

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

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

SIME DARBY PLANTATION BERHAD
Client Company (HQ) Address: Level 11, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 24) Hadapan Palm Oil Mill and Plantations: Kulai Estate, Layang Estate, Seri Pulai Estate and CEP Rengam Estate
Date of Final Report: 13/3/2023

Report prepared by:
Ahmad Ruffi Bin Abu Talib Khan (Lead Auditor)

Report Number: 3511618

Assessment Conducted by:
BSI Services Malaysia Sdn Bhd,
(DSM Accreditation Number: MSPO 09112018 CB 12)
Suite 29.01 Level 29 The Gardens North Tower,
Mid Valley City Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia
Tel +60392129638 Fax +60392129639
www.bsigroup.com

TABLE of CONTENTS	Page No
Section 1: Executive Summary	3
1.1 Organizational Information and Contact Person	3
1.2 Certification Information	3
1.3 Other Certifications	4
1.4 Location of Certification Unit	4
1.5 Certified Area	5
1.6 Plantings & Cycle	5
1.7 Certified Tonnage of FFB	5
1.8 Uncertified Tonnage of FFB.....	6
1.9 Certified Tonnage	6
1.10 Actual Sold Volume (CPO).....	6
1.11 Actual Sold Volume (PK).....	6
Section 2: Assessment Process	7
2.1 BSI Assessment Team	8
2.2 Impartiality and conflict of interest	10
2.3 Accompanying Persons	10
2.4 Assessment Plan	11
Section 3: Assessment Findings	13
3.1 Details of audit results.....	13
3.2 Details of Nonconformities and Opportunity for improvement	13
3.3 Status of Nonconformities Previously Identified and OFI	15
3.4 Summary of the Nonconformities and Status	20
3.5 Issues Raised by Stakeholders	20
3.6 List of Stakeholders Contacted	22
Section 4: Assessment Conclusion and Recommendation	23
Appendix A: Summary of the findings by Principles and Criteria.....	24
Appendix B: Smallholder Member Details.....	126
Appendix C: Location and Field Map.....	127
Appendix D: List of Abbreviations	133

Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	Sime Darby Plantation Berhad		
Mill/Estate	Certification Unit	MPOB License No.	Expiry Date
	Hadapan Palm Oil Mill	510425004000	28/02/2023
	Kulai Estate	508509102000	31/03/2023
	Layang Estate	508443402000	21/03/2023
	Seri Pulai Estate	520195002000	30/04/2023
	CEP Rengam Estate	508444202000	31/03/2023
Address	Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia		
Management Representative	Mdm. Shylaja Devi Vasudevan Nair - Head, Sustainability Compliance Unit, GSD Mr Hasnol Hisham Bin Hamdan - SOU 24 Chairman Mr Mohammad Saufi Bin Baharudin - Mill Manager		
Website	www.simedarbyplantation.com	E-mail	shylaja.vasudevan@simedarbyplantation.com Ldg.kulai@simedarbyplantation.com kks.hadapan@simedarbyplantation.com
Telephone	07-6523688	Facsimile	NA

1.2 Certification Information			
Certificate Number	Mill: MSPO 739513 Estate: MSPO 739514	Certificate Start Date	15/02/2023
Date of First Certification	15/02/2018	Certificate Expiry Date	14/02/2028
Scope of Certification	<input checked="" type="checkbox"/> Mill: Production of Sustainable Palm Oil and Palm Oil Products <input checked="" type="checkbox"/> Estate: Production of Sustainable Oil Palm Fruits		
Visit Objectives	<p>The objective of the assessment was to conduct a recertification assessment 1 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		

MSP0 Public Summary Report
Revision 2 (Nov 2021)

	<input checked="" type="checkbox"/> MSP0 MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders <input checked="" type="checkbox"/> MSP0 MS 2530-4:2013 – General Principles for Palm Oil Mills
Recertification Assessment Visit Date (RAV)	13-16/12/2022
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
RSPO 739013	RSPO Principles & Criteria of Sustainable Palm Oil production: 2018; Malaysian National Interpretation: 2019	BSI Services Malaysia Sdn. Bhd.	28/03/2026
MSP0 739515	MSP0 Supply Chain Certification Standard (MSP0 SCCS) 1 October 2018	BSI Services Malaysia Sdn. Bhd.	23/03/2025

1.4 Location of Certification Unit

Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Latitude	Longitude
Hadapan Palm Oil Mill	Batu 6, Jalan Bukit Permai, k/b 109, 81850 Layang-Layang, Johor, Malaysia	1° 45' 44.00" N	103° 26' 51.00" E
Kulai Estate	Bt 25 Jalan Johor Bahru Air Hitam, 81000 Kulai, Johor, Malaysia	1° 40' 05.14" N	103° 32' 28.21" E
Layang Estate	Jalan Ladang Layang-Layang, 81850 Layang-Layang, Johor, Malaysia	1° 46' 00.27" N	103° 27' 14.07" E
Seri Pulai Estate	KM 9, Jalan Sawah, 81000 Kulai, Johor, Malaysia	1° 35' 36.10" N	103° 30' 34.30" E
CEP Rengam Estate	KM 3, Jalan Simpang Renggam, 86300 Rengam, Johor, Malaysia	1° 52' 23.01" N	103° 22' 45.73" E

MSPO Public Summary Report Revision 2 (Nov 2021)

1.5 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Kulai Estate	2,652.37	0.77	370.28	3,023.42	87.73
Layang Estate	2,819.72	6.02	433.16	3,258.90	86.52
Seri Pulai Estate	1,980.76	27.61	41.50	2,049.87	96.63
CEP Rengam Estate	2,869.32	7.19	162.87	3,039.38	94.40
Total (ha)	10,322.17	41.59	1,007.81	11,371.57	90.77

Notes:

- HCV Hectarage for Seri Pulai has been revised in January 2021 by Conservation & Biodiversity Unit to 27.61 Ha as attached.
- There is re-assessment exercise on January 2022 by GPS survey under Precision Agriculture Unit (PAU) for SOU 24 Hadapan (Kulai Estate, Layang Estate, Seri Pulai Estate and CEP Rengam Estate). Changes of the hectarage was due to the assessment.

1.6 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Kulai Estate	70.38	886.20	1,336.66	74.76	284.37	2,581.99	70.38
Layang Estate	185.10	393.19	2,043.15	198.28	0.00	2,634.62	185.10
Seri Pulai Estate	325.12	768.43	569.22	317.99	0.00	1,655.64	325.12
CEP Rengam Estate	418.45	538.64	893.16	594.06	425.01	2,450.87	418.45
Total (ha)	999.05	2,586.46	4,842.19	1,185.09	709.38	9,323.12	999.05

1.7 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Feb 2022 - Jan 2023)	Actual (Dec 2021 - Nov 2022)	Forecast (Feb 2023 - Jan 2024)
Kulai Estate	25,744.55	25,009.31	25,744.55
Layang Estate	33,415.02	32,150.76	53,112.87
Seri Pulai Estate	30,557.14	23,546.24	17,145.64
CEP Rengam Estate	515.79	30,743.38	874.44
Sembrong Estate	2,181.36	563.30	2,569.75
Tun Dr. Ismail Estate	4,488.12	2,920.85	6,607.73
Bukit Badak Estate	3,197.48	1,181.55	4,567.63
Pekan Estate	4,801.74	2,413.76	4,825.81

MSPO Public Summary Report Revision 2 (Nov 2021)

Lambak Estate	3,268.87	1,294.06	5,465.62
Ulu Remis Estate	3,277.17	563.25	4,328.89
Tradewinds Plantation Berhad (Ladang Air Manis)	6,000.00	4.75	6,000.00
Total (mt)	117,447.24	120,391.21	131,242.96

1.8 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Feb 2022 - Jan 2023)	Actual (Dec 2021 - Nov 2022)	Forecast (Feb 2023 - Jan 2024)
OCP	40,000.00	38,659.10	42,000.00
Total (mt)	40,000.00	38,659.10	42,000.00

1.9 Certified Tonnage

Mill Capacity: 60 MT/hr	Estimated (Feb 2022 - Jan 2023)	Actual (Dec 2021 - Nov 2022)	Forecast (Feb 2023 - Jan 2024)
		FFB	FFB
	117,447.25	120,391.21	131,242.96
SCC Model: MB	CPO (OER: 19.85%)	CPO (OER: 19.17%)	CPO (OER: 19.70%)
	23,313.28	23,078.99	25,854.86
	PK (KER: 4.98%)	PK (KER: 4.82%)	PK (KER: 5.02%)
	5,848.87	5,802.86	6,588.40

1.10 Actual Sold Volume (CPO)

CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
23,078.99	0.00	0.00	1,554.42	19,786.88	21,341.30

1.11 Actual Sold Volume (PK)

PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
5,802.86	0.00	0.00	4,039.74	776.98	4,816.72

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 13-16/12/2022. The audit programme is included as Section 2.4. The approach to the audit was to treat the Hadapan Palm Oil Mill and Supply Bases (Kulai Estate, Seri Pulai Estate, Layang Estate and CEP Rengam Estate) as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities. The Public Notification was posted on BSI website on 07/11/2022 which is more than 30 days prior to audit. The notification can be access through the link [11-1-mspo-public-notification recertification sime-darby sou-24-hadapan-pom--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 or smallholders sample were determined based on formula $S = r\sqrt{n}$ where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula $(r\sqrt{n})$; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix B.

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

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

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

All the previous nonconformities are remains closed. The assessment findings from the reassessment is detailed in Section 4.2. Major non-conformities were closed offsite due to evidence submission were sufficient.

