

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

- Initial Assessment**
- Annual Surveillance Assessment** (Choose an item.)
- Recertification Assessment (RA 1)**
- Extension of Scope**

TDM PLANTATION SDN BHD
Client Company (HQ) Address: Level 3, Bangunan UMNO Terengganu Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu, Terengganu, Malaysia
Certification Unit: Kemaman Palm Oil Mill & Plantations: Tebak Estate, Pelantoh Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate and MAIDAM Estate
Date of Final Report: 11/11/2022

Report prepared by:
Mohd Nur Amin Bin Mohd Halim (Lead Auditor)

Report Number: 3754631

Assessment Conducted by:
BSI Services Malaysia Sdn Bhd,
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Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	TDM Plantation Sdn Bhd		
Mill/Estate	Certification Unit	MPOB License No.	Expiry Date
	Kemaman Palm Oil Mill	500041904000	31/03/2023
	Pelantoh Estate	620807002000	31/01/2023
	Air Putih Estate	503558102000	31/07/2023
	Tebak Estate	620743002000	31/01/2023
	Jernih Estate	501868702000	31/10/2023
	Gajah Mati Estate	502036302000	31/08/2023
	MAIDAM Estate	503576002000	31/08/2023
Address	Level 3, Bangunan UMNO Terengganu, Lot 3224, Jalan Masjid Abidin, 20100 Kuala Terengganu, Terengganu, Malaysia		
Management Representative	Mohd. Izwan Haffez bin Che Azmi		
Website	www.tdmberhad.com.my	E-mail	izwan.tdmp@tdmberhad.com.my
Telephone	09-6204 800/ 019-9515 898	Facsimile	-

1.2 Certification Information			
Certificate Number	Mill: MSPO 678572 Estate: MSPO 686877	Certificate Start Date	15/12/2022
Date of First Certification	15/12/2017	Certificate Expiry Date	14/12/2027
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		

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Recertification Assessment Visit Date (RAV) 1	26 - 29/09/2022
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
EU-ISCC-Cert-IT206-795	International Sustainable Carbon Certification (EU)	RINA	16/03/2022
RSPO 587626	RSPO Principles & Criteria of Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019	BSI Services Malaysia Sdn. Bhd.	31/10/2023

1.4 Location of Certification Unit

Name of the Certification Unit (Palm Oil Mill/ Estate)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Kemaman Palm Oil Mill	KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 24' 10.80" N	103° 14' 52.80" E
Pelantoh Estate	KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 25' 19.23" N	103° 14' 59.64" E
Air Putih Estate	PT 2143-2147, Mukim Tebak & 1209-1213, Mukim Bandi, 24007 Kemaman, Terengganu, Malaysia	4° 15' 18.59" N	103° 12' 38.77" E
Tebak Estate	KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 25' 48.61" N	103° 13' 35.40" E
Jernih Estate	KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4° 26' 0.90" N	103° 12' 47.94" E
Gajah Mati Estate	Ladang Gajah Mati, 23200 Bukit Besi, Dungun, Terengganu, Malaysia	4° 41' 45.05" N	103° 12' 23.30" E
MAIDAM Estate	AM9, Bandar AMBS, 23400 Dungun, Terengganu, Malaysia	4° 37' 39.58" N	103° 12' 24.42" E

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1.5 Certified Area					
Estates	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pelantoh Estate	3,153.27	0.25	138.08	3,291.60	95.80
Air Putih Estate	4,042.70	187.70	121.58	4,351.98	92.89
Tebak Estate	2,922.33	30.46	340.84	3,293.63	88.73
Jernih Estate	2,822.07	65.46	248.07	3,135.60	90.00
Gajah Mati Estate	3,520.87	153.13	208.78	3,882.78	90.68
MAIDAM Estate	755.96	6.74	151.38	914.08	82.70
Total (ha)	17,217.20	443.74	1,208.73	18,869.67	91.24

1.6 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Pelantoh Estate	1,858.27	-	-	-	1,295.00	1,295.00	1,858.27
Air Putih Estate	82.49	2,435.24	-	1,336.21	188.76	3,960.21	82.49
Tebak Estate	419.60	419.53	-	901.67	1,181.53	2,502.73	419.60
Jernih Estate	663.00	307.93	1,280.77	570.37	-	2,159.07	663.00
Gajah Mati Estate	1,091.90	1,673.62	-	755.35	-	2,428.97	1,091.90
MAIDAM Estate	255.80	-	-	500.16	-	500.16	255.80
Total (ha)	4,371.06	4,836.32	1,280.77	4,063.76	2,665.29	12,846.14	4,371.06

1.7 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Oct 2021 - Aug 2022)	Actual (Oct 2021 - Aug 2022)	Forecast (Dec 2022 - Nov 2023)
Pelantoh Estate	13,610.00	14,454.03	13,885.00
Air Putih Estate	2,180.00	48,372.92	56,607.00
Tebak Estate	38,500.00	12,242.09	16,580.00
Jernih Estate	66,748.00	26,616.65	34,800.00
Gajah Mati Estate	40,700.00	34,409.73	38,500.00
MAIDAM Estate	35,300.00	1,313.62	2,060.00
Total (mt)	197,038.00	137,409.04	162,432.00

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1.8 Uncertified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Oct 2021 - Aug 2022)	Actual (Oct 2021 - Aug 2022)	Forecast (Dec 2022 - Nov 2023)
N/A	N/A	N/A	N/A
Total (mt)	N/A	N/A	N/A

1.9 Certified Tonnage			
Mill Capacity: 60 MT/hr SCC Model: MB	Estimated (Oct 2021 - Aug 2022)	Actual (Oct 2021 - Aug 2022)	Forecast (Dec 2022 - Nov 2023)
	FFB	FFB	FFB
	197,038.00	137,409.04	162,432.00
	CPO (OER: 20.50%)	CPO (OER: 24.38%)	CPO (OER: 22.09%)
	40,392.79	33,498.85	35,886.19
	PK (KER: 5.00%)	PK (KER: 5.75%)	PK (KER: 5.25%)
	9,851.90	7,911.04	8,530.84

1.10 Actual Sold Volume (CPO)					
CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
33,498.85	-	-	32,952.69	546.16	33,498.85

1.11 Actual Sold Volume (PK)					
PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
7,911.04	-	-	7,829.96	81.08	7,911.04

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 26-29/09/2022. The audit programme is included as Section 2.4. The approach to the audit was to treat the mill and estates 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. Prior to on-site assessment, a global stakeholder consultation has been conducted through notification dated on 22/08/2022 via website as following: [08-4-mspo-public-notification-recertification_tdm-kemaman-palm-oil-mill--supply-base_english.pdf](https://www.bsigroup.com/08-4-mspo-public-notification-recertification_tdm-kemaman-palm-oil-mill--supply-base_english.pdf) (bsigroup.com)

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 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 sample were determined based on formula $S = r\sqrt{n}$ where n is the number of estates while when applicable, the estates 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.

Emails also sent to selected stakeholders among NGOs, local authorities and interested parties on 20/09/2022. No feedbacks or comments received from the global stakeholder consultation and email consultation except for on-site consultation as reported under section 3.5 of this report. 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 initial assessment are detailed in Section 4.2. Major NC closure was conducted offsite based on evidence submitted.

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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.

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 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Kemaman Palm Oil Mill	✓	✓	✓	✓	✓
Tebak Estate	-	✓	-	✓	-
Pelantoh Estate	✓	-	✓	-	✓
Jernih Estate	-	✓	-	✓	-
Air Putih Estate	-	✓	-	✓	-
Gajah Mati Estate	✓	-	✓	-	✓
MAIDAM Estate	✓	-	✓	-	✓

Tentative Date of Next Visit: September 25, 2023 - September 28, 2023

Total No. of Mandays: 15

2.1 BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Mohd Nur Amin Bin Mohd Halim (MNA)	Team Leader	<p>Education: Diploma Office Management & Technology, UiTM.</p> <p>Work Experience: He gained his career as sustainability practitioner in Government Link Company related to palm oil plantation for over 6 years and 10 months majorly handling operational excellent, environment, safety and health at the upstream and downstream operations. He then joining an international certification body over the last 3 years and started his auditing career as qualified lead auditor for MSPO (OPMC and SCCS) scheme; and qualified auditor for ISCC Waste and Residue scheme. Concurrent, he was also a document controller and scheme coordinator for MSPO (OPMC and SCCS) prior to DSM accreditation.</p> <p>Training attended: He has completed Exemplar IMS (9001, 14001 & 45001) LA Course (2019), SA 8000 Course (2019), Endorse MSPO SCCS Course (2020), Endorse MSPO LA Course (2020), Endorse ISCC Waste and Residue Course (2020), HCV &</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>HCS Course (2020), Endorse ISCC Basic & PLUS Course (2022), CQI & IRCA ISO 9001:2015 LA Course (2022), CQI & IRCA ISO 14001:2015 LA Course (2022), Endorse RSPO P&C LA Course (2022), Endorse RSPO SCCS LA Course (2022).</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspect of management commitment and responsibility, transparency, traceability, legal, social responsibility, employment conditions and contractor management.</p> <p>Language proficiency: He is fluent in both verbal/ written English and Bahasa Malaysia languages.</p>
Muhamad Naquiuddin Mazeli (MNM)	Team Member	<p>Education: Bachelor Science Horticulture, UPM.</p> <p>Work Experience: He gained his career for over 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, managed, implement and monitors the RSPO, ISCC, MSPO and ISO 9001 and ISO 45001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also supports in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company.</p> <p>Training attended: He has completed ISO 9001:2015 LA Course (2019), ISO 14001:2015 LA Course (2018), ISO 45001:2018 LA Course (2018), HCV & HCS Training (2019), Endorsed RSPO P&C LA Course (2018), MSPO LA Training (2018), SMETA Training (2021), SCCS Training and Refresher (2019).</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of lands use and customary rights, environmental, natural resources, biodiversity/ HCV, ecosystem and development of new planting.</p> <p>Language proficiency: He is fluent in both verbal/ written English and Bahasa Malaysia languages.</p>
Vijay Kanna Pakirisamy (VKP)	Team Member	<p>Education: Bachelor’s Degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010.</p> <p>Work Experience: He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad prior to joining BSI as a Client Manager.</p> <p>Training attended:</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 has completed ISO IMS 9001, 14001, 45001 (OHS 18001) LA Course (2019), Endorsed RSPO P&C LA Course (2019), Endorsed RSPO SCCS LA Course (2020), Endorsed MSPO LA Course (2019) and SMETA Requirements Training (2021).</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspect of traceability, estate best practices and long-term economic viability.</p> <p>Language proficiency: He is fluent in both verbal/ written English, Bahasa Malaysia and Tamil languages.</p>
Yusof Khairan Nizar b. Ahmad Tarmizi (YKN)	Team Member	<p>Education: Certificate of Safety and Health Officer-Malaysian Insurance Institute (2003). Bachelor of Corporate Administration (Hons)-MARA University of Technology, Malaysia (2003), Master of Science in Occupational Safety and Health Management-Northern University of Malaysia (2011).</p> <p>Work Experience: Experience in managing, consulting, training and auditing Quality, Environmental, Occupational Safety and Health Management Systems such as ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, OHSAS 18001:2007, MS1722:2011 since 1996. Contract Trainer of OSH & Environmental Legal & other requirements Lead Auditors course for SIRIM Training Services Sdn Bhd & NIOSH Certification Sdn Bhd. Contract Auditor for Quality, Environmental, Occupational Safety and Health Management System and Malaysia Sustainable Palm Oil (MSPO). OSH, Legal and Environmental Auditor for TUV Rheinland Malaysia RSPO Principles & Criteria. Contract SIRIM QAS International Auditor (2006). Department of Occupational Safety and Health Malaysia (DOSH) Registered Safety and Health Officer (2003-2006). Approved Human Resources Development Fund (HRDF) Trainer (since 2011). Also appointed as Assessor for Prime Minister's Hibiscus Award involving assessment for oil and gas companies, plantations industries, manufacturing, utilities, cleaning and transportations services (since 2003). MPOCC Registered Peer Reviewer.</p> <p>Training attended: Successfully attended course ISO 9001 IRCA/IATC A Lead Auditor Course – International Management & Technology Limited (Kuala Lumpur), ISO 14001:2004 IEMA Approved EMS Advanced Lead Auditor Course – Aspects Moody Certification Ltd (UK). OH&SMS IRCA Certified Lead Auditor Course – Moody International (KL). MS 1722 Lead Auditor Training – NIOSH Certification (KL). ISO 9001:2015 and ISO 14001:2015 Transition Course-DNV-GL, ISO 45001:2018 Auditor Migration Training-NIOSH Certification. MSPO Auditing – SGS (Malaysia). RSPO P&C 2018 Lead Auditor Course – Checkmark Training. Also attended the Quality & Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment – For Bodied Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality Malaysia, ISO/IEC 17021. Attended</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>MSPO Peer Reviewer Training (MPOCC)-2019. Attended Online HCV-HCS Integrated Concept & Brief Method and another one Social Knowledge for Assessing High Carbon Stock jointly organized by Asian Institute of Knowledge (Aiknow) and PT Remark Asia. SMETA Auditor Training based on Ethical Trade Initiative (ETI) and Sedex Members Ethical Trade Audit (SMETA).</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspect of employees' safety, health, training and competency.</p> <p>Language proficiency: He is fluent in both verbal/ written English and Bahasa Malaysia languages.</p>
Mohd Sabre Salim (MSS)	Peer Reviewer	<p>Education: Master's in Business Administration (MBA) from UiTM in 2006 and Bachelor Science Agribusiness from UPM in 1986.</p> <p>Work Experience: He gained his working exposure in the plantation sector, serving as an 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: Master's 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>

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2.2 Impartiality and conflict of interest

During this assessment there was circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

2.3 Accompanying Persons

No.	Name	Role
1	Mohd Hidhir Bin Zainal Abidin	Qualifying Reviewer - Observer

2.4 Assessment Plan

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

Date	Time	Subjects	MNA	MNM	YKN	VKP
Sunday 25/09/2022	09:00 - 15:00	Audit team travel to Kemaman, Terengganu	✓	✓	✓	✓
Monday 26/09/2022	08:30 - 09:00	Opening Meeting (Kemaman Palm Oil Mill) <ul style="list-style-type: none"> • Presentation by TDM Kemaman • Presentation by BSI Lead Auditor – Introduction of team member and assessment agenda • Confirmation of assessment scope and finalizing audit scope 	✓	-	-	-
	09:00 - 12:45	Gajah Mati Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant, etc.), agrochemical mixing area, wastes management, workers housing, clinic, landfill, etc.	✓	✓	✓	✓
	10:00 - 12:00	Stakeholder consultation: Government agencies, village representatives, smallholders, Union Leader, contractors and etc.	✓	-	-	-
	12:45 - 13:45	Lunch break	✓	✓	✓	✓
	13:45 - 16:30	Gajah Mati Estate Document review P1 – P7 (MS 2530 Part 3): General documentation e.g., Legal, Manual and Procedures, production and monitoring records, IPM & HCV records, SEIA documents and records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓	✓	✓
	16:30 - 17:00	Interim closing meeting	✓	✓	✓	✓

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Date	Time	Subjects	MNA	MNM	YKN	VKP
Tuesday 27/09/2022	08:30 - 12:45	<u>MAIDAM Estate</u> 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, wastes management, workers housing, clinic, landfill, etc.	✓	✓	✓	✓
	10:00 - 12:00	Stakeholder consultation: Government agencies, village representatives, smallholders, Union Leader, contractors and etc.	✓	-	-	-
	12:45 - 13:45	Lunch Break	✓	✓	✓	✓
	13:45 - 16:30	<u>MAIDAM Estate</u> Document review P1 – P7 (MS 2530 Part 3): General documentation e.g., Legal, Manual and Procedures, production and monitoring records, IPM & HCV records, SEIA documents and records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓	✓	✓
	16:30 - 17:00	Interim closing meeting	✓	✓	✓	✓
Wednesday 28/09/2022	08:30 - 12:45	<u>Pelantoh Estate</u> 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, wastes management, workers housing, clinic, landfill, etc.	✓	✓	✓	✓
	10:00 - 12:00	Stakeholder consultation: Government agencies, village representatives, smallholders, Union Leader, contractors and etc.	✓	-	-	-
	12:45 - 13:45	Lunch Break	✓	✓	✓	✓
	13:45 - 16:30	<u>Pelantoh Estate</u> Document review P1 – P7 (MS 2530 Part 3): General documentation e.g., Legal, Manual and Procedures, production and monitoring records, IPM & HCV records, SEIA documents and records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	✓	✓	✓	✓
	16:30 - 17:00	Interim closing meeting	✓	✓	✓	✓
Thursday 29/09/2022	08:30 - 12:45	<u>Kemaman Palm Oil Mill</u> Document review P1 – P6 (MS 2530 Part 4): SOPs, Review on SEIA documents and records, wage	✓	✓	✓	-

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Date	Time	Subjects	MNA	MNM	YKN	VKP
		records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.				
	10:00 - 12:00	Stakeholder consultation: Government agencies, village representatives, smallholders, Union Leader, contractors and etc.	✓	-	-	-
	12:45 - 13:45	Lunch Break	✓	✓	✓	✓
	13:45 - 16:30	<u>Kemaman Palm Oil Mill</u> Document review P1 – P6 (MS2530 Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓	-
	16:30 - 17:00	Closing meeting	✓	✓	✓	✓
Friday 30/09/2022	09:00 - 15:00	Audit team travel back to Kuala Lumpur	✓	✓	✓	✓

Section 3: Assessment Findings

3.1 Details of audit results

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

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

3.2 Details of Nonconformities and Opportunity for improvement

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

During the assessment there were two (2) Major nonconformities and three (3) of OFIs raised. The Kemaman Palm Oil Mill and Supply Base 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.

Two (2) Major nonconformities and three (3) of OFIs raised. 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 #:	2252660-202209-M1	Issue Date:	29/09/2022
Due Date:	28/12/2022	Date of Closure:	27/10/2022
Area/Process:	Pelantoh Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.4.2 Major
Requirements:	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 2000The management shall establish.		
Statement of Nonconformity:	The proper and safe handling of pesticides found not consistent with relevant Standard Operating Procedure and applicable legal requirements as found no signage for entry restriction after application of pesticides and bathing room for sprayers currently cannot be used and need to be repaired in providing facility for them to clean-up themselves and washing PPEs used before going home.		
Objective Evidence:	<ol style="list-style-type: none"> 1. Chemical Handling SOP documented dated 01/09/17, Rev. TDMP-01/2017. Para 4.3 Shower Room/Changing Room. 2. Spraying activity at field PR20C not having signage for entry restriction after application of pesticides. 3. Interviewed 3 lady sprayers and mandore at site on requirements of signage and bathing room. 4. Visit at Chemical Store where the bathing room is located found has not being used for sometimes and need to be repaired immediately. 		

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Corrections:	<ol style="list-style-type: none"> 1. Signage 'AWAS KAWASAN TELAH DIRACUN' have been placed for entry restriction after application of pesticides/herbicides. 2. Repairing changing room for the workers to clean up themselves and washing PPEs before going home.
Root cause analysis:	<ol style="list-style-type: none"> 1. Safety signage is indeed provided by estate however the signage dislocates to the newly sprayed area. 2. Shower Room/Changing Room is temporarily closed for use due to the unsafe and risky condition of the roofing.
Corrective Actions:	<ol style="list-style-type: none"> 1. Estate will continue arranging a proper training session for the workers, mandores and field staffs on how importance of placing safety signage after spraying activity at field. 2. Shower Room/Changing Room will be repaired for the workers to clean-up themselves and washing their clothing and PPEs. 'Rekod Penggunaan Bilik Persalinan' will be recorded by mandore and monthly inspection will be conducted by compliance clerk to check if there is any damage in the shower room and also to ensure each worker washes their clothes and PPEs properly before going home.
Assessment Conclusion:	<p>Major Non-conformity close out</p> <p>Evidence verified:</p> <p>Pelantoh Estate established 'Laporan Gerak Kerja NC Major' with pictures includes correction as below:</p> <ol style="list-style-type: none"> 1. Based on evidence photo share, Pelantoh Estate has repair main suis in the shower room and useable. 2. Based on evidence photo share, Pelantoh Estate has installed clothes changes in shower room. 3. Based on evidence photo share, Pelantoh Estate has repair mechanical washing machine for worker to use and wash their clothes after work. 4. Based document review, Pelantoh Estate conduct briefing on hygiene after work to all workers involve with chemical application activities, shower room usage and signage 'Awat Kawasan Telah Diracun' after chemical application in fields/blocks dated on 24/10/2022. Records includes with attendance, pictures, and briefing notes to workers. 5. Based on evidence photo share, Pelantoh Estate implements signage 'Awat Kawasan Telah Diracun' in field after chemical application at block number PR20C dated 15/10/2022, PR20A dated 14/10/2022 and PM 18A dated 14/10/2022. <p>The evidence submitted were found adequate and effectively implemented. The Major NC was closed on 28/10/2022.</p> <p>The implementation of the corrective actions will be verified during next assessment.</p>

Non-Conformity Report			
NCR Ref #:	2252660-202209-M2	Issue Date:	29/09/2022
Due Date:	28/12/2022	Date of Closure:	27/10/2022

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Area/Process:	MAIDAM Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.5.4.2 Major
Requirements:	Found the action plan to reduce pollution inadequately implemented.		
Statement of Nonconformity:	The proper and safe handling of pesticides found not consistent with relevant Standard Operating Procedure and applicable legal requirements as found no signage for entry restriction after application of pesticides and bathing room for sprayers currently cannot be used and need to be repaired in providing facility for them to clean-up themselves and washing PPEs used before going home.		
Objective Evidence:	The management already establish Pollution Prevention Plan 2022 dated 5/2/2022 already identified buffer zone and to ensure no chemical activities in this area. However sighted spraying activity in field PR18A at buffer zone area thus Major NC been raised in MAIDAM Estate.		
Corrections:	<ol style="list-style-type: none"> To be ensure all worker especially sprayer clearly understand about the Pollution Prevention Plan and River Buffer Zone Policy. Estate will identify the involved oil palm tree and ensure these issues will not be repeated. Signage "DILARANG MELAKUKAN AKTIVITI MEMBAJA DAN MERACUN DI KAWASAN BUFFER ZONE" will be placed. Always remind the sprayer about the chemical and environment management during muster call. 		
Root cause analysis:	Spraying activity in the buffer zone area because the sprayer does not notice the buffer zone area and there is no sign at this area.		
Corrective Actions:	<ol style="list-style-type: none"> Training session for sprayers regarding these issues will be arrange. Provide relevant signage at the buffer zone area in field PR18A 		
Assessment Conclusion:	<p>Major Non-conformity close out</p> <p>Evidence verified:</p> <p>MAIDAM Estate established 'MSPO Audit Corrective Action Report' with pictures includes correction as below:</p> <ol style="list-style-type: none"> Based document review, MAIDAM estate conduct briefing to sprayer on restriction to sprayer at buffer zone area dated 13/10/2022 include with 'Laporan Latihan Dalaman' consist of attendance, briefing notes and pictures of workers. Based on evidence photo share, MAIDAM estate has installed signage "DILARANG MELAKUKAN AKTIVITI MEMBAJA DAN MERACUN DI KAWASAN BUFFER ZONE" in field PR18A on 23/10/2022. <p>The evidence submitted were found adequate and effectively implemented. The Major NC was closed on 28/10/2022.</p> <p>The implementation of the corrective actions will be verified during next assessment.</p>		

Opportunity For Improvement

Ref:	2252660-202209-11	Clause:	MSPO 2530 Part 3: 4.4.4.2 (b)
Area/Process:	Pelantoh Estate, Gajah Mati Estate and MAIDAM Estate		

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Objective Evidence:	Assessment of risk as Hazard Identification, Risk Assessment and Control SOP dated 22/10/18, Rev. 02/2018 for estate operations that was reviewed in 2022 to be further enhanced by having new propose control measure clearly indicated and covering potential hazard of working in area with threat of biological hazard (wildlife).
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Opportunity For Improvement			
Ref:	2252660-202209-12	Clause:	MSPO 2530 Part 4: 4.4.4.2 (b)
Area/Process:	Kemaman Palm Oil Mill		
Objective Evidence:	Assessment of risk of mill operation that was reviewed in 2022 to be further enhanced by having new propose control measure clearly indicated as priority for medium (score 5-14) and high risk (15-25).		

Opportunity For Improvement			
Ref:	2252660-202209-13	Clause:	MSPO 2530 Part 4: 4.4.4.2 (e)
Area/Process:	Kemaman Palm Oil Mill		
Objective Evidence:	The requirements in Chemical Handling SOP documented dated 01/09/17, Rev. TDMP-01/2017 under Para 7.2 Chemical Spill Kit to be further enhanced by considering other location where chemical being use other than currently stated area: General/Chemical Store and Scheduled Waste Store.		

Noteworthy Positive Comments	
1	Good commitment from TDM Plantation Sdn Bhd’s management (Oil Mill and Plantations).
2	Good filing system and documentation, easy to retrieve the documents and records.
3	Positive feedback from stakeholders whose attended during stakeholder consultations.
4	Good awareness among workers towards the MSPO requirement and able to demonstrate in fields.
5	Warmly welcome, transport and hospitality to auditors by most of mill and estates management.

