual Harassment for management level was conducted on 09/03/2022 and Briefing on Gender Representative was conducted on 02/03/2022.	
4.4.5.13	<p>The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They respect the rights of their employees to form and join unions and bargain collectively.</p> <p>Sime Darby Plantation Berhad has implemented The Group Sustainability & Quality Policy Statement which signed on 02/12/2019 where the management is respecting Freedom of Association. Sighted Human Right Charter Revised 2020 has been established to cover on Human Right consist of Preamble, Scope, Commitments, Approach, Implementation and Responsibilities & Reporting. Refer section 3.2 stated respect the rights of employees to join and form organizations of their own choice and to bargain collectively.</p> <p>Meeting with AMESU/NUPW representatives were conducted on 23/05/2022 and issues raised such as installation of mosquito's netting and clothes hangar, unsatisfactory grass cutting and fogging by vendors, road condition and low water pressure has been updated in the Social Management & Action Plan.</p>	Complied
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																												
		the United Nations Guiding Principles on Business and Human Rights. They recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography. They are eradicating child labour in all their supply chain and not employ anyone underage of 18 years.																													
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 -	Chersonese POM has established a training program for all workers based on the training need analysis conducted on a yearly basis. Records of trainings were maintained by the estates as below: - <table border="1" data-bbox="1086 810 1841 1284"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Roles and Responsibility SHC Committee</td> <td>22/03/2022</td> </tr> <tr> <td>Backhoe and Loader Training</td> <td>02/30/2022</td> </tr> <tr> <td>Training at Height</td> <td>26/01/2022</td> </tr> <tr> <td>Contractor & Vendor Training</td> <td>13/01/2022</td> </tr> <tr> <td>Policy Briefing</td> <td>14/06/2022</td> </tr> <tr> <td>LOTO Briefing</td> <td>25/04/2022</td> </tr> <tr> <td>Total Productive Maintenance Training</td> <td>22/04/2022</td> </tr> <tr> <td>Schedule waste refresher training</td> <td>23/07/2022</td> </tr> <tr> <td>RSPO, MSPO, SCCS Refresher Training</td> <td>20/07/2022</td> </tr> <tr> <td>Palm GHG Training</td> <td>28/06/2022</td> </tr> <tr> <td>First Aid Training</td> <td>12/11/2021</td> </tr> <tr> <td>ERP Training</td> <td>02/02/2022</td> </tr> <tr> <td>Emergency Drill Training</td> <td>21/07/2022</td> </tr> </tbody> </table>	Training	Date	Roles and Responsibility SHC Committee	22/03/2022	Backhoe and Loader Training	02/30/2022	Training at Height	26/01/2022	Contractor & Vendor Training	13/01/2022	Policy Briefing	14/06/2022	LOTO Briefing	25/04/2022	Total Productive Maintenance Training	22/04/2022	Schedule waste refresher training	23/07/2022	RSPO, MSPO, SCCS Refresher Training	20/07/2022	Palm GHG Training	28/06/2022	First Aid Training	12/11/2021	ERP Training	02/02/2022	Emergency Drill Training	21/07/2022	Complied
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4.4.6.2	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	Chersonese 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	Complied																												

Criterion / Indicator		Assessment Findings	Compliance
	employees based on their job description. - Major compliance -	required by the job type. Sighted the Training Requirement for Strategic Operating Units Chersonese POM for the year 2022 for verification.	
4.4.6.3	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. - Minor compliance -	A training programme has been developed and available in the Training Requirement for Chersonese POM ESH Activities for 2022. The trainings were sighted to have also included Gender Specific Training and involves staffs, workers, and contractors.	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	There is an Environmental Management Policy was signed by the Chief Operation Officer Upstream Malaysia in June 2020 and displayed prominently on notice boards in English and local language Bahasa Malaysia. Therein the policy among others states that the Company is committed to protecting the environment and conserving biodiversity through sustainable development. This is policy is prominently displayed in the office along with other Company's Policies.	Complied
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations - Major compliance -	The Environmental Policy has been established as described in 4.5.1.1 above. The objectives of the environmental management plan among others include the following; <ul style="list-style-type: none"> • Implement and comply all prevailing statutory environmental laws • Plantation development emphasizing zero burning practices. • Compliance of DOE - to minimize pollution of land/water/air 	Minor Non-Conformities

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Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> • To control and practice GAP systems in both mineral/peat soils. • Identification of HCV and preserving riparian zones. <p>The environmental aspects and impact evaluation covers the following areas/activities among others;</p> <ul style="list-style-type: none"> • Boiler operation • Power generation • Crude palm oil storage leakage and spillage • Effluent pond ruptured • Process operations and workshop activities. <p>The plans and impact assessments relating to environmental impacts based on documents for both estates and the mill are elaborated in the following records:</p> <ul style="list-style-type: none"> • Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, (version 1; year 2008 Issue no. 1; dated 1 April 2009 Register) • Appendix 5.4.1c - Environmental Aspect and Impact Identification form (version 1; year 2008 Issue no. 1; dated 1 April 2009; MR-01/EAI) • Appendix 5.4.1d – Environmental Impacts Evaluation form(version 1; year 2008 issue no. 1; dated 1 April 2009; MR-02/EIE) <p>The latest register being reviewed dated 19/01/2022 to include the following changes and continued being formalised for 2022.</p> <p>The FFB oil dripping sourced from the old FFB crop was not identified/listed in the environmental impact assessment. The mill EIA was compiled in the "Environmental Aspects and Impact</p>	