MSPO Public Summary Report
Revision 2 (Nov 2021)

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 (Re-Certification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Hadapan Palm Oil Mill	X	X	X	X	X
Kulai Estate	X		X		X
Layang Estate		X		X	
Seri Pulai Estate	X		X		X
CEP Rengam Estate		X		X	

Tentative Date of Next Visit: December 11, 2023 - December 14, 2023

Total No. of Mandays: 11

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>
Ahmad Rufi Bin Abu Talib Khan (ARK)	Team Leader	<p>Education: Bachelor’s Degree in Mechanical Engineering from Universiti Teknologi MARA Shah Alam, graduated in 2015.</p> <p>Work Experience: He started his career as Assistant Mill Manager, managing the day-to-day mill operations. In his five years’ experience, he has experience handling the certification of ISO 9001, OHSAS 18001, ISO 14001 as well as Malaysia Sustainable Palm Oil (MSPO). He is a qualified Lead Auditor for MS 2530:2013 and has accumulated more than 300 audit days throughout his current career as the auditor for multiple disciplines covering all over Malaysia.</p> <p>Training attended: He has completed CQI – IRCA approved ISO 9001, ISO 14001 and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor and RSPO SCC Auditor course.</p> <p>Aspect covered in this audit:</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

		<p>Legal Requirements, land & legal issue and MSPO requirements Traceability, Best Practices.</p> <p>Language proficiency: Fluent in English and Bahasa Malaysia.</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: He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in November 2019, Endorsed RSPO P&C Lead Auditor Course in October 2019, Endorsed RSPO SCCS Lead Auditor Course in August 2020, Endorsed MSPO Lead Auditor Course in November 2019 and attended SMETA Requirements Training in April 2021.</p> <p>Aspect covered in this audit: Policy and commitment, Internal Audit, Management Review, Occupational safety and health, HIRADC, trainings, mill and estate best practise.</p> <p>Language proficiency: He is fluent in English, Bahasa Malaysia, and Tamil languages.</p>
Muhammad Fadzli Masran (MFM)	Team Member	<p>Education: He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia.</p> <p>Work Experience: He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day-to-day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers’ welfare, workers’ occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018, endorsed RSPO Lead Auditor Course in July 2018, MSPO Lead Auditor Course in October 2018, endorsed RSPO Supply Chain Certification training course in January 2019, MSPO Supply Chain Certification System (SCCS) Auditor training Course (MPOCC Endorsed), CQI and IRCA Certified ISO 9001:2015 Lead Auditor Training Course in April 2019, HCV and GIS Training in November 2019 and SMETA Requirements Training in April 2021.</p> <p>Language proficiency:</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

		<p>Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit: During the assessment he covered mills and estates best practices, Legal Requirements, land & legal issue environmental and HCV, Environmental Aspect impact, Environmental Management plan, and greenhouse gas.</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>

2.2 Impartiality and conflict of interest

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

2.3 Accompanying Persons

No.	Name	Role
	N/A	

2.4 Assessment Plan

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

Date	Time	Subjects	ARK	VKP	MFM
Monday, 12/12/2022		Audit team travel to Kulai	√	√	√
Tuesday, 13/12/2022 Kulai Estate - 3 Auditors	0800 - 0930	Audit team travel to Kulai Estate Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). • Verification on previous audit findings 	√	√	√
	0930 - 1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, worker housing, clinic, Landfill, etc.	√	√	√
	1230 - 1330	Lunch	√	√	√
	1330 - 1700	Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting	√	√	√
	1700 - 1730	Interim closing meeting	√	√	√
Wednesday, 14/12/2022 Kulai Estate Estate - 1 Auditor (MFM) & Seri Pulai Estate - 2 Auditors (ARK & VKP)	0900 - 1230	Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting	√	√	√
	1230 - 1330	Lunch	√	√	√
	1330 - 1700	Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting	√	√	√
	1700 - 1730	Interim closing meeting	√	√	√

MSPO Public Summary Report
Revision 2 (Nov 2021)

Date	Time	Subjects	ARK	VKP	MFM
Thursday, 15/12/2022	0900 - 1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, worker housing, clinic, Landfill, etc	√		√
	1230 - 1330	Lunch	√	√	√
	1330 - 1700	Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting Document review (MS 2530:2013 Part 4): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices	√	√	√
Hadapan POM - 1 Auditor (VKP)	1700 - 1730	Interim closing meeting	√	√	√
	Friday, 16/12/2022	0900 - 1230	Assessment: Plant visit, FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc	√	
Hadapan POM - 2 Auditors (ARK & MFM)	1000 - 1200	Stakeholder Consultation Meeting – (Government, Village Rep, Smallholders, Union Leaders, Contractors)	√		
	1230 - 1330	Lunch	√		√
	1330 - 1600	Document review (MS 2530:2013 Part 4): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices	√		√
	1600 - 1630	Auditor Meeting - Preparation for Closing Meeting	√		√
	1630 - 1700	Closing Meeting	√		√

Section 3: Assessment Findings

3.1 Details of audit results

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

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

3.2 Details of Nonconformities and Opportunity for improvement

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

During the assessment there were two (2) Major, zero (0) Minor nonconformities and zero (0) OFI raised. The SOU 24 Hadapan Palm Oil Mill and Supply Bases Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-Conformity Report			
NCR Ref #:	2289605-202212-M1	Issue Date:	16/12/2022
Due Date:	15/02/2023	Date of Closure:	11/02/2023
Area/Process:	Kulai Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.4.1 Major
Requirements:	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.		
Statement of Nonconformity:	The occupational safety and health plan were not effectively implemented.		
Objective Evidence:	During the visit to the Chemical Store, it was noticed that the storekeeper was a female who was currently pregnant. The management have mentioned that they are aware that the storekeeper is pregnant. Nevertheless, the pregnant storekeeper is still currently working as the chemical storekeeper and has not been offered alternative work as verified during the audit. Furthermore, there were excessive fumes coming out of the chemical store due to poor ventilation. This was against the company policy that states "Sprayer atau pekerja Wanita yang bekerja secara langsung dengan bahan kimia yang disahkan hamil akan ditugaskan ke bahagian lain sepanjang kehamilan" and memo dated 01/11/2022 entitled "Larangan Terlibat Dalam Urusan Berkaitan dengan Chemical".		
Corrections:	Estate management to follow memo that has been issued to storekeeper date 01/11/2022. Storekeeper immediately prohibited to involve with any chemical related job. The new appointed person in charge will cover all the operations in		

MSPO Public Summary Report
Revision 2 (Nov 2021)

	receiving, issuing of chemical.
Root cause analysis:	Lack of understanding on “no work on chemical for pregnant lady and new mother” by Person In charge (Storekeeper). As during the audit, she assisted the auditor to open the chemical store door during site visits due to her sense of ownership and accountability for her scope of work.
Corrective Actions:	Estate management to conduct refresher training to the storekeeper and all the female employee for improving their understanding of “No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work”. Estate management to monitor by using “No work with chemical for new mother and pregnant lady” template every 2 months.
Assessment Conclusion:	Sighted the training was conducted by the RSQM to the staff was conducted on 27/12/2022 regarding pregnancy policy and working for pregnant worker. The management of Kulai Estate also has conducted the new mother assessments and training the workers regarding the new mother’s policy. The management also has issued the Memo regarding the prohibition of pregnant workers to work in handling the chemical. The Major NC is closed, further verification will be conducted in next surveillance audit.

Non-Conformity Report			
NCR Ref #:	2289605-202212-M2	Issue Date:	16/12/2022
Due Date:	15/02/2023	Date of Closure:	11/02/2023
Area/Process:	Kulai Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.4.4.1 Major
Requirements:	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.		
Statement of Nonconformity:	The occupational safety and health plan were not effectively implemented.		
Objective Evidence:	<ul style="list-style-type: none"> a. The risks and hazards associate to the operations of the Shovel at the Reception Station was not assessed in the HIRARC. This was against the UM HSE Management System – OSH Risk Management Procedure (Doc Number: UM/HSE/SP/01) which states “To identify all the hazards in the workplace.” b. The mechanism to monitor faulty machineries were not effectively implemented. It was noticed that the Shovel reverse siren was not functioning. Interview with the driver indicated that the siren has not been functioning for the last 2 months. Nevertheless, the shovel driver has not reported the issue to the current management. Verified that the daily checklist prior to operation did not capture faulty parts as well. c. It was noticed that the reception station attendant was wearing rubber boots. This was not in line with the SOU 24 Hadapan POM HIRARC for Reception Station that states Existing Control: Safety Shoes for all activities at the Reception Station. 		
Corrections:	<ul style="list-style-type: none"> 1. Mill immediately informed worker on safety of wearing PPE to the worker. 2. Mill management immediately establish HIRARC Review for shovel operation. 		

MSPO Public Summary Report
Revision 2 (Nov 2021)

	3. Mill management immediate to repaired reverse siren for shovel.
Root cause analysis:	<ol style="list-style-type: none"> 1. Lapse on safety inspection of their workstation due to rainy day by workers. As rubber boot only for cleaning activity during non-processing day. 2. HIRARC Review for shovel was available in Reception Station. However, the work activities were not insufficient for shovel daily operation. 3. Miscommunication between the shovel driver and Mill management due to PIC was transferred to the other mills.
Corrective Actions:	<ol style="list-style-type: none"> 1. Mill management to conducted safety and PPE awareness training for the worker. 2. Mill to establish the HIRARC Review for shovel operation with SHC committee, including the shovel operator. 3. Mill Management to conduct safety training to shovel operator/driver. Shovel operator will inspect the shovel daily by using shovel inspection checklist before submitting the checklist to Mill management. The shovel inspection checklist includes all the main part of the shovel.
Assessment Conclusion:	<p>Verified that the management of Hadapan Palm Oil has conducted trainings as follows:</p> <ol style="list-style-type: none"> 1. Safety Awareness Training – 21/12/2022 2. Induction & Safety Awareness Briefing – 19/12/2022 3. PPE Refresher training – 19/12/2022 4. HIRARC Review – 19/12/2022 <p>Training evaluation records were available and verified. The Major NC is closed, further verification will be conducted in the next surveillance audit.</p>

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

Noteworthy Positive Comments	
1.	Good relationship being maintained with surrounding communities and stakeholders.
2.	Good commitment from the management on maintaining the certification.

3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
NCR Ref #:	2145469-202112-N1	Issue Date:	15/12/2021
Due Date:	Next Surveillance	Date of Closure:	16/12/2022
Area/Process:	Hadapan Palm Oil Mill	Clause & Category: (Major / Minor)	MSPO 2530 Part 4 – 4.4.1.1 Minor

MSPO Public Summary Report
Revision 2 (Nov 2021)

Requirements:	Social impacts should be identified, and plans should be implemented to mitigate the negative impacts and promote the positive ones.
Statement of Nonconformity:	The issue in mill was not been identified in SIA and management plan.
Objective Evidence:	<p>External stakeholder issue:</p> <ol style="list-style-type: none"> 1. From interview with stakeholder, it was found that some issue was not been identified by the management as per feedback from the stakeholder interview such as; Grocery in Hadapan Div compound stated some workers have debt with the shop already leave the company and the owner don't know how to report this matter. <p>Internal Issue</p> <ol style="list-style-type: none"> 1) Issue regarding to overtime that been raised during townhall dated 5/4/2021 was not identified in the management plan 2) Some allowance and overtime issue was not clear as per interview with Union committee and also not been identified in SIA
Corrections:	Mill will arrange meeting with sundry shop operator and meeting with union representative to discuss further on the issue raised by them and explain on the grievance/complaint channel. Mill will review the SIA action plan and include the respective issues raised.
Root cause analysis:	Awareness on complaint/grievance channel was found less effective since before this the awareness was given during stakeholder meeting. However, mill has yet to conduct the stakeholder meeting after restriction of movement caused by pandemic and no meeting conducted with the sundry shop owner within one year. This resulted the sundry shop owner was not fully aware with grievance/complaint process. Thus, the issue was not received at mill's end and yet to be updated in SIA management plan. The issues raised by union representative was not included in SIA management plan due to these issues was not further discussed in Union Rep meeting with mill management. No specific agenda to discuss on working time/OT/allowance issues during this meeting resulted the issues was left out to be discussed further to ensure workers representative fully understand on the said matters and to be recorded accordingly.
Corrective Actions:	Mill will disseminate brochure with information on complaint/grievance process to stakeholder and start to conduct normal stakeholder meeting periodically. Issues on working time/OT/allowance will be included in the management and workers/union representative meeting agenda. Any social related issues require longer time or other resource (i.e., budget, etc) which monitoring is needed will be included accordingly in SIA action plan.
Assessment Conclusion:	As per the SIA management plan verification, NUPW Minutes of Meeting, OPP Complaint book, complaints records, social dialogues minutes of meeting, the Minor NC raised during previous audit is closed effectively on 16/12/2022.
Verification Statement:	Based on SIA management plan established on 04/03/2022, sighted Hadapan POM has identify areas of concerns/ key findings, action plan, status, person incharge and completion date. Includes linesite/ workers housing (Oil Palm Pal-OPP DSHC), grievance/ complaint on working time/ overtime allowance made known to all employees to be established, grievances procedures that are made known to all