3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
NCR Ref #:	2121820-202110-N1	Issue Date:	28/10/2021
Due Date:	Next Assessment Visit	Date of Closure:	29/10/2022
Area/Process:	Jernih Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 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 environmental aspect impact analysis was insufficiently covered all operations in the estates.		

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Objective Evidence:	Noted during site visit at all estates it was sighted that the bio-compost fertilizer was dump at the roadside before applied in the field. Reviewed the EAI and EIE conducted, the bio-compost application was not captured in the assessment conducted.
Corrections:	Flatten the bio-compost dump using backhoe on to frond stacking.
Root cause analysis:	Delay in flatten the bio-compost dump due to unavailability of machinery (backhoe).
Corrective Actions:	<ul style="list-style-type: none"> - Complete the application (in-field) by 3rd quarter before raining season - The application of bio-compost should begin after 3rd row from the water source (river) to avoid leaching
Assessment Conclusion:	Corrective action plan (CAP) has been accepted. Evidence of CAP effectiveness to be verified in next coming audit.
Verification Statement:	As per verification on documentation in sampling estate, the bio compost activity already been input together in the aspect and impact environmental as per new review dated 24/05/2022. The EA and EIE also captured the new activity such as palm cutter in the sampling estate. Thus, the Minor NC was close on 29/09/2022.

3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
2252660-202209-M1	4.4.4.2 Part 3 Major	29/10/2022	Closed on 27/10/2022
2252660-202209-M2	4.5.4.2 Part 3 Major	29/10/2022	Closed on 27/10/2022

3.5 Issues Raised by Stakeholders



IS #	Description
1	Issues: Local Communities, (Representative from Kampung Ladang Gajah Mati) For neighbouring communities, 1 local community invited for interviewed which are Kampung Ladang Gajah Mati. As per interview, they are aware about policy and procedure that has been established. Good communication and respond by the management and some contribution has been received.
	Management Responses: Noted on the information.
	Audit Team Findings: No other issue.
2	Issues: Suppliers (Representative from Apsha Jaya, Apsha Trading, RZ Mutiara AMBS, Hasrat Sutera Ent., Anika Agency) 5 suppliers' representatives been contacted and interviewed which are Apsha Jaya, Apsha Trading, RZ Mutiara AMBS, Hasrat Sutera Enterprise and Anika Agency. Based on interviewed with suppliers' representative informed they have a very good relationship with TDM Plantation Sdn Bhd which has already established for years. Suppliers' representative attended also informed they agreed that the payment paid within 60 days as per terms and conditions. All suppliers' representatives informed they been briefed regarding RSPO & MSPO during stakeholders meeting.

	<p>Management Responses: Noted on the information.</p>
	<p>Audit Team Findings: No other issue.</p>
3	<p>Issues: Government Agencies (SK Ladang Gajah Mati and SK Padang Kubu) Interview with teachers from SK Ladang Gajah Mati and SK Padang Kubu, they feedback with good relationship with estates management. All matters related to safety and health has regularly discussed between parties. No serious issue involved between schools and estates operations. They often joined both parties' community programme.</p>
	<p>Management Responses: Noted on the information.</p>
	<p>Audit Team Findings: No other issue.</p>
4	<p>Issues: Estates Employee (Sampled Local and Foreign employee) Interviewed with sampled employees from estates and mill. Informed that they attended training and briefing which conducted by their employer. Employees informed they are being given with equal wages, equal welfare, and equal benefits as per stated in their employment contract. Employees being paid either with daily rated and piece rated are understandable on how their salary being calculated. Employees who do not understand on their salary calculated, will be communicated with their officers for further clarifications. Any deduction from employee, will be communicate and have mutually agreement. Employees informed they are aware and being brief of any new deduction or new wages during muster call.</p>
	<p>Management Responses: Noted on the information.</p>
	<p>Audit Team Findings: No other issue.</p>

3.6 List of Stakeholders Contacted

<p>Government Officer: Headmaster, SK Padang Kubu Teacher, SK Ladang Gajah Mati</p>	<p>Community/neighbouring village: Head, Kampung Gajah Mati</p>
<p>Suppliers/Contractors/Vendors: Apsha Jaya & Motor Trading Apsha Trading RZ Mutiara AMBS Hasrat Sutera Enterprise Anika Agency</p>	<p>Worker's Representative/Gender Committee: Local employee Foreigner employee (Indonesia)</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 TDM Plantation Sdn Bhd - Kemaman Palm Oil Mill & Supply Base Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013 . It is recommended that the certification of TDM Plantation Sdn Bhd - Kemaman Palm Oil Mill & Supply Base Certification Unit is remain certified.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Haji Fikri Bin Ismail	Name: Mohd Nur Amin Bin Mohd Halim
Company name: TDM Plantations Sdn Bhd	Company name: BSI Services Malaysia Sdn. Bhd.
Title: Plantation Controller	Title: Client Manager
Signature: 	Signature: 
Date: 1.11.2022	Date: 27/10/2022

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 -	TDM Plantation Sdn Bhd established Sustainability Policy approved by the BOD and signed by Group CEO on 01/01/2022. Briefing of the policies were provided to the workers as per records of internal training report Briefing of Company Policies including MSPO Policy as follow: 1. Gajah Mati Estate dated 25/8/2022 2. MAIDAM Estate dated 13/08/2022 The policies were displayed at the notice board outside the office.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	TDM Plantation Sdn Bhd established Sustainability Policy approved by the BOD and signed by Group CEO on 01/01/2022. The policy emphasized the commitment by management in all its management aspect through: 1. Commitment and responsible management 2. Transparency 3. Compliance towards legal requirements 4. Responsibility in social, health, safety and employment condition 5. Environmental, natural resources, biodiversity and ecosystem 6. Best management practices	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>7. Responsible new development</p> <p>Additionally, the policy includes on the commitment to implement continual improvement through gainful utilization of resources among human, process and technology to ensure sustainability production of palm products.</p>	
Criterion 4.1.2 – Internal Audit			
4.1.2.1	<p>Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has established internal audit for year 2022 on MSPO / RSPO Compliance Audit Plan with latest from 02/08/2022 until 14/08/2022.</p> <p>Document review, TDM Plantation Sdn Bhd headquarters has generate internal audit report dated 15/09/2022 with findings to determine the strong and weak points and potential area for further improvement.</p> <p>For the findings, TDM Plantation Sdn Bhd headquarters has issued with 17 documentations and 11 visual findings. Out of 28 total findings, 13 findings have been closed with submitted evidence of corrective action taken by the Operating Units.</p> <p>Date internal audit conducted at sampled estate as follow:</p> <ol style="list-style-type: none"> 1. Gajah Mati Estate dated 04/08/2022 2. MAIDAM Estate dated 07/08/2022 3. Pelantoh Estate dated 09/08/2022 	Complied
4.1.2.2	<p>The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has established STPOM MSPO Internal Audit Procedure; Edition: TDMP/01; Rev.: TDMP-02/2022, date 01/01/2022. The procedure describes of identified findings and determine the needs for TDMPT sustainability internal audit in conducting internal audit activities based on the above-mentioned standards recorded in</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Sustainability Audit Non-Compliance Findings and Recommendations Report for the internal audit from 02/08/2022 until 14/08/2022. Sighted the Corrective Action Report on Non-compliance Findings on the analysis of nonconformity raised.	
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	TDM Plantation Sdn Bhd conduct management review meeting dated on 15/09/2022 to report on ' <i>Pembentangan Laporan Audit Dalam Kelestarian MSPO 2022</i> ' that includes in the meeting agenda. The discussion on the internal audit than being recorded in the minutes of meeting.	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 -	TDM Plantation Sdn Bhd conduct management review meeting dated on 15/09/2022 as per notification email of 04/2022 Marketing & Operation Meeting Year 2022 (MOM – 05/2022). The meeting was chaired by the CEO and attended by plantation controllers, all operating unit managers as well as other departmental managers including sustainability, marketing, and finance. The notification includes with meeting agenda followed: 1. Safety Briefing 2. Opening by CEO 3. Mills and estates operation performance reporting 4. Present the Internal Audit for RSPO / MSPO Reporting performance 5. Any other matters (if any).	Complied

Criterion / Indicator		Assessment Findings	Compliance																					
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>TDM Plantation Sdn Bhd established Sustainability Committee TDM South Zone Brief Report of Sustainability and Challenges (TDM South Zone) June 2022.</p> <p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate established a Continuous Improvement Plan FY 2022/2023 dated June 2022 which based on consideration of main social and environmental impact as well as opportunities for company includes with 2022 on-going and completed plan as follow:</p> <table border="1"> <thead> <tr> <th>Category</th> <th>Issue</th> <th>Plan</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Welfare (Social)</td> <td>Location of workers housing too close to effluent ponds</td> <td>Relocate to safer and better location</td> </tr> <tr> <td>Insufficient workers housing</td> <td>Additional housing construction</td> </tr> <tr> <td>Bad road surface</td> <td>Construction of Pro-base road</td> </tr> <tr> <td>Insufficient drinking water resources</td> <td>Install new water filtration system in workers rest room</td> </tr> <tr> <td>Dirty drinking water in mill</td> <td>Install new water filtration system</td> </tr> <tr> <td rowspan="3">Operation (Environmental)</td> <td>High water usage at ramp for cleaning</td> <td>Front-end upgrading works</td> </tr> <tr> <td>Cleanliness problem at front end area</td> <td>Front-end upgrading works</td> </tr> <tr> <td>Overflow of effluent</td> <td>Digging of 2 new ponds and</td> </tr> </tbody> </table>	Category	Issue	Plan	Welfare (Social)	Location of workers housing too close to effluent ponds	Relocate to safer and better location	Insufficient workers housing	Additional housing construction	Bad road surface	Construction of Pro-base road	Insufficient drinking water resources	Install new water filtration system in workers rest room	Dirty drinking water in mill	Install new water filtration system	Operation (Environmental)	High water usage at ramp for cleaning	Front-end upgrading works	Cleanliness problem at front end area	Front-end upgrading works	Overflow of effluent	Digging of 2 new ponds and	Complied
Category	Issue	Plan																						
Welfare (Social)	Location of workers housing too close to effluent ponds	Relocate to safer and better location																						
	Insufficient workers housing	Additional housing construction																						
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Operation (Environmental)	High water usage at ramp for cleaning	Front-end upgrading works																						
	Cleanliness problem at front end area	Front-end upgrading works																						
	Overflow of effluent	Digging of 2 new ponds and																						

Criterion / Indicator		Assessment Findings			Compliance
			during heavy rain	rebuild of flatbeds	
			Integrated Pest Management	Planting of beneficial plant and barn owl box	
			Empty chemical container	Triple rinsing program	
			Domestic waste - plastics	Recycle program	
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>TDM Plantation Sdn Bhd has optimized the use of mechanized operations to reduce pollutions.</p> <p>For example, existing crop evacuation system using mechanized buffalo (MB), Mini Tractor Grabber (MTG) and bin system are still in used.</p> <p>Onsite visit verified no new information and techniques, or new industry standards and technology observed.</p>			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>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate established action plan based on Continuous Improvement Plan for FY 2022/2023 adopted from Sustainability Committee TDM South Zone Brief Report of Sustainability and Challenges (TDM South Zone) June 2022.</p>			Complied
4.2 Principle 2: Transparency					
Criterion 4.2.1 – Transparency of information and documents relevant to MSP0 requirements					
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.	<p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate established records of communication with stakeholders.</p> <p>From document review, estates received request for assistance such as donation for sports day, Eid celebration, transportation, and netball pole. The estates management have responded and provided with</p>			Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>assistance.</p> <p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate established stakeholder lists which included all relevant stakeholders such as local communities, government authorities, contractors and suppliers and etc.</p> <p>Stakeholders' meeting conducted at each estate as follow:</p> <ol style="list-style-type: none"> 1. Gajah Mati Estate conducted on 14/09/2022. 2. MAIDAM Estate conducted on 14/09/2022. 3. Pelantoh Estate conducted 27/07/2022. <p>Issues raised during the stakeholders was explained in the meeting and unresolved issue has incorporated into the Social Action Plan to monitor.</p>	
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>TDM Plantation Sdn Bhd manage any restriction documents and publicly available document request from any third parties who has interest on the business related. This to prevent by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>Documents that publicly available are such as social and environment impact assessment, action plan, meeting minutes and audit reports.</p> <p>Besides, policies were also displayed at various locations including the main notice boards of the estates offices and muster ground notice boards.</p> <p>TDM Plantation Sdn Bhd issued a new approved company policies signed by Group CEO dated 01/01/2022 through email to estate managers as follow:</p> <ol style="list-style-type: none"> 1. Sustainability Policy 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		2. Environment & Biodiversity Policy 3. Social & Humanity Policy 4. Occupational safety & health Policy 5. Gender & Diversity Policy 6. Child Protection Policy 7. Freedom of Association Policy 8. Foreign Workers Policy 9. Work Ethic Policy 10. Human Right Policy 11. Reproductive Right Policy	
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 -	TDM Plantation Sdn Bhd established Stakeholder Social Issue (Requests/ Complaints / Grievances) Handling Flow-Chart Rev. 1 TDMP 2017. The flowchart is used by all estates to handle any communication and consultation matters with stakeholder. TDM Plantation Sdn Bhd established procedure of external communication for handling of specific external stakeholders. TDM Plantation Sdn Bhd has conduct stakeholders meeting at each estate with below sighted minutes: 1. Ladang Gajah Mati conducted on 14/09/2022. 2. Ladang MAIDAM conducted on 14/09/2022. 3. Ladang Pelantoh conducted 27/07/2022.	Complied
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.	TDM Plantation Sdn Bhd appoint Gajah Mati Estate, MAIDAM Estate, Pelantoh Estate Managers as PIC for communication and consultation	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	through the official appointment letter ' <i>Perlantikan Sebagai Wakil Syarikat Bagi Mengendalikan Isu Sosial Dengan Pihak Luar Di Peringkat Ladang/Kilang</i> ' issued by Group Human Resource Manager; ref. # TDMP/HR-GEN(MSPO/RSPO); dated 17/10/2021.	
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate established stakeholder lists which included all relevant stakeholders such as local communities, government authorities, contractors, and suppliers etc. for the sampled 3 estates. Sampled records maintained as following: <ol style="list-style-type: none"> 1. Register of stakeholders 2022 list 2. External communications letters received 3. Communication of workers and contractors' form TDM Plantation Sdn Bhd has conduct stakeholders meeting attended by stakeholders such as local communities, managers from other estates, workers' representatives, and school representatives at each estate with below sighted minutes: <ol style="list-style-type: none"> 1. Ladang Gajah Mati conducted on 14/09/2022. 2. Ladang MAIDAM conducted on 14/09/2022. 3. Ladang Pelantoh conducted 27/07/2022. Issues raised during the stakeholders meeting recorded in minutes of meeting and unresolved issue has incorporated into the Social Action Plan to monitor. No negative feedback was feedback to TDM Plantation Sdn Bhd.	Complied
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements	TDM Plantation Sdn Bhd established SOP on traceability and detailed out in the Supply Chain Standard Operating Procedure – Identity	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	for traceability of the relevant product(s). - Major compliance -	Preserved & Mass Balance; Section 5.4 Traceability for Estates; Document Date: 01/12/2020; Document Number: TDM/TRCBLT/04; Revision: SCCS-01/2020. All estates send their FFB to Kemaman POM. Weighbridge tickets were available for verification and maintained for traceability of all FFBs sent to the mill. Weighbridge tickets were sampled for all sample estates.	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Traceability Audit was carried out on by TDM Plantation Sdn Bhd Sustainably Department at the mill and estates. Regular Inspections are done to ensure the traceability system is well implemented. The details of the records include Block No, FFB Driver Daily Collection (Bunch), Average Bunch Weight, Total Weight and division which show the traceability from estate field to the mill. Sighted the sustainability audit report for Gajah Mati Estate (04/08/2022), MAIDAM Estate estates dated 18/08/2022.	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	Each operating unit have assigned one of their employees to be responsible for all traceability matters as verified in the appointment letters as below. 1. <u>Gajah Mati Estate</u> The management has appointed Assistant Manager as the Traceability Representative for Gajah Mati Estate as stated in the appointment letter dated 01/01/2022 undersigned by the Estate Manager. 2. <u>MAIDAM Estate</u> The management has appointed Assistant Manager as the Traceability Representative for MAIDAM Estate as stated in the appointment letter dated 01/03/2021 undersigned by the Assistant Estate Manager.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>3. <u>Pelantoh Estate</u> The management has appointed Assistant Manager as the Traceability Representative for Pelantoh Estate as stated in the appointment letter dated 31/12/2021 undersigned by the Estate Manager.</p>	
4.2.3.4	<p>Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -</p>	<p>Records of sales and delivery/transportation of FFB were maintained and updated on daily basis as part of estate production report. Sample estate FFB delivery to mill records sighted as following:</p> <ol style="list-style-type: none"> 1. Gajah Mati Estate – DO Number: LGM 2212; Date of Delivery: 19/09/2022; Vehicle Number: KDH 8033 N; Estimated Weight: (6.86mt + 4.53mt + 1.13mt). 2. MAIDAM Estate – DO Number: LMA 0226; Date of Delivery: 25/04/2022; Vehicle Number: TDQ 5397. 3. Pelantoh Estate – DO Number: LPT 2567; Date of Delivery: 24/09/2022; Vehicle Number: TBU257; Estimated Weight: 7.00 mt. 	Complied
4.3 Principle 3: Compliance to legal requirements			
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. - Major compliance -</p>	<p>TDM Plantation Sdn Bhd monitor compliance to each applicable law and regulation. Reviewed the sampled evidence of compliancy to the regulation as follows: <u>Gajah Mati Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License no. 502036302000, valid till 31/08/2023 2. MPOB License no. 562823011000, valid till 30/06/2023 	Complied

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		<p>3. Certificate of fitness (CF) no. for air receiver no. PMT-TG/22 29688 valid till 11/01/2023</p> <p>4. Diesel permit no. T 000129 (TR/DGN/09/10 SKD valid till 02/11/2024</p> <p><u>MAIDAM Estate</u></p> <p>1. MPOB License no. 503576002000, valid till 31/08/2023.</p> <p>2. Housing Certificate of fitness (CF) no. PCF: 110020170003 issued by Labour Department using Form 2, 17/08/2017</p> <p>3. Diesel permit no. T 000126 valid till 05/10/2024</p> <p>4. Wages deduction permit no.: PP3/22/0046 in purpose for Bayaran Balik Levi and Pas Lawatan Pekerja Sementara (PLKS) issued by Labour Department dated 15/06/2005.</p> <p><u>Pelantoh Estate</u></p> <p>1. MPOB License no. 502036302000, valid till 31/01/2023</p> <p>2. Deduction Wage Permit, Approval letter from Jabatan Tenaga Kerja Negeri Terengganu, ref no.: JTK(T) 600.2.2.3 (48), dated 12/11/2018. – (Electric, Water, Tabung Haji & Insurance (Great Eastern Life Assurance)</p> <p>3. Certificate of fitness (CF) no. for air receiver no. PMT-TG/21 27048 valid till 21/12/2022</p> <p>4. Diesel permit no. T 001857 (KPDNKK/KMN/25-14/07 SK D) valid till 22/01/2025</p>	
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>TDM Plantation Sdn Bhd has established SOP to identify, access, tracking changes and monitoring the compliance with legal requirements that were applicable to them documented in Standard Operating Procedure: Legal and Other Requirements. Refer document</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>no. TDM/Estate/01, rev. 00 dated 01/01/2022. The legal register shall be evaluated at least once a year.</p> <p>The estates listed all applicable legal and other requirements in Legal Register 2022.</p> <ol style="list-style-type: none"> 1. Minimum Wages Order 2020 with latest update. 2. Akta Pencegahan dan Pengawalan Penyakit Berjangkit 1988 (Akta 342). 3. Workers Minimum standard of housing accommodations and amenities act 1990. Revised on 01/02/2021. 	
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>TDM Plantation Sdn Bhd has established SOP to identify, access, tracking changes and monitoring the compliance with legal requirements that were applicable to them documented in Standard Operating Procedure: Legal and Other Requirements. Refer document no. TDM/Estate/01, rev. 00 dated 01/01/2022.</p> <p>TDM Plantation Sdn Bhd monitor compliance to each applicable law and regulation.</p> <p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate adopted the list of all applicable legal and other requirements in Legal Register 2022. Latest review and update was conducted 19/09/2022. Among the latest update to the applicable law and other regulation as follows:</p> <ol style="list-style-type: none"> 1. Movement Control Order 2020 for COVID-19 2. Minimum Wages Order 2020 with latest update. 3. Workers Minimum standard of housing accommodations and amenities act 1990. Revised on 01/02/2021. 	Complied
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory</p>	<p>TDM Plantation Sdn Bhd has established SOP to identify, access, tracking changes and monitoring the compliance with legal</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>requirements.</p> <p>- Minor compliance -</p>	<p>requirements that were applicable to them documented in Standard Operating Procedure: Legal and Other Requirements. Refer document no. TDM/Estate/01, rev. 00 dated 01/01/2022.</p> <p>TDM Plantation Sdn Bhd monitor compliance to each applicable law and regulation through Legal and Secretarial Department.</p> <p>TDM Plantation Sdn Bhd Sustainability Team will update in the legal register and communicate the new update with operating units through memorandum, letter, or emails.</p> <p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate appointed the Assistant Manager / Compliance Executive / Compliance Clerk as PIC for compliance legal and other requirement with appointment letter signed by the Estates Manager.</p>	
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd’s estates activities do not diminish the land use rights of other users. Ownership documents sighted i.e., State Title; Ownership # 6521; Lot #7663; Area: 58.7685 ha; District: Kuala Terengganu; Mukim Belara; Date: 18/11/1976; Owner: Perbadanan Memajukan Iktisad Negeri Terengganu; Leasing to: Kumpulan Ladang-ladang Terengganu Sdn. Bhd.; Period: 1/1/1973 – 31/12/2017. Sighted too the Management Agreement as following:</p> <ol style="list-style-type: none"> 1. Between Kumpulan Ladang-ladang Terengganu Sdn Bhd and TDM Plantation Sdn Bhd dated 20/7/2016 2. Between TDM Plantation Sdn Bhd and TDM Berhad dated 20/7/2016 3. Between Kumpulan Ladang-ladang Terengganu Sdn Bhd and TDM Berhad dated 1/9/2012 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		It was noted that the agreements were under review for extension depends on negotiated terms and conditions between both parties.	
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 -	<p>TDM Plantation Sdn Bhd’s estates are on government lease land, and they hold copies of Land Titles. Original land title document is kept at head office while a copy of it is available at estate’s office. At least four of the estates within Kemaman POM complex mainly Tebak, Jernih, Air Putih and Pelantoh Estates shared their land titles with demarcation only with individual estate’s field map among each other. These mainly for estates located within mukim Tebak and Bandi Estates which is also the area for mill location.</p> <p>Kemaman POM does not have a copy of land title by itself but is located within Pelantoh Estate that has legal ownership of the land and is an Operating Unit of TDM Plantation Sdn Bhd.</p> <p>Land title for Pelantoh Estate as follow:</p> <ol style="list-style-type: none"> 1. Land title QT(R) Kemaman 11 Lot No. 28 with total hectare 3439.831 2. Land title 12509 Lot no 821 with total hectare 35.45 3. Land title 12618 Lot no 822 with total hectare 68.712 	Complied
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	<p>TDM Plantation Sdn Bhd’s estates boundary are well maintained with the construction of boundary pegs. There are more than 10 boundary pegs, painted with red and white stripe installed at the boundary of the estate and are evidence in Layout Plan with details GPS Coordinate.</p> <p>Onsite visit to all estates verified that the boundary stone clearly demarcated and visibly maintained.</p>	Complied

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 or encroachment in TDM Kemaman complex at the time of audit. The land belongs to TDM Plantation Sdn Bhd and land ownership documents verified.	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 -	No lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	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 -	No lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced. The estates' maps are reviewed to confirm the location of all sampled estates.	N/A
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	No lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced. No issue of land dispute or encroachment. Thus, no FPIC required.	N/A
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			