Criterion / Indicator		Assessment Findings	Compliance																		
		Identification Form ref serial no EAI/2012-13/002/B annually reviewed recent on 19/01/2022. During site visit it was noticed that there were traces of FFB oil dripping/spillages dripping from FFB old crop underneath the ramp hopper onto the concrete ground. The perimeter drain within the vicinity is also silted with palm fruitlet and debris. However, these issues were not described in the EIA Impacts. Thus, Minor NC was raised.																			
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 -	<p>This plan is available and updated for the FY 2022. The environmental issues for improvement outlined by the mill are shown below.</p> <table border="1"> <thead> <tr> <th></th> <th>Environmental issues</th> <th>Mitigating Measures</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Meet new regulatory requirement of <15% boiler emission</td> <td>Need to install new dust collecting system to reduce from 40% to 15%.</td> </tr> <tr> <td>2</td> <td>Solids from effluent pond</td> <td>Disposed as fertilizer dry basis upon deslugged</td> </tr> <tr> <td>3</td> <td>Leachate into estate trench</td> <td>Drainage system being monitored and ensure proper application of EFB - pumping into effluent pond</td> </tr> <tr> <td>4</td> <td>To avail min 2 competent persons for POME & SW</td> <td>Currently with competent personnel in view of transfer and retirement. Liaison with DOE for to comply by 2021.</td> </tr> <tr> <td>5</td> <td>To comply with Clean Air Regulations 2014</td> <td>To improve boiler air emission through equipment of new technology VORSEP</td> </tr> </tbody> </table> <p>All actions are to be monitored on the indicated frequency shown in the plan.</p>		Environmental issues	Mitigating Measures	1	Meet new regulatory requirement of <15% boiler emission	Need to install new dust collecting system to reduce from 40% to 15%.	2	Solids from effluent pond	Disposed as fertilizer dry basis upon deslugged	3	Leachate into estate trench	Drainage system being monitored and ensure proper application of EFB - pumping into effluent pond	4	To avail min 2 competent persons for POME & SW	Currently with competent personnel in view of transfer and retirement. Liaison with DOE for to comply by 2021.	5	To comply with Clean Air Regulations 2014	To improve boiler air emission through equipment of new technology VORSEP	Complied
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4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	This is available as elaborated in indicator 4.5.1.3 above. Improvement planned for both short and long terms are detailed along with the identified issues.	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 -	<p>A training program is available in the SOU 02 Program updated on a yearly basis or revised as per the management requirement. Programs in relation to environmental among others as follows;</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Subjects</th> <th colspan="3">Month</th> </tr> <tr> <th>1-4</th> <th>5-8</th> <th>9-12</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>ESH Legal & Other requirements</td> <td>/</td> <td></td> <td></td> </tr> <tr> <td>2</td> <td>ER Plan Chemical spill, Fire. Lightning)</td> <td>/</td> <td></td> <td>/</td> </tr> <tr> <td>3</td> <td>Scheduled waste management</td> <td>/</td> <td>/</td> <td></td> </tr> <tr> <td>4</td> <td>Policy Training</td> <td>/</td> <td></td> <td>/</td> </tr> <tr> <td>5</td> <td>Effective workplace inspection</td> <td></td> <td>/</td> <td>/</td> </tr> <tr> <td>6</td> <td>GAP training / SW</td> <td>/</td> <td>/</td> <td>/</td> </tr> <tr> <td>7</td> <td>HCV Training for Region</td> <td></td> <td>/</td> <td>/</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th colspan="3">Training Sessions</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>13/01/22</td> <td>Environmental briefing to vendors / contractors</td> </tr> <tr> <td>2</td> <td>03/02/22</td> <td>Sludge oil recovery system</td> </tr> <tr> <td>3</td> <td>20/02/22</td> <td>Chemical handling</td> </tr> <tr> <td>4</td> <td>23/07/22</td> <td>Scheduled Waste Management</td> </tr> <tr> <td>5</td> <td>28/06/22</td> <td>Palm GnG - Understanding</td> </tr> <tr> <td>6</td> <td>23/09/21</td> <td>EIA/EIE awareness</td> </tr> </tbody> </table>		Subjects	Month			1-4	5-8	9-12	1	ESH Legal & Other requirements	/			2	ER Plan Chemical spill, Fire. Lightning)	/		/	3	Scheduled waste management	/	/		4	Policy Training	/		/	5	Effective workplace inspection		/	/	6	GAP training / SW	/	/	/	7	HCV Training for Region		/	/	Training Sessions			1	13/01/22	Environmental briefing to vendors / contractors	2	03/02/22	Sludge oil recovery system	3	20/02/22	Chemical handling	4	23/07/22	Scheduled Waste Management	5	28/06/22	Palm GnG - Understanding	6	23/09/21	EIA/EIE awareness	Complied
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4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	The forum used in discussing environmental issues are the quarterly OSH meeting and the annual management review meeting (dated 18/07/2022). The latter emphasized more on issues	Complied																																																																

Criterion / Indicator		Assessment Findings				Compliance												
		on water management plan, electricity use, diesel consumption, waste management, SIA plan, renewable energy, aspect/impact. <table border="1"> <tr> <td colspan="4">ESH Meeting</td> </tr> <tr> <td>1</td> <td>19/07/22</td> <td>3</td> <td>25/01/22</td> </tr> <tr> <td>2</td> <td>19/04/22</td> <td>4</td> <td>19/10/21</td> </tr> </table> The Environmental Performance Monitoring Committee is setup to comply with the DOE requirement of Guidance Self-Regulation (GSR). The meeting it to review environmental performance within the POM.				ESH Meeting				1	19/07/22	3	25/01/22	2	19/04/22	4	19/10/21	
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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 -	A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2021. The document was reviewed/updated on Jan 2022. The Environment Management Plan for efficiency of fossil fuel usage are detailed below: <table border="1"> <thead> <tr> <th></th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Backhoe tractor/ front loader</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel</td> </tr> <tr> <td>2</td> <td>Van/ Supervisory vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel</td> <td>To record vehicle activity in order to eliminate waste activity which consume fuel.</td> </tr> </tbody> </table>					Target	Objective	Action plan	1	Backhoe tractor/ front loader	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel	2	Van/ Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel	To record vehicle activity in order to eliminate waste activity which consume fuel.	Complied
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			using mobile equipment	To turn off vehicle engine during idle time.																																																											
		3	Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources																																																										
		<p>The utilization of fossil fuel in 2021 - total 24596 liters is being monitored with records shown below: Baseline is 0.25.</p> <table border="1"> <thead> <tr> <th>Mth</th> <th>Diesel L</th> <th>FFB mt</th> <th>Diesel/FF B</th> <th>Mth</th> <th>Diesel L</th> <th>FFB mt</th> <th>Diesel/FF B</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>1536</td> <td>11338</td> <td>0.13</td> <td>July</td> <td>2461</td> <td>15374</td> <td>0.16</td> </tr> <tr> <td>Feb</td> <td>2128</td> <td>14147</td> <td>0.15</td> <td>Aug</td> <td>2215</td> <td>15716</td> <td>0.14</td> </tr> <tr> <td>Mac</td> <td>2429</td> <td>15876</td> <td>0.15</td> <td>Sep</td> <td>2313</td> <td>13629</td> <td>0.17</td> </tr> <tr> <td>Apr</td> <td>1857</td> <td>15881</td> <td>0.12</td> <td>Oct</td> <td>2270</td> <td>13184</td> <td>0.17</td> </tr> <tr> <td>May</td> <td>2207</td> <td>14844</td> <td>0.15</td> <td>Nov</td> <td>1625</td> <td>10531</td> <td>0.15</td> </tr> <tr> <td>Jun</td> <td>1981</td> <td>14969</td> <td>0.13</td> <td>Dec</td> <td>1674</td> <td>9449</td> <td>0.18</td> </tr> </tbody> </table> <p>The monitoring is recorded in environment performance indicator-electricity generated by steam turbine tabulated for the financial year 2022. It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt FFB. A monthly record on energy consumption for both renewable and non-renewable sources were also maintained and documented. It is monitored to optimize use of renewable energy. The data is compiled for comparison and control for future improvement with aim of gradual reduction particularly diesel.</p> <p>Diesel consumption & ratio diesel used /mt FFB (Baseline set at 0.25)</p>						Mth	Diesel L	FFB mt	Diesel/FF B	Mth	Diesel L	FFB mt	Diesel/FF B	Jan	1536	11338	0.13	July	2461	15374	0.16	Feb	2128	14147	0.15	Aug	2215	15716	0.14	Mac	2429	15876	0.15	Sep	2313	13629	0.17	Apr	1857	15881	0.12	Oct	2270	13184	0.17	May	2207	14844	0.15	Nov	1625	10531	0.15	Jun	1981	14969	0.13	Dec	1674	9449	0.18
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Criterion / Indicator		Assessment Findings	Compliance								
		<p>Variation of ratio in the analysis were explained and justified. Under the energy management plan 2022 the mill aimed for reduction plan among others;</p> <ul style="list-style-type: none"> • Educate workers on fuel saving practice • Avoid leakages during vehicles maintenance. 									
4.5.2.2	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p>- Major compliance -</p>	<p>The 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 in all transport and machinery operations was available in the yearly budgets.</p>	Complied								
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p>	<p>The fiber and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fibre are delivered to estates for multi purposes or sold to outside buyers. EFB is used in the estates for mulching. Details of renewable energy fibre/shell used in the mill are shown in 4.5.2.2 above. The long term planning for biogas implementation was reviewed to stand similar with other sister mills in the Group. The recovered biogas will be used for energy generation (e.g. steam & electricity)</p>	Complied								
Criterion 4.5.3: Waste management and disposal											
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>All waste and pollution are identified and documented in the Waste Management Plan for Financial Year 2022. The waste generated from the mill operations as shown below;</p> <table border="1"> <thead> <tr> <th></th> <th>Waste</th> <th>Item</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled Waste</td> <td>Spent lubricants/ hydraulic oil</td> <td>Workshop activities</td> </tr> </tbody> </table>		Waste	Item	Sources	1	Scheduled Waste	Spent lubricants/ hydraulic oil	Workshop activities	Complied
	Waste	Item	Sources								
1	Scheduled Waste	Spent lubricants/ hydraulic oil	Workshop activities								