MSPO Public Summary Report
Revision 2 (Nov 2021)

	<p>stakeholder to be established and any complaint by workers can be made in Social Dialogue Online Trackers (SDOT).</p> <ol style="list-style-type: none"> 1. Document review on minutes of NUPW meeting, Hadapan POM conduct on 31/10/2022 to discuss agenda include with 'Outstanding Special allowance 2018-2021' that to be paid in October 2022's salary. Based on the minutes of meeting three (3) workers being listed to receive arrears from mill management for four (4) years from 2018 until 2021 as per listed of categories of employees in agreement Memorandum of Agreement Between MAPA and NUPW with MAPA Circular No.27/2022 updated 20/07/2022 mention special allowance MYR1.90 per day worked for Palm Oil Mill Employees. Due to disputes with workers, Industrial Relation Kluang Office has issued letter to Hadapan POM with title of 'Pertikaian Perusahaan Diantara NUPW Dengan Kilang Kelapa Sawit Hadapan Mengenai Kegagalan Majikan Membayar Elaun Khas (MYR 1.90 Sehari) kepada En. Mohd Zaid Bin Zainal'. Due to the letter sent by Industrial Relation, Hadapan Palm Oil Mill has paid back to affected workers the arrears for the last four (4) years on the rate that lack being paid since 2018 until 2021. Based on sampled payslips for November 2022, sighted Hadapan Palm Oil Mill includes MYR1.90 special allowance into Workers Normal Rate from MYR 57.69 that become MYR 59.59. 2. Document review on OPP – Housing Complaint records book, Hadapan POM maintain copy of complaint records from online system into books as monitoring. Based on the records, sighted 91 complaints received related to housing maintenance since 12/04/2021. Has latest complaint dated on 02/12/2022 request for housing maintenance has completed on 03/12/2022. 3. Document review on minutes Monday briefing record, sighted Hadapan POM conducts meeting includes agenda of grievance channel, complaint's stickers, housing maintenance, workers' rights, ILO requirements, etc. The briefing to workers conducts on 08/08/2022, 15/08/2022, 22/08/2022, 05/09/2022, 12/09/2022, 19/09/2022, 26/09/2022, 03/10/2022, 17/10/2022, 25/10/2022/ 31/10/2022, 07/11/2022, 21/11/2022 and 05/12/2022. 4. Document review sighted that grievance/complaint on working time/overtime/allowance been briefed to 148 workers and 2 contractors during Safety & Sustainability Townhall Southern Region FY2022 at Hadapan. 5. Briefing on handling grocery shop terms, grievance channel, contracts, safety, work scope and salary to sundry owner on 09/09/2022. The new contract agreement starts from 01/08/2022 until 31/07/2023 signed by new owner Ana Majid Enterprise, 202203163486 on 01/08/2022. The new owner has share list of grocery with prices contains 64 items includes cooking oils, breads, milk, onion, raw meat, raw chicken, raw fishes, etc. 6. Document review on minutes of meeting for Social Dialogue, Hadapan POM conduct meeting to discuss on workers safety, working hours, control of overtime based on FFB received, channel of grievances through online system (Oil Palm Pal -OPP), medical access, vacation leave pays, calculation of workers salary, new salary to be implement, housing amenities upkeep, maintenance & cleanliness, new Collective Agreement (AMESU & NUPW) status, etc. Dates of meetings on 22/04/2022, 30/06/2022, 15/07/2022, 27/07/2022, 11/08/2022, 26/08/2022, 12/09/2022, 23/09/2022, 07/10/2022, 19/10/2022, 01/11/2022, 15/11/2022, 26/11/2022 and 09/12/2022. 7. Hadapan POM monitor all grievances or complaints through SDOT online system collected from social dialogue meeting conduct twice a month. Document review
--	---

MSPO Public Summary Report
Revision 2 (Nov 2021)

	<p>on the list extract from SDOT system, sighted 66 issues being address by workers to Hadapan POM management with latest issued on 09/12/2022.</p> <p>The corrective actions were verified and deemed to be sufficient to address the raised non-conformities. Hence the Minor Non-conformity was closed on 16/12/2022.</p>
--	--

Non-Conformity Report			
NCR Ref #:	2145469-202112-N2	Issue Date:	15/12/2021
Due Date:	Next Surveillance	Date of Closure:	16/12/2022
Area/Process:	Hadapan Palm Oil Mill	Clause & Category: (Major / Minor)	MSPO 2530 Part 4 – 4.4.4.2 (a) (b) (e) Minor
Requirements:	<ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. 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. 		
Statement of Nonconformity:	Sighted the occupational safety and health plan was inadequately implemented.		
Objective Evidence:	<ul style="list-style-type: none"> a) The contract agreement between Guna Sons Earthwork Construction and the Hadapan POM was made available to the audit team and reviewed. It was stated that, under section 8, all contractor’s workers are compulsory to be equipped with the basic PPE such as safety helmet, safety shoes, ear plug and glasses if necessary. However, during site visit, it was sighted that a backhoe operator was not wearing a proper PPE (such as safety helmet and safety shoes) while operating the backhoe inside the mill compound. b) HIRARC assessment for Hadapan Palm Oil Mill was made available to the audit team. However; <ul style="list-style-type: none"> i) The assessment did not capture the risk of not having flashback arrester for gas cylinder and no implementation was observed on site. ii) HIRARC under Kernel Recovery Station, it was mentioned that under Existing Control: Nature of Risk Control, operator is required to wear earplug at this area to minimize the risk to the ears. However, during the site visit, it was observed an operator who happened to work at the kernel station, did not wear earplug despite the loud noise. e) During the site visit, the audit team found a gear box oil stored in a plastic drinking container and was not properly labelled. The use of plastic container was meant to be stored temporarily. 		
Corrections:	Mill will conduct refresher training on the control measure (PPE Usage for Kernel Recovery Station Operators, contractor, and installation of flashback arrester for workshop). Mill to ensure control measure (PPE usage and installation of flashback arrester) to be implemented immediately. HIRARC for welding work for mill will be updated to include control measure (installation of flashback arrester). Mill has		

MSPO Public Summary Report
Revision 2 (Nov 2021)

	changed the container using suitable container and relabel accordingly for the gearbox oil.
Root cause analysis:	The contractor was operating outside the mill gate perimeter resulting the backhoe operator not registered at mill's AP Post which includes PPE checking before start work. Training on HIRARC and its implementation has yet to be conducted for the respective person in charge (Kernel Recovery Station, & Workshop) resulted the implementation was not in place. Workplace inspection at mill was not included monitoring on suitability of container use for mineral oil and its labelling resulting usage of unsuitable container and not relabel accordingly.
Corrective Actions:	Mill will brief the contractor on safety measures and requirement to register at mill's AP Post/office before operating inside mill area (inside/outside mill gate area). Quarterly workplace inspection at mill will be inclusive of monitoring container use and labelling for mineral oil.
Assessment Conclusion:	As per training records, workplace inspections training, interviews with workers and observation during audit. It is concluded that the Minor NC raised during previous audit is closed effectively on 16/12/2022.
Verification Statement:	<p>a. Mill has briefed the contractor on safety measures and requirements to register at the mills AP Post before operating inside the mill area. The Briefing was conducted on 17/12/2021. Records of briefing was available for verification.</p> <p>b. The HIRARC for Backhoe has been revised on 17/12/2021 to include the usage of appropriate PPEs. The record of HIRARC was available for verification. PPE has been issued to the Backhoe driver on 22/11/2021. Sighted the PPE issuance record for Safety Shoe, Safety Helmet and Ear Plugs.</p> <p>c. Workplace Inspection records for January 2022 was refereed to and has stated that Flashback Arrestor were available and in good condition. During the RA1 assessment visit to the field it was seen that the flashback arrestor was available and in use at the mill for the oxygen and acetylene tanks.</p> <p>d. A refresher training has been conducted for the Kernel Recovery Station workers where they have been briefed on the PPE that is required to be worn. The training was conducted on 17/12/2021 and records were available for verification. During the visit to the mill during the RA1 assessment, it was found that all workers were wearing appropriate PPE's.</p> <p>e. The Worksite Inspection Checklist was available which was used for inspecting the work sites were included with the monitoring of containers used to store chemicals and lubricants. During the site visit to the mill, there were no evidence of chemicals being stored in unlabelled containers.</p> <p>The corrective actions were verified and deemed to be sufficient to address the raised non-conformities. Hence the Minor Non-conformity was closed on 16/12/2022.</p>

Opportunity For Improvement			
Ref:	2145469-202112-I1	Clause:	MSPO 2530 Part 3 – 4.6.1.1
Area/Process:	Layang Estate & CEP Rengam Estate		
Objective Evidence:	To ensure the landfill in each estate to followed as SOP for Landfill Management in Estate, document no: SD/SDP/PSQM(ESH)203-EN7, dated on 13/03/2017, revise no 0. The objective of this SOP is to provide guidelines on the acceptable procedures for managing landfill within Sime Darby Plantation operations.		