Criterion / Indicator		Assessment Findings	Compliance
4.4.1.1	<p>Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.</p> <p>- Minor compliance -</p>	<p><u>Bukit Besi Complex</u></p> <p>TDM Plantation Sdn Bhd established Social Impact Assessment (SIA) for Bukit Besi Complex, with document ref no.: GO/SIA/2203/01.</p> <p>Document review, the report was prepared by Green Orbis Environmental Sdn Bhd, Puchong, Selangor dated 12/06/2022 until 15/06/2022.</p> <p>Based on the assessment, action plan was established on annual basis as per sighted SIA Action Plan and review on 24/01/2022.</p> <p>Sighted assessment finding and mitigation summary of positive observation for estates with aspect, positive impact and improvement being identified.</p> <p>The summary includes road maintenance, wages, work permit, housing facilities, infrastructure, CSR, job opportunity, complaints, and grievances. Progress of improvement plan shown most of the areas of concerns have been completed such as issues on poor drainage and septic tank system at line site while some were done continuously on annual basis for improvement plan such as construction of new workers quarters.</p> <p><u>Kemaman Complex</u></p> <p>TDM Plantation Sdn Bhd established Social Impact Assessment (SIA) for Kemaman Complex.</p> <p>Document review, the report prepared by SRA Consultancy, Senawang, Negeri Sembilan dated 01/11/2011.</p> <p>Based on the assessment, action plan was established on annual basis as per sighted SIA Action Plan and review in April 2022.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Sighted assessment finding and mitigation summary of positive observation for estates with aspect, positive impact and improvement being identified.</p> <p>The summary includes Housing infrastructure, health facilities, environment, social and gender policy enhancement, hospital attendance, job opportunity, safety training, renewal passport and permit during MCO. Progress of improvement plan shown most of the areas of concerns have been completed such as issues on health issues, social and gender enhancement and environmental are completed and continuously monitor. While for construction of new workers quarters, the action plan still waiting for the approval and weather due to construction need to have a land clearance and foundation with dry weather.</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>TDM Plantation Sdn Bhd established Handling Social Issue and Complaint/ Grievance Procedure.</p> <p>Based on the established procedure describes of any issue raised by stakeholders will be discuss within 2 weeks for the first meeting and issues to be resolved within 28 working days.</p> <p>Document review on the grievance form established, as follow:</p> <ol style="list-style-type: none"> Gajah Mati Estate: Dated - 23/08/2022 – ‘Borang Aduan Umum’ was latest complaint issued by worker pertaining to house maintenance on 30/04/2022 and closed at 28/08/2022 MAIDAM Estate: Dated - 01/06/2022 – ‘Borang Aduan / Cadangan’ with latest complaint issued by worker pertaining to house maintenance on 01/06/2022 and not closed due to budget. 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		3. Pelantoh Estate: Dated - 16/06/2022 – ‘Borang Aduan dan Cadangan’ with latest complaint issued by worker pertaining to house maintenance on 16/06/2022 and closed at 19/06/2022.	
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate maintained records through Complaint Logbooks. Document review was verified that all complaints and action able to be resolved in effective, timely and appropriate manner. Verification of resolution signatures by Officer, Assistant Manager and Manager were sighted.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate maintained records through Complaint Logbooks. Complaint Logbook for Linesite Repair and Complaint / Request form was established and implemented. No external stakeholders were recorded related on complaint and grievances.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate maintained records through Complaint Logbooks. Onsite interview with internal and external stakeholders informed they were aware of the complaint procedure, and they were briefed by the management during stakeholder meeting.	Complied
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate maintained records through Complaint Logbooks. The complaint logbook / complaint files that recorded complaints and solutions since at least October 2020 was maintained available to affected stakeholders upon request.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			

Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.3.1 Growers should contribute to local development in consultation with the local communities. - Minor compliance -</p>	<p>TDM Plantation Sdn Bhd contributed to local development by providing jobs opportunity for local community and store operate by local community.</p> <p>Additionally, Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate has make individual contribution to community as part of CSR.</p> <p>Document review on records of contribution as follow:</p> <p><u>Gajah Mati Estate</u></p> <ol style="list-style-type: none"> 1. Memohon sumbangan bagi kejohanan bola speak 9 sebelah; Date: 13/02/2022 2. Sumbangan barangan asas harian dan program gotong-royong pasca banjir; Date: 02/03/2022 3. Pengagihan bantuan makanan kepada staf dan pekerja yang kuarantin akibat COVID-19; Date: 22/02/2022 4. Memohon sumbangan kejohanan bola speak 9 sebelah tertutup DUN Bukit Besi piala pegawai penyeleras; date: 07/01/2022. 5. Memohon sumbangan untuk menyiapkan bilik alatan bahan bantu mengajar (ABM); date 22/11/2021 <p><u>MAIDAM Estate</u></p> <ol style="list-style-type: none"> 1. Mohon sumbangan Hamper; 18/07/2022 2. Program Huluran Kasih Ladang Siri 5, 6 and 7; 22/03/2022 <p><u>Pelantoh Estate</u></p> <ol style="list-style-type: none"> 1. Memohon meminjam kerusi bagi awatan kerja pengwakilan KBRI dan Dialog ke Ladang Tebak, 23/04/2022 2. Memohon Bantuan Pekerja untuk Kerja Kemasan Selepas Banjir SKPK 2022, dated 02/03/2022 3. Memohon sumbangan bagi bantuan Mangsa Banjir Barisan 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p>hadapan (KKM) Daerah Kemaman, dated 01/03/2022</p> <p>4. Memohon Sumbangan Perkhidmatan Van untuk TID Olahraga untuk kemasukan ke Sekolah Sukan Negeri Terengganu 2022, dated 25/01/2022</p> <p>5. Memohon Sumbangan Tanah Hitam Beserta Penghantaran, dated 18/01/2022</p> <p>6. Pelantoh Estate: Aktiviti pengambilan darah bagi mencegah penyakit malaria dan taklimat keselamatan, 23/05/2022</p> <p>7. Pelantoh Estate: Majlis Iftar untuk anak-anak yatim, 24/04/2022</p>	
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	TDM Plantation Sdn Bhd established OSH Policy signed by Group CEO dated 01/01/2022. Mentioned TDM Plantation Sdn Bhd is committed to welfare and safe and healthy working condition. Promoting legal compliance. Similar policy posted on the wall of TDM Plantation Sdn Bhd in Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate.	Complied
4.4.4.2	The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices	a) TDM Plantation Sdn Bhd established OSH Plan (For Year 2022) for Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate. Among action plan included: 1. Training on OSH Legal compliance and review between group. 2. Emergency Response Plan included review, briefing, drill, First aid training etc. 3. OSH Management System (Submission of JKKP 8, HIRARC, license review, CHRA, SDS and etc. 4. Safety and Health Committee (Meeting once every 3 months, workplace inspection, safety campaign and etc.).	Major NC & OFI

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000. f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must 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 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. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. 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. 	<ul style="list-style-type: none"> 5. PPE training to all workers. a) TDM Plantation Sdn Bhd established OSH policy, communicated and posted at strategic location such as notice board as sighted in Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate. b) Hazard identification was conducted as established HIRARC SOP Rev. 02/2018, dated 22/10/2018. Latest HIRARC Review Team was appointed as letter dated 01/09/22 by Penaung HIRARC Gajah Mati Estate. List of HIRARC documented by Gajah Mati Estate with 30 titles such as Breaktime, collection, confined space, drainage, harvesting, manuring, spraying, workshop operation etc. Sighted HIRARC for Estate Gajah Mati recently reviewed dated 01/09/22 for Replanting (Deboiling) and other activities reviewed. In MAIDAM Estate available a HIRARC List 2022 covering 25 activities and jobs. Found correct formats used in identification and assessment correctly used. For Harvesting, Manuring, weeding and Spraying Activities review dated 18/07/2022 to be enhanced by considering biological hazard such as attack by wildlife such as elephant, snake, tiger, bees and etc as received existence information from interviewed mandores and workers at site (Rat Bait & Harvester). Also sighted risk assessment column scored medium (5-14) example: Weeding-Mixing and Spraying (scored 6), Transport-Lorry / tractor breakdown (scored 12), Transporting Worker-Travelling to field (scored 12, 9, 6) and others to have recommendation of new control measures. In Pelantoh Estate, found HIRARC form revised on 14/04/2022 and the risk score medium to be enhanced by having consideration of new control measures. c) Awareness training was conducted for sprayers and manurers exposed to chemicals such as:

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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>	<ol style="list-style-type: none"> 1. Training on Rat Baiting on 20/09/2022 at Field 16B attended by 25 workers. 2. Training on Manuring (Nursery) was conducted on 14/06/2022 at Nursery and attended by 3 ladies manurers. 3. Manuring Training was conducted on 25/04/2022 and attended by 10 workers. <p>d) PPE provided as sampled during site visit at Block 20A (Manurers) provided with N95 face mask, apron, safety boots, gloves, googles. Block 15C2 (Harvesters) provided with safety boots, safety helmets, Block B15C2 (Sprayers) provided with helmets, googles, cartridge mask, apron, safety boots, nitrile gloves. TDM Plantation Sdn Bhd has established a pictogram of PPE required for Mechanic, Harvester, Sprayer. Available records of distribution of PPE to all workers in year 2022. In MAIDAM Estate, available PPE SOP dated 11/11/21, Rev. TDMP-02/2021. PPE Matrix established (MAIDAM Estate/2022). All types of PPE required, and work related performs. PPE Issuance records found maintained in FY 2022 as sampled. In Pelantoh Estate during site visit found Group of 3 Sprayers and Mandore wearing Safety Helmets, Safety Boots, Aprons, Face Mask and Gloves. While group of Harvesters, Loader and Tractor Driver wearing PPE Issued such as Safety Helmets and Safety Boots.</p> <p>e) TDM Plantation Sdn Bhd established Chemical Handling SOP Rev. TDMP-01/2017 dated 01/09/2017. Covering requirement of applicable legal and related requirements in handling, labelling, storage, and emergency. In Gajah Mati Estate and MAIDAM Estate, store of chemicals maintained and having proper signage. Sampled in Pelantoh Estate, found spraying activity at field PR20C not having signage for entry restriction after application of pesticides and bathing room for sprayers not in used as currently need to be</p>	

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	<p>repaired. Workers will go home after day of spraying at filed as accommodation not available to be used. During onsite interview sprayers understood the requirement as explained by them. This includes washing PPEs used and leave them there and not allow to bring back home.</p> <p>f) OSH person in-charge was appointed as in Organization Chart of Safety and Health Committee for Gajah Mati Estate. Chairman, Assistant Chairman, Secretary, Employee representatives, Employer representatives. Sighted SHC Organization Chart for MAIDAM Estate 2022 where Estate Manager is the Chairman. Available organization chart. Available appointment letter as sighted accordingly issued to all members dated 01/01/2022. In Pelantoh Estate, available Organization Chart of SHC where Chairman is Estate Manager as Appointment Letter dated 01/07/2022. While appointment of members as Appointment Letter dated 01/08/2022 issued by Estate Manager.</p> <p>g) Regular meeting was conducted to discuss OSH related issues as required as minutes of meeting sighted. Meetings of SHC were held on 11/09/2022, 18/06/2022, 22/03/2022, 15/12/2021 as records kept. In MAIDAM Estate, meeting of SHC was regularly conducted as sighted in the Minutes of Meeting dated 15/09/2022, 04/09/2022, 15/08/2022, 19/06/2022, 12/03/2022, 06/02/2022, 23/12/2021. In Pelantoh Estate, the SHC meeting was conducted regularly as sighted Minutes of Meeting of SHC dated 01/06/2022, 16/03/2022.</p> <p>h) Accident and Emergency Preparedness and Response Procedures dated 01/01/18, Rev. TDMP-01/2018, established, documented. Sighted in MAIDAM Estate, a fire extinguisher with BOMBA SN/EE102013Y236835 expiring 20/03/2023. Monthly Fire Fighting</p>	

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		<p>Equipment Checking Record dated 12/09/2022 which indicated Office ABC fire extinguisher with OK pressure gauge. Sampled Fire Extinguisher in Chemicals Store, Workshop and Office valid till 2023.</p> <p>i) Sighted a list of 18 First Aid Box holders for Gajah Mati Estate such as to Office, Store, Mandores (Nursery), Workshop, Ramp. Crech, Mandores. This managed by Medical Assistant of Gajah Mati Estate. In MAIDAM Estate available a document of List of First Aid Box Keeper 2022. Main Office (Compliance Clerk), Estate Office (External Officer), Worker Quarter (Harvester-TNI), Chemical Store (External Officer), Security (Guard), Harvester Gang (Mandore), Matured Area (Tractor Driver), Immature Area (Tractor Driver). Monthly inspection done by Clerk for data sighted in 2022. As sampled in Pelantoh Estate found first aid box kept by Sprayer Mandore, Workshop, Chemical store maintained and accessible by workers.</p> <p>j) Accident Records maintained as sighted in Accident Log and recorded 19 accidents for Gajah Mati Estate:</p> <ol style="list-style-type: none"> 1. JKPP 6 for accident involving maintenance on 31/07/2022 2. JKPP 6 for accident involving Harvesters on 01/06/2022 3. JKPP 6 for accident involving Harvester on 24/05/2022 4. JKPP 6 for accident involving Badang Driver on 12/03/2022 5. Statistic of accident in 2021 using JKPP 8 was submitted to JKPP on 06/02/2022 <p>18 accidents recorded in Accident log for MAIDAM Estate for 2022. Among notification made in 2022 covering:</p>	

Criterion / Indicator	Assessment Findings	Compliance
	<p>1. JKPP 7 for occupational poisoning case involving Sprayer from exposure of pesticides activity reported by OHD from Klinik Bestari Sdn. Bhd. on 31/08/2022.</p> <p>2. Statistic of accident in 2021 using JKPP 8 was submitted to JKPP on 09/01/2022.</p> <p>In Pelantoh Estate, accident was reported occurred:</p> <ul style="list-style-type: none"> on 30/05/2022 at Field 19A involving Maintenance Worker - left wrist cut and 4 days medical leaves (Occupational). Another accident on 01/03/2022 involving mandore from motorcycle accident (non-Occupational). <p>Form JKPP 8 was submitted to JKPP on 18/01/2022 by former CC.</p> <p><u>Major Non-conformance (Major NC)</u></p> <p>The proper and safe handling of pesticides found not consistent with relevant Standard Operating Procedure and applicable legal requirements as found no signage for entry restriction after application of pesticides and bathing room for sprayers currently cannot be used and need to be repaired in providing facility for them to clean-up themselves and washing PPEs used before going home.</p> <ol style="list-style-type: none"> Chemical Handling SOP documented dated 01/09/17, Rev. TDMP-01/2017. Para 4.3 Shower Room/Changing Room Spraying activity at field PR20C not having signage for entry restriction after application of pesticides. Interviewed 3 lady sprayers and mandore at site on requirements of signage and bathing room. 	

Criterion / Indicator		Assessment Findings	Compliance
		<p>4. Visit at Chemical Store where the bathing room is located found has not being used for sometimes and need to be repaired immediately.</p> <p><u>Opportunity for Improvement (OFI)</u></p> <p>4.4.4.2 (b) - Assessment of risk as Hazard Identification, Risk Assessment and Control SOP dated 22/10/18, Rev. 02/2018 for estate operations that was reviewed in 2022 to be further enhanced by having new propose control measure clearly indicated and covering potential hazard of working in area with threat of biological hazard (wildlife).</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>TDM Plantation Sdn Bhd established Sustainability Policy approved by the BOD and signed by Group CEO on 01/01/2022.</p> <p>Briefing of the company policies were conduct to the workers including Sustainability Policy as follow:</p> <ol style="list-style-type: none"> 1. Gajah Mati Estate dated 25/8/2022 2. MAIDAM Estate dated 13/08/2022 <p>The policies were displayed at the notice board outside the office.</p>	Complied
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd established Sustainability Policy approved by the BOD and signed by Group CEO on 01/01/2022.</p> <p>The policy stated that the management was committed to treat everyone equally without any discrimination and provide equal opportunities regardless of race, nationality, and gender etc.</p> <p>Onsite interviewed with workers informed no discrimination was practice by the management.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Briefing of the policies were provided to the workers as per records of internal training report Briefing of Company Policies including Sustainability Policy as follow:</p> <ol style="list-style-type: none"> Gajah Mati Estate dated 25/8/2022 MAIDAM Estate dated 13/08/2022 	
4.4.5.3	<p>Management shall ensure that employees’ pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd have ensured that employees’ pay and conditions meet applicable legal requirements i.e. MAPA / NUPW Circular No. 16/2022, revised dated 29/04/2022 in line with Minimum Wages Order 2022, P.U (A) 140, revised dated 27/04/2022; Oil Palm MAPA/NUPW on the Wages of Harvesters, Harvesting Kangannies, Loaders and `Other Loaders on Oil Palm Estates, 2022; Wage Rate August 2022 & Palm Oil Mill MAPA/NUPW Palm Oil Mill Employees Agreement, 2022; Wage Rates – August 2022.</p> <p>Document review on sampled employee payslip as follow:</p> <p><u>Gajah Mati Estate</u></p> <ol style="list-style-type: none"> Employee # GM0901821; Post: General Worker - Field; Male Employee # GM0901990; Post: General Worker – Field; Male Employee # TB1200654; Post: General Worker – Field; Female <p><u>MAIDAM Estate</u></p> <ol style="list-style-type: none"> Employee # MA0006; Post: Manurer; Female Employee # MA1300294; Post: Sweeper; Female Employee # MA1500358; Post: Manurer, Female Employee # MA2200539; Post: Scout Harvesting; Male Employee # MA1900518; Post: General Worker; Male <p><u>Pelantoh Estate</u></p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		1. Employee # PT0900446; Post: Harvester; Male 2. Employee # PT0900450; Post: Harvester; Male 3. Employee # PT1701130; Post: General Worker; Male 4. Employee # PT1400980; Post: General Worker; Male 5. Employee # PT2003405; Post: General Worker; Female 6. Employee # PT1701194; Post: General Worker; Female All samples shown employees received minimum wages as per legal requirements.	
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance -	TDM Plantation Sdn Bhd has ensure their contractors follow the industrial best practices in terms of hiring their own employee. The contractor shall be solely responsible for their employees and workmen whereby the contractor shall pay and shall be solely responsible for the payment wages, salary, benefits, EPF contribution, SOCSO and any other benefits required under the laws of Malaysia. Document review, on sampled contractors' employee payslip as follow: Pelantoh Estate: Contractor: Maliaray Holiday Sdn Bhd Driver ID: 640601-xx-xxxx Basic pay above MYR 1,500.00. Employer Contribution for EPF and SOCSO.	Complied
4.4.5.5	The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate established list of employees consist of employee number, full name, division, wages, NRIC / Passport no, employment category, nationality, DOB, age, race, and status in the HR Payroll system updated September 2022.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>		
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>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate provide with fair contracts signed by both employee and employer. The employment contracts which contents comply with Employment Act 1955.</p> <p>Both parties will have copy for reference.</p> <p>Document review on the sample employee's file, the employment contracts include overtime pay, rest day, working hours, rate for working on rest day, termination notice period, public holidays, paid annual leave, paid medical leave, etc.</p>	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	<p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate established computation recording system and implemented through punch card. The check roll system will generate with Time and Attendance Report of employee working hours and overtime that is transparent.</p>	Complied
4.4.5.8	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p> <p>- Major compliance -</p>	<p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate provide with fair contracts signed by both employee and employer. The employment contracts which contents comply with Employment Act 1955 includes with working hours of 8 hours and overtime.</p> <p>Working day for all estate starting from Saturday to Thursday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Employment Act 1955.</p> <p>As per mentioned in the employment contract, stated that working hours is from 6.30 am until 2.30 pm inclusive of 30 minutes of break time. Overtime rate which stated 1.5 for normal hours rate, 2.0 from</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		normal rate for rest days and 3.0 for public holiday and will not exceed 104 hours per months.	
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 -	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate provide with fair contracts signed by both employee and employer. The employment contracts which contents comply with Employment Act 1955. As per sampled of employee payslip verified, they paid as per requirement. Wages and overtime payment documented found consistent with legal regulations and collective agreements as per sample sighted in indicator 4.4.5.3 above.	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - Minor compliance -	TDM Plantation Sdn Bhd has forms of social benefits for all employees including the mandatory contribution for local workers & staff of Social Security Organization (SOCSO) Monthly Contribution sighted as per sample sighted as following: <ol style="list-style-type: none"> 1. Gajah Mati Estate: Form 8A SOCSO Acknowledgement Contribution Received (ACR); Employer Code: F8100000658Z; Period: 08/2022; Date: 3/8/2022 2. MAIDAM Estate: Form 8A SOCSO Acknowledgement Contribution Received (ACR); Employer Code: F8100002826A; Period: 08/2022; Date: 04/09/2022. 3. Pelantoh Estate: Form 8A SOCSO Acknowledgement Contribution (ACR); Employer Code: F8100000656K; Period: 08/2022, Date: 03/09/2022 Other than that, TDM Plantation Sdn Bhd include in the employment contract of remuneration, working hours, rate of pay, leaves and any other benefits of employment entitle to them.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.5.11 In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p>- Major compliance -</p>	<p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate provide living quarters to all employees.</p> <p>Onsite visit to the housing area / line site, observed quarters are decently habitable and equipped with basic amenities of free electricity and water supply including other facilities such as mosque, community hall, sundry store, canteen, children’s crèche and football field.</p> <p>Gajah Mati Estate and MAIDAM estate sharing clinic which is located at Gajah Mati Estate.</p> <ol style="list-style-type: none"> 1. Latest VMO visit for Gajah Mati Estate dated 15/09/2022 by doctor from Klinik Bestari Dungun. 2. Latest housing inspection for Gajah Mati Estate by MA conducted on 15/09/2022 for workers line site main division, creche, chemical store, workshop & hall. 3. Program Semburan Nyamuk di Kawasan Perumahan Pekerja dated 01/09/2022. <p>Pelantoh Estate:</p> <ol style="list-style-type: none"> 1. Weekly linesite inspection / Pemeriksaan Mingguan Perumahan Pekerja, dated: 26/09/2022, 21/08/2022 & 07/09/2022. 2. Latest VMO visit for Pelantoh Estate dated 26/09/2022 by doctor from Klinik Bestari Dungun. 3. Crèche daily book updated by September 2022, 8 workers’ children were being taking care by 2 nannies with typhoid injection (Fatimah Binti Ali, 720217-xx-xxxx and Sakina Binti Samudera Khan, 670613-xx-xxxx) <p>Gajah Mati Estate and MAIDAM Estate sharing clinic which is located at Gajah Mati Estate. Pelantoh Estate, Tebak Estate and Kemaman POM sharing clinic which is located at Tebak Estate.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.5.12 The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has established Gender Policy and Reproductive Policy signed by Group CEO dated 01/01/2022.</p> <p>TDM Plantation Sdn Bhd will ensure the workplace and surrounding are free from any types of harassment included ethnic harassment, religious, gender, country of origin etc. They will ensure that the rights of women will be protected.</p> <p>Document review, Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate conduct periodical meetings among women employees through Women Association.</p> <p>Sampled as follow:</p> <ol style="list-style-type: none"> 1. Gajah Mati Estate conduct on 11/08/2022, 09/05/2022, 10/2/2022. 2. Pelantoh Estate on 29/08/2022, 22/06/2022, 21/03/2022. 	<p>Complied</p>
<p>4.4.5.13 The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has established Social Policy signed by Group CEO dated 01/01/2022.</p> <p>The policy describes TDM Plantation Sdn Bhd is committed to comply with principles as following:</p> <ol style="list-style-type: none"> 1. Fair treatment to everyone without discrimination 2. Freedom of association to everyone 3. Strongly opposed force labour and child labor <p>TDM Plantation Sdn Bhd respect the rights of all personnel to form and join trade unions of their choice to bargain collectively.</p> <p>Onsite interview with workers informed they have not restricted form or join trade union. The workers have their freedom to join the NUPW/ MAPA union.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.5.14 Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children and young persons is acceptable on family farms, under adult supervision, and when not interfering with their education. They shall not be exposed to hazardous working conditions.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has established Child Protection Policy signed by Group CEO dated 01/01/2022.</p> <p>The policy describes TDM Plantation Sdn Bhd will not recruit or exploit any individual less than 16 years old to work in the company.</p> <p>Document review on employee master list verified that all the workers were above 18 years old.</p> <p>Onsite interviewed with workers informed they are no children working with TDM Plantation Sdn Bhd with age less than 18 years old.</p>	<p>Complied</p>
<p>Criterion 4.4.6: Training and competency</p>		
<p>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.</p> <p>- Major compliance -</p>	<p>Gajah Mati Estate has records of training conducted and maintained as sighted among others:</p> <ol style="list-style-type: none"> 1. Basic First Aid CPR (BOFA-C) and AED conducted on 23-24/03/2022 and attended by Field Assistant and Compliance Clerk of Gajah Mati Estate. 2. First Aid Box conducted on 19/09/2022 at Gajah Mati Clinic and attended by 18 workers (mandora). 3. Fire Drill conducted on 14/03/2022 at Muster Ground and attended by 29 workers with support of 6 BOMBA Officers. 4. Rat Baiting conducted on 20/09/2022 at Field 16B attended by 25 workers. 5. Tractors Driver conducted on 16/02/2022 at workshop and attended by 10 workers and mostly tractor drivers. On 11/01/2022 attended by 14 tractor drivers. 6. Noise Risk conducted on 30/01/2022 during Muster Call and attended by 14 workers. 	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>7. Manuring (Nursery) conducted on 14/06/2022 at Nursery and attended by 3 ladies manurers.</p> <p>8. Manuring conducted on 25/04/2022 and attended by 10 workers. MAIDAM Estate has records of training conducted and maintained as sighted among others:</p> <ol style="list-style-type: none"> 1. Noise risk conducted on 29/01/2022 attended by 6 workers (Mist Blowers, Tractor Driver, Genset Operator, Mistblower Operator). 2. Using of Fire Extinguisher conducted on 10/03/2022 3. Scheduled Waste Management (e-waste) conducted on 15/03/2022 4. First Aid conducted on 27/07/2022. 5. Rat Baiting conducted on 04/09/2022 attended by 7 General Workers. 6. PPE usage conducted on 04/09/2022 attended by 16 workers. 7. Harvesting conducted on 20/06/2022 attended by 8 harvesters and mandora. 8. Manuring conducted on 16/06/2022 attended by 5 Manurers, Mandore and Tractor Driver. 9. Spraying conducted on 20/04/2022. 10. Scheduled Waste conducted on 21/08/2022 attended by 9 Workers. <p>Pelantoh Estate has records of training conducted and maintained as sighted among others:</p> <ol style="list-style-type: none"> 1. Use of Fire Fighting Equipment on 21/09/2022 attended by all estate workers. 	