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Criterion / Indicator		Assessment Findings			Compliance								
			Used batteries/ used rags/ empty containers	Workshop activities									
			Hexane/ chemicals/ empty containers	Laboratory and boiler station									
		2	Domestic Waste	Rubbish		Line site/ office & mill complex							
				Sewage		Line site/ office & mill complex							
		3	Industrial Waste	POME		Effluent Treatment Plant							
				EFB		EFB station							
		Compost production at time of visit has been shelved by the SDP management until a new directive is announced. The source of mill pollution generated from the mill is the smoke from the boiler. It is monitored from the stack emission during the entire operations. These reports are reviewed by the mill and submitted to DOE. There was no major issue.											
4.5.3.2	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p>- Major compliance -</p>	<p>The Waste Management Plan for Financial Year 2022 is available and sighted. The plan listed the waste generated from the mill operations as shown in indicator 4.5.3.1 above. The management of the waste aimed for a reduction and improvement are described below.</p> <table border="1"> <thead> <tr> <th>Type</th> <th>Item</th> <th>Action/ Program</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Scheduled waste</td> <td>Spent lubricants/ hydraulic oil</td> <td>SOP titled MQMS Section VII Compliance to Environmental Quality Regulation 2005;</td> </tr> <tr> <td>Used batteries/</td> <td>Establishment & notification of SW</td> </tr> </tbody> </table>			Type	Item	Action/ Program	Scheduled waste	Spent lubricants/ hydraulic oil	SOP titled MQMS Section VII Compliance to Environmental Quality Regulation 2005;	Used batteries/	Establishment & notification of SW	Complied
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Scheduled waste	Spent lubricants/ hydraulic oil	SOP titled MQMS Section VII Compliance to Environmental Quality Regulation 2005;											
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Criterion / Indicator		Assessment Findings			Compliance
			used rags/ empty containers	Labeling & Coding of SW SW Inventory Disposal < 180 days & approved quantity/volume.	
			Hexane/ spent chemicals/ empty containers		
		Domestic Waste	Rubbish	Disposed together with the estate to the Majlis Daerah Kerian	
			Sewage	Disposal by local authority	
		Industrial Waste	POME	Monitoring of application & through operation of evaporators	
			EFB	Monitoring of application in the field	
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>The SOP on Scheduled Waste disposal is established and implemented.</p> <p>a) Details as provided in SDP MQMS Standard Operating Procedure Section VII- Handling of scheduled waste (Hazardous Waste) Management ref no. SD/SDP/PSQM (ESH) /203-EN1 dated 26/2/2015.</p> <p>b) The inventory of the waste generated is recorded using the "E-SWISS" inventory system. Methodology of SW disposal is also described in indicator 4.5.3.2 above.</p> <p>c) All SW are disposed to Pentas Flora Sdn Bhd from CLM Conservation Sdn Bhd in view of quota storage capacity letter from DOE dated 12/11/2021 was sighted and verified. no 004640-licence valid dated 30/4/2023. Details as sampled as shown below.</p>			Complied

Criterion / Indicator		Assessment Findings							Compliance	
			SW collector	Date	SW 409	SW 322	SW 409	SW 110	SW 410	
		1	Pentas Flora Sdn Bhd	18/05/22	0.225	0.069	0.036	-	-	
				18/05/22	-	0.001		-	0.220	
				04/01/22	-	0.001	0.051	-	0.250	
				03/01/22	-	0.121	1.904	-	0.252	
		2	EDSHA solution	18/05/22	-	-	-	0.070	-	
		1	Disposal vendor		Licence no		Validity			
		2	Pentas Flora Sdn Bhd		005470		30/04/2023			
		3	CLM Conservation Sdn Bhd		004640		30/04/2023			
		4	EDSHA Solutions Sdn Bhd		004253		30/04/2023			
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	The mill and the host estate used the facility available in the District of Kerian. All domestic waste is collected 2 to 3 x /week by Majlis Daerah Kerian eliminating the issue of managing own landfill in the estate property. Collection is made from a centralized point accumulated internally by the estate management from the living quarters and office complex. The risk of contamination has been minimized through this system.							Complied	
Criterion 4.5.4: Reduction of pollution and emission										
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	The polluting activities are identified and documented in the Environmental Aspect & Impact Identification. From the EAI, it will be evaluated for the impact. The identified impact if any will be included in the management plan. The evaluation is documented in the Environmental Impact Evaluation. It was last reviewed on 04/01/2021. Areas of focus include activities at the chemical store							Complied	