Verification Statement:	Verification at sample estate, verified that the estates are disposing the domestic waste at municipal facilities.
--------------------------------	--

3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
2289605-202212-M1	MSPO 2530 Part 3: 4.4.4.1 Major	16/12/2022	Closed on 11/02/2023
2289605-202212-M2	MSPO 2530 Part 4: 4.4.4.1 Major	16/12/2022	Closed on 11/02/2023

3.5 Issues Raised by Stakeholders



IS #	Description
1	<p>Issues: Kampung Melayu Raya, Kampung Sri Gading Pulai representative and independent smallholder representative</p> <p>Good cooperation given by Estate management team from mill and estates. Contributions not only monetary but also manpower was given if there is any such assistance required. So far, no land encroachment from Sime Darby Plantations’ Estates and Mill receives outside crop from the neighbouring smallholders/ dealers. Job opportunity were given to the locals however, only a few people interested with the estate job.</p>
	<p>Management Responses:</p> <p>The management continue to maintain good relationship with neighbouring villagers and contribute whenever necessary.</p>
	<p>Audit Team Findings:</p> <p>No further issues.</p>
2	<p>Issues: Evergreen Sdn Bhd, Govinda Rajoo, Bingan Jaya</p> <p>All jobs/ contracts offered were official via purchase order or contract and local work order. Payment was done in promptly manner as per agreed term and conditions. They have signed agreement and Vendor Integrity Pledge @ VIP as part of self-declaration on due diligence process.</p>
	<p>Management Responses:</p> <p>The management will continue to ensure payment make promptly and maintain good relationship with the suppliers/ vendors/ contractors.</p>
	<p>Audit Team Findings:</p> <p>No further issues.</p>
3	<p>Issues: NUPW Representative</p> <p>They informed that no pending issue during the time of audit. They will discuss with the management if there is any issue reported. Workers are paying in accordance with Minimum Wage Order 2022.</p>
	<p>Management Responses:</p> <p>The management will continue to ensure the workers are paying accordingly.</p>
	<p>Audit Team Findings:</p> <p>No further issues.</p>

<p>4</p>	<p>Issues: Gender Committee Representatives They informed that no sexual harassment and violence case reported since last audit. The female workers understand the function of Gender committee and aware of the complaint mechanism if there are any issues. They were treated equally without any discrimination by the management.</p> <p>Management Responses: The management will respect the rights of female employees and monitor if there is any case of sexual harassment and violence happen.</p> <p>Audit Team Findings: No further issues.</p>
<p>5</p>	<p>Issues: Local workers They apply work with estates and mill based on the vacancy information spread by the head of villagers. They have been briefed on the terms and conditions and working environment in the plantations during the interview before been offer with the job they acquired. No contract substitution occurred. Their wages are paid according to Minimum Wage Order 2022 and Collective Agreement. They interested to join as member of union, and they not been stop by management. During pick crop, they been offer voluntary to do job task outside working hour (overtime) for additional income.</p> <p>Management Responses: The management encourage local communities surrounded to apply for job to work with estates and mill will all amenities, benefit and good salary offered. Unfortunately, number of local workers applied below with manpower budget which still not enough to cover the operations job task. Management is always advertising the job vacancy in media social to attract local workers.</p> <p>Audit Team Findings: No further issues.</p>
<p>6</p>	<p>Issues: Foreign workers They did not pay any recruitment fee for getting a job in Sime Darby Plantation Berhad. They have been briefed on the terms and conditions and working environment in the plantations while they were in home country. No contract substitution occurred. Their wages are paid according to Minimum Wage Order 2021 and Collective Agreement. During pick crop, they been offer for overtime on voluntary basis. They not been stopped to join as member of union by management. Some of them been selected as workers representative to the Joint Committee to discuss workers matter including benefits and wages by voting among themselves without management interfere.</p> <p>Management Responses: The management will continue to ensure employment law is being complied with. There will be no difference between local and foreign workers in term salary calculation and related remuneration.</p> <p>Audit Team Findings: No further issues.</p>

3.6 List of Stakeholders Contacted

<p>Government Officer: Nil</p>	<p>Community/neighbouring village: Kg Melayu Raya Kg Sri Gading Pulai</p>
<p>Suppliers/Contractors/Vendors: Evergreen Sdn Bhd Govinda Rajoo Bingan Jaya</p>	<p>Worker’s Representative/Gender Committee: NUPW Gender Committee Representative Local Workers Foreign Workers</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 SOU 24 Hadapan Palm Oil Mill and Supply Bases Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of SOU 24 Hadapan Palm Oil Mill and Supply Bases Certification Unit is continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: HASNOL HISHAM BIN HAMDAN	Name: AHMAD RUFİ BIN ABU TALIB KHAN
Company name: SIME DARBY PLANTATION BERHAD	Company name: BSI SERVICES MALAYSIA SDN BHD
Title: ESTATE MANAGER	Title: CLIENT MANAGER
Signature:  SIME DARBY PLANTATION BERHAD KULAI ESTATE (CO. NO. 647766-V) (HASNOL HISHAM BIN HAMDAN) MANAGER Date: 21/02/2023	Signature:  Date: 17/02/2023

Appendix A: Summary of the findings by Principles and Criteria

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	A policy for the implementation of MSPO shall be established. - Major compliance -	Sime Darby Plantation Berhad (SDPB) commitments towards MSPO compliance being established through Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha, Group Managing Director dated 2nd December 2019. MSPO Briefing has been conducted to all internal and external stakeholders through the communicated to workers during Town Hall Session The meeting chaired by RSQM Team.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The sustainability goals are in line with United Nations Sustainable Development Goals (UNSDG) 2030, which committed to: 1. Promoting good governance and transparency 2. Contributing to a better society 3. Minimizing environmental harm 4. Delivering sustainability quality This policy being guided by the commitments spelt out in the Company's: 1. Responsible Agriculture Charter (RAC) 2. Human Rights Charter (HRC)	Complied

**MSPO Public Summary Report
Revision 2 (Nov 2021)**

Criterion / Indicator		Assessment Findings	Compliance												
		Innovation and Productivity Charter (IPC)													
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 -	Sime Darby Plantation Berhad, Plantation Sustainability and Quality Management (PSQM), Internal Audit Procedures, Doc No: SD/SDP/PSQM/IAP Revision 2 Date 01/11/2017. The internal audit being conducted annually to implement and maintain the respective standard requirements effectively within the Group. The Management had drawn an Internal Audit Plan and it being carried out once a year to the Estate. The Internal audit conducted by Sustainability Unit, GSQM Department and RSQM.	Complied												
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	The Internal Audit was planned to be conducted annually. The MSPO Internal Audit was conducted by Sustainability Compliance Unit, Group Sustainability Department and GSD. The team Lead Auditor is Mr Saiful Bari Munir from GSQM. The recent internal audits for the sampled estates were conducted as follows: <table border="1" data-bbox="1048 1002 1872 1107"> <thead> <tr> <th>No</th> <th>OU</th> <th>Date of audit</th> <th>Finding</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kulai Estate</td> <td>06/10/2022</td> <td>3 Major 1 Minor</td> </tr> <tr> <td>2</td> <td>Seri Pulai Estate</td> <td>07/10/2022</td> <td>1 Major 2 Minor</td> </tr> </tbody> </table> The root-causes of the NCR have been identified and recorded in the corrective action plan. All the NCRs were satisfactorily closed within the timeframe.	No	OU	Date of audit	Finding	1	Kulai Estate	06/10/2022	3 Major 1 Minor	2	Seri Pulai Estate	07/10/2022	1 Major 2 Minor	Complied
No	OU	Date of audit	Finding												
1	Kulai Estate	06/10/2022	3 Major 1 Minor												
2	Seri Pulai Estate	07/10/2022	1 Major 2 Minor												
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	The internal audit reports were available to the management of each operating unit. The report has the information about standards' requirements and findings. The results of the internal audits were also part of the agenda recorded in the management review meeting.	Complied												

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance												
Criterion 4.1.3 – Management Review															
4.1.3.1	<p>The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.</p> <p>- Major compliance -</p>	<p>The procedure for Management Review, Standard Operation Manual, Sub-Section 5.6, dated: 25/05/2015 was established. The frequency for management review needs to be carried out at least once a year. The Management Review meeting is on Operating Unit basis. The actual meeting date as below:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Date of meeting</th> <th>No of Participants</th> <th>Venue</th> </tr> </thead> <tbody> <tr> <td>Kulai Estate</td> <td>27/10/2022</td> <td>16</td> <td>Meeting Room, Kulai Estate</td> </tr> <tr> <td>Seri Pulai Estate</td> <td>10/10/2022</td> <td>13</td> <td>Meeting Room, Seri Pulai Estate</td> </tr> </tbody> </table>	Estate	Date of meeting	No of Participants	Venue	Kulai Estate	27/10/2022	16	Meeting Room, Kulai Estate	Seri Pulai Estate	10/10/2022	13	Meeting Room, Seri Pulai Estate	Complied
Estate	Date of meeting	No of Participants	Venue												
Kulai Estate	27/10/2022	16	Meeting Room, Kulai Estate												
Seri Pulai Estate	10/10/2022	13	Meeting Room, Seri Pulai Estate												
Criterion 4.1.4 – Continual Improvement															
4.1.4.1	<p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p>- Major compliance -</p>	<p>The estates visited has established continual improvement plan covers the main social and environmental impacts. Continual improvement plan for the estate being strategized under the following program as follows:</p> <ol style="list-style-type: none"> 1. SIME Card <ol style="list-style-type: none"> a. To identify unsafe act and condition to minimize near missed/ accident occurrence 2. SEMUA 2.0 <ol style="list-style-type: none"> a. To keep tracks on the FFB movement from the field up to the oil mill 3. Rapid4 IT System 	Complied												