Criterion / Indicator		Assessment Findings	Compliance
		2. First aid Box conducted on 21/05/2022 and attended by 9 mandores, Assistant, Field Officer. 3. MSPO Policy and other policies conducted on 15/08/2022 and attended by workers at Block 93E1. 4. Safety and Sustainability to contractors conducted on 27/07/2022 attended by 8 workers. 5. Manuring conducted on 29/05/2022 attended by 12 workers. 6. Scheduled Waste Management & Triple Rinse conducted on 17/05/2022 and attended by 14 workers. 7. Safe Manuring Handling conducted on 11/04/2022 and attended by 4 workers. 8. Safe Spraying conducted on 13/08/2022 attended by 11 Sprayers (Gang 13). 9. Pruning conducted on 12/04/2022 and attended by 13 workers. 10. Buffer Zone conducted on 12/03/2022 attended by 6 workers.	
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 -	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate adopt TDM Plantation Sdn Bhd's OSH Plan Year 2022, Training Matrix, and Training Schedule. The plan includes types of training to be conducted and employees that required to attend training (Manager, Assistant Managers, HA, Field Supervisor, Office Staff, OSH Committee, ERT team, Mandores, Storekeeper, Operators (Harvesters, Sprayers, Manurers, General Workers), Drivers/Loader, Ramp Attendant and Foreman. Matrix covering training such as OSH Legal Compliance Review, OSH Management System, Safe Driving Technique, HIRARC, Accident and Dangerous Occurrence, Schedule Waste management, RSPO/ MSPO	Complied

Criterion / Indicator		Assessment Findings	Compliance
		training, SOP training etc. While training participants clearly indicated from Estate Manager, Assistant till General Workers.	
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 -	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate adopt TDM Plantation Sdn Bhd’s OSH Plan Year 2022, Training Matrix, and Training Schedule. Continuous training planned for employees such as harvesters, sprayers, manurers to ensure they are well trained and understand their job function and roles.	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 -	TDM Plantation Sdn Bhd has established Biodiversity and Environmental Policy signed by the Group CEO dated 01/01/2022. In the policy stated the company commitment to: 1. Complied with all statutory requirement regarding biodiversity and environmental 2. Creating, maintaining and continuous improvement of sustainable plantation management 3. Eliminate potential adverse effects on the environment and biodiversity that may arise from plantation activities 4. Provide an effective work system subject to Environmental Quality Act 1974 5. Ensure zero burning is always given priority as stipulated in the Environmental Quality (Declared Activities) (Open Burning) Order 2003.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		The policy was communicated to the employee through displayed at notice board at the offices, training and morning briefing.	
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations.</p> <p>- Major compliance -</p>	<p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate conducted aspect and impacts analysis of all operations as per SOP established and documented in Standard Operating Procedure – Environmental Aspects/Impacts Evaluation date 01/11/2017, edition TDMP/01 rev. TDMP – 01/2017.</p> <p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate conducted environmental aspects impacts analysis for all operation in the estate and documented in Environmental Aspect Identification and Environmental Impact Evaluation.</p> <p>The management review the environmental aspects impacts on annually basis or if there are changes in the legal or mill operation.</p> <p><u>Gajah Mati Estate</u></p> <p>Latest aspect impacts analysis review was conducted in 01/09/2022. Base EAI and EIE conducted, the estate established environmental management plan. This also included the new activity Har-Mechanical Palm Cutter (MPC).</p> <p><u>MAIDAM Estate</u></p> <p>Latest aspect impacts analysis review was conducted in 29/06/2022. Base EAI and EIE conducted, the estate established environmental management plan.</p> <p><u>Pelantoh Estate</u></p> <p>Latest aspect impacts analysis review was conducted in 25/05/2022. Base EAI and EIE conducted, the estate established environmental management plan.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Noted during site visit at Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate it was sighted that the bio-compost fertilizer was dump at the roadside before applied in the field. Reviewed the EAI and EIE conducted, the bio-compost application was not captured in the assessment conducted.	
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance -	The management review the environmental aspects impacts on annually basis or if there are changes in the legal or estates operation. <u>MAIDAM Estate</u> Latest review was conducted in 29/06/2022. Based on the EIE and EAI conducted, the estate has established Environmental Management Plan. Reviewed the implementation as follows: <ol style="list-style-type: none"> 1. To reduce the usage of chemical: using barn owl box to control rat population in estate and using beneficial plant to control bag bagworm and others pest in estate. 2. The empty pesticides containers were triple rinse and reuse back as pre-mix chemical container. The estate monitors the inventory of empty pesticides container on monthly. 3. 3. to service the oil trap or pollution control device every 2 monthly basis to ensure the oil trap was function accordingly. 	Complied
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	No changes from the previous report. Program to promote the positive impacts was documented in the Continuous Improvement Plan / Environmental Management Plan. Sighted the improvement plan as follows: <ol style="list-style-type: none"> 1. Planting beneficial plan such as Tunera Subulata to control pest 2. Frond stacking to enhance the beneficial microbe and bacteria for soil fertility 	Complied

Criterion / Indicator		Assessment Findings	Compliance												
		3. Rainwater harvesting													
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate continuously provide training to the workers to create awareness regarding the environmental policy and management plan established. Sighted the training records as stated in criteria 4.4.6.1 above.	Complied												
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate managements has established Environmental Performance Monitoring Committee. The committee consist of representative from the employer and employee. The committee conducted meeting on quarterly basis. Gajah Mati Estate conducted on 4/9/2022 refer meeting record 03/2022 previously was on 12/6/2022 (02/2022). Pelantoh Estate conducted on 23/02/2022 (032022) and previously was on 18/05/2022 (022022)	Complied												
Criterion 4.5.2: Efficiency of energy use and use of renewable energy															
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance -	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate have established management plan to assess the usage of the non-renewable energy in the estate and documented in the Continuous Improvement Plan. Sighted the implementation of the management plan FY 2022 as follows: <table border="1" data-bbox="1048 1232 1877 1396"> <thead> <tr> <th>Diesel usage/ FFB Production</th> <th>Gajah Mati Estate</th> <th>MAIDAM Estate</th> <th>Pelantoh Estate</th> </tr> </thead> <tbody> <tr> <td>FY 2020</td> <td>3.22 (75,758 liter)</td> <td>19.78 (2,842.78 liter)</td> <td>1.79 (55,929 liter)</td> </tr> <tr> <td>FY 2021</td> <td>3.22</td> <td>21.52</td> <td>2.98</td> </tr> </tbody> </table>	Diesel usage/ FFB Production	Gajah Mati Estate	MAIDAM Estate	Pelantoh Estate	FY 2020	3.22 (75,758 liter)	19.78 (2,842.78 liter)	1.79 (55,929 liter)	FY 2021	3.22	21.52	2.98	Complied
Diesel usage/ FFB Production	Gajah Mati Estate	MAIDAM Estate	Pelantoh Estate												
FY 2020	3.22 (75,758 liter)	19.78 (2,842.78 liter)	1.79 (55,929 liter)												
FY 2021	3.22	21.52	2.98												

Criterion / Indicator		Assessment Findings				Compliance
			(76,689 liter)	(2,805.17 liter)	(60,480 liter)	
		FY 2022	2.03 (35,627 liter)	16.68 (1,848.87 liter)	3.66 (31,957 liter)	
		<p>As per verification the management have establish the diesel usage plan to decrease the usage such as monitor the vehicle condition on daily basis recorded in 'Pemeriksaan harian/ mingguan kendaraan' and reviewed the diesel usage by tractor records by monthly.</p> <p>Pelantoh Estate have significant rise during year 2021 due to more replanting activity and lorry been used. The used of diesel high but the low in productivity of FFB have contribute to high rate.</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>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate have established baseline for diesel usage based on 5 years diesel consumption trend. The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations. This all based on the budget of the management, sighted the record was available.</p>				Complied
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p>	<p>Not sighted and no record of renewable energy used in Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate.</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>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate have identified the waste products and source pollution generated in the estates and mill. The waste is categorized as follows:</p>				Complied

Criterion / Indicator		Assessment Findings	Compliance
		Scheduled Waste: SW 102, SW 305, SW 306, SW 408, SW 410, SW 404, SW 409 Domestic Waste: Rubbish and Sewage waste Industrial Waste: EFB & Scrap metal	
4.5.3.2	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for: a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products - Major compliance -	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate established management Plan base on the identification and source of pollutions and the documented in Waste management Plan FY 2022 and were available for review. In the management plan stated the type of waste, description, source of pollution, action to be taken and person responsible. Reviewed the implementation of the management plan as follows: 1. In Gajah Mati Estate collected the domestic waste 3 times a week and disposed at the designated landfill. Sighted the landfill at field P18A1, only domestic waste was disposed in the landfill. Reviewed collection records dated 3/8/2022, 7/8/2022 and 11/8/2022. 2. In MAIDAM Estate applied bio-compost (bio-organic fertilizer) as nutrient cycle program. Noted during site visit at field PR18A, it was sighted that the bio-compost fertilizer application in the field.	Complied
4.5.3.3	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. - Major compliance -	TDM Plantation Sdn Bhd has established SOP for handling scheduled waste and documented in Standard Operating procedure – Procedure for handling schedule waste dated 1/11/2008, edition TDMP/02 rev. TDMP – 02/2017. Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate also has a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected at both estates visited, and disposal	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate maintains the inventory records of the Scheduled Waste generated and reported to DOE through ESWISS. Reviewed the Fifth Scheduled: Inventory of Scheduled Waste for the month of July, August, September and October 2022.</p> <p>Inventory for all scheduled waste generated were recorded and reported to DOE through E-SWISS. Reviewed the sampled scheduled waste disposal records:</p> <p><u>Gajah Mati Estate</u></p> <ol style="list-style-type: none"> 1. 2022092016QAELO4 dated 20/09/2022 for SW 404 2. 2022083011KYSJRN dated 30/08/2022 for SW 410 3. 2022083012W4ETI3 dated 30/08/2022 for SW 409 <p><u>MAIDAM Estate</u></p> <ol style="list-style-type: none"> 1. 2022091216V169ER dated 12/09/2022 for SW 408 2. 2022091216YJKQ3E dated 12/9/2022 for SW 103 3. 202209121630OCTV dated 12/09/2022 for SW 102 4. 2022090413RGO4XZ dated 4/9/2022 for SW 305 <p><u>Pelantoh Estate</u></p> <ol style="list-style-type: none"> 1. 20220921120OKI6B dated 21/09/2022 for SW 410 2. 20220920128VKAZL dated 20/09/2022 for SW 404 3. 2022091216BILKD dated 12/09/2022 for SW 102 	
4.5.3.4	Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there	Empty pesticides container were triple rinse and puncture before being disposed as scheduled waste.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer’s labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers. - Major compliance -	Reviewed the disposal records as follows: Gajah Mati Estate disposed as scheduled waste (SW 409). Latest record was on 30/08/2022 as per consignment note 2022083012W4ETI3. MAIDAM Estate disposed as scheduled waste (SW 409). Latest record was on 04/09/2022 as per consignment note 2022090413074WVE.	
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	<u>Gajah Mati Estate</u> The estate collected the domestic waste 3 times a week and disposed at the designated landfill. Sighted the landfill at field P18A1, only domestic waste was disposed in the landfill. <u>MAIDAM Estate</u> The estate collected the domestic waste 3 times a week and disposed at the designated landfill. Sighted the landfill at field P98A, only domestic waste was disposed in the landfill.	Complied
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate conducted assessment of all polluting activities in the Environmental Aspect Impact and Environmental Impact Evaluation. A management plan has been established based on the significant aspect identified during the assessment and documented in the Pollution Prevention Plan/ Environmental Management Plan.	Complied
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	A management plan has been established based on the significant aspect identified during the assessment and documented in the Pollution Prevention Plan/Environmental Management Plan. <u>Major Non-conformance (Major NC)</u>	Major NC

Criterion / Indicator		Assessment Findings	Compliance																		
		Found the action plan to reduce pollution inadequately implemented. The management already establish Pollution Prevention Plan 2022 dated 5/2/2022 already identified buffer zone and to ensure no chemical activities in this area. However sighted spraying activity in field PR18A at buffer zone area. Thus, Major NC been raised in MAIDAM Estate.																			
Criterion 4.5.5: Natural water resources																					
4.5.5.1	<p>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 	<p>a. Policy signed by the CEO dated 01/04/2021. In the policy stated that river buffer zone must be maintained at both side of riverbank as per schedule below:</p> <table border="1"> <thead> <tr> <th>No</th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate visited monitored the water consumption on monthly basis in litres per metric ton FFB produced (l/mt FFB). Sighted the sampled records was available at each estate.</p> <p>b. TDM Plantation Sdn Bhd has established SOP for Taking Water Samples from sampling Points/Streams/Rivers. Refer document no. TDM/EST/01 rev. EST-02/2018 dated 01/12/2018.</p> <p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate conducted river water quality monitoring on annually basis as per SOP established. Reviewed the records as follows: <u>Gajah Mati Estate</u></p>	No	River width	Buffer zone	1	> 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters	Complied
No	River width	Buffer zone																			
1	> 40 meters	50 meters																			
2	20 - 40 meters	40 meters																			
3	10 - 20 meters	20 meters																			
4	5 - 10 meters	10 meters																			
5	< 5 meters	5 meters																			

Criterion / Indicator	Assessment Findings	Compliance
<p>the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>	<p>Latest river water sampling was conducted on 19/09/2022 by Eralab (KT) Sdn Bhd. Refer lab report no. 21/08/W0556 dated 29/08/2021. The results were complied with limit stated in Class IIA/IIB of NWQSM.</p> <p><u>MAIDAM Estate</u></p> <p>Latest river (Sg Angka) water sampling was conducted on 11/08/2022 by Eralab (KT) Sdn Bhd. Refer lab report no. 22/08/W0589 dated 11/08/2022. The results were complied with limit stated in Class IIA/IIB of NWQSM.</p> <p>c. Harvesting of rainwater was practiced at Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate operation i.e. water bodies area whereas in the field drain, collection drain and main drain was well maintained to collect rainwater. Pruned palm oil fronds are heaped at interrow and soft grass allowed to grow to retain moisture and prevent nutrient washout.</p> <p>d. The riparian buffer zone along natural waterway was established. No chemical spraying within the 5 meters from riverbank is allowed. Observed adequate maintaining and restoring appropriate riparian buffer zones at along all-natural waterways within the estate. Training was given to sprayers and manurers on no chemical application at the prohibited areas of the buffer zone.</p> <p>e. Site visit has confirmed that riparian buffer was well maintained as per policy statement.</p> <p>f. It was confirmed that there was no bore well available at the assessed estates.</p>	

Criterion / Indicator		Assessment Findings	Compliance								
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	Sighted during field visit in Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate, no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	Complied								
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). - Minor compliance -	Water management plan includes rainwater harvesting, desilting of roadside drains etc. For office / housing complex, the rainwater harvesting was used for cleaning housing compound etc.	Complied								
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value											
4.5.6.1	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover: a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. - Major compliance -	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate have conducted Biodiversity Assessment for Kemaman Complex by SRA Consultancy as per report dated November 2011. HCV Toolkit for Malaysia by WWF – Malaysia was used. There were appropriate consultation processes as per the HCV Toolkit-Malaysia which covers the three main components of identification, management and monitoring. Among the HCV and Conservation area identified as follows: <table border="1" data-bbox="1048 1066 1870 1300"> <thead> <tr> <th>Estate</th> <th>HCV Area</th> </tr> </thead> <tbody> <tr> <td>Gajah Mati Estate</td> <td>River bufferzone – Sungai Kesik & Sungai Besul Forest Reserve Besul and Wildlife Sanctuary</td> </tr> <tr> <td>MAIDAM Estate</td> <td>River bufferzone – Sungai Nipis, Sg. Manik and Sg. Angka Forest Reserve Kuala Jengal</td> </tr> <tr> <td>Pelantoh Estate</td> <td>River bufferzone – Sungai Tebak</td> </tr> </tbody> </table>	Estate	HCV Area	Gajah Mati Estate	River bufferzone – Sungai Kesik & Sungai Besul Forest Reserve Besul and Wildlife Sanctuary	MAIDAM Estate	River bufferzone – Sungai Nipis, Sg. Manik and Sg. Angka Forest Reserve Kuala Jengal	Pelantoh Estate	River bufferzone – Sungai Tebak	Complied
Estate	HCV Area										
Gajah Mati Estate	River bufferzone – Sungai Kesik & Sungai Besul Forest Reserve Besul and Wildlife Sanctuary										
MAIDAM Estate	River bufferzone – Sungai Nipis, Sg. Manik and Sg. Angka Forest Reserve Kuala Jengal										
Pelantoh Estate	River bufferzone – Sungai Tebak										
4.5.6.2	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management	Endangered, rare and threatened species classified by IUCN was recorded in the report findings for the studies undertaken. Among the	Complied								

Criterion / Indicator		Assessment Findings	Compliance
	<p>planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p>- Major compliance -</p>	<p>species recorded are elephant (<i>Elephas maximus</i>), Malayan tiger (<i>Panthera Tigris Corbetti</i>), Malayan tapir (<i>Tapirus Indicus</i>) and wild boar. Other species captured during the assessment was monkey and birds. It is due to certain estate bordering with the forest reserve.</p> <p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate continues to create awareness on the RTE through training. Signboard of prohibition of illegal hunting were erected at several strategic places in the estates such as estates entrance, office, housing areas and conservation areas.</p>	
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>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate established HCV Management and Monitoring Plan 2022. Reviewed the implementation of the management plan as follows:</p> <p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate conducted HCV monitoring on annually basis. Latest HCV monitoring was conducted in Aug 2022. During the monitoring, sighted the evidence of wild boar footprint at the HCV area (MAIDAM Estate).</p> <p><u>Gajah Mati Estate</u></p> <p>Latest river water sampling was conducted on 19/09/2022 by Eralab (KT) Sdn Bhd. Refer lab report no. 21/08/W0556 dated 29/08/2021. The results were complied with limit stated in Class IIA/IIB of NWQSM.</p> <p><u>MAIDAM Estate</u></p> <p>Latest river (Sg Angka) water sampling was conducted on 11/08/2022 by Eralab (KT) Sdn Bhd. Refer lab report no. 22/08/W0589 dated 11/08/2022. The results were complied with limit stated in Class IIA/IIB of NWQSM.</p> <p><u>Pelantoh Estate</u></p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Latest river (Sg Tebak) water sampling was conducted on 23/08/2022 by Eralab (KT) Sdn Bhd. Refer lab report no. 22/08W0632 dated 23/08/2022. The results were complied with limit stated in Class IIA/IIB of NWQSM.	
Criterion 4.5.7: Zero burning practices			
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -	There was no land preparation of existence or new planting in sampling Estates by burning ever since TDM Plantation Sdn Bhd practiced zero burning as per the policy in: 1. Under felling/clearing & land preparation 2. Carbon Policy TDM Plantation Sdn Bhd has a policy of no open burning. As advocated, Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed, and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal.	Complied
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance -	No areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. Therefore, not required treatment by burning method.	N/A
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws.	There is no controlled burning carried out in preparation of replanting in Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate.	N/A

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	There are no infected oil palms observed at field operations that required treatment by burning method. There is no application for approval of controlled burning.	
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	In the replants visited during the audit in Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate, it was evidence that all palms were felled, shredded, and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	TDM Plantation Sdn Bhd established standard operation procedure for estates operations. There are levels of the documentation identified as follows. 1. Level 1 standard operating procedure 2. Level 2 work instruction 3. Level 3 records. Amendments are made should there be requirement to suit the local issues/situation. Latest Standard Operating Procedure updated as follows: TDM Plantation Sdn Bhd has established system to monitor and control of best practice implementation at its estate such as: 1. Internal audit by Sustainability Department 2. Plantation Controller Visit 3. Agronomist visit.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Monthly progress report submitted to the headquarters.	
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. - Major compliance -	TDM Plantation Sdn Bhd has established Slope Protection and River Buffer Zone Policy signed by the Group CEO dated 01/04/2021. The policy describes as follows: 1. For area with slope more than 25° must be excluded from new planting development and replanting program. 2. For area with slopes less than 25°, existing crops and plants should be properly maintained.	Complied
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	During site verification, seen all fields are marked and identified. Information like year planting (field no) and the total hectare is shown in all markers. There are both stencilled at the palm trees and displayed in signage at the boundary/corners of every 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 -	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate have established 5 years business plan as a guidance for daily estate operations. Sighted the 5-year business plan FY 2023 – 2027 available for verification. The business plan contains FFB, Yield per ha, CPO, PKO, General Overheads, Labour Overheads, Other overheads, Upkeep cultivations, Harvesting and collection, EPC, Proportion of General Charges.	Complied
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years.	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate established a replanting program spanned over a 5-year period till 2024. All programs were available for verification and documented in the TDMP Long Range Replanting Programme 2021 – 2027 (updated replanting	Complied

Criterion / Indicator		Assessment Findings				Compliance
	- Major compliance -	as at 06/07/2022).				
		Year/ Estate	Gajah Mati Estate	MAIDAM Estate	Pelantoh Estate	
		2023	203.83	-	611.16	
		2024	178.03	-	472.75	
		2025	-	-	-	
		2026	120.65	-	-	
		2027	-	-	-	
4.6.2.3	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment <p>- Major compliance -</p>	<p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate have established 5 years business plan as a guidance for daily estate operations. Sighted the 5-year business plan FY 2023 – 2027 available for verification. The business plan contains FFB, Yield per ha, CPO, PKO, General Overheads, Labour Overheads, Other overheads, Upkeep cultivations, Harvesting and collection, EPC, Proportion of General Charges</p>				Complied
4.6.2.4	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p> <p>- Major compliance -</p>	<p>Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate maintained all records of monitoring and available for review. There are several levels of records beginning from the field / mill supervisors to executives and the Managers. The Plantation Controller (PC) is accountable to monitor the estates compliance towards the SOP, Budget, and Productivity among others. Estates / Mill performances are reviewed during the monthly meeting with PC / Group CEO.</p>				Complied
Criterion 4.6.3: Transparent and fair price dealing						

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Criterion / Indicator		Assessment Findings	Compliance
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	TDM Plantation Sdn Bhd established pricing method has been clearly stated in the contract and contractors are explained on the terms of contracts prior to the signing of the contract.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	TDM Plantation Sdn Bhd established pricing method has been clearly stated in the contract and contractors are explained on the terms of contracts prior to the signing of the contract. Sample contract and payment record verification together with interviews of estates management found that the payments have been made as per contract. 1. For Gajah Mati Estate, Sampled Contractor (Nantha Agency – Registration Number: 220-NAGA). Refer to tax invoice (No. Pesanan: LGM 095/22) dated 01/07/2022 and the payment was on 14/09/2022 as per Voucher Number: PV 212/09. 2. For MAIDAM Estate, sampled contractor (Bizme Jaya Enterprise). Refer to tax invoice (No. Pesanan: PPK/LMA 009/22) dated 25/08/2022 and the payment was on 28/08/2022 as per Voucher Number: PV 178/08/22. 3. Pelantoh Estate sampled contractor (Maliaray Holidays Sdn Bhd – Registration Number: 220-MHSB). Refer to tax invoice (No. Pesanan: PL/PPK/-023/22) dated 01/08/2022 and the payment was on 31/08/2022 as per Voucher Number: MHSB/INV/2022/1029.	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	Where contractors are engaged, they shall understand the MSP0 requirements and shall provide the required documentation and information.	Gajah Mati Estate, MAIDAM Estate and Pelantoh Estate provided MSP0 information and documentation for engaged contractors via work agreement signed by the contractors prior to delivery of work items	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	and/or services. Briefing to contractors together done by mill management to contractors during signing of <i>Perjanjian Pesanan Kerja</i> (Work Order Agreement) which included the provision for contractors to comply with legal requirements, MSP0 requirements and authorization by the estate to audit the contractors from time to time on their compliance against all relevant requirements.	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Evidence of agreed contracts with contractor provided by the estates together with Code of Ethics & Business Conducts; CoBE TDM; Rev. 01; Approved date: 25/3/2018 for following: 1. For Gajah Mati Estate, Sampled Contractor (Nantha Agency – Registration Number: 220-NAGA). Refer to tax invoice (No. Pesanan: LGM 095/22) dated 01/07/2022 and the payment was on 14/09/2022 as per Voucher Number: PV 212/09. 2. For MAIDAM Estate, sampled contractor (Bizme Jaya Enterprise). Refer to tax invoice (No. Pesanan: PPK/LMA 009/22) dated 25/08/2022 and the payment was on 28/08/2022 as per Voucher Number: PV 178/08/22. 3. Pelantoh Estate sampled contractor (Maliaray Holidays Sdn Bhd – Registration Number: 220-MHSB). Refer to tax invoice (No. Pesanan: PL/PPK/-023/22) dated 01/08/2022 and the payment was on 31/08/2022 as per Voucher Number: MHSB/INV/2022/1029.	Complied
4.6.4.3	The management shall accept MSP0 approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	TDM Plantation Sdn Bhd established contract agreement with contractors include a clause reserving the right of the BSI auditors to audit the outsourced contractor and verify the assessment through a physical inspection if required.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>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.</p> <p>- Major compliance -</p>	<p>The contractor will issue the invoice once completion of work done as stated in the contract agreement. During the completion period, the contractor will issue the tax invoice to the company for all the work done to proceed for payment.</p> <p><u>Gajah Mati Estate</u> Nantha Agency – Registration Number: 220-NAGA Invoice: LGM 095/22) dated 01/07/2022 Payment Voucher: PV 212/09, dated 14/09/2022</p> <p><u>MAIDAM Estate</u> Bizme Jaya Enterprise; Work Order # PPK/LMA/009/22; Date: 25/08/2022; Contract period: 28/08/2022 – 31/08/2022 Invoice: 786/1835, dated 28/08/2022 Creditor Invoice listing: 29/08/2022 Payment Voucher: PV 178/08/2022, dated 28/08/2022</p> <p><u>Pelantoh Estate</u> Maliaray Holidays Sdn Bhd; Work Order # PL/PPK-023/22; Dated 01/08/2022; Contract period: 01/08/2022 – 31/08/2022. Invoice: MHSB/INV/2022/1029, dated 31/08/2022 Creditor Invoice listing: RPTAP1000003, 30/08/2022.</p>	<p>Complied</p>
<p>4.7 Principle 7: Development of new planting</p>		
<p>Criterion 4.7.1: High biodiversity value</p>		