Criterion / Indicator		Assessment Findings	Compliance												
		/ workshop/ store/ scheduled waste/ diesel tank/ boiler house/ effluent pond/ WTP.													
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>The pollution prevention plan and plan to reduce GHG emission 2022 dated 11/01/2022, with the mitigation plan, actions and time frame has been identified. In addition, the Environmental Management Plan for FY2022 is available. The monitoring of the plan is available. The following tabled the management action plan to reduce GHG emission from the mill activities.</p> <table border="1"> <thead> <tr> <th></th> <th>Issues & Strategies</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reduce diesel consumption at mill operation</td> <td>To monitor diesel usage To ensure vehicle scheduled maintenance Optimum gen set usage</td> </tr> <tr> <td>2</td> <td>Reduce smoke emission to the air</td> <td>To effectively implement the CEMS Eliminate use of wet shell as fuel</td> </tr> <tr> <td>3</td> <td>Reduce electricity usage</td> <td>Monitor usage vs baseline Install capacitor at identified large power consumption motor Install LED bulb for the lighting system</td> </tr> </tbody> </table> <p>All efforts and action plan for the identified pollutants and emission above is adequate to comply with the requirement. All identified issues have significant impacts to the environment. The mill also monitored and maintained records on Palm GHG. This compilation is made at Head Office level and made for the entire SOU. Inclusive in the report are.</p> <ul style="list-style-type: none"> Plantation/field emission (76.91%) data from field emission and sinks (CO2/FFB) 		Issues & Strategies	Action Plan	1	Reduce diesel consumption at mill operation	To monitor diesel usage To ensure vehicle scheduled maintenance Optimum gen set usage	2	Reduce smoke emission to the air	To effectively implement the CEMS Eliminate use of wet shell as fuel	3	Reduce electricity usage	Monitor usage vs baseline Install capacitor at identified large power consumption motor Install LED bulb for the lighting system	Complied
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		<ul style="list-style-type: none"> Mill emission (23.09%) data from mill emission and credits (CO2/FFB) 																																																	
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>Based on Jadual Pematuhan Chersonese POM disposed effluent on water discharge. Sighted quarterly report has been submitted to DOE (license no 004229 01/07/2022 - 30/06/2023) by quarterly basis. Latest submission for to DOE on as follows. Among others the indicators were:</p> <table border="1"> <thead> <tr> <th></th> <th>April - Jun 22</th> <th>STD</th> <th>7/4/22</th> <th>11/5/22</th> <th>1/6/22</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>5-9</td> <td>8.9</td> <td>9.0</td> <td>8.8</td> </tr> <tr> <td>2</td> <td>BOD mg/l</td> <td>50</td> <td>27.00</td> <td>36.00</td> <td>26.00</td> </tr> <tr> <td>3</td> <td>Total Solids</td> <td>400</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>4</td> <td>S Solids</td> <td>-</td> <td>180.00</td> <td>200.00</td> <td>100.00</td> </tr> <tr> <td>5</td> <td>Oil & Grease</td> <td>50</td> <td>8.00</td> <td>8.00</td> <td>3.00</td> </tr> <tr> <td>6</td> <td>AN</td> <td>150</td> <td>1.00</td> <td>1.00</td> <td>1.00</td> </tr> <tr> <td>7</td> <td>TN</td> <td>150</td> <td>42.00</td> <td>36.00</td> <td>34.00</td> </tr> </tbody> </table> <p>All parameters tested complied with regulatory standards</p>		April - Jun 22	STD	7/4/22	11/5/22	1/6/22	1	pH	5-9	8.9	9.0	8.8	2	BOD mg/l	50	27.00	36.00	26.00	3	Total Solids	400	0.00	0.00	0.00	4	S Solids	-	180.00	200.00	100.00	5	Oil & Grease	50	8.00	8.00	3.00	6	AN	150	1.00	1.00	1.00	7	TN	150	42.00	36.00	34.00	Complied
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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>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>The Water Management Plan for the mill has been established. It was last reviewed on 11/1/2022 plan. Included therein are the following documents which were sighted and verified.</p> <p>a. Assessment water usage tabulated in the table below:</p> <table border="1"> <thead> <tr> <th colspan="3">Contingency plan during water shortage</th> </tr> <tr> <th>Area/incident</th> <th>Action steps</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>To obtain water from LAP</td> <td></td> </tr> </tbody> </table>	Contingency plan during water shortage			Area/incident	Action steps	PIC	1	To obtain water from LAP		Complied																																							
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<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>		Water shortage/ prolonged dry season	To train/ educate staff/ workers to conserve water To seek assistance from LAP To obtain treated water supply from neighboring mill's WTP			Mill Executive / Staff																																																		
	2	Severe water pollution/ contamination	To obtain water from LAP To train/ educate staff/ workers to conserve water To seek assistance from LAP To obtain treated water outsourced supply.			Mill Executive / Staff																																																		
	<p>b. Monitoring of water has been detailed in the management plan as Monitoring of upstream, midstream and downstream of Sg Kurau monthly. Analysis of water as shown below. All units in mg/L except for pH</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Sample points</th> <th>pH</th> <th>BOD</th> <th>SS</th> <th>TN</th> </tr> </thead> <tbody> <tr> <td></td> <td>Standard</td> <td>6-9</td> <td>3</td> <td>25</td> <td>-</td> </tr> <tr> <td>1 07/07/22</td> <td>Sg Kurau Upstream</td> <td>6.4</td> <td>1</td> <td>6</td> <td>6</td> </tr> <tr> <td>2 07/07/22</td> <td>Sg Kurau Downstream</td> <td>6.2</td> <td>3</td> <td>8</td> <td>3</td> </tr> <tr> <td>3 19/05/22</td> <td>Sg Kurau Upstream</td> <td>6.2</td> <td>2</td> <td>26</td> <td>2</td> </tr> <tr> <td>5 19/05/22</td> <td>Sg Kurau Downstream</td> <td>6.6</td> <td>1</td> <td>22</td> <td>2</td> </tr> <tr> <td>6 10/01/22</td> <td>Sg Kurau Upstream</td> <td>6.3</td> <td>4</td> <td>18</td> <td>3</td> </tr> <tr> <td>7 10/01/22</td> <td>Sg Kurau Downstream</td> <td>6.0</td> <td>3</td> <td>34</td> <td>2</td> </tr> </tbody> </table>							Date	Sample points	pH	BOD	SS	TN		Standard	6-9	3	25	-	1 07/07/22	Sg Kurau Upstream	6.4	1	6	6	2 07/07/22	Sg Kurau Downstream	6.2	3	8	3	3 19/05/22	Sg Kurau Upstream	6.2	2	26	2	5 19/05/22	Sg Kurau Downstream	6.6	1	22	2	6 10/01/22	Sg Kurau Upstream	6.3	4	18	3	7 10/01/22	Sg Kurau Downstream	6.0	3	34	2	
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<p>c. Ways to optimize water usage has been detailed in the table below as per water management plan:</p> <table border="1"> <thead> <tr> <th colspan="4">Water reduction plan</th> </tr> <tr> <th>Issues/Area</th> <th>Action Steps</th> <th>PIC</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>							Water reduction plan				Issues/Area	Action Steps	PIC	Status																																										
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		1	Rain water collection	Large containers are to be placed at strategic locations to collect rain water The rainwater shall be recycled for washing heavy machinery	Mill Engineer	On-going		
		2	Re-streaming	Re stream from sterilizer condensate pit for dilution	Mill Engineer	On-going		
		Identification & management of wastewater						
			Location	Wastewater produced	Treatment/containment	Reuse/ recycle disposal method		
		1	Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system		
		2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain		
		3	Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain		
		4	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain		