**MSPO Public Summary Report
Revision 2 (Nov 2021)**

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> a. Reporting on accidents, OSH program, alert on expiring dates of permits and license 4. Raking <ul style="list-style-type: none"> a. To reduce raking cost by using Zenoah Blower 5. Selective Weeding <ul style="list-style-type: none"> a. To reduce selective weeding cost by implementing mechanization 	
4.1.4.2	<p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p>- Major compliance -</p>	<p>Any new technology and/or innovation equipment is subject to approval by Regional Offices and Headquarters.</p> <p>Any new information is updated to employees through morning briefings, memo, meetings, station training. So far, no new technology at both estates visited.</p>	Complied
4.1.4.3	<p>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.</p> <p>- Major compliance -</p>	<p>Any new technology and/or innovation equipment is subject to approval by Regional Offices and Headquarters.</p> <p>Any new information is updated to employees through morning briefings, memo, meetings, station training. So far, no new technology at both estates visited.</p>	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	<p>The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.</p>	<p>Sime Darby Plantation Berhad (SDPB) has established Communication Procedure either Internal or External Stakeholders. The information was available in two (2) languages English and Malay. This document was accessible to stakeholder as sighted at Estate notice board. The information being disseminated to the Internal and External</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>Stakeholders either through Townhall Session or External Stakeholders' Meeting.</p> <p>Latest stakeholder meeting was conducted on 12/09/2022, with attendance of 15 stakeholders from various group of stakeholders including the Government Agencies, Local Community and neighboring estates.</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 style="text-align: center;">- Major compliance -</p>	<p>Sime Darby Plantation Berhad (SDPB) has established Estate Quality Management System, Level 2, Standard Operation Manual Sub – Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1, Year 2008, Issue No 1 dated 01/11/2008.</p> <p>The mechanism is to enable effective and timely communication with employees and external interested parties. The audit team observed that the above SOP specifies the means to communicate and consult with the relevant stakeholders pertaining to the company's safety & health, social, environmental and other aspects.</p> <p>Information relating to land titles, safety and health plans, pollution prevention plans was made available at all Estates. Among the documents that were made available for viewing were land titles, occupational health and safety plans, EIA reports, SIA reports, details of complaints and grievances, negotiation procedures, continuous improvement plans, and human rights policy.</p> <p>Furthermore, information regards to Sustainability Reports, sustainability policies, Human Rights Charter, practices and key initiatives which include Lean Six Sigma and Continuous Improvement, Safety and Health, Environment, Biodiversity Conservation,</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Environmental Conservation can be retrieve through the company's website http://www.simedarbyplantation.com/.</p> <p>Confidential documents such as financial, personal and etc. are not allowed to be shared publicly. The Estate Manager is responsible to address all communication and request for documentations that could be made available to public or stakeholders.</p>	
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>Sime Darby Plantation Berhad (SDPB) has established Estate Quality Management System, Level 2, Standard Operation Manual Sub – Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1, Year 2008, Issue No 1 dated 1st April 2008.</p> <p>The procedure for Internal Stakeholders was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Internal Issues.</p> <p>The mechanism is to enable effective and timely communication with employees and external interested parties. The audit team observed that the above SOP specifies the means to communicate and consult with the relevant stakeholders pertaining to the company's safety & health, social, environmental and other aspects.</p> <p>The SOP also specifies the timeframe to be taken to provide feedback to the stakeholder is: Within 2 weeks from the date receiving the queries.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Within one week of the completion of the investigation for communication requiring investigation.</p> <p>The management has developed the Workers Housing Management Procedure dated 26/11/2021. The procedure is regarding the process and time frame of housing complaints management.</p> <p>The procedure for consultation and communication is also available through website address http://simeidarbyplantation.com</p>	
4.2.2.2	<p>A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.</p> <p>- Minor compliance -</p>	<p>The management nominated their assistant in each estate to be an official for social and stakeholder communication. The appointment letter was available in each estate for review dated Jan 2022.</p> <p>Kulai Estate Manager En. Amir Hassan was appointed as Responsible PIC regarding Social Issue, appointment date 25/09/2022. The job scope is as per the following:</p> <ol style="list-style-type: none"> 1. Investigate social issue complaints 2. Keep the records of complaints 3. To give counseling and motivation to workers 4. Help the estate in conducting the activity regarding social issues. <p>Seri Pulai has appointed En. Muhammad Faiz Bin Roslan, Senior Assistant Manager, appointed date 01/01/2022. The job scope is as the following:</p> <ol style="list-style-type: none"> 1. Investigate social issue complaints 2. Keep the records of complaints 3. To give counseling and motivation to workers 4. Help the estate in conducting the activity regarding social issues. 	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	List of stakeholders for all the operating units were last updated n 22/09/2022. The list consists of various group of stakeholders such as government authorities, contractors/suppliers, NGOs, local communities and also internal stakeholders such as workers and representatives. Records of consultation generally recorded in the stakeholders' consultation minute of meeting. The last meeting was conducted on 12/09/2022.	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 for traceability of the relevant product(s). - Major compliance -	Sime Darby Plantation Berhad has established SOP for traceability and documented in Sime Darby Plantation, Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022. Refer document no. SD/SDP/GSD/SCCS/0522/01.	Complied
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	SIME Semua 2.0 (CRS system) for traceability. Electronic tag/chip is used for each and every load/consignment. Chip is linked to Semua apps and scanned and before weigh and despatch. All information were recorded in the system which traceable to identify [field, crop type, harvesting date, number of bunches, weight etc]. Person in charge for each load/consignment is harvesting mandore and bunch counter.	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The estate has appointed personnel to be responsible for Supply Chain Certification System as per appointment letter which state the responsible of the PIC as follows: 1. Assisting Assistant on Supply Chain Certification System 2. Other related issues on SCCS	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance		
		Kulai Estate has appointed the Asst. Manager and Office Clerk as Person Responsible for SCCS as per Appointment Letter dated 04/11/2021 and 06/11/2019 signed by the Estate manager.			
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	<p>The estate sends the FFB harvested to the Hadapan POM. The estate maintain the records of FFB sale/dispatch to the mill. Reviewed the records of FFB dispatch as follows:</p> <table border="1" style="width: 100%;"> <tbody> <tr> <td> Supplier: Kulai Estate field 2011B Estate Weighbridge No.: 23430 No. of Bunch: 3002 Product ID: 0001-FFB A Crop Nett weight: 12,610 kg Delivery date: 16/11/2022 Mill Weighbridge ticket no.: 247545 MSPO certificate no.: MSPO 739514 MSPO certificate validity: 15/02/2018 – 14/02/2023 </td> </tr> <tr> <td> Supplier: Kulai Estate field 2011B Estate Weighbridge No.: 23431 No. of Bunch: 948 Product ID: 0001-FFB A Crop Nett weight: 10,710 kg Delivery date: 16/11/2022 Mill Weighbridge ticket no.: 247553 MSPO certificate no.: MSPO 739514 MSPO certificate validity: 15/02/2018 – 14/02/2023 </td> </tr> </tbody> </table>	Supplier: Kulai Estate field 2011B Estate Weighbridge No.: 23430 No. of Bunch: 3002 Product ID: 0001-FFB A Crop Nett weight: 12,610 kg Delivery date: 16/11/2022 Mill Weighbridge ticket no.: 247545 MSPO certificate no.: MSPO 739514 MSPO certificate validity: 15/02/2018 – 14/02/2023	Supplier: Kulai Estate field 2011B Estate Weighbridge No.: 23431 No. of Bunch: 948 Product ID: 0001-FFB A Crop Nett weight: 10,710 kg Delivery date: 16/11/2022 Mill Weighbridge ticket no.: 247553 MSPO certificate no.: MSPO 739514 MSPO certificate validity: 15/02/2018 – 14/02/2023	Complied
Supplier: Kulai Estate field 2011B Estate Weighbridge No.: 23430 No. of Bunch: 3002 Product ID: 0001-FFB A Crop Nett weight: 12,610 kg Delivery date: 16/11/2022 Mill Weighbridge ticket no.: 247545 MSPO certificate no.: MSPO 739514 MSPO certificate validity: 15/02/2018 – 14/02/2023					
Supplier: Kulai Estate field 2011B Estate Weighbridge No.: 23431 No. of Bunch: 948 Product ID: 0001-FFB A Crop Nett weight: 10,710 kg Delivery date: 16/11/2022 Mill Weighbridge ticket no.: 247553 MSPO certificate no.: MSPO 739514 MSPO certificate validity: 15/02/2018 – 14/02/2023					

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Supplier: Seri Pulai Estate field 2003B, 2005 Estate Weighbridge No.: 21938 No. of Bunch: 778 Product ID: 0001-FFB A Crop Nett weight: 11,990 kg Delivery date: 05/12/2022 Mill Weighbridge ticket no.: 248118 MSPO certificate no.: MSPO 739514 MSPO certificate validity: 15/02/2018 – 14/02/2023</p> <p>Supplier: Ser Pulai Estate field 2002 Estate Weighbridge No.: 21936 No. of Bunch: 750 Product ID: 0001-FFB A Crop Nett weight: 12,260 kg Delivery date: 05/12/2022 Mill Weighbridge ticket no.: 248110 MSPO certificate no.: MSPO 739514 MSPO certificate validity: 15/02/2018 – 14/02/2023</p>	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	The operating units continued to comply with the legal requirements. Among the evidence of legal compliance as follows: <u>Kulai Estate</u> 1. MPOB License no. 508509102000 valid till 31/03/2023	Complied

Criterion / Indicator		Assessment Findings	Compliance
		2. Permit for Scheduled Controlled Goods, Diesel Purchase and Storage permit no. KPDNHEP.J-JB/26/5A/11/553 (P/D) (P3) and KPDNKK.J-JB/26/51/11/107 (P/D) (P4) valid till 29/05/2024 3. Air Compressor Certificate of Fitness no. i. PMT-JH/22 192921 valid till 06/02/2024 ii. PMT-JH/22 192918 valid till 24/01/2024 <u>Seri Pulai Estate</u> 1. MPOB License no. 520195002000 valid till 30/04/2023 2. Permit for Scheduled Controlled Goods, Diesel Purchase and Storage permit no. KPDNHEP.J-JB/26/5A/11/1424 (P/D) (P1) valid till 08/11/2024 3. Water diversion and abstraction river water license no. 07/A/KJ/054 valid till 31/12/2022 4. Air Compressor Certificate of Fitness no. PMT-JH/22 193876 valid till 07/03/2024	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. Refer to legal register dated November 2022 with addition to applicable laws as follows: 1. Anti-Sexual Harassment Act 2021 2. Employees’ Social Security (Amendment) Act 2022 3. Employment Insurance System (EIS) (Amendment) Act 2022	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
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>Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 24. GSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p>Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.</p>	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 requirements.</p> <p>- Minor compliance -</p>	<p>Group Sustainability will update the operating regarding any changes on applicable laws to the operating units. The person responsible appointed at the operating units will update the changes in the Legal Register.</p> <p><u>Kulai Estate</u></p> <p>The estate has appointed the Asst. Manager and Office Clerk as person responsible to monitor any changes to the LORR and update when necessary, as per appointment letter dated 04/11/2021 and 06/11/2019 signed by the Estate Manager.</p> <p><u>Seri Pulai Estate</u></p> <p>The estate has appointed the Asst. Manager as person responsible to monitor any changes to the LORR and update when necessary, as per appointment letter dated 18/05/2022 signed by Sr. Asst. In Charge.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance							
Criterion 4.3.2 – Lands use rights										
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	The was no evidence to show that oil palm cultivation activities in both estates visited had diminished the land use rights of others. Verified documents to show legal ownership of its land.	Complied							
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	<p>Sime Darby Plantation Berhad (SDPB) did not acquire land from landowners but leased it directly from the government. The quit rent payment was done accordingly as requirement from the state government.</p> <p>Both Kulai Estate and Seri Pulai Estate has kept the land title available at site. Verification of land title has been conducted during the audit. Sighted the sampled land title taken at Kulai Estate and Seri Pulai Estate as follows:</p> <table border="1"> <tbody> <tr> <td rowspan="2">Kulai Total land titles: 24)</td> <td>1. GRN 236123 Lot: 5032 Land area: 585.581ha District: Kulaijaya Issued on 26/12/2007.</td> <td>Agricultural</td> <td>Freehold (Perpetuity Ownership)</td> </tr> <tr> <td>2. GRN 237360 Lot: 3632 Land area: 772.5437ha District: Kulaijaya Issued on 28/12/2007.</td> <td>Agricultural</td> <td>Freehold (Perpetuity Ownership)</td> </tr> </tbody> </table>	Kulai Total land titles: 24)	1. GRN 236123 Lot: 5032 Land area: 585.581ha District: Kulaijaya Issued on 26/12/2007.	Agricultural	Freehold (Perpetuity Ownership)	2. GRN 237360 Lot: 3632 Land area: 772.5437ha District: Kulaijaya Issued on 28/12/2007.	Agricultural	Freehold (Perpetuity Ownership)	Complied
Kulai Total land titles: 24)	1. GRN 236123 Lot: 5032 Land area: 585.581ha District: Kulaijaya Issued on 26/12/2007.	Agricultural		Freehold (Perpetuity Ownership)						
	2. GRN 237360 Lot: 3632 Land area: 772.5437ha District: Kulaijaya Issued on 28/12/2007.	Agricultural	Freehold (Perpetuity Ownership)							