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Criterion / Indicator		Assessment Findings	Compliance
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 -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	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 -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	N/A
Criterion 4.7.2: Peat Land			
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	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 -	All certification units do not carry out any new plantings since January 2015. Therefore, no SEIA conducted.	N/A
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations,	All certification units do not carry out any new plantings since January 2015. Therefore, no SEIA conducted.	N/A

Criterion / Indicator		Assessment Findings	Compliance
	via participatory methodology which includes external stakeholders. - Major compliance -		
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, no SEIA conducted.	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 are no smallholder's scheme in TDM Plantation Sdn Bhd certification. Therefore, not applicable.	N/A
Criterion 4.7.4: Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	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 -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	N/A
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			

Criterion / Indicator		Assessment Findings	Compliance
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 -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	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 -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	N/A
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	N/A
Criterion 4.7.6: Customary land			
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	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 -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	N/A

Criterion / Indicator		Assessment Findings	Compliance
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 -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	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 -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	N/A
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	N/A
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	N/A
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	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 -	All certification units do not carry out any new plantings since January 2015. Therefore, this requirement is not applicable.	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 -	TDM Plantation Sdn Bhd established Sustainability Policy approved by the BOD and signed by Group CEO on 01/01/2022. Latest MSPO Policy briefing was conducted by Kemaman POM management to all workers on 09/08/2022.	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 -	TDM Plantation Sdn Bhd established Sustainability Policy approved by the BOD and signed by Group CEO on 01/01/2022. The policy emphasized the commitment by management in all its management aspect through: 1. Commitment and responsible management 2. Transparency 3. Compliance towards legal requirements 4. Responsibility in social, health, safety and employment condition 5. Environmental, natural resources, biodiversity and ecosystem 6. Best management practices 7. Responsible new development Additionally, the policy includes on the commitment to implement continual improvement through gainful utilization of resources among human, process and technology to ensure sustainability production of palm products.	Complied

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	TDM Plantation Sdn Bhd has established internal audit for year 2022 on MSPO / RSPO Compliance Audit Plan with latest from 02/08/2022 until 14/08/2022. Document review, TDM Plantation Sdn Bhd headquarters has generate internal audit report dated 15/09/2022 with findings to determine the strong and weak points and potential area for further improvement. For the findings, TDM Plantation Sdn Bhd headquarters has issued with 17 documentations and 11 visual findings. Out of 28 total findings, 13 findings have been closed with submitted evidence of corrective action taken by the Operating Unit including Kemaman POM. Date internal audit conducted on 14/08/2022.	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 -	TDM Plantation Sdn Bhd has established STPOM MSPO Internal Audit Procedure; Edition: TDMP/01; Rev.: TDMP-02/2022, date 01/01/2022. The procedure describes of identified findings and determine the needs for TDMPT sustainability internal audit in conducting internal audit activities based on the above-mentioned standards recorded in Sustainability Audit Non-Compliance Findings and Recommendations Report for the internal audit from 02/08/2022 until 14/08/2022. Sighted the Corrective Action Report on Non-compliance Findings on the analysis of nonconformity raised.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	TDM Plantation Sdn Bhd conduct management review meeting dated on 15/09/2022 to report on ' <i>Pembentangan Laporan Audit</i>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p><i>Dalaman Kelestarian MSPO 2022'</i> that includes in the meeting agenda.</p> <p>The discussion on the internal audit than being recorded in the minutes of meeting.</p>	
Criterion 4.1.3 – Management Review			
4.1.3.1	<p>The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd conduct management review meeting dated on 15/09/2022 as per notification email of 04/2022 Marketing & Operation Meeting Year 2022 (MOM – 05/2022).</p> <p>The meeting was chaired by the Group CEO and attended by plantation controllers, all operating unit managers as well as other departmental managers including sustainability, marketing, and finance.</p> <p>The notification includes with meeting agenda followed:</p> <ol style="list-style-type: none"> 1. Safety Briefing 2. Opening by CEO 3. Mills and estates operation performance reporting 4. Present the Internal Audit for RSPO/ MSPO Reporting performance 5. Any other matters (if any). 	Complied
Criterion 4.1.4 – Continual Improvement			
4.1.4.1	<p>The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd established Sustainability Committee TDM South Zone Brief Report of Sustainability and Challenges (TDM South Zone) June 2022 which based on consideration of main social and environmental impact as well as opportunities for company.</p>	Complied

Criterion / Indicator		Assessment Findings			Compliance
		Amongst all, 2022 on-going and completed plan include the following samples:			
		Category	Issue	Plan	
		Welfare/ Social	Location of workers housing too close to effluent ponds	Relocate to safer and better location	
			Insufficient workers housing	Additional housing construction	
			Bad road surface	Construction of Pro-base road	
			Insufficient Drinking water resources	Install new water filtration system in workers rest room	
			Dirty drinking water in mill	Install new water filtration system	
		Operation/ Environmental	Rundown overhead water tank and structure	Front-end upgrading works including new water tank and structure with relocation of office building	
			DOE License and Clean Air Regulations for boiler smoke	Electrostatic Precipitators (ESP) construction	
			Overflow of effluent during heavy rain	Increased capacity of POME discharge tractors	

Criterion / Indicator		Assessment Findings	Compliance
4.1.4.2	<p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has optimized the reuse all potential renewable energy generated from its operations to reduce pollutions.</p> <p>Kemaman POM established methane capture (biogas) plant for its POME treatment system. This system able to utilize the use of renewable energy further.</p>	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSP0 requirements			
4.2.1.1	<p>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.</p> <p>- Major compliance -</p>	<p>Kemaman POM established records of communication with stakeholders.</p> <p>Document review, mill has maintained records of request and response, land titles, environmental and OSH plans etc. relating to environmental and social issues, plans for pollution prevention, complaints and grievances records that make available upon request.</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>TDM Plantation Sdn Bhd manage any restriction documents and publicly available document request from any third parties who has interest on the business related. This to prevent by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>Documents that publicly available are such as social and environment impact assessment, action plan, meeting minutes and audit reports.</p> <p>Besides, policies were also displayed at various locations including the main notice boards of the estates offices and muster ground</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>notice boards.</p> <p>TDM Plantation Sdn Bhd issued a new approved company policies signed by Group CEO dated 01/01/2022 through email to estate managers as follow:</p> <ol style="list-style-type: none"> 1. Sustainability Policy 2. Environment & Biodiversity Policy 3. Social & Humanity Policy 4. Occupational safety & health Policy 5. Gender & Diversity Policy 6. Child Protection Policy 7. Freedom of Association Policy 8. Foreign Workers Policy 9. Work Ethic Policy 10. Human Right Policy 11. Reproductive Right Policy 	
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd established Stakeholder Social Issue (Requests / Complaints / Grievances) Handling Flow-Chart Rev. 1 TDMP 2017. The flowchart is used by all estates to handle any communication and consultation matters with stakeholder.</p> <p>TDM Plantation Sdn Bhd established procedure of external communication for handling of specific external stakeholders.</p> <p>Kemaman POM has conduct stakeholders meeting on 27/07/2022 and documented in minutes of meeting.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 -	TDM Plantation Sdn Bhd appoint Kemaman POM Mill Manager as PIC for communication and consultation through the official appointment letter ' <i>Perlantikan Sebagai Wakil Syarikat Bagi Mengendalikan Isu Sosial Dengan Pihak Luar Di Peringkat Ladang/Kilang</i> ' issued by Group Human Resource Manager; ref. # TDMP/HR-GEN(MSPO/RSPO); dated 17/10/2021.	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance -	Kemaman POM established stakeholder list includes with government authorities, local communities, contractors, and supplier, neighboring and schools etc. for the mill. Sampled records maintained as following: 1. Register of stakeholders 2021 list 2. External communications letters received 3. Communication of workers and contractors' form 4. DOE field citation records 5. DOSH visit books Kemaman POM has conduct stakeholders meeting on 27/07/2022 and documented in minutes of meeting. Issues raised during the stakeholders meeting recorded in minutes of meeting and unresolved issue has incorporated into the Social Action Plan to monitor. No negative feedback was feedback to Kemaman POM.	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 -	TDM Plantation Sdn Bhd established SOP on traceability and detailed out in the Supply Chain SOP for Identity Preserved & Mass Balance Doc. No.: TDM/TRCBLT/04; Rev.: SCCS-01/2020 updated 01/12/2020. These procedures are current and include all elements of the traceability for controlling the receipt, sale, and dispatch of	Complied

Criterion / Indicator		Assessment Findings	Compliance
		palm products. Weighbridge tickets were available for verification and maintained for traceability of all palm oil products purchase and sell from Kemaman POM. Weighbridge tickets were sampled for suppliers and buyers of palm oil products.	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Traceability Audit was carried out on by TDM Plantation Sdn Bhd Sustainably Department at the mill and estates. Regular Inspections are done to ensure the traceability system is well implemented. The details of the records include List of FFB suppliers, List of CPO / PK buyers, List of FFB / CPO / PK transporters, FFB received summary, CPO / PK daily & month production, CPO / PK dispatch and CPO / PK buyer contract for traceability. Sighted records of South Zone Sustainability Audit Report for Kemaman POM dated on 15/09/2022 indicated no non-compliance on traceability.	Complied
4.2.3.3	The management shall identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	Kemaman POM appoint Mr. Wan Ahmad Amilin Wan Ngah, Compliance Executive as PIC to implement and maintain traceability system with appointment letter dated 10/9/2019. Onsite interview with the PIC verified he has good knowledge on MSPO traceability and supply chain requirements.	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 maintained available as per sample sighted as following: <u>Ladang Gajah Mati:</u> Weighbridge ticket: KTP22316565, Date: 27/09/2022 Supplier: 110-LGM – Ladang Gajah Mati Transporter: CTR – Contract Subblock: PM14A2G, bunch: 7 unripe, 12 empty bunches	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Block: 14A2, Planted: Year 2014 DO No. Ladang Gajah Mati: 2317, Date: 27/09/2022 Net weight: 7.48 mt Transport: WA2624T MSPO Certificate number: MSPO 686877</p> <p><u>MewahOleo Industries Sdn Bhd</u> Weighbridge ticket: KTS22129397 Date: 27/09/2022 MPOB L3 Form: F896637 Product: CSPO – Crude Palm Oil Weight: 38.70 mt Transporter Koperasi Kemaman Berhad, Lorry: PLS2872 Customer: 120 MEOL Destination PLO 283, Jalan Besi Satu, Pasir Gudang, Johor Contract: SGPO-IP-220912 Net Weight: 38.79 mt FFA: 3.6%, Moisture: 0.154%, Dirt: 0.01%, DOBI: 2.9 % Tank: 7 Temperature: 50 degrees Celsius Stamping: RSPO 587626 Delivery Advice: 20238</p> <p><u>Hup Lee Oil Mill Sdn Bhd</u> Weighbridge ticket: KTS22129373</p>	

Criterion / Indicator		Assessment Findings	Compliance
		Product CSPK – Palm Kernel Weight: 41.75 mt Lorry: TCE3247 Customer: 130 – HL- Hup Lee Oil Mill Sdn Bhd Destination: Lot No.8947 – 8949, Batu 5 ½, Jalan Kapar, Klang, Selangor DO No.: 08/22/L47579 No. Contract: SGPK-220804 FFA: 0% Moisture: 6.19% Dirt: 5.99% DOBI: 0% Tank: 0 Temperature: 0 Delivery Advice: 20233 Collection Order: 0190 - Daily Process Report; Date: 24/10/2021; Daily FFB received: 758.71 mt; OER: 20.04%; KER: 4.78%; CPO Stock: 445.54mt; PK stock: 78.00 mt	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	TDM Plantation Sdn Bhd monitor compliance to each applicable law and regulation. Review the sample evidence of compliancy to the regulation as follows: 1. MPOB license (Menjual, membeli, mengalih, menyimpan dan mengilang) no. 500041904000 valid till 31/03/2023.	Complied

Criterion / Indicator	Assessment Findings	Compliance
	<ol style="list-style-type: none"> 2. MPOB license (Menjual dan mengalih) no. 502392302000) valid till 31/03/2023. 3. DOE license no. 004055 with compliance schedule no. 4. AS(B)T:31/152/000/001 valid till 30/06/2023. 5. DOE contravene license no. 004082 with compliance license no. JPLP(UB)/2022/004082 valid till 31/12/2022 6. Perakuan Penentuan Timbang dan Sukat for loading of 80 Mt No.: B596793 dated 14/03/2022 7. Perakuan Penentuan Timbang dan Sukat for loading of 60 Mt No.: B692272 dated 29/06/2022 8. Perakuan BOMBA, JBPM: TR/7/66/2019, valid till 05/07/2023 9. Permit Barang Kawalan Berjadual, Ref No.: KPDKKK/KMN/25-02/08 SK D, No. Siri: T 001757 for diesel storage: 42,000 Litre valid till 10/05/2024. 10. Lesen Pengabstrakan Air, License No.: PA (P) A0012, valid till 31/12/2022 11. Private installation license no. 2021/02942 for kapasiti no exceed: 2,400 kW, valid till 21/11/2022 12. Competent Person: <ol style="list-style-type: none"> a) Mohd Ammar Bin Mohd Maulud, Assistant Manager, 880614-11-5821, CePSWaM certificate no. CePSWaM/209338, valid till 22/12/2020, Field Report has submitted and waiting for interview. b) Muhammad Thobari bin Ismail, Assistant Manager, 871218-08-5515, CePPOME certificate no. CePPOME/00228. 	

Criterion / Indicator		Assessment Findings	Compliance
		c) Tn. Hj Hassan Bin Osman, Engineer Steam Grade 1, Perakuan: 028/97 issued date 24/06/1997.	
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -	<p>TDM Plantation Sdn Bhd has established SOP Legal and Other Requirements with document no. TDM/KPOM/01, rev. 00/2021 dated 01/01/2021 to identify and comply with current legal and other requirements that are relevant to the mill operations. The legal register shall be evaluated shall be done periodically (daily, monthly, six monthly) based on the frequency of generation of the monitoring results for the various requirements. All requirements shall be evaluated a least once a year. Should there be any non-compliance or potential non-compliance to the regulation or other requirement, necessary corrective and preventive action shall be taken.</p> <p>Kemaman POM listed all applicable legal and other requirements in Legal Register 2022. Latest review was conducted 19/09/2022.</p> <ol style="list-style-type: none"> 1. Minimum Wages Order 2020 with latest update. 2. Akta Pencegahan dan Pengawalan Penyakit Berjangkit 1988 (Akta 342). 3. P.U (A) 290, Fire Services (Fire Certificate) (Amendment) Regulations 2020, 30/09/2020, BOMBA Act 1988 4. P.U (A) 289, Fire Services (Designated Premises (Amendment) Order 2020, 30/09/2020, BOMBA Act 1988. 5. Workers Minimum standard of housing accommodations and amenities act 1990. Revised on 01/02/2021. 	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	TDM Plantation Sdn Bhd has established SOP Legal and Other Requirements with document no. TDM/KPOM/01, rev. 00/2021 dated 01/01/2021.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Kemaman POM listed all applicable legal and other requirements in Legal Register 2022. Latest review was conducted 19/09/2022. Among the latest update to the applicable law and other regulation as follows:</p> <ol style="list-style-type: none"> 1. Minimum Wages Order 2020 with latest update. 2. Akta Pencegahan dan Pengawalan Penyakit Berjangkit 1988 (Akta 342). 3. P.U (A) 290, Fire Services (Fire Certificate) (Amendment) Regulations 2020, 30/09/2020, BOMBA Act 1988. 4. P.U (A) 289, Fire Services (Designated Premises (Amendment) Order 2020, 30/09/2020, BOMBA Act 1988. 5. Workers Minimum standard of housing accommodations and amenities act 1990. Revised on 01/02/2021. 	
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>TDM Plantation Sdn Bhd monitor compliance to each applicable law and regulation through Legal and Secretarial Department.</p> <p>TDM Plantation Sdn Bhd has established SOP Legal and Other Requirements with document no. TDM/KPOM/01, rev. 00/2021 dated 01/01/2021 to identify and comply with current legal and other requirements that are relevant to the mill operations. The legal register shall be evaluated shall be done periodically (daily, monthly, six monthly) based on the frequency of generation of the monitoring results for the various requirements. All requirements shall be evaluated a least once a year. Should there be any non-compliance or potential non-compliance to the regulation or other requirement, necessary corrective and preventive action shall be taken.</p> <p>TDM Plantation Sdn Bhd Sustainability Team will update in the legal</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>register and communicate the new update with operating units through memorandum, letter or emails.</p> <p>Kemaman POM has appointed Compliance Executive as PIC for compliance legal and other requirement with appointment letter doc. no. TDMP/LRR/001/2022 dated from 01/02/2022 until 28/02/2023 signed by Mill Manager.</p>	
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>No changes from previous report. Milling activities do not diminish the land use rights of other users. Ownership documents sighted i.e., State Title; Ownership # 6521; Lot #7663; Area: 58.7685 ha; District: Kuala Terengganu; Mukim Belara; Date: 18/11/1976; Owner: Perbadanan Memajukan Iktisad Negeri Terengganu; Leasing to: Kumpulan Ladang-ladang Terengganu Sdn. Bhd.; Period: 1/1/1973 – 31/12/2017. Sighted too the Management Agreement as following:</p> <ol style="list-style-type: none"> 1. Between Kumpulan Ladang-ladang Terengganu Sdn Bhd and TDM Plantation Sdn Bhd dated 20/7/2016 2. Between TDM Plantation Sdn Bhd and TDM Plantation Sdn Bhd dated 20/7/2016 3. Between Kumpulan Ladang-ladang Terengganu Sdn Bhd and TDM Berhad dated 1/9/2012 	Complied
4.3.2.2	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.</p> <p>- Major compliance -</p>	<p>Kemaman POM on government lease land and they hold copies of Land Titles. Original land title document is kept at head office while a copy of it is available at estate’s office. At least four of the estates within Kemaman POM complex mainly Tebak, Jernih, Air Putih and Pelantoh Estates shared their land titles with demarcation only with</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		individual estate’s field map among each other. These mainly for estates located within mukim Tebak and Bandi Estates which is also the area for mill location. Kemaman POM does not have a copy of land title by itself but is located within Pelantoh Estate that has legal ownership of the land and is an Operating Unit of TDM Plantation Sdn Bhd.	
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Kemaman POM boundary in the Pelantoh Estate is well maintained and marked by perimeter fencing. Boundaries in all visited estates demarcated with either boundary drain or pegs on top of the original boundary stones. Onsite visit sighted a sample boundary stone # 141 for Air Putih Estate boundary with Kampung Air Putih.	Complied
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute in TDM Kemaman complex at the time of audit. The land belongs to TDM Plantation Snd Bhd and land ownership documents verified.	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 -	No lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	N/A
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available.	No lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any	N/A

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	customary rights are understood and not being threatened or reduced. The estates' maps and mill layout are reviewed to confirm the location.	
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	No lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced. No issue of land dispute or encroachment. Thus, no FPIC required.	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 -	TDM Plantation Sdn Bhd established Social Impact Assessment (SIA) for Kemaman Complex. Document review, the report prepared by SRA Consultancy, Senawang, Negeri Sembilan dated 01/11/2011. Based on the assessment, action plan was established on annual basis as per sighted SIA Action Plan and review in June 2022. Sighted assessment finding and mitigation summary of positive observation for estates with aspect, positive impact and improvement being identified. Sighted area of concerns including housing and infrastructure with social impact identified were poor facilities and infrastructure, housing not complying with legal requirement, poor waste dumpsite etc. Progress of improvement plan shown most of the areas of concerns have been completed such as issues on poor	Complied

Criterion / Indicator		Assessment Findings	Compliance
		drainage and septic tank system at line site while some were done continuously on annual basis for improvement plan such as construction of new workers quarters.	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	TDM Plantation Sdn Bhd established Handling Social Issue and Complaint/ Grievance Procedure. Based on the established procedure describes of any issue raised by stakeholders will be discuss within 2 weeks for the first meeting and issues to be resolved within 28 working days.	Complied
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	Kemaman POM maintained records through Complaint Logbooks. Document review on Complaint Logbooks in mill, it was verified that all complaints and action able to be resolved in effective, timely and appropriate manner. Verification of resolution signatures by Officer, Assistant Manager and Manager were sighted.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	Kemaman POM maintained records through Complaint Logbooks. Complaint Logbook for Linesite Repair and Complaint/ Request form was established and implemented. No external stakeholders were recorded related on complaint and grievances.	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 -	Kemaman POM maintained records through Complaint Logbooks. Onsite interview with internal and external stakeholders informed they were aware of the complaint procedure, and they were briefed by the management during stakeholder meeting.	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.	Kemaman POM maintained records through Complaint Logbooks. The complaint logbook/ complaint files that recorded complaints	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	and solutions since at least June 2020 was maintained available to affected stakeholders upon request.	
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	<p>POM should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.</p> <p>- Minor compliance -</p>	<p>TDM Plantation Sdn Bhd contributed to local development by providing jobs opportunity for local community and store operate by local community.</p> <p>Additionally, Kemaman POM has make individual contribution to community as part of CSR.</p> <p>Document review on records of contribution as follow:</p> <ol style="list-style-type: none"> 1. Memohon meminjam kerusi bagi awatan kerja pengwakilan KBRI dan Dialog ke Ladang Tebak, 23/04/2022 2. Memohon Bantuan Pekerja untuk Kerja Kemasan Selepas Banjir SKPK 2022, dated 02/03/2022 3. Memohon sumbangan bagi bantuan Mangsa Banjir Barisan hadapan (KKM) Daerah Kemaman, dated 01/03/2022 4. Aktiviti pengambilan darah bagi mencegah penyakit malaria dan taklimat keselamatan, 23/05/2022. 5. Majlis Iftar untuk anak-anak yatim, 24/04/2022 6. Kemaman POM: Contribution of food basket to all employees during EMCO; 5/8/2021 	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and	TDM Plantation Sdn Bhd established OSH Policy signed by Group CEO dated 01/01/2022. Mentioned TDM Plantation Sdn Bhd is	Complied

Criterion / Indicator	Assessment Findings	Compliance
	Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented. - Major compliance -	committed to welfare and safe and healthy working condition & promoting legal compliance.
4.4.4.2	<p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> 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 POM: <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; 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 	<ul style="list-style-type: none"> a) TDM Plantation Sdn Bhd established OSH policy, communicated, and posted at entrance of office of Kemaman POM. b) Risks were identified and assessed. Sampled Chemical Health Risk Assessment (Rep. No. HQ/08/ASS/00/259-2020/009) prepared by OOS Venture Sdn Bhd assessed on 12/07/2020 by Person (HQ/08/ASS/00/259) for 4 work units. Noise Risk Assessment was conducted as reported by SI Energy Sdn Bhd on 15/03/20. Assessment conducted by competent Noise Risk Assessor (HQ/09/PEB/00/97). Audiometric Test required for workers in Engine Room, Boiler, Workshop, Oil Room, Press, Kernel Plant. While Hazard Identification, Risk Assessment and Control (HIRARC) was conducted as Master List 2022 covering all department and section in Kemaman POM. A HIRARC SOP established and documented dated 22/10/2018, Rev. TDMP-02/2018. Assessment of risk of mill operation that was reviewed in 2022 to be further enhanced by having new propose control measure clearly indicated as priority for medium (score 5-14) and high risk (15-25). HIRARC was revised after accident involving Boilerman, dated 18/0520/22 for Workshop Mechanical activity for hazard of flying object. c) Awareness training on OSH Best Management Practices (Plantation Industry) was conducted on 13/09/2022 and various other awareness training were conducted as records. d) PPE was control and sighted PPE receiving records for Safety Boots, Helmets, Earmuff, Hand Gloves for year 2021-2022.