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		5	Laboratory	Cleaning water	Process drains	Monsoon drain	
		6	Washroom	Toilet water, cleaning water	Septic tank	Supernatant to drains, sludge collected by licensed contractor.	
4.5.5.2	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations. - Major compliance -	Details of effluent treatment and report as per item 4.5.4.3 above. The effluent is retained for treatment in a flow through 14 ponds before being discharge through water course. Both the management and DOE are understudying changes for the method of practice. Communication in this relation was sighted and verified. The DOE has initiated the following initiatives among others for the effluent management during a meeting with Perak Millers; <ul style="list-style-type: none"> • Issues faced by the millers in meeting Compliance Schedule • Compliance to AKAS 1974 • Sampling Points of water sampling 				Complied	
4.6 Principle 6: Best Practices							
Criterion 4.6.1: Mill Management							
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Chersonese POM processing system is documented in the Sustainability Plantation Management System MQMS/SQM/08 v1 dated 01/11/2008 which includes the mill SOP, and 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 the reception, sterilization, threshing, pressing, clarification,				Complied	

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		depericarping (nut polishing) station, effluent, laboratory, workshop, despatches etc. In addition, there are also manuals available within the industry and MPOB that are used as guidelines.	
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 the Mill Advisor scheduled on a 6-monthly basis. In addition, there are audits by Regional Head, PSQM and GCAD. This is to ensure compliance to Policies, procedures in relation mill operations, financial, OSH, welfare among others. Report relating to the monitoring i.e. daily production report, monthly report, SOU meetings minutes and RSQM internal audit report were sighted, and system adopted was effective.	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 -	Chersonese POM continued to achieve long term economic and financial viability through documented management plan projected to year 2026. Since there are no smallholders in this Business Unit, therefore a business case for scheme smallholders is not considered. a) A Management Plan including crop forecast, capital expenditure, operational expenditure, general charges, profit and loss covering the period of 2022 to 2026 had been prepared and made available to the audit team. b) This plan had also included mature area and also FFB production 2022 to 2026.	Complied

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Criterion / Indicator		Assessment Findings	Compliance																																																						
		<p>c) The component of the budget comprises of the following items.</p> <ul style="list-style-type: none"> - Labour statement / Allocation of wages - Labour benefit summary / Labour reconciliation - Yield statement oil palm - Summary of vehicle and running schedule - Job allocation for vehicles / Summary of workshop running schedule - Summary if budget / Summary of general charges - CAPEX, <table border="1"> <thead> <tr> <th>Year</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>1 FFB processed</td> <td>220.2K</td> <td>229.3K</td> <td>236.0K</td> <td>244.3K</td> <td>245.0K</td> </tr> <tr> <td>2 CPO Produced</td> <td>45.1K</td> <td>47.1K</td> <td>48.6K</td> <td>50.4K</td> <td>50.7K</td> </tr> <tr> <td>3 CPK Produced</td> <td>11.9K</td> <td>12.4K</td> <td>12.8K</td> <td>13.3K</td> <td>13.3K</td> </tr> <tr> <td>4 OER %</td> <td>20.50</td> <td>20.55</td> <td>20.60</td> <td>20.65</td> <td>20.70</td> </tr> <tr> <td>5 KER %</td> <td>5.41</td> <td>5.45</td> <td>5.45</td> <td>5.45</td> <td>5.45</td> </tr> <tr> <td>6 Gen charges</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>7 Processing Cost</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>8 RM/FFB mt</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> </tbody> </table>	Year	2022	2023	2024	2025	2026	1 FFB processed	220.2K	229.3K	236.0K	244.3K	245.0K	2 CPO Produced	45.1K	47.1K	48.6K	50.4K	50.7K	3 CPK Produced	11.9K	12.4K	12.8K	13.3K	13.3K	4 OER %	20.50	20.55	20.60	20.65	20.70	5 KER %	5.41	5.45	5.45	5.45	5.45	6 Gen charges	x	x	x	x	x	7 Processing Cost	x	x	x	x	x	8 RM/FFB mt	x	x	x	x	x	
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Criterion 4.6.3: Transparent and fair price dealing																																																									
4.6.3.1	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p>- Major compliance -</p>	<p>This is available in the guidelines LOA (limit of authority) and revised sourcing method for plantation upstream Malaysia dated 11/7/2017. All tender and pricing exercises are handled by the HQ management. Projects are tendered from the approved vendors registered with HQ. Payments are processed and made by HQ</p>	Complied																																																						