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings				Compliance
		Seri Pulai Estate (Total land titles: 7)	1. GRN 326461 Lot: 2938 Land area: 1,420.4444ha District: Kulaijaya Issued on 10/02/2009.	Agricultural	Freehold (Perpetuity Ownership)	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	<p>The legal boundary for estate visited was clearly demarcated by constructing security trenches along the boundary and it was visibly maintained.</p> <p><u>Kulai Estate</u> The estate has clearly demarcated the legal boundary with red and colour pole and security trenches as sighted at P13A at Main Division, adjacent with Kg. Seri Paya and P06A Kelan Division, adjacent smallholders.</p> <p><u>Seri Pulai Estate</u> The estate has clearly demarcated the legal boundary with red and colour pole and security trenches as sighted at P16C adjacent with Kg. Melayu Raya</p>				Complied
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 was no land dispute at all the sampled estates. The company has the legal ownership documents as demonstrated by possessing a land title.				N/A
Criterion 4.3.3 – Customary rights						

Criterion / Indicator		Assessment Findings	Compliance
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land or negotiated agreements at all the sampled estates. The management established procedure as per Sime Darby Plantation (Plantation Quality Management System) Appendix 3: Flowchart and Procedures on Handling Land Disputes version:2 dated 1/11/2008. There is no customary land within or surrounding in all sample estates. There are also no land disputes or claims involving the estates. The company has proper legal land titles for the land ownership.	N/A
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	There is no customary land or negotiated agreements at all the sampled estates. The management established procedure as per Sime Darby Plantation (Plantation Quality Management System) Appendix 3: Flowchart and Procedures on Handling Land Disputes version:2 dated 1/11/2008. There is no customary land within or surrounding in all sample estates. There are also no land disputes or claims involving the estates. The company has proper legal land titles for the land ownership.	N/A
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	There is no customary land or negotiated agreements at all the sampled estates.	N/A
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Sighted main template of Social Impact Assessment for SOU 24 being established on 3– 7/2/2014. Social impact has been identified based on consultative process to mitigate the negative impacts and promote	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>the positive one. Based on the social impact improvement plan, total of 6 positive impacts identified with proposed mitigation plan for improvement.</p> <p>The management has developed the management plan for social assessment which are conducted yearly. The current 2022 management was prepared on 02/12/2022.</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>Management System, Level 2, Standard Operation Manual Sub – Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1 Year 2008, Issue No 1 dated 1st Nov 2008.</p> <p>The procedure for handling internal social issue was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Social Issues.</p> <p>The mechanism is to enable effective and timely communication with employees and external interested parties.</p>	Complied
4.4.2.2	<p>The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.</p> <p>- Major compliance -</p>	<p>The Standard operation Manual under clause 6.3 Timeframe for External Communication has stated:</p> <p>Within 2 weeks of the date of receipt for communication requiring direct feedback. Within 1 week of the completion of the investigation for communication requiring investigation.</p> <p>The relevant management personnel may extend due to extenuating circumstances or with justifiable reasons time limit. So far, no complaint received from internal and external except for housing</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>maintenance. Evidence, all the stakeholders are informed on the progress of their grievances.</p> <p>Sighted the Records of Grievances, OilPalmPal record book, which consist of housing repair record book. The management also maintain the complaint record book, that keep the record of complaint for the past 24 months.</p> <p>The latest procedure on complaint dated 26/11/2021 on Workers Housing Management Procedure and 'OilpalmPal' Digital Housing Complaint System (OPP DHCS). Referred IOM ref; UM/HSE/013/11/2021. This procedure already been brief to workers dated 01/10/2022, during the Grievances and Freedom of Movement – Kulai Estate.</p>	
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p>- Minor compliance -</p>	<p>The complaint forms were available at the operating unit's office, where the stakeholders can easily access should it be needed. Among the information available in the form is name of requestor/complainant, date of request, details of complaint/grievance, details of action taken including dates and acknowledgement signature of the requestor. However, the Estate has established 5 types of new complaints medium as per below: -</p> <ul style="list-style-type: none"> • Complaint Book – Housing Repairs • Complaint Book – Electricity Repairs • Letter by complainant • Suara Kami • Whistle Blowing • OilPalmPal (Digital Housing Complaint System) 	Complied

**MSPO Public Summary Report
Revision 2 (Nov 2021)**

Criterion / Indicator		Assessment Findings	Compliance
		<p>Complaint Form can be obtained at the Estate Office. Interview with the local and foreign confirmed they are aware of the above process. Merely, complaints on Housing Maintenance being observed in all sampled Estates.</p> <p>Under Group policies and authority's GPA No 85 Whistleblowing channels are established to help all stakeholders raise concerns, without fear or retaliation, on any wrongdoing that they may observe in the Sime Darby Group. The statement can be viewed through https://simedarbyplantation.com/contact-us/</p> <p>Instead of whistle blowing, the workers have another medium to relay their complaints and grievances through SUARA KAMI – TALIAN BANTUAN PEKERJA. The complaints will be directed to Sime Darby HQ for investigation. This medium being handled by 3rd party.</p>	
4.4.2.4	<p>Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.</p> <p>- Minor compliance -</p>	<p>Employees and the surrounding communities were made aware that complaints or suggestions can be made any time through various meetings such as morning muster, training/briefing and stakeholder consultation. Employees and the surrounding communities were communicated through:</p> <p>The latest procedure on complaint dated 26/11/2021 on Workers Housing Management Procedure and 'OilpalmPal' Digital Housing Complaint System (OPP DHCS). Referred IOM ref; UM/HSE/013/11/2021. This procedure already been brief to workers dated 01/10/2022.</p>	Complied
4.4.2.5	<p>Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request.</p> <p>- Major compliance -</p>	<p>The complaints and resolutions for the past 24 months (i.e. from November 2019) were well maintained by the sampled estates and available upon request.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
Criterion 4.4.3: Commitment to contribute to local sustainable development		
4.4.3.1 Growers should contribute to local development in consultation with the local communities. - Minor compliance -	The estate management have made contribution to both internal and external stakeholders. Estate is committed and have contributed to local development. The contribution made to the internal. As evidence, the followings: <u>Kulai Estate</u> 1. Approval of using the estate area for the school activity dated 12/06/2022 2. Approval of using estate temple for the purpose of religion activity 3. Approval of using the football field for the reunion activity of Ex-Kulai Oil Mill staff. <u>Seri Pulai</u> 1. Donation to local mosque 2. Distribution of essential item to local communities and workers during Ramadhan.	Complied
Criterion 4.4.4: Employees safety and health		
4.4.4.1 An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	Sime Darby Plantation Berhad have established the Group Policy on Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 01/06/2020. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the estates. The GSM team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition.	Major Non-Conformity

Criterion / Indicator		Assessment Findings	Compliance
		<p>The estates have established Safety and Health Management Plan and documented in Environment, Safety and Health Plan FY 2022. The management plan includes the ESH Risk Management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring, Health monitoring.</p> <p>Nevertheless, the implementation of safety management plans was not demonstrated effectively.</p> <p><u>Kulai Estate</u></p> <p>During the visit to the Chemical Store, it was noticed that the storekeeper was a female who was currently pregnant. The management have mentioned that they are aware that the storekeeper is pregnant. Nevertheless, the pregnant storekeeper is still currently working as the chemical storekeeper and has not been offered alternative work as verified during the audit. Furthermore, there were excessive fumes coming out of the chemical store due to poor ventilation. This was against the company policy that states "<i>Sprayer atau pekerja Wanita yang bekerja secara langsung dengan bahan kimia yang disahkan hamil akan ditugaskan ke bahagian lain sepanjang kehamilan</i>" and memo dated 01/11/2022 entitled "<i>Larangan Terlibat Dalam Urusan Berkaitan dengan Chemical</i>" Thus Major NC was raised.</p>	
4.4.4.2	<p>The occupational safety and health plan shall cover the following:</p> <p>a) A safety and health policy, which is communicated and implemented.</p> <p>b) The risks of all operations shall be assessed and documented.</p>	<p>The occupational safety and health plan cover the following:</p> <p>a. Sime Darby Plantation Berhad have established the Group Policy on Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 01/06/2020. The policy has been communicated to the staffs and workers through induction training for new workers, morning briefing and displayed at various notice boards within the</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <ul style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied <p>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p>	<p>estate. The policy has been briefed to all workers on 30/09/2022 at Kulai Estate and 29/03/2022 at Seri Pulai Estate.</p> <p>b. Sime Darby Plantation Berhad have established Standard Operating Procedure for Risk Assessment and documented in EQMS/SOM sub-section 5.4, Appendix 5.4.1a. Kulai Estate and Seri Pulai Estate has conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment covers all main operations and support operations. Among the activities verified in the HIRARC included Manuring, Harvesting, Spraying, etc. HIRARC is reviewed on annually and as and when there are any accidents that occur in the estates.</p> <p>Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate.</p> <ul style="list-style-type: none"> - Kulai Estate The Chemical Health Risk Assessment Report (Ref. Number: HQ/15/ASS/00/363-2022-028) conducted by Nisafety Consultancy (DOSH Registration: HQ/15/ASS/00/363) on 09/03/2022 was available for verification. - Seri Pulai Estate The Chemical Health Risk Assessment Report (Ref. Number: HQ/15/ASS/00/363-2022-029) conducted by Nisafety Consultancy (DOSH Registration: HQ/15/ASS/00/363) on 09/03/2022 was available for verification. 	