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Criterion / Indicator	Assessment Findings	Compliance
<p>shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>e) TDM Plantation Sdn Bhd established Chemical Handling SOP Rev. TDMP-01/2017 dated 01/09/2017. Covering requirement of applicable legal and related requirements in handling, labelling, storage, and emergency. Sighted in Chemical Store where Oils, IPA kept having a new and sealed spill kit in 20 liters pail that included Sorbent Sock (1 unit), Sorbent Pillow (2 units), Sorbent Pad (5 units), Disposable bag (2 pcs), Cable tie (2 pcs), Anti fog goggle (1 pair) and Nitrile glove (1 pair). The kit found hardly to be open and readily accessible for use. In the lab where chemicals such as IPA and N-Hexane use for testing to be provided with spill kit stand by for emergency purpose. Under Para 7.2 Chemical Spill Kit of SOP mentioned the chemical spillage kit are provided at the following area: General / Chemical Store and Scheduled Waste Store need to be further enhanced and considering including laboratory. Sighted and sampled all SDS in Chemicals Store and Lab maintained in term of revision below period of 5 years as required under CLASS 2013.</p> <p>f) TDM Plantation Sdn Bhd appoint Kemaman POM Mill Manager as SHC Chairman / EPMC with appointment letter dated 01/07/2022, SHC members dated 01/07/2022 and PIC for MSPO dated 23/01/2021.</p> <p>g) SHC meeting was conducted regularly and sighted a Minutes of Meeting of SHC attended by members including, secretary and chairman on 19/09/2022, 21/07/2022, 17/04/2022. As in the minutes sampled found information and OSH issues discussed with decision for action required accordingly.</p> <p>h) TDM Plantation Sdn Bhd established Emergency Preparedness and Response SOP Rev. TDMP-01/2018 dated 01/01/2018. In</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>the SOP, stated Appendix A (TDMP/OD/07/60-10/Memo) Incident Reporting which explain the process of notification to JKKP by using JKKP 6, 7, 8, 9, 10. While in Appendix B TDMP Incident Reporting Flow (B1) explains the process flow of reporting. Accident Panel Review Committee (APRC) (B2) and Definition & Incident Rate (B3).</p> <p>i) First Aider was trained and appointed. 2 staffs (Compliance Clerk and SHC) were sent for 1st Aider Training (Basic First Aid, CPR, AED-BOD+FA C) on 23/03/2022-24/03/2022 at TDM Training Hall in Sg. Tong. Regular Inspection of First Aid Box conducted weekly by Medical Assistant as last dated 27/09/2022. Available PIC / First Aider List located at Security Post Tg. Mustafa, Weighbridge, Canteen, KPOM Office, Lab, Grading, Supervisor Room, Store General, Kernel Plant, Oil Room, Boiler, Workshop Mechanical, Store and Workshop Electrical.</p> <p>Kemaman POM maintained accident statistic and records. Accident Report 001/2022 involving Boilerman on 17/05/2022, investigated by SHC as required on 18/05/2022. 8 days medical leave given to him. JKKP 6 was notified to JKKP on 18/05/2022. Another Detailed Investigation Report (DIR) related to hearing impairment for 23 workers of Kemaman POM on 24/02/2022. After result of Audiometric Test and notified by OHD using JKKP 7. Diagnosis done on 25/02/2022. Form JKKP 8 was submitted to JKKP on 27/01/2022 by Estate Manager.</p> <p><u>Opportunity for Improvement (OFI)</u></p>	

Criterion / Indicator		Assessment Findings	Compliance
		<p>4.4.4.2 (b) - Assessment of risk of mill operation that was reviewed in 2022 to be further enhanced by having new propose control measure clearly indicated as priority for medium (score 5-14) and high risk (15-25).</p> <p>4.4.4.2 (e) - The requirements in Chemical Handling SOP documented dated 01/09/2017, Rev. TDMP-01/2017 under Para 7.2 Chemical Spill Kit to be further enhanced by considering other location where chemical being use other than currently stated area: General/Chemical Store and Scheduled Waste Store.</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>TDM Plantation Sdn Bhd established Sustainability Policy approved by the BOD and signed by Group CEO on 01/01/2022.</p> <p>Briefing of the company policies were conduct to the workers including Sustainability Policy on 09/08/2022.</p> <p>The policies were displayed at the notice board outside the office.</p>	Complied
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd established Sustainability Policy approved by the BOD and signed by Group CEO on 01/01/2022.</p> <p>The policy stated that the management was committed to treat everyone equally without any discrimination and provide equal opportunities regardless of race, nationality, and gender etc.</p> <p>Onsite interviewed with workers informed no discrimination was practice by the management.</p> <p>Briefing of the company policies were conduct to the workers including Sustainability Policy on 09/08/2022.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<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>The management have ensured that employees’ pay, and conditions meet applicable legal requirements i.e., MAPA / NUPW Circular No. 16/2022, revised dated 29/04/2022 in line with Minimum Wages Order 2022, P.U (A) 140, revised dated 27/04/2022; Oil Palm MAPA/NUPW on the Wages of Harvesters, Harvesting Kangannies, Loaders and “Other Loaders on Oil Palm Estates, 2022; Wage Rate August 2022 & POM MAPA/NUPW POM Employees Agreement, 2022; Wage Rates – August 2022.</p> <p>Document review on sampled payslips as follow:</p> <ol style="list-style-type: none"> 1. Employee # KM1400201; Post: General Am; Female 2. Employee # KM1400202; Post: Operator Oil Room; Male 3. Employee # KM0900157; Post: Gardener Housing; Female 4. Employee # KM1800210; Post: Admin Office; Female 5. Employee # KM1800217; Post: Maintenance; Male 6. Employee # KM00093; Post: Operator Bio Mill; Female 7. Employee # KM00054; Post: Driver Shovel; Male 8. Employee # KM00012; Post Kernel Plant Operator; Male 9. Employee # KM1800216; Maintenance; Male 10. Employee # KM1400208; EFB Press Operator; Male <p>All samples shown employees received minimum wages as per legal requirements. Workers signed an announced of new salary based on Section 23, Akta Majlis Perundangan Gaji Negara 2011 (Akta 732) effective by 01/05/2022.</p> <p>General Workers, DOB: 15/07/1994,</p> <ol style="list-style-type: none"> 1. Holiday Pay with daily rate; MYR 66.11 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		2. Overtime of the month = 42 hours	
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>TDM Plantation Sdn Bhd has ensure their contractors follow the industrial best practices in terms of hiring their own employee.</p> <p>The contractor shall be solely responsible for their employees and workmen whereby the contractor shall pay and shall be solely responsible for the payment wages, salary, benefits, EPF contribution, SOCSO and any other benefits required under the laws of Malaysia.</p> <p>Document review, on sampled contractors' employee Payslip August 2022 as follow: Contractor: Sutera Adela Transporters Driver Id: SASB 007, Basic pay above MYR 1,500.00. Employer contribution of EPF, SOCSO and SIP (Insurance).</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>Kemaman POM established list of employees consist of employee number, full name, division, wages, NRIC / Passport no, employment category, nationality, DOB, age, race, and status in the HR Payroll system updated September 2022.</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>Kemaman POM provide with fair contracts signed by both employee and employer. The employment contracts which contents comply with Employment Act 1955.</p> <p>Both parties will have copy for reference.</p> <p>Document review on the sample employee's file, the employment contracts include overtime pay, rest day, working hours, rate for</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		working on rest day, termination notice period, public holidays, paid annual leave, paid medical leave, etc.	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	Kemaman POM established computation recording system and implemented through punch card. The check roll system will generate with Time and Attendance Report of employee working hours and overtime that is transparent.	Complied
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. - Major compliance -	Kemaman POM provide with fair contracts signed by both employee and employer. The employment contracts which contents comply with Employment Act 1955 includes with working hours of 8 hours and overtime. Working day for mill starting from Saturday to Thursday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Employment Act 1955. As per mentioned in the employment contract, stated that working hours as shift from 8.00 am until 3.00 pm or 3.00 pm to 10.00 pm inclusive of 30 minutes of break time. Overtime rate which stated 1.5 for normal hours rate, 2.0 from normal rate for rest days and 3.0 for public holiday and will not exceed 104 hours per months.	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 -	Kemaman POM provide with fair contracts signed by both employee and employer. The employment contracts which contents comply with Employment Act 1955. As per sampled of employee payslip verified, they paid as per requirement. Wages and overtime payment documented found consistent with legal regulations and collective agreements as per sample sighted in indicator 4.4.5.3 above.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.5.10 Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.</p> <p>- Minor compliance -</p>	<p>TDM Plantation Sdn Bhd has forms of social benefits for all employees including the mandatory contribution for Local workers & staff Social Security Organization (SOCSO) Monthly Contribution with two forms; Acknowledgement Contribution Received (ACR). Document review on Form 8 and Employee Contribution Received (ECR) Form includes with Employer Code: F8100000657B; for the month of August 2022, Total Number of Employee; 106. Dated 01/09/2022.</p> <p>Other than that, TDM Plantation Sdn Bhd include in the employment contract of remuneration, working hours, rate of pay, leaves and any other benefits of employment entitle to them.</p>	<p>Complied</p>
<p>4.4.5.11 In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.</p> <p>- Major compliance -</p>	<p>Kemaman POM provide living quarters to all employees.</p> <p>Onsite visit to the housing area / line site, observed quarters are decently habitable and equipped with basic amenities of free electricity and water supply including other facilities such as mosque, community hall, sundry store, canteen, children’s crèche and football field.</p> <p>Kemaman POM and Pelantoh Estate sharing their children’s creche, football field and mosque which located side by side in same complex.</p> <p>Kemaman POM, Pelantoh Estate and Tebak Estate sharing clinic which is located at Tebak Estate.</p>	<p>Complied</p>
<p>4.4.5.12 The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has established Gender Policy and Reproductive Policy signed by Group CEO dated 01/01/2022.</p> <p>TDM Plantation Sdn Bhd will ensure the workplace and surrounding are free from any types of harassment included ethnic harassment,</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p>religious, gender, country of origin etc. They will ensure that the rights of women will be protected.</p> <p>Document review, Kemaman POM conduct periodical meetings among women employees through Women Association as follow:</p> <ol style="list-style-type: none"> 1. Bil 003-2022, 05/09/2022 2. Bil 002-2022, 25/07/2022 3. Bil 001-2022, 23/03/2022 	
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>TDM Plantation Sdn Bhd has established Social Policy signed by Group CEO dated 01/01/2022.</p> <p>The policy describes TDM Plantation Sdn Bhd is committed to comply with principles as following:</p> <ol style="list-style-type: none"> 1. Fair treatment to everyone without discrimination 2. Freedom of association to everyone 3. Strongly opposed force labour and child labor <p>TDM Plantation Sdn Bhd respect the rights of all personnel to form and join trade unions of their choice to bargain collectively.</p> <p>Onsite interview with workers informed they have not restricted form or join trade union. The workers have their freedom to join the NUPW / MAPA union.</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>TDM Plantation Sdn Bhd has established Child Protection Policy signed by Group CEO dated 01/01/2022.</p> <p>The policy describes TDM Plantation Sdn Bhd will not recruit or exploit any individual less than 16 years old to work in the company.</p> <p>Document review on employee master list verified that all the workers were above 18 years old.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Onsite interviewed with workers informed they are no children working with TDM Plantation Sdn Bhd with age less than 18 years old.	
Criterion 4.4.6: Training and competency			
4.4.6.1	<p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p>- Major compliance -</p>	<p>Kemaman POM has records of training conducted and maintained as sampled:</p> <ol style="list-style-type: none"> 1. Safety Steps in Maintenance of Safety Valve conducted on 18/05/2022 at Mechanical Workshop attended by 7 workers. This was related to accident on 17/05/2022. 2. RSPO/MSP0 & Supply Chain conducted on 09/08/2022 and attended by 12 workers 3. Scheduled Waste Management conducted on 11/05/2022 attended by 9 workers. 4. PPE conducted on 15/03/2022 attended by all workers. 5. Chemical Handling (N-Hexane) conducted on 25/05/2022 and attended by 4 workers. 6. Showel Handling and Safe Driving conducted on 01/06/2022 and attended by 5 drivers. 7. Emergency and First Aid Box conducted on 24/05/2022 and attended by 8 workers. 8. Noise Exposure conducted on 27/01/2022 and attended by all workers. 9. BOD Testing conducted on 19/01/2022 and attended by 11 workers. 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		10. Fire Drill conducted on 13/07/2022 and supported by BOMBA Kuala Terengganu	
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>Kemaman POM adopt TDM Plantation Sdn Bhd's OSH Plan, Training matrix and training Schedule 2021/2022.</p> <p>The plan includes the objectives to provide the specific skill and competency required to all employees (from managers till general workers) based on their job description. Among training needed included:</p> <ol style="list-style-type: none"> 1. OSH Legal compliance review 2. OSH Management System 3. Risk Management 4. Safety Committee 5. SOP Training 6. MSP0 Training 7. Accident Investigation Technique 8. HIRARC Training 9. Chemical Safety. 	Complied
4.4.6.3	<p>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>Kemaman POM adopt TDM Plantation Sdn Bhd's OSH Plan, Training matrix and training Schedule 2021/2022 where all needs of training were listed for relevant level of workers from Mill Manager, Sr. Assistant, Assistant Manager, Compliance Executive, Compliance Clerk, Supervisor, Foreman, Chargemen, Store Clerk, Boilerman, Grader, Mandore, General Worker, Security, OSH Committee, ERT Team, HA.</p>	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	<p>An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has established Biodiversity and Environmental Policy signed by the Group CEO dated 01/01/2022. In the policy stated the company commitment to:</p> <ol style="list-style-type: none"> 1. Complied with all statutory requirement regarding biodiversity and environmental 2. Creating, maintaining and continuous improvement of sustainable plantation management 3. Eliminate potential adverse effects on the environment and biodiversity that may arise from plantation activities 4. Provide an effective work system subject to Environmental Quality Act 1974 5. Ensure zero burning is always given priority as stipulated in the Environmental Quality (Declared Activities) (Open Burning) Order 2003 <p>The policy was communicated to the employee through displayed at notice board around the mill, training and morning briefing. Reviewed the training records as follows:</p> <ol style="list-style-type: none"> 1. Slope protection and buffer zone policy training dated 01/01/2022. 2. Biodiversity and environmental policy training dated 01/01/2022. 	<p>Complied</p>
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <ol style="list-style-type: none"> a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations 	<p>Kemaman POM conducted aspect and impacts analysis of all operations as per SOP established and documented in Standard</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Operating Procedure – Environmental Aspects/Impacts Evaluation date 01/11/2017, edition TDMP/01 rev. TDMP – 01/2017. Kemaman POM review the environmental aspects impacts on annually basis or if there are changes in the legal or mill operation. Latest review on the environmental aspect impact was conducted on 01/02/2022.	
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -	Based on the environmental aspects and impacts conducted, Kemaman POM established action plan documented in the Environmental Improvement Plan / Pollution Prevention Plan and continuous improvement. Latest review was conducted 04/09/2022. Among the plan established for 2022 as follows: The unused empty fruit bunches, to build BOF plant transforming the EFB to compost fertilizer that can be sold or used at the estate. This will add up with effluent for composting purpose. The leakage of used engine oil and lubricant from workshop area will be construct the oil containment sump and implement the metal tray for each lubricant and oil container as secondary containment.	Complied
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Program to promote the positive impacts was documented in the Continuous Improvement Plan. Sighted the improvement plan as follows: To build up the proper dumping area to avoid any leakage of leachate from EFB As per Jadual Pematuhan the management should followed the 'Garis Panduan Pelan Pengurusan Tandan Kosong Kelapa Sawit' for EFB management, as per latest the management already in progresss to build up the EFB storage followed the EFB guideline. The management already award to Kulim Safety Training and	Complied

Criterion / Indicator		Assessment Findings	Compliance								
		Services Sdn Bhd as per contract award ref. no.: TDMP 27/22 dated 14/09/2022.									
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 -	Kemaman POM continuously provided training to the employee to ensure the understanding on the environmental policy, objectives and management plans. Noted during interview, the understanding on the environmental issue were acceptable. The sampled of training conducted as per criteria 4.4.6.1 above.	Complied								
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	Kemaman POM has established Environmental Performance Monitoring Committee. The committee consist of representative from the employer and employee. The committee conducted meeting on twice a year. Among the issue discussed during the meeting Environmental Sustainability Objective and Program, Compliance to Legal and Other Requirement, Environmental Control Tools, Environmental License Application and Training and Competency. Reviewed the minutes meeting dated (03-2022) 19/9/2022 & (02-2022) 21/7/2022.	Complied								
Criterion 4.5.2: Efficiency of energy use and use of renewable energy											
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period - Major compliance -	Kemaman POM has established management plan to assess the usage of the non-renewable energy in the mill and documented in the Continuous Improvement Plan. The monitoring record as per below: - <table border="1" data-bbox="1086 1257 1771 1390"> <thead> <tr> <th>Diesel usage / FFB Production</th> <th>Kemaman POM</th> </tr> </thead> <tbody> <tr> <td>FY 2020</td> <td>1.27 (264,573 liter)</td> </tr> <tr> <td>FY 2021</td> <td>1.50 (216,133 liter)</td> </tr> <tr> <td>FY 2022</td> <td>1.06 (128,423 liter)</td> </tr> </tbody> </table>	Diesel usage / FFB Production	Kemaman POM	FY 2020	1.27 (264,573 liter)	FY 2021	1.50 (216,133 liter)	FY 2022	1.06 (128,423 liter)	Complied
Diesel usage / FFB Production	Kemaman POM										
FY 2020	1.27 (264,573 liter)										
FY 2021	1.50 (216,133 liter)										
FY 2022	1.06 (128,423 liter)										

Criterion / Indicator		Assessment Findings	Compliance									
4.5.2.2	POMers shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. - Major compliance -	Kemaman POM has established baseline for diesel usage based on 3 years diesel consumption trend. The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations.	Complied									
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	Renewable energy used is from biofuel (shell and fiber) for boiler start-up. Sighted the records for usage of renewable energy FY 2021/22 as follows: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Type of biofuel</th> <th>Year / Tonne</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Shell</td> <td>2022 / 6,323.68</td> </tr> <tr> <td>2021 / 10,344.74</td> </tr> <tr> <td rowspan="2">Fibre</td> <td>2022 / 13,313.63</td> </tr> <tr> <td>2021 / 21,787.62</td> </tr> </tbody> </table>	Type of biofuel	Year / Tonne	Shell	2022 / 6,323.68	2021 / 10,344.74	Fibre	2022 / 13,313.63	2021 / 21,787.62	Complied	
Type of biofuel	Year / Tonne											
Shell	2022 / 6,323.68											
	2021 / 10,344.74											
Fibre	2022 / 13,313.63											
	2021 / 21,787.62											
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 -	Kemaman POM have identified the waste products and source pollution generated in the estates and mill. The waste is categorized as follows: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Type</th> <th>Item Description</th> </tr> </thead> <tbody> <tr> <td rowspan="6">Scheduled Waste</td> <td>SW 102 – Waste of lead acid batteries</td> </tr> <tr> <td>SW 110 – Fluorescent tube/lamp</td> </tr> <tr> <td>SW 305 – spent lubricant</td> </tr> <tr> <td>SW 410 – rags, plastics, papers, contaminated filters</td> </tr> <tr> <td>SW 322 – Waste of non-halogenated organic</td> </tr> <tr> <td>SW 409 – empty chemical containers</td> </tr> </tbody> </table>	Type	Item Description	Scheduled Waste	SW 102 – Waste of lead acid batteries	SW 110 – Fluorescent tube/lamp	SW 305 – spent lubricant	SW 410 – rags, plastics, papers, contaminated filters	SW 322 – Waste of non-halogenated organic	SW 409 – empty chemical containers	Complied
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	SW 409 – empty chemical containers											

Criterion / Indicator		Assessment Findings		Compliance								
		Domestic waste	Rubbish									
		Industrial waste	Scrap metal EFB POME Fiber Ash Boiler Shell									
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>Kemaman POM has established management Plan base on the identification and source of pollutions and the documented in Waste management Plan FY 2021 and were available for review. In the management plan stated the type of waste, description, source of pollution, action to be taken and person responsible.</p> <p>Reviewed the implementation of the management plan as follows:</p> <p>1. Shell and fiber were used as boiler fuel. Reviewed the records FY 2021/22 as follows:</p> <table border="1"> <thead> <tr> <th>Type of biofuel</th> <th>Year / Tonne</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Shell</td> <td>2022 / 6,323.68</td> </tr> <tr> <td>2021 / 10,344.74</td> </tr> <tr> <td rowspan="2">Fibre</td> <td>2022 / 13,313.63</td> </tr> <tr> <td>2021 / 21,787.62</td> </tr> </tbody> </table>		Type of biofuel	Year / Tonne	Shell	2022 / 6,323.68	2021 / 10,344.74	Fibre	2022 / 13,313.63	2021 / 21,787.62	Complied
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4.5.3.3	<p>The POM 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>TDM Plantation Sdn Bhd has established SOP for handling scheduled waste and documented in Standard Operating procedure – Procedure for handling schedule waste dated 1/11/2008, edition TDMP/02 rev. TDMP – 02/2017.</p> <p>Kemaman POM also has a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor.</p>		Complied								

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Criterion / Indicator		Assessment Findings	Compliance																
	- Major compliance -	<p>Kemaman POM maintains the inventory records of the Scheduled Waste generated and reported to DOE through ESWISS. Reviewed the Fifth Scheduled: Inventory of Scheduled Waste (JAS.TKM.600-3/1/4) for the month of June, July and August 2022.</p> <p>Inventory for all scheduled waste generated were recorded and reported to DOE through E-SWISS. Sighted the sampled scheduled waste disposal records:</p> <ol style="list-style-type: none"> 1. 2022083015PORK37 for SW 410 (0.0524 mt) dated 30/08/2022 2. 2022083014HMTZ2R for SW 322 (0.02 mt) dated 30/08/2022 3. 2022083015VOF8XD for SW 305 (0.3 mt) dated 30/08/2022 																	
4.5.3.4	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p>- Minor compliance -</p>	Domestic waste was collected by Kemaman POM and disposed at the designated landfill at sister estate. Reviewed the records of domestic waste collection was available at site.	Complied																
Criterion 4.5.4: Reduction of pollution and emission including greenhouse gas																			
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p>	<p>The assessment of all polluting activities been conducted by monthly basis as per online environmental reporting to DOE by quarterly latest was on 07/07/2022. The result of the assessment as per below: -</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Parameter / Limit</th> <th>28/04/2022</th> <th>15/05/2022</th> <th>23/06/2022</th> </tr> </thead> <tbody> <tr> <td>Total discharge; cubic meter (m³)</td> <td style="text-align: center;">375.18</td> <td style="text-align: center;">399.48</td> <td style="text-align: center;">414.05</td> </tr> <tr> <td>pH Value/ &<9.0</td> <td style="text-align: center;">8.10</td> <td style="text-align: center;">8.10</td> <td style="text-align: center;">8.20</td> </tr> <tr> <td>BOD at 30° / C100 mg/l</td> <td style="text-align: center;">16.00</td> <td style="text-align: center;">28.00</td> <td style="text-align: center;">50.00</td> </tr> </tbody> </table>	Parameter / Limit	28/04/2022	15/05/2022	23/06/2022	Total discharge; cubic meter (m ³)	375.18	399.48	414.05	pH Value/ &<9.0	8.10	8.10	8.20	BOD at 30° / C100 mg/l	16.00	28.00	50.00	Complied
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Criterion / Indicator		Assessment Findings				Compliance
		Oil & Grease/ 50mg/l	0	1.00	2.00	
		AN / 150mg/l	7.39	13.89	2.13	
		<p>As per Jadual Pematuhan the management should followed the 'Garis Panduan Pelan Pengurusan Tandan Kosong Kelapa Sawit' for EFB management, as per latest the management already in progress to build up the EFB storage followed the EFB guideline. The management already award to Kulim Safety Training and Services Sdn Bhd as per contract award (TDMP 27/22 dated 14/09/2022.</p> <p>The management also conducted the Stack Flue Gas of Boiler No. 1 and No. 2. Stack Flue Gas of Boiler No.1 (L-GB-TC2204CTP-0361) dated 20/04/2022. Stack Flue Gas of Boiler No. 2 (L-GB-TC2206CTP-0377 dated 23/06/2022.The result: -</p>				
		Stack	Average Dust Concentration (mg/m ³)	Environmental Quality (Clean Air) Regulations 2014, (mg/m ³)		
		Boiler 1 (TG PMD 232)	35.0 at 12% CO2	150.0		
		Boiler 2 (TG PMD 12383)	138.2 at 12% CO2	150		
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>Report of Third Party for environmental have been conducted by the management since year 2021. The record as per below: -</p> <p>1 Half 2021</p> <p>Audit date; 30/11/2021</p>				Complied