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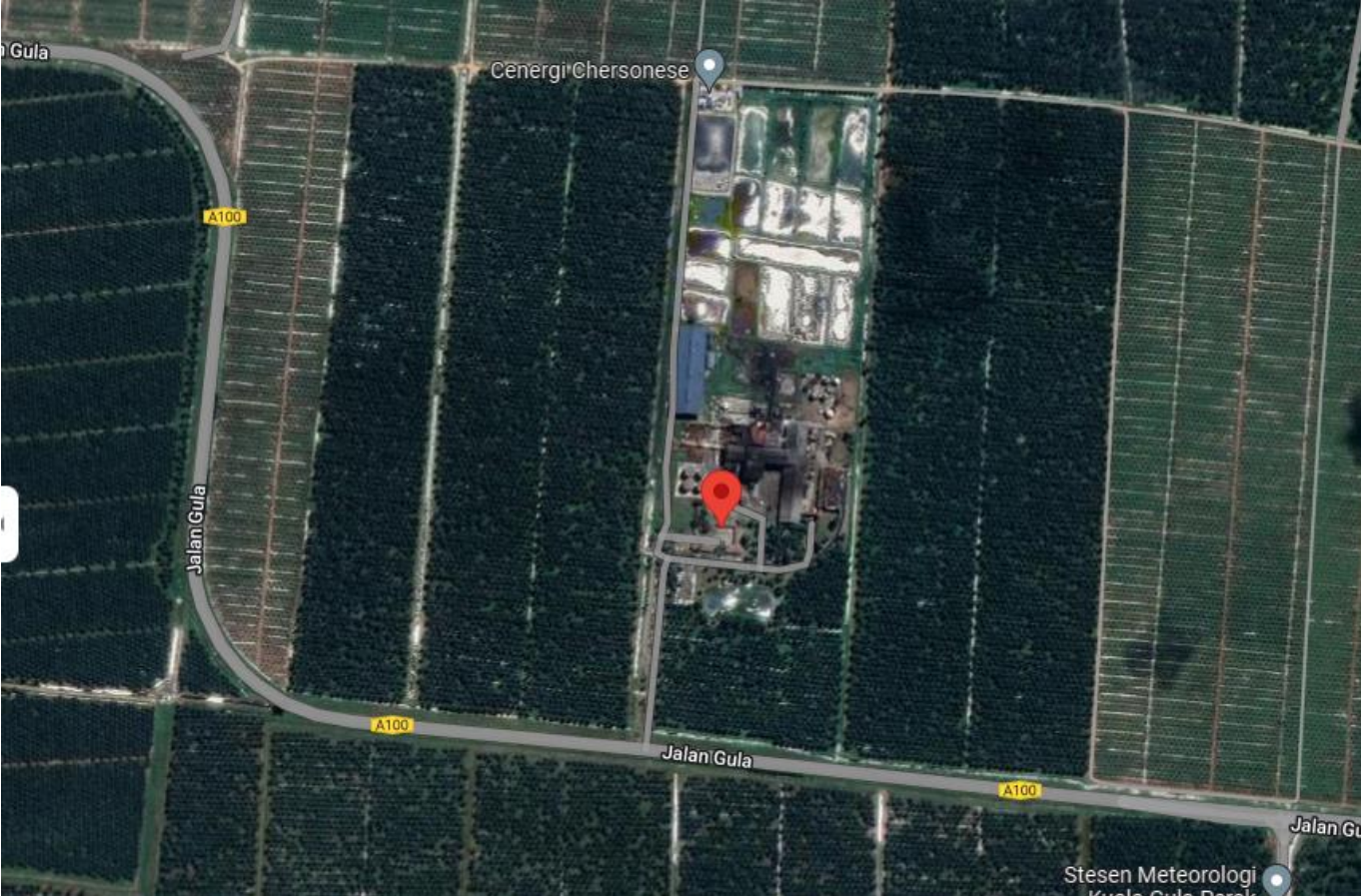
Criterion / Indicator		Assessment Findings	Compliance
		<p>through system named MEX. This is made upon job verification by the mill personnel.</p> <p>Sighted contract Transportation of Crude Palm Oil (CPO) (Services) For Sime Darby Plantation Berhad Peninsular Malaysia oil Mills between Chersonese Mill with Mayang Bayumas Sdn Bhd, pricing mechanism detailed out under Appendix 1 (Schedule of Transport Rates) and Appendix 2 (Transport Rate Adjustment Mechanism) (Ref No: T/SDPD/PEN/CPO/0720/003).</p>	
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>All contracts were awarded through tendering system at Zone Level. Approved contractors will be given the LOA. Payments were all made in timely manner and no complaint from the contractor so far.</p> <p>Letter of Award (LOA): Transportation, Warehousing and Handling Services for Sime Darby Plantation Berhad (transportation services to transport Palm Kernel (PK) and Palm Kernel Expeller (PKE) to S.T.B. Maju (Malaysia) Sdn. Bhd. LOA has been accepted and acknowledged by vendors on 04/08/2021 for 3 years contract period.</p> <p>All contracts were awarded through tendering process at Zone Level. Successful contractors were issued with LOA. Payments were made in timely manner and no complaints received from the contractor so far.</p> <p>Refer contract Transportation of Crude Palm Oil (CPO) (Services) For Sime Darby Plantation Berhad Peninsular Malaysia oil Mills between Chersonese Mill with Mayang Bayumas Sdn Bhd (Ref No: T/SDPD/PEN/CPO/0720/003).</p>	Complied
Criterion 4.6.4: Contractor			

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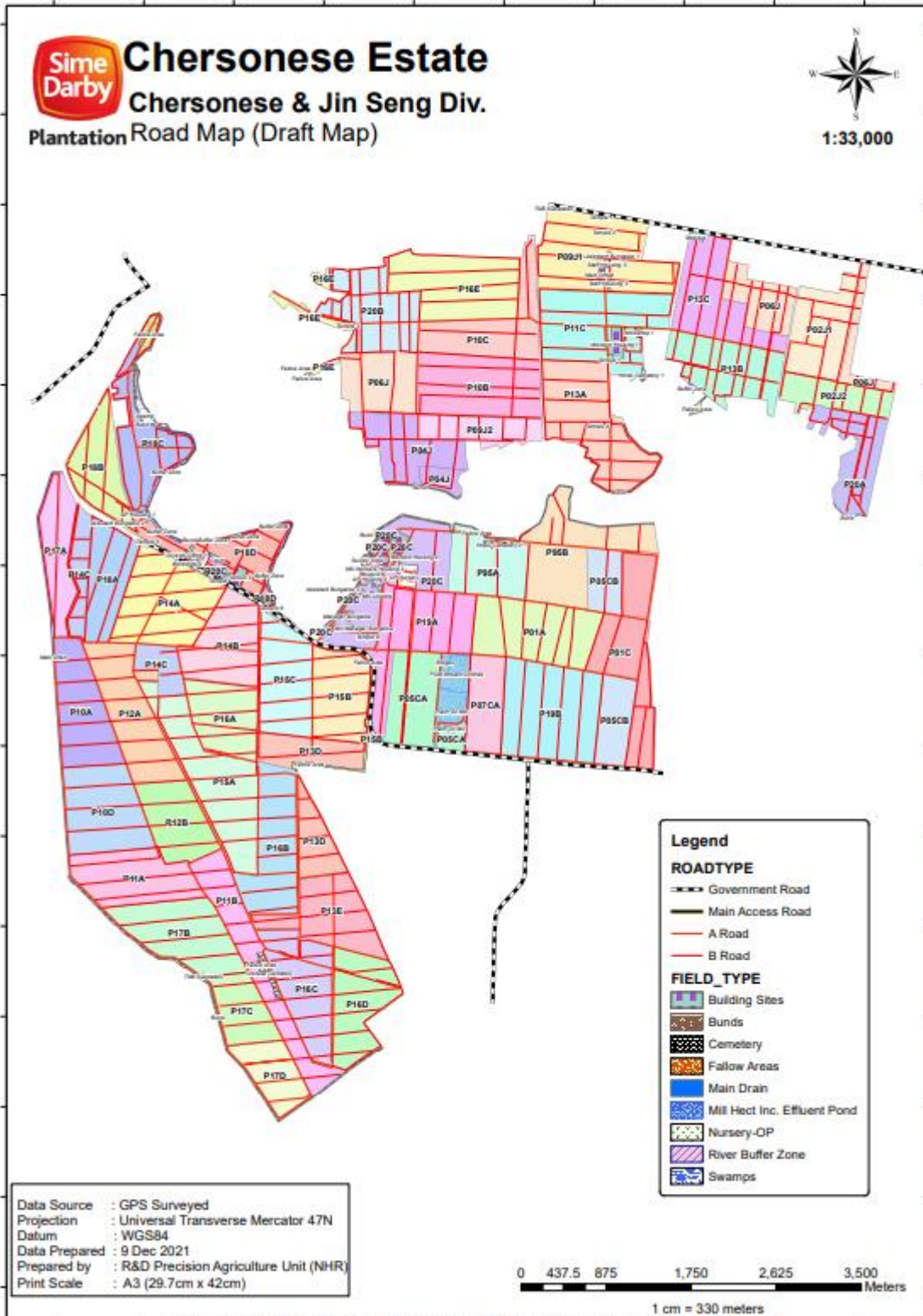
Criterion / Indicator		Assessment Findings	Compliance
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	All contracts were awarded through tendering system at Zone Level. Approved contractors will be given the LOA. Payments were all made in timely manner and no complaint from the contractor so far. Refer contract Transportation of Crude Palm Oil (CPO) (Services) For Sime Darby Plantation Berhad Peninsular Malaysia oil Mills between Chersonese Mill with Mayang Bayumas Sdn Bhd. (Ref No: T/SDPD/PEN/CPO/0720/003). Inclusive in the contract is a clause 5 (d) requiring compliance on RSPO and MSPO matters.	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Letter of Award (LOA) Transportation, Warehousing and Handling Services for Sime Darby Plantation Berhad (transportation services to transport Palm Kernel (PK) and Palm Kernel Expeller (PKE) to S.T.B. Maju (Malaysia) Sdn. Bhd. LOA has been accepted and acknowledged by vendors on 04/08/2021 for 3 years contract period. Contractor: Dynamic Attraction Enterprise, Letter of Award for Skilled Labour for FFB Cages Repair and Maintenance Work at KKS Chersonese (Ref No: NTR/CSM/M176/2022/CSMSL00001/SKILL LABOUR FOR FFB CAGES REPAIR AND MAINTENANCE WORK dated 15/01/2022. Contract period: 19/01/2022 – 19/03/2022.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	This requirement has been specified during a briefing by the mill to CPO transporter. In addition, Inclusive in the contract (LOA) is a clause 5 (d) requiring compliance on RSPO and MSPO matters.	Complied