Criterion / Indicator	Assessment Findings	Compliance
<p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>Medical Surveillance was conducted for workers exposed to chemicals and welding fumes in the estate as recommended in the CHRA. The medical surveillance was conducted to monitor the level of exposure on the workers towards the chemicals and fumes.</p> <ul style="list-style-type: none"> - Medical Surveillance was conducted from 08 an 09/11/2022 for 22 estate chemical handlers who have been exposed to chemicals. Results indicated that no workers had abnormal results (Occupational or Non occupational caused), and all were fit to work. - Medical Surveillance was conducted from 03/10/2022 at Klinik Rengam for 11 estate chemical handlers who have been exposed to chemicals. Results indicated that no workers had abnormal results (Occupational or Non occupational caused). <p>Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the estates.</p> <ul style="list-style-type: none"> - <u>Kulai Estate</u> The Noise Risk Assessment Report (Ref. Number: HQ/LPROYKPEB/21/00305) conducted by Etosh Consult & Engineering Plt (DOSH Registration: JH/04/04/539) on 24/08/2020 was available for verification. - <u>Seri Pulai Estate</u> The Noise Risk Assessment Report (Ref. Number: HQ/LPROYKPEB/20/00155) conducted by Etosh Consult & Engineering Plt (DOSH Registration: JH/04/04/305) on 20/07/2020 was available for verification. 	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Audiometric Test was conducted in compliance with the recommendation from the estate's NRA Report.</p> <ul style="list-style-type: none"> - <u>Kulai Estate</u> – Audiometric Test was conducted on 03/11/2022 for workers exposed to excessive noise. 13 workers were diagnosed with NIHL and referred to OHD where 7 workers were reported to DOSH via JKPP7. - <u>Seri Pulai Estate</u> – Audiometric Test was conducted on 09/07/2022 for a total of 12 employees. The results indicated that there were 9 workers with Normal hearing and 3 Workers with Hearing Loss. <p>c. SOU 24 estates have established a training program for employees exposed to chemicals used at the palm oil estate to ensure continuous awareness to the employees. The training was conducted by the Manager, Asst. Manager, and representative from the chemical suppliers to the supervisors and operators. Sighted the training records as follows</p> <ul style="list-style-type: none"> - My Crop - Interpump Spraying & Maintenance Training: 08/03/2022 at Kulai Estate. - Chemical Spraying SOP, SW Management & Inventory, Labelling, disposal, handling and SDS Training on 10/06/2022 at Kulai Estate. - Chemical and PPE Training conducted on 16/06/2022 at Seri Pulai Estate. - Induction Training for Chemical & Spraying Safe Operating Procedures conducted on 21/11/2022 at Seri Pulai Estate. <p>d. The estate has provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC and Pictorial Safety Standard (PSS) Palm Oil Estates dated</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>17/03/2008.</p> <p>Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>e. Standard Operating Procedures for Handling of Chemicals were available in several documents such as:</p> <ul style="list-style-type: none"> - Sime Darby Plantation, Chemical Safety Management; Document No. SD/SDP/PSQM (ESH)/202-OH4; dated 26/02/2015. <p>f. The Estate Managers were appointed to be the Chairman of OSH Committee at the estate as stated in the appointment letter undersigned by the Regional CEO. Estate management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate Manager.</p> <p>g. The management conducted regular OSH committee meetings on quarterly basis and when necessary due to accidents that occur. The meeting discussed issues on employees' safety, health and welfare such as operational risks and health achievement report, estate security, safety compliance by contractors, workplace inspection, legal compliance, safety and health training.</p> <p>Kulai Estate - Sighted the OSH Meeting Minutes dated 10/11/2022 (04/2022), 18/08/2022 (03/2022), 16/05/2022 (02/2022) and 18/02/2022 (01/2022).</p> <p>Seri Pulai Estate - Sighted the OSH Meeting Minutes dated 14/10/2022 (04/2022), 22/07/2022 (03/2022), 15/04/2022 (02/2022) and 18/01/2022 (01/2022).</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>h. Accident and Emergency procedures were available in the ESH Management System Manual; Emergency Preparedness & Response Guidelines and Procedures; Doc No: SD/SDP/SQM (ESH)/001-2-6; Revision:0; Date 01.07.2012.</p> <p>The estates have established Emergency Response Team lead by the Estate Managers. The ERT chart and Fire Extinguisher Map was also available and verified.</p> <p>Emergency Response Training was conducted as below:</p> <ul style="list-style-type: none"> - Fire Fighting and ERP Training was conducted on 10/12/2022 at Kulai Estate. - Emergency Response Plan (ERP) Training on 20/04/2022 <p>i. First aiders were assigned to various workstation at the estates. The mandores and staffs were responsible for first aid boxes at each workstation assigned to them by the management. The first aid box was recently replenished with all stated items available in the box. First Aid trainings were conducted regularly at the sampled estates and documents of trainings were verified. First Aid Training conducted at Kulai Estate on 26/08/2022. First Aid Training was conducted on 19/10/2022 at Seri Pulai Estate.</p> <p>j. The estates recorded all accidents reports and reported to HQ using the PSQM-ESH Monthly update form via online through GSQM ESH Portal. The accident occurred was reviewed on quarterly basis during OSH committee meeting.</p> <ul style="list-style-type: none"> - <u>Kulai Estate</u> <p>There were 4 accident cases for the year 2021 reported in the estate. The JKKP 8 form has been submitted to DOSH for the year ending 2021 on 17/01/2022 and documents available for</p>	

Criterion / Indicator		Assessment Findings	Compliance
		<p>verification. For the year 2022 there were 5 minor accident cases reported as of to date.</p> <ul style="list-style-type: none"> - <u>Seri Pulai Estate</u> <p>There were 2 accident cases for the year 2021 reported in the estate. The JKKP 8 form for the year ending 2021 have been submitted to DOSH and available for verification. As for the year 2022 there were 10 reported cases in the estate. Records were available for verification.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has established Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha; Group Managing Director dated 2nd December 2019. Human rights element being spelt out under the followings: -</p> <p>Human Rights Charter – Clause 3.2, We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> a) Providing equal opportunities b) Respecting freedom of association c) Eradicating any form of exploitation d) Ensuring favorable working conditions e) Enhancing safety and health f) Respecting community rights and the rights of indigenous people g) Protecting the Rights of vulnerable people h) Protecting the rights of children i) Eliminating violence and sexual harassment 	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Responsible Agriculture Charter – Human Rights and Social Development Commitments Clause 2.1, Respect Human Rights & empower communities and Clause 2.2 Protect Labor standards and enhance employment conditions.</p> <p>Sime Darby Plantation Group, Vendor COBC dated 30/5/2018 under Clause 5, Labor and Human Rights. Communication of all the policies to workforce is through Town hall, training and during muster call.</p> <p>The policy is communicated externally during the stakeholder meeting dated 12/09/2022 and internal workers during muster call and trainings.</p>	
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>The management establish sustainable policy to commit to their transparent respect and recognition of the right of all their employee including contract, temporary and migrant workers as well as people living nearby and adjacent communities. Other support such as job opportunities and amenities such as free housing, water and medical care are given to all employees without discrimination.</p> <p>Based on worker employment master record, there are mixed of India, Nepal, Bangladesh and Indonesia foreign workers lives and work with local employees. Interview with office staff and general workers who mentioned their job selection process was fair and transparent.</p> <p>This policy is available in English and Malay displayed at the estate office wall and notice boards.</p> <p>No evidence of discrimination based on race, skin color, religion, gender, national origin, ancestry, disability, marital status, and sexual orientation was found in both Estates.</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.5.3 Management shall ensure that employees’ pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>All the workers are under direct employment. The payslip has included basic income, allowance pay, working days, medical leave, and deduction of salary and others as per employment contract. The payroll for the following sampled workers for the month of July 2022, September 2022, and October 2022 were verified to be consistent with the Minimum Wages Order 2022. Sample of salary slip and files are as follows:</p> <p><u>Kulai Estate:</u></p> <ol style="list-style-type: none"> 1. Employee ID: 0000154016 2. Employee ID: 0000146140 3. Employee ID: 0000058988 4. Employee ID: 0000162934 5. Employee ID: 0000118186 6. Employee ID: 0000126443 7. Employee ID: 0000169861 <p><u>Seri Pulai Estate:</u></p> <ol style="list-style-type: none"> 1. Employee ID 0000125312 2. Employee ID 0000104711 3. Employee ID 0000109066 4. Employee ID 0000118225 5. Employee ID 0000170109 6. Employee ID 0000173407 7. Employee ID 0000173411 8. Employee ID 0000140051 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		9. Employee ID 0000173807	
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>There are contractors for transporting of FFB and grass cutting. Kulai Estate:</p> <ol style="list-style-type: none"> 1. Pengangkutan Sutra Jaya 2. Govinda Rajo a/l Manikam <p>The Verification of payslip and employment contract has confirmed that 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>	Complied
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The workers master list was reviewed. The list includes names, NRIC & Passports numbers, Expiry dates of Passports & Work Permits, date of birth, date joined, gender etc.</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>Employees had been provided with fair contracts that have been signed by both employee and employer. Foreign migrant Indonesian workers are recruited with 2 years contract. Local workers are on a long-term employment basis.</p> <p>The following contracts has been verified to confirm that workers have binding working agreement with the company:</p> <p>Employment contracts are available and explained in language that understood by workers. The payroll for the following sampled workers for the month of July 2022, September 2022, and October 2022 were verified to be consistent with the Minimum Wages Order 2022. Sample of salary slip, and files are as follows:</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p><u>Kulai Estate:</u></p> <ol style="list-style-type: none"> 1. Employee ID: 0000154016 2. Employee ID: 0000146140 3. Employee ID: 0000058988 4. Employee ID: 0000162934 5. Employee ID: 0000118186 6. Employee ID: 0000126443 7. Employee ID: 0000169861 <p><u>Seri Pulai Estate:</u></p> <ol style="list-style-type: none"> 1. Employee ID 0000125312 2. Employee ID 0000104711 3. Employee ID 0000109066 4. Employee ID 0000118225 5. Employee ID 0000170109 6. Employee ID 0000173407 7. Employee ID 0000173411 8. Employee ID 0000140051 9. Employee ID 0000173807 	
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>The company working hours is 8 hours. From Monday to Saturday. The overtime maximum is 104 hours according to Malaysian Law.</p> <p>Seen the working hours being displayed at the notice board. The office will be working from 8.00 am to 5.00pm and break time at 1.00 pm to</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		3.00 pm. The workers are from 6.30 am to 2.30pm. Verified on the sample workers check roll record was verified.	
4.4.5.8	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement. - Major compliance -	The management of both estates had informed all workers the working hours and breaks times. The working hours and break times complied with legal regulations and collective agreements. The working hours and break time was exhibited on notice boards. Working time was from 6.30am to 2.30pm while the break time was from 11.00am to 11.30am.	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 -	The payslip and the inputs were reviewed to confirm the wages and overtime is in line with legal requirements of Employment Act 1955 and worker’s employment contract. The payroll for the following sampled workers for the month of July 2022, September 2022, and October 2022 were verified to be consistent with the Minimum Wages Order 2022. Sample of salary slip, and files are as follows: <u>Kulai Estate:</u> 1. Employee ID: 0000154016 2. Employee ID: 0000146140 3. Employee ID: 0000058988 4. Employee ID: 0000162934 5. Employee ID: 0000118186 6. Employee ID: 0000126443 7. Employee ID: 0000169861 <u>Seri Pulai Estate:</u> 1. Employee ID 0000125312	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		2. Employee ID 0000104711 3. Employee ID 0000109066 4. Employee ID 0000118225 5. Employee ID 0000170109 6. Employee ID 0000173407 7. Employee ID 0000173411 8. Employee ID 0000140051 9. Employee ID 0000173807 Salary slips clearly shows the calculations of gross salary, all deductions and net salary of a worker. Workers interviewed confirmed that they are being paid more than the stipulated minimum wage and that they understand all the deductions being made. Documented pay slip was distributed to individual workers on the day of payment.	
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 -	The company provides free medical benefit and free housing to foreign workers. All workers have been provided with medical and accident insurance. With regards to local and foreign workers, staffs and executives, all of them are covered under EPF & SOCSO as required by the Malaysian Laws and Regulations. All workers are provided with housing facilities at workers line site. Medical Assistant is responsible to carry out the monitoring at workers quarters. In addition, there is football field, mosque, community hall was provided.	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities	Estate worker lived in 1 house with 3 rooms, which shared 2 persons in a room (maximum 6 person per dwelling). Water for domestic usage is provided from SAJ and Tenaga Nasional Berhad with subsidize rate	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. - Major compliance -	as per agreement which is 50 kWh per month for electric and 35 gallon/people. Linesite inspection was carried out on weekly basis by Estate Hospital Assistant.	
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	The company has implemented Policy on Harassment at Workplace dated June 2018 where the company is committed to promote a safe and healthy working environment. The company has zero tolerance for any form of harassment at workplace. The policy serves as a guidance on handling matters related to harassment. The briefing of Policy was conducted at respective unit and the record was available at each site.	Complied
4.4.5.13	The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	Sighted in Sime Darby Plantation Human Rights Charter under 3.2 Respect and Uphold Labour Rights clause: 3.2.4 Respecting Freedom of Association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, we will provide alternative means of employee engagement and grievance redressal. Workers interview found they are aware on their rights to voice out any issues and they are allowed to join the Union. The policy being briefed to all workers during Town Hall Session and Stakeholder Meeting either at Estates or Mill. The documented social policy as specified above outlined the company's commitment to allow the workers to join and formed union among the workers. There is also a specific procedure (in the form of a flowchart) in both English and Malay namely Sexual Harassment Procedure which outlines the basic framework for handling of sexual harassment complaints. There is no sexual harassment case reported through interview and document reviewed in Estate. The workers have the right to join or form trade unions of their own choosing without prior authorization	Complied