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Criterion / Indicator		Assessment Findings	Compliance																				
		Audit date report: 7/12/2021 Reported by SFE Consultant Sdn Bhd (EA 0024), no finding from the report only observation been raised by the auditor. 2 half 2022 Audit Date: 26/07/2022 Report Date: 03/08/2022 Reported by the SFE Consultant Sdn Bhd (EA0024), no finding from the report only observation been raised by the auditor.																					
4.5.4.3	POM 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. - Major compliance -	Treated POME discharge was regularly monitored as prescribed under Compliance Schedule License no. 004055. Limit of Biochemical Oxygen Demand (BOD) discharge is 100 mg/l for land application. Regular monitoring was done on monthly basis and every quarterly via Quarterly return form to DOE for compliance. Sighted the quarterly return form as follows: Dated: 07/07/2022 <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Parameter / Limit</th> <th>28/04/2022</th> <th>15/05/2022</th> <th>23/06/2022</th> </tr> </thead> <tbody> <tr> <td>pH Value/ >5.0 &<9.0</td> <td>8.10</td> <td>8.10</td> <td>8.20</td> </tr> <tr> <td>BOD at 30° / C 100 mg/l</td> <td>16.00</td> <td>28.00</td> <td>50.00</td> </tr> <tr> <td>Oil & Grease/ 50mg/l</td> <td>0</td> <td>1.00</td> <td>2.00</td> </tr> <tr> <td>AN / 150mg/l</td> <td>7.39</td> <td>13.89</td> <td>2.13</td> </tr> </tbody> </table>	Parameter / Limit	28/04/2022	15/05/2022	23/06/2022	pH Value/ >5.0 &<9.0	8.10	8.10	8.20	BOD at 30° / C 100 mg/l	16.00	28.00	50.00	Oil & Grease/ 50mg/l	0	1.00	2.00	AN / 150mg/l	7.39	13.89	2.13	Complied
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Criterion 4.5.5: Natural water resources																							
4.5.5.1	The management shall establish water management plans to maintain the quality and availability of natural water resources	Kemaman POM has established water management Plan and documented in Action Plan to reduce freshwater usage. In the plan	Complied																				

Criterion / Indicator	Assessment Findings	Compliance																							
<p>(surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>stated the areas of concern, action plan, person responsible and time frame. Latest review was conducted in February 2022.</p> <ul style="list-style-type: none"> a) The assessment of water usage has been conducted monthly basis and recorded. The usage record as per below: - <table border="1" data-bbox="1137 576 1753 711"> <thead> <tr> <th>Year</th> <th>Water usage (liter)</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>169,250</td> </tr> <tr> <td>2021</td> <td>317,525</td> </tr> <tr> <td>2020</td> <td>467,800</td> </tr> </tbody> </table> b) The monitoring of the outgoing water (Sg. Tebak) have been conducted by monthly basis. The latest record was on 30/08/2022 (22/08/W0653) and previously was on 27/07/2022 (22/07/W0550). The record latest result as per below: - <table border="1" data-bbox="1137 858 1771 1027"> <thead> <tr> <th>Parameter</th> <th>Unit</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>-</td> <td>7.7</td> </tr> <tr> <td>BOD</td> <td>mg/L</td> <td>11</td> </tr> <tr> <td>COD</td> <td>mg/L</td> <td>85</td> </tr> <tr> <td>AN</td> <td>mg/L</td> <td>ND</td> </tr> </tbody> </table> c) To optimize the water usage in mill, the management already establish the plan as per below: - <ol style="list-style-type: none"> 1. Large containers to be placed at strategic locations to collect water 2. Rainwater to be used to wash heavy machineries and watering plant 3. Install flowmeter 4. Upgrade front end – less washing frequency at ramp, marshalling 	Year	Water usage (liter)	2022	169,250	2021	317,525	2020	467,800	Parameter	Unit	Result	pH	-	7.7	BOD	mg/L	11	COD	mg/L	85	AN	mg/L	ND	
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Criterion / Indicator		Assessment Findings	Compliance																				
4.5.5.2	<p>Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.</p> <p>- Major compliance -</p>	<p>Kemaman POM treated POME discharge on regularly monitored as prescribed under Compliance Schedule License no. 003180. Limit of Biochemical Oxygen Demand (BOD) discharge is 100 mg/l for land application. Regular monitoring was done on monthly basis and every quarterly via Quarterly return form to DOE for compliance. Sighted the quarterly return form as follows:</p> <table border="1"> <thead> <tr> <th>Parameter / Limit</th> <th>28/04/2022</th> <th>15/05/2022</th> <th>23/06/2022</th> </tr> </thead> <tbody> <tr> <td>pH Value/ >5.0 &<9.0</td> <td>8.10</td> <td>8.10</td> <td>8.20</td> </tr> <tr> <td>BOD at 30° / C 100 mg/l</td> <td>16.00</td> <td>28.00</td> <td>50.00</td> </tr> <tr> <td>Oil & Grease/ 50mg/l</td> <td>0</td> <td>1.00</td> <td>2.00</td> </tr> <tr> <td>AN / 150mg/l</td> <td>7.39</td> <td>13.89</td> <td>2.13</td> </tr> </tbody> </table>	Parameter / Limit	28/04/2022	15/05/2022	23/06/2022	pH Value/ >5.0 &<9.0	8.10	8.10	8.20	BOD at 30° / C 100 mg/l	16.00	28.00	50.00	Oil & Grease/ 50mg/l	0	1.00	2.00	AN / 150mg/l	7.39	13.89	2.13	Complied
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4.6 Principle 6: Best Practices																							
Criterion 4.6.1: Mill Management																							
4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd established standard operation procedure for mill operations. There are levels of the documentation identified as follows.</p> <ol style="list-style-type: none"> Level 1 standard operating procedure Level 2 work instruction Level 3 records. <p>Kemaman POM adopt the TDM Plantation Sdn Bhd's SOP & Operation Manual updated on November 2012 (TDM/KPOM/01 dated 1 May 2011) as guidance document to operate the mill with</p>	Complied																				

Criterion / Indicator		Assessment Findings	Compliance
		total of 25 SOPs were kept and maintained. Includes with the updated version of SCCS implementation, RSPO Supply Chain SOP for Identity Preserved & Mass Balance Doc. No.: TDM/TRCBLT/04; Rev.: SCCS-01/2020 updated 01/12/2020.	
4.6.1.2	All POMs shall implement best practices. - Major compliance -	<p>Kemaman POM has established reports for monitor the operations based on current year actual performance against budget for year 2022 as follow:</p> <ol style="list-style-type: none"> 1. Key Performance Index (KPI) as of August 2022 <ol style="list-style-type: none"> a. Revenue b. Production Cost c. Other Income d. Sales CPO – inter department 2. Daily production report as of August 2022 <ol style="list-style-type: none"> a. Progress report b. FFB quality / Extraction Ratios c. Qualities issues/complaints d. MPD analysis e. Manpower f. Process control g. Mill throughput /downtime h. Water consumption i. Processing cost /CAPEX. 3. Annual Sustainability Department Internal Audit 4. The Mill Advisor visits dated 14/06/2022 – 15/06/2022; and 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		15/08/2022 a. Financial b. Business Operation c. Supplier and Customer Need & Expectation d. Human Capital Planning e. Occupational Safety and Health f. Environmental Kemaman POM Mill Manager then develop action plans based on Mill Advisor visit report and internal audit report for improvement of mill operations. Review of reports, action plans and site inspections confirmed consistent records of implementation of SOPs. This to ensure that performance is on track and best practices being consistently implemented.	
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 -	Kemaman POM established business plan annually in the form of yearly budget and projection for 5 years planning. The business plan among others includes: <ol style="list-style-type: none"> 1. FFB Processing & CPO / CPK production forecast 2. Extraction Ratios – OER / KER, 3. Cost of production: <ol style="list-style-type: none"> a) administration / labour overhead b) processing cost labour, maintenance, consumables c) depreciation and head office charges- d) EVIT running accounts 	Complied

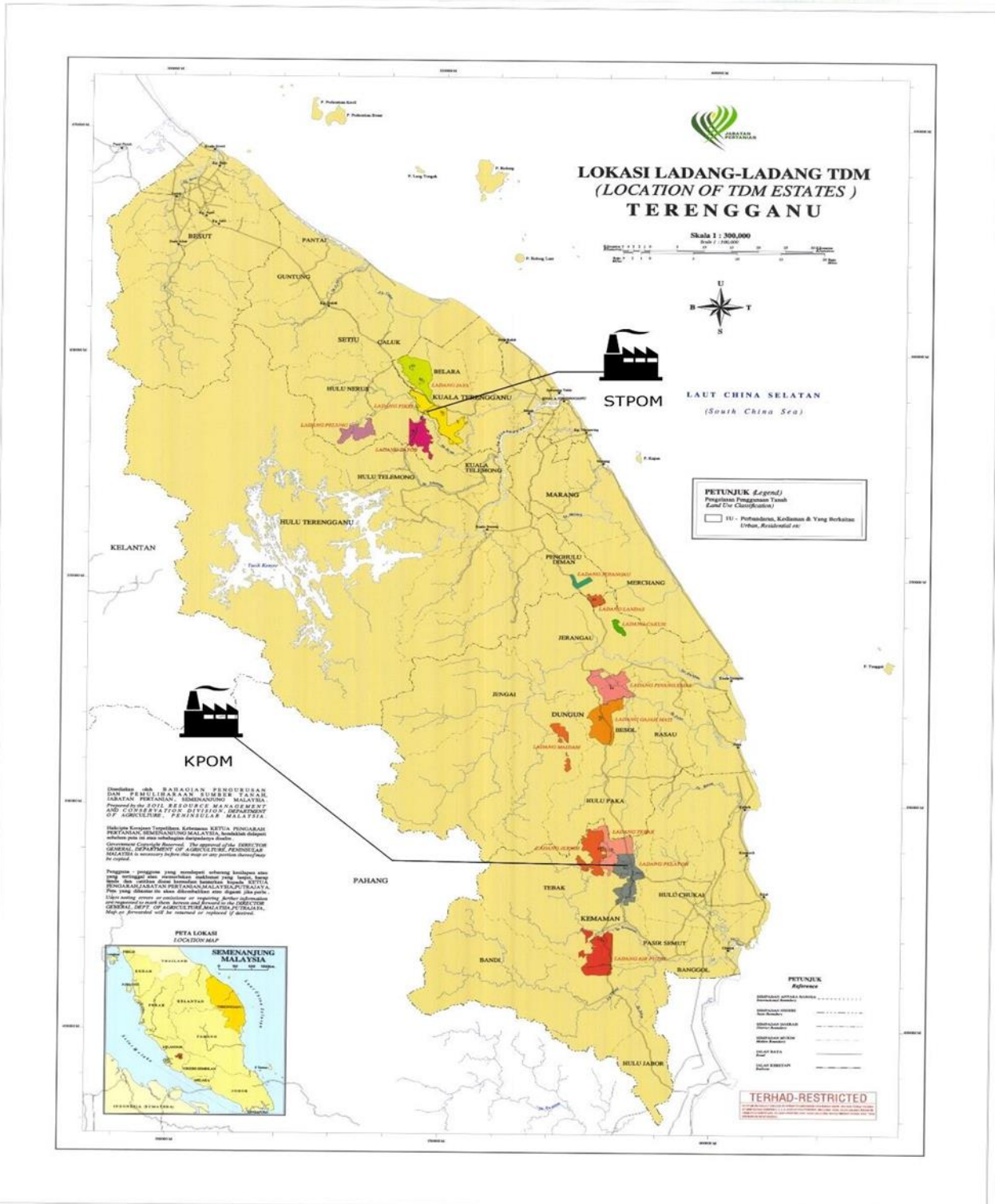
Criterion / Indicator		Assessment Findings	Compliance
		e) CAPEX - capital expenditure.	
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	TDM Plantation Sdn Bhd established pricing method has been clearly stated in the contract and contractors are explained on the terms of contracts prior to the signing of the contract. Kemaman POM received only within TDM Plantation Sdn Bhd's certified estates suppliers. However, the pricing of FFB available and displayed at the weighbridge area.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	TDM Plantation Sdn Bhd established pricing method has been clearly stated in the contract and contractors are explained on the terms of contracts prior to the signing of the contract. Contracts are fair, legal, and transparent as per sampled: 1. CPO & PK Transport contract between TDM Plantation Sdn Bhd with Koperasi Ladang Kelapa Sawit Kemaman Terengganu Berhad, dated 01/01/2019 with extension letter, ref. no.: TDMP/OD/09/01.32, valid till 31/10/2022 signed on 15/09/2022. 2. CPO & PK Transport contract between TDM Plantation Sdn Bhd with Sutera Adela Sdn Bhd, dated 01/06/2019 with extension letter ref. no.: TDMP/OD/09/01.32, valid till 31/10/2022 signed on 20/09/2022 3. New contract work order no.: TDMP 27/22, for contractor Kulim Safety Training & Services Sdn Bhd with TDM Plantation Sdn Bhd dated 15/09/2022. The contract period started from 18/09/2022 until 26/11/2022.	Complied
Criterion 4.6.4: Contractor			

Criterion / Indicator		Assessment Findings	Compliance
4.6.4.1	<p>In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p>	<p>Kemaman POM provided MSPO information and documentation for engaged contractors via work agreement signed by the contractors prior to delivery of work items and/or services. Briefing to contractors together done by mill management to contractors during signing of <i>Perjanjian Pesanan Kerja</i> (Work Order Agreement) which included the provision for contractors to comply with legal requirements, MSPO requirements and authorization by the estate to audit the contractors from time to time on their compliance against all relevant requirements.</p> <p>Kemaman POM conduct briefing to contractor and transporter's drivers in related to MSPO requirements dated 09/03/2022.</p> <p>Agenda of the briefing includes:</p> <ol style="list-style-type: none"> 1. Awareness on RSPO & MSPO Policy 2. Awareness related to labour and minimum wages requirements. 3. Awareness on safety & health requirement while enter mill facility. 	Complied
4.6.4.2	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p>- Major compliance -</p>	<p>Evidence of agreed contracts with contractor provided by Kemaman POM together with Code of Ethics & Business Conducts; CoBE TDM; Rev. 01; Approved date: 25/3/2018 for following:</p> <ol style="list-style-type: none"> 1. CPO & PK Transport contract between TDM Plantation Sdn Bhd with Koperasi Ladang Kelapa Sawit Kemaman Terengganu Berhad, dated 01/01/2019 with extension letter, ref. no.: TDMP/OD/09/01.32, valid till 31/10/2022 signed on 15/09/2022. 2. CPO & PK Transport contract between TDM Plantation Sdn Bhd with Sutera Adela Sdn Bhd, dated 01/06/2019 with extension letter ref. no.: TDMP/OD/09/01.32, valid till 31/10/2022 signed 	Complied

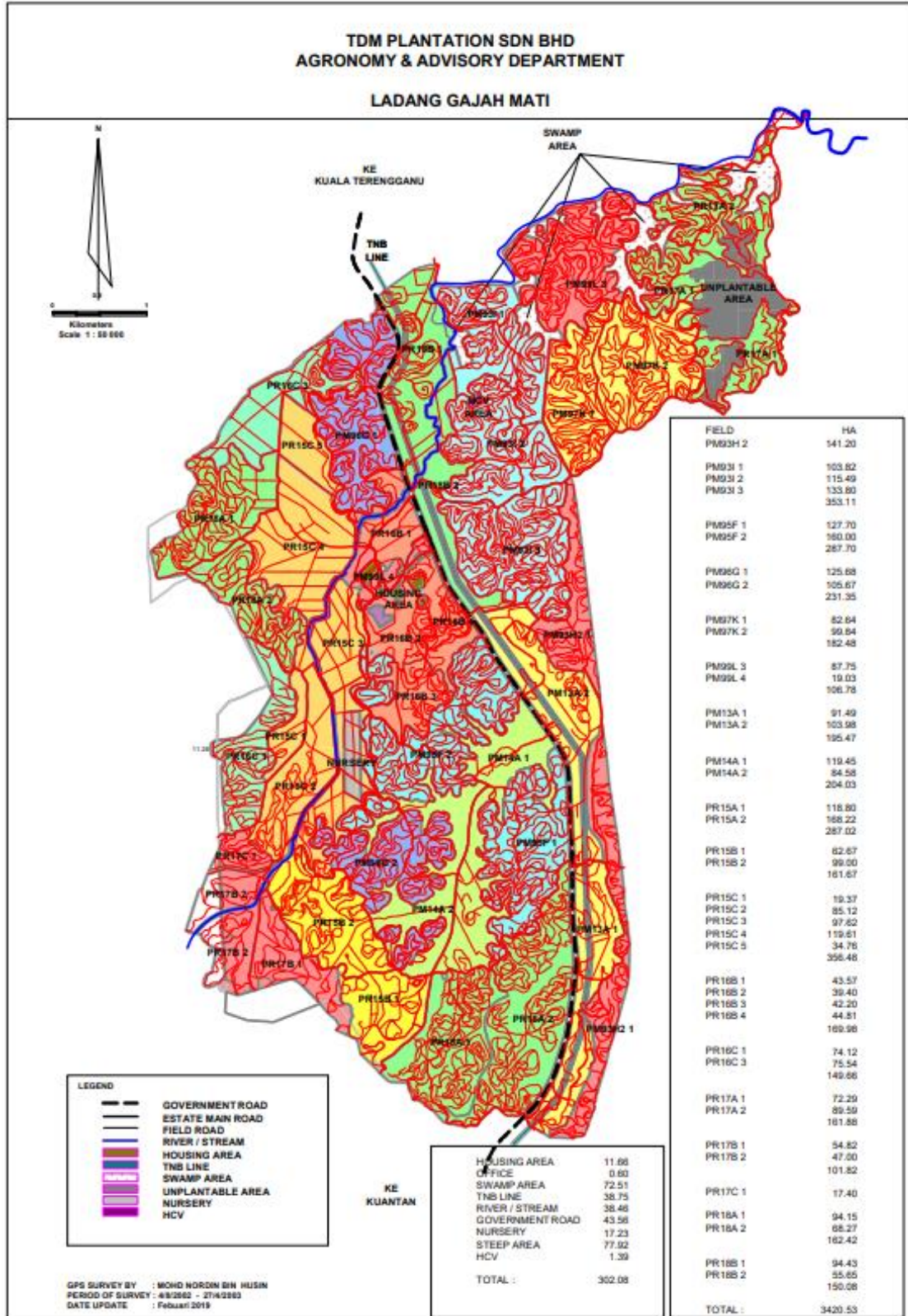
Criterion / Indicator		Assessment Findings	Compliance
		<p>on 20/09/2022</p> <p>3. New contract work order no.: TDMP 27/22, for contractor Kulim Safety Training & Services Sdn Bhd with TDM Plantation Sdn Bhd dated 15/09/2022. The contract period started from 18/09/2022 until 26/11/2022.</p>	
4.6.4.3	<p>The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.</p> <p>- Minor compliance -</p>	<p>TDM Plantation Sdn Bhd established contract agreement with contractors include a clause reserving the right of the BSI auditors to audit the outsourced contractor and verify the assessment through a physical inspection if required.</p>	Complied

Appendix C: Location and Field Map

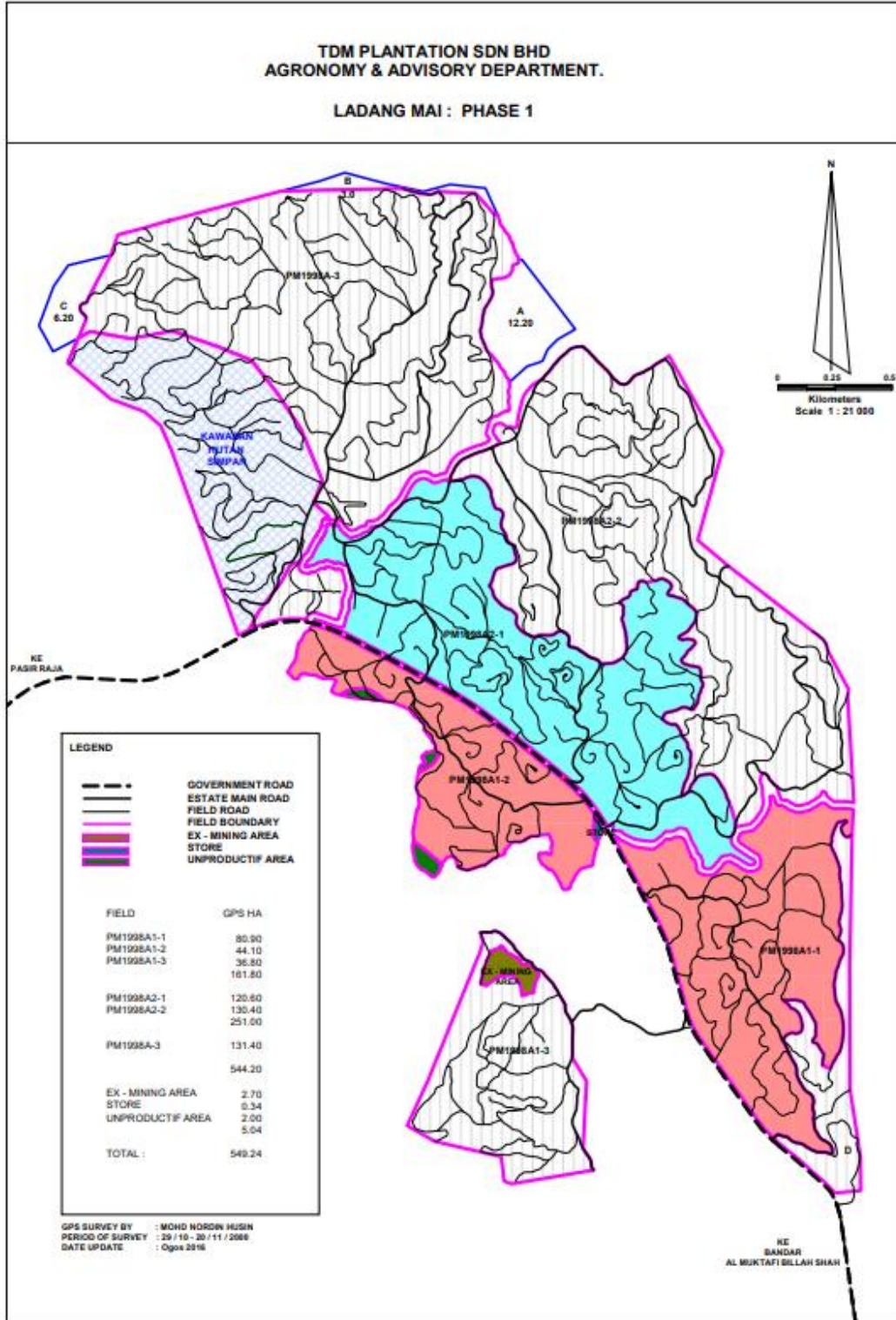
Location of Kemaman Palm Oil Mill & Estates