Appendix C: Location and Field Map

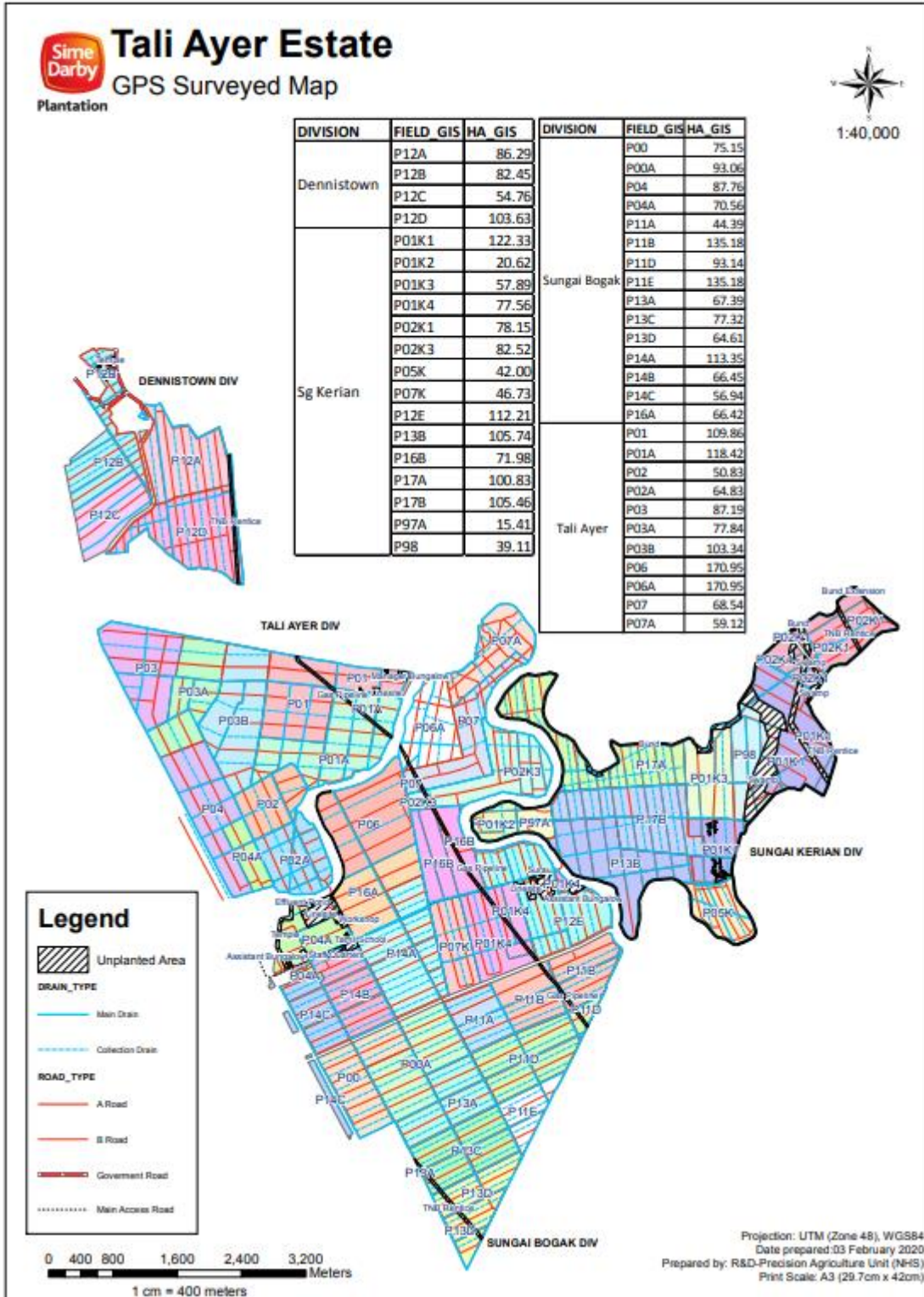
Chersonese POM



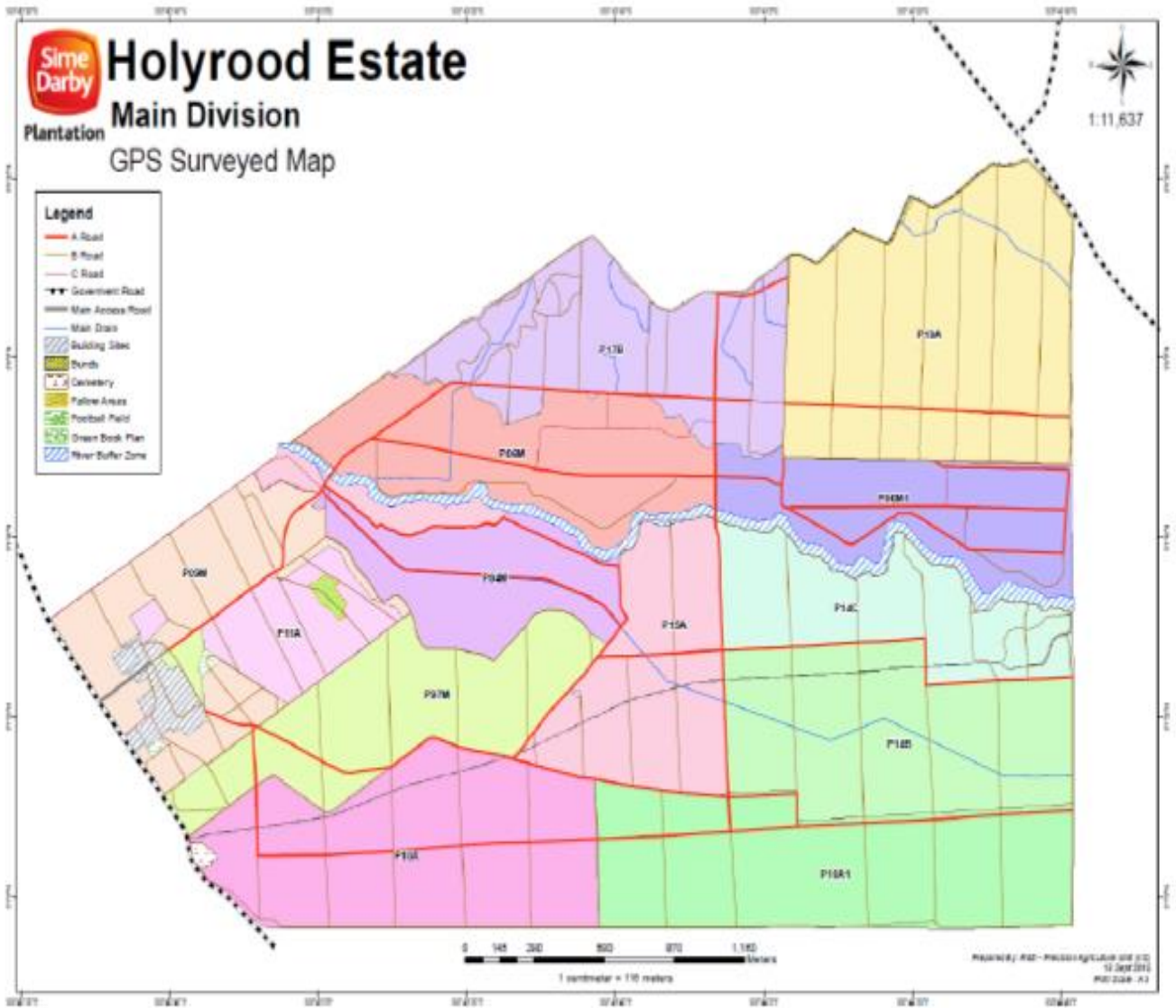
Chersonese Estate