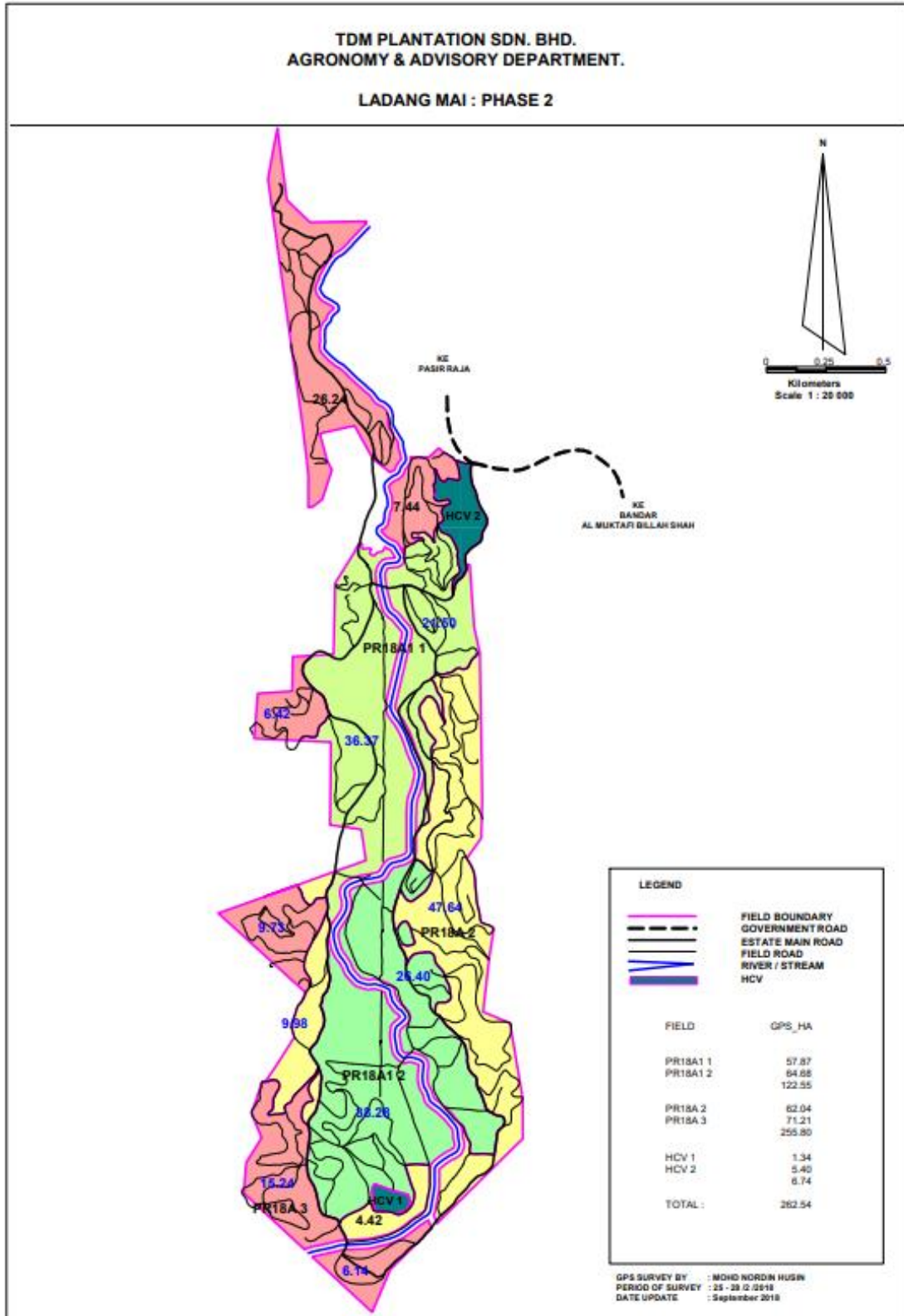
Gajah Mati Estate Map



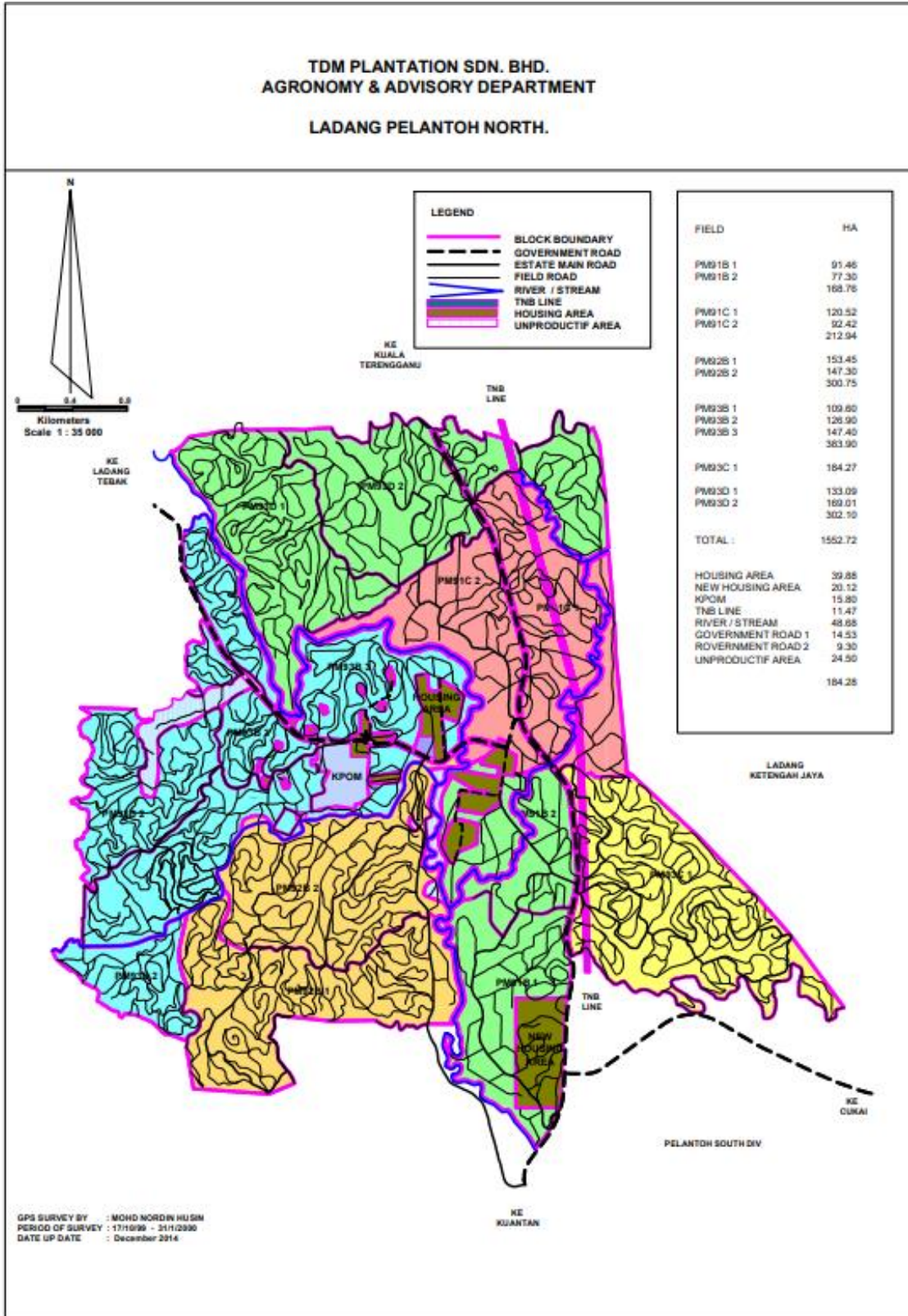
MAIDAM Estate, Phase 1 Map



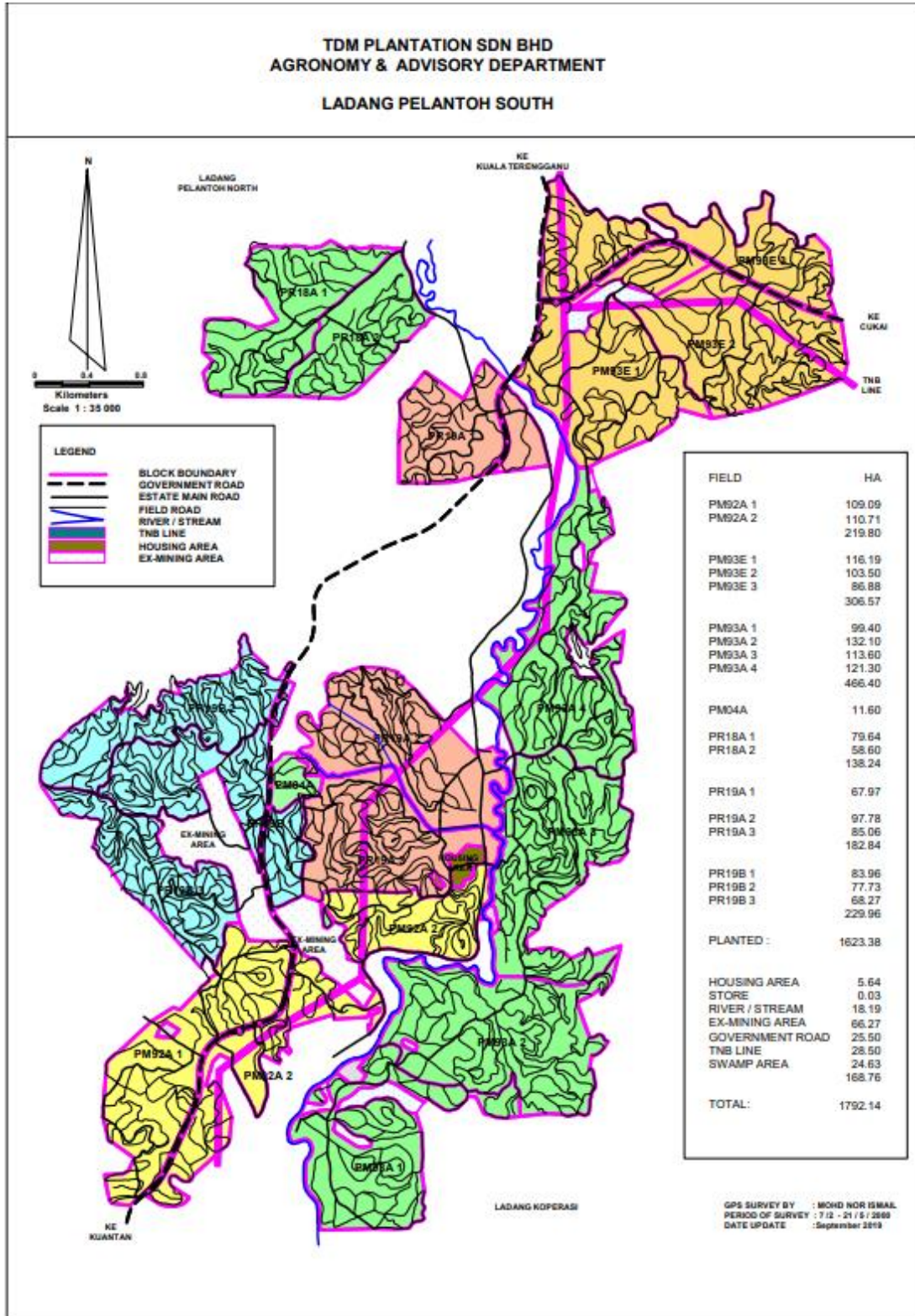
MAIDAM Estate, Phase 2 Map



Pelantoh Estate North Map



Pelantoh Estate South Map

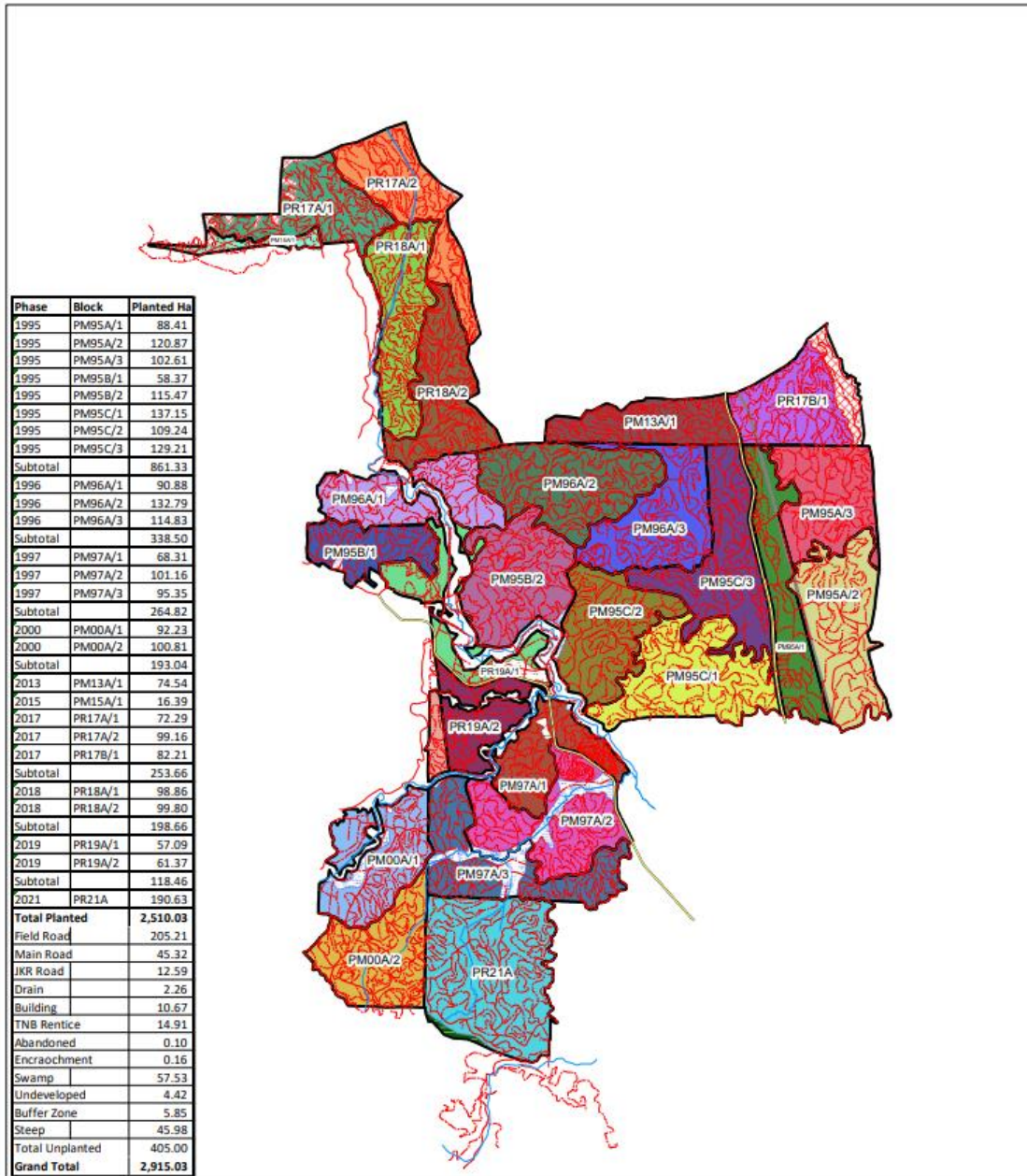


Tebak Estate Map



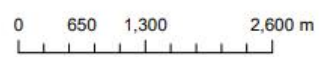
TDM PLANTATION SDN. BHD.
AGRONOMY & ADVISORY DEPARTMENT

Ladang Tebak



Phase	Block	Planted Ha
1995	PM95A/1	88.41
1995	PM95A/2	120.87
1995	PM95A/3	102.61
1995	PM95B/1	58.37
1995	PM95B/2	115.47
1995	PM95C/1	137.15
1995	PM95C/2	109.24
1995	PM95C/3	129.21
Subtotal		861.33
1996	PM96A/1	90.88
1996	PM96A/2	132.79
1996	PM96A/3	114.83
Subtotal		338.50
1997	PM97A/1	68.31
1997	PM97A/2	101.16
1997	PM97A/3	95.35
Subtotal		264.82
2000	PM00A/1	92.23
2000	PM00A/2	100.81
Subtotal		193.04
2013	PM13A/1	74.54
2015	PM15A/1	16.39
2017	PR17A/1	72.29
2017	PR17A/2	99.16
2017	PR17B/1	82.21
Subtotal		253.66
2018	PR18A/1	98.86
2018	PR18A/2	99.80
Subtotal		198.66
2019	PR19A/1	57.09
2019	PR19A/2	61.37
Subtotal		118.46
2021	PR21A	190.63
Total Planted		2,510.03
Field Road		205.21
Main Road		45.32
JKR Road		12.59
Drain		2.26
Building		10.67
TNB Rentice		14.91
Abandoned		0.10
Encroachment		0.16
Swamp		57.53
Undeveloped		4.42
Buffer Zone		5.85
Steep		45.98
Total Unplanted		405.00
Grand Total		2,915.03

Legend	
	Field Road
	Main Road
	Drain / River
	Govt Road
	Abandoned
	Buffer Zone
	Building
	Encroachment
	Govt Infra
	Steep
	Swamp
	Undeveloped



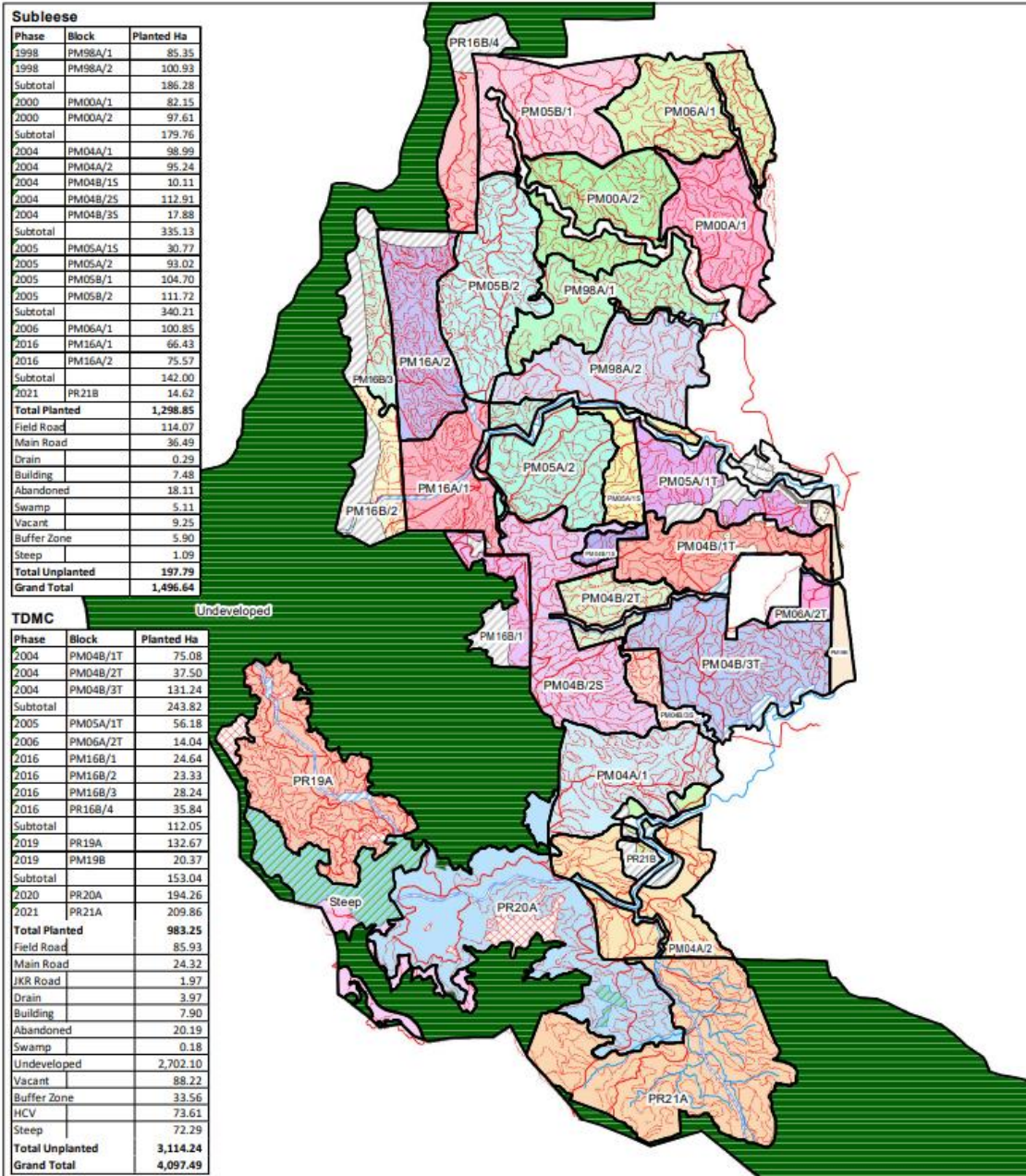
Prepared By: AAD
Map Date: 12 Jul 2022
Projection: UTM N48 WGS84

Jernih Estate Map

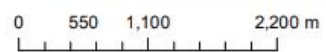


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Ladang Jernih



Legend			
	Field Road		Abandoned
	Main Road		Govt Infra
	Drain / River		Swamp
	Govt Road		Buffer Zone
	Undeveloped		HCV
	Building		Steep



Prepared By: AAD
Map Date: 6 Oct 2022
Projection: UTM N48 WGS84

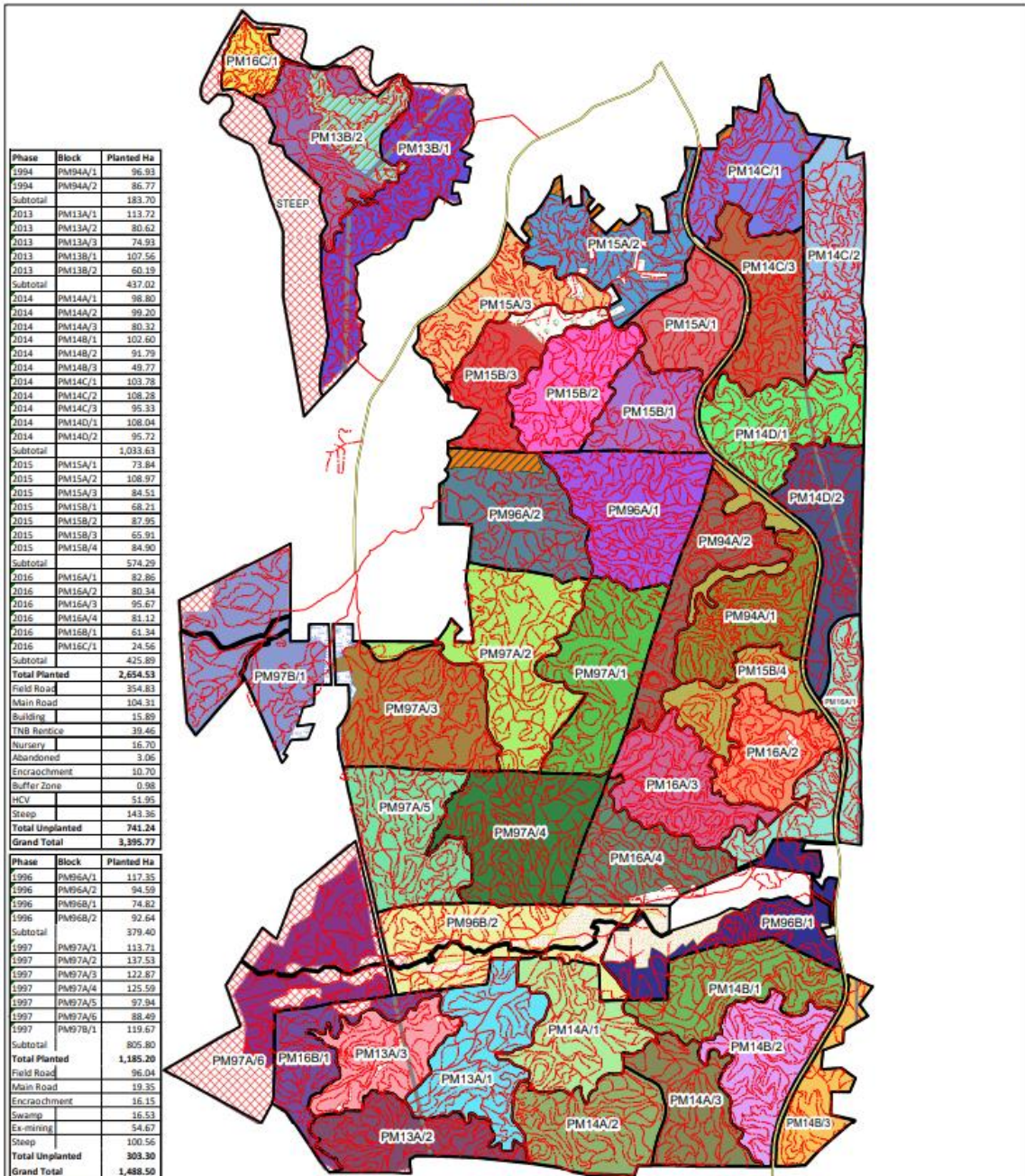
Air Putih Estate Map



1:32,600

TDM PLANTATION SDN. BHD.
AGRONOMY & ADVISORY DEPARTMENT

Ladang Air Putih

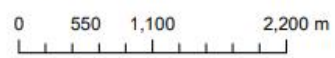


Phase	Block	Planted Ha
1994	PM94A/1	96.93
1994	PM94A/2	86.77
Subtotal		183.70
2013	PM13A/1	113.72
2013	PM13A/2	80.62
2013	PM13A/3	74.91
2013	PM13B/1	107.56
2013	PM13B/2	60.19
Subtotal		437.02
2014	PM14A/1	98.80
2014	PM14A/2	99.20
2014	PM14A/3	80.32
2014	PM14B/1	102.60
2014	PM14B/2	91.79
2014	PM14B/3	49.77
2014	PM14C/1	103.78
2014	PM14C/2	108.28
2014	PM14C/3	95.33
2014	PM14D/1	108.04
2014	PM14D/2	95.72
Subtotal		1,033.63
2015	PM15A/1	73.84
2015	PM15A/2	108.97
2015	PM15A/3	84.53
2015	PM15B/1	68.21
2015	PM15B/2	87.95
2015	PM15B/3	65.91
2015	PM15B/4	84.90
Subtotal		574.28
2016	PM16A/1	82.86
2016	PM16A/2	80.34
2016	PM16A/3	95.67
2016	PM16A/4	81.12
2016	PM16B/1	61.34
2016	PM16C/1	24.56
Subtotal		425.89
Total Planted		2,654.53
Field Road		354.83
Main Road		104.31
Building		15.89
TNB Retrace		39.46
Nursery		16.70
Abandoned		3.06
Encroachment		10.70
Buffer Zone		0.98
HCV		51.95
Steep		143.36
Total Unplanted		741.24
Grand Total		3,395.77

Phase	Block	Planted Ha
1996	PM96A/1	117.35
1996	PM96A/2	94.59
1996	PM96B/1	74.82
1996	PM96B/2	92.64
Subtotal		379.40
1997	PM97A/1	113.71
1997	PM97A/2	137.53
1997	PM97A/3	122.87
1997	PM97A/4	125.59
1997	PM97A/5	97.94
1997	PM97A/6	88.49
1997	PM97B/1	119.67
Subtotal		805.80
Total Planted		1,185.20
Field Road		96.04
Main Road		19.35
Encroachment		16.15
Swamp		16.53
Ex-mining		54.63
Steep		100.56
Total Unplanted		303.36
Grand Total		1,488.56

Legend

- - - Field Road
- [Blue hatched] Buffer Zone
- [Yellow hatched] Ex-mining
- [Green with trees] Nursery / Orchard
- - - Main Road
- [Black hatched] Building
- [Blue hatched] HCV
- [Red hatched] Steep
- - - Drain / River
- [Orange hatched] Encroachment
- [Grey] Govt Infra
- [Blue with water] Swamp
- - - Govt Road



Prepared By: AAD
Map Date: 13 Jul 2022
Projection: UTM N48 WGS84

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