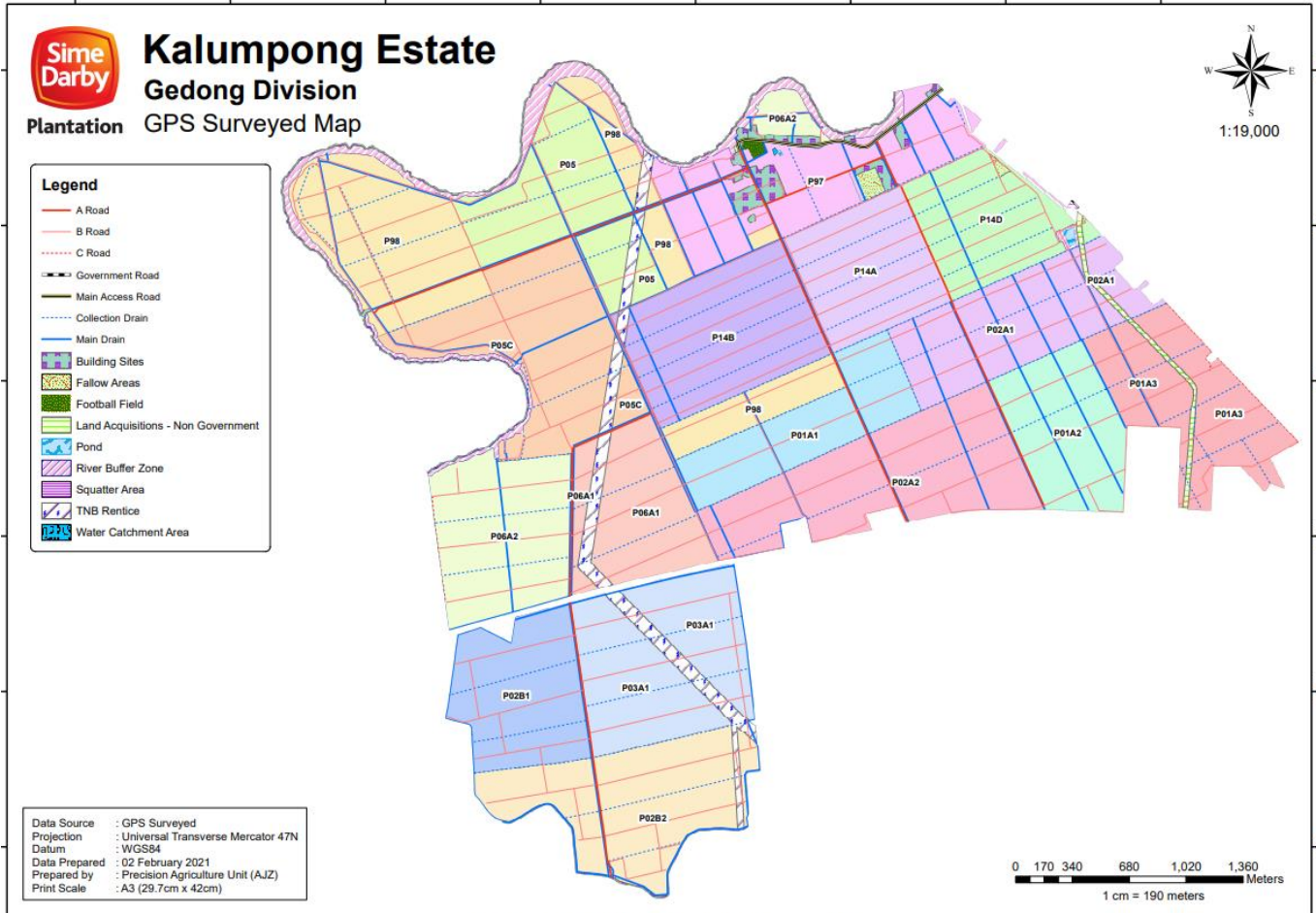
Tali Ayer Estate



Holyrood Estate



Kalumpang 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