**MSPO Public Summary Report
Revision 2 (Nov 2021)**

Criterion / Indicator		Assessment Findings	Compliance														
		and to bargain collectively. The policy has been displayed at notice board in office and linesite.															
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. - Major compliance -	Based on the employee’s record compiled in Check-roll Employment Listing, reviewed of the name list of workers found that the workers recruited with minimum age of 18 years old.	Complied														
Criterion 4.4.6: Training and competency																	
4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept. - Major compliance -	<p>SOU 24 Estates has established a training program for all workers based on the training need analysis conducted on a yearly basis. COVID-19 training and briefings were sighted for the estates. Interview with the sampled workers and staff indicated that they were aware on the SOP such as social distancing, regular sanitization and use of PPE (Face Mask). Records of trainings were maintained by the estate as below:</p> <p><u>Kulai Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Grievance Channel Training</td> <td>06/01/2022</td> </tr> <tr> <td>Workers Passport Safekeeping Training</td> <td>21/01/2022</td> </tr> <tr> <td>PPE Training</td> <td>03/03/2022</td> </tr> <tr> <td>Sexual Harassment Training</td> <td>11/03/2022</td> </tr> <tr> <td>Hearing Conservation Training</td> <td>16/03/2022</td> </tr> <tr> <td>HCV Training</td> <td>17/06/2022</td> </tr> </tbody> </table>	Training	Date	Grievance Channel Training	06/01/2022	Workers Passport Safekeeping Training	21/01/2022	PPE Training	03/03/2022	Sexual Harassment Training	11/03/2022	Hearing Conservation Training	16/03/2022	HCV Training	17/06/2022	Complied
Training	Date																
Grievance Channel Training	06/01/2022																
Workers Passport Safekeeping Training	21/01/2022																
PPE Training	03/03/2022																
Sexual Harassment Training	11/03/2022																
Hearing Conservation Training	16/03/2022																
HCV Training	17/06/2022																

Criterion / Indicator		Assessment Findings	Compliance														
		<p><u>Seri Pulai Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Scheduled Waste Management Training</td> <td>26/05/2022</td> </tr> <tr> <td>HCV Training and Briefing</td> <td>13/10/2022</td> </tr> <tr> <td>Landfill Management Training</td> <td>22/02/2022</td> </tr> <tr> <td>Drug & Alcohol Policy</td> <td>16/05/2022</td> </tr> <tr> <td>Interpump Usage and Maintenance Training by MyCrop</td> <td>29/09/2022</td> </tr> <tr> <td>Awareness on Sexual Harassment</td> <td>11/03/2022</td> </tr> </tbody> </table>	Training	Date	Scheduled Waste Management Training	26/05/2022	HCV Training and Briefing	13/10/2022	Landfill Management Training	22/02/2022	Drug & Alcohol Policy	16/05/2022	Interpump Usage and Maintenance Training by MyCrop	29/09/2022	Awareness on Sexual Harassment	11/03/2022	
Training	Date																
Scheduled Waste Management Training	26/05/2022																
HCV Training and Briefing	13/10/2022																
Landfill Management Training	22/02/2022																
Drug & Alcohol Policy	16/05/2022																
Interpump Usage and Maintenance Training by MyCrop	29/09/2022																
Awareness on Sexual Harassment	11/03/2022																
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>SOU 24 estates have conducted training need analysis for all employees, management and contractors. The training need analysis was conducted based on the job designation and training required by the job type. Sighted the Estate: Recommended Training Needs for the year 2022 for all estates.</p>	Complied														
4.4.6.3	<p>A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>A training programme has been developed and available in the Annual Sustainability Programme 2022. The trainings were sighted to have been sub categorised to trainings on Environmental, GAP, SOP, Social and OSH.</p>	Complied														
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services																	
Criterion 4.5.1: Environmental Management Plan																	
4.5.1.1	<p>An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be</p>	<p>Sime Darby Plantation Berhad has established environmental policy documented in Group Sustainability and Quality Statement signed by</p>	Complied														

Criterion / Indicator		Assessment Findings	Compliance
	<p>developed, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Group Managing Director dated 2/12/2019 and Upstream Malaysia Health, Safety and Environment (HSE) Policy Statement signed by CEO Upstream Malaysia dated 1/6/2020.</p> <p>In the Policy stated as follows:</p> <p>Group Sustainability and Quality Statement:</p> <p>Minimizing Environmental Harm:</p> <ul style="list-style-type: none"> i) Protecting and enhancing biodiversity and ecosystem ii) No deforestation and No new development on peat land iii) Enhancing resilience against climate change impact iv) Adopting responsible consumption and production <p>Upstream Malaysia Health, Safety and Environment (HSE) Policy Statement</p> <p>Environment</p> <ul style="list-style-type: none"> i) Comply to emission and effluent standard ii) Efficient use of water and energy iii) Minimize waste iv) Protect the ecosystem and biodiversity <p>The Policy has been communicated to the workers during townhall meeting.</p>	
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. <p>- Major compliance -</p>	<p>The estate visited has established environmental management plan base on aspect and impacts analysis conducted.</p> <p>The environmental management plan was established based on Environmental Aspect Impact Identification and Environmental Impact</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Evaluation conducted and documented in Pollution Prevention Plan. The EAI/EIE was reviewed by the estate management team.</p> <p>The EAI/EIE and management plan was reviewed on annually basis. Latest review was conducted on 01/11/2022 for Kulai Estate and 17/01/2022 for Seri Pulai Estate.</p> <p>The management plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated Environmental Issue, Mitigation Measures and Person Responsible.</p>	
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>The estate has established Environmental Management Plan FY 2022. The plan was reviewed on annually basis. Sighted the implementation of the management plan as follows:</p> <p><u>Kulai Estate</u></p> <ol style="list-style-type: none"> 1. To ensure no oil spillage polluted the soil/ waterways in the estate area, the estate has installed pollution control device (oil trap) at workshop, engine room and skid tank. Sighted during site visit, the oil trap condition is satisfactory. The estate conducted oil trap inspection and maintenance on weekly basis. 2. The estate monitor the diesel usage on monthly basis. Reviewed the monitoring records FY 2021 and to-date November 2022. 3. To ensure the vehicle and machinery works on optimize condition and used optimize fuel, the estate conduct preventive maintenance vehicle on daily basis. Reviewed the records of PMV for the month of December 2022 for vehicle no. TC 002, TC 005, TF 020 and HM 251. <p><u>Seri Pulai Estate</u></p> <ol style="list-style-type: none"> 1. To ensure the correct pesticide usage, the estate only purchase approved pesticides by procurement as per email dated 	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>06/12/2022. Reviewed the chemical register dated 01/12/2022 found consistent with pesticides in email.</p> <p>2. To reduce the usage of pesticides, the estate emphasize on IPM. The estate conducted barn owl census twice a year. Reviewed the latest barn owl census conducted in June – July 2022.</p> <p>3. The estate continuously provided training to the workers on the IPM. Reviewed the training records dated 13/06/2022.</p> <p>4. The estate collected wastewater from premixing chemical operations and reuse back for chemical premixing as sighted during site visit at chemical mixing area.</p>	
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>Program to promote positive impact was documented in Pollution Prevention Plan.</p> <p>Among the promote positive impact as follows:</p> <p><u>Kulai Estate</u></p> <p>1. Empty container was triple rinse, reuse back as premix chemical containers or puncture disposed as recycle waste through licensed contractors, SS Setia. Reviewed latest disposal records dated 12/12/2022 receipt 2236.</p> <p>2. The estate applied EFB as nutrient cycle program. Reviewed the application records as todate November 2022 at 1,405.18 tons for 40.91 ha</p> <p><u>Seri Pulai Estate</u></p> <p>1. The estate applied EFB as nutrient cycle program. Reviewed the application records as todate November 2022 at 2,345.76 tons ha.</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																		
		<p>2. Empty containers were disposed as recycle waste through licensed contractors, SS Setia. Reviewed latest disposal records dated 13/12/2022 receipt 2239 and 2238.</p> <p>The estate continuously provided training to the workers on the IPM. Reviewed the training records dated 13/06/2022.</p>																			
4.5.1.5	<p>An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.</p> <p>- Major compliance -</p>	<p>The estates visited 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.</p>	Complied																		
4.5.1.6	<p>Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>The estates visited discussed the issues on environmental concern during Environmental, Safety and Health committee meeting conducted on quarterly basis.</p>	Complied																		
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																					
4.5.2.1	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p>- Major compliance -</p>	<p>The estate has established Energy Management Plan. Reviewed implementation of the plan as follows:</p> <p>1. The estates monitor the diesel consumption for non-renewable energy as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Kulai Estate</th> <th>Seri Pulai Estate</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>2.03</td> <td>1.60</td> </tr> <tr> <td>Feb</td> <td>2.22</td> <td>1.03</td> </tr> <tr> <td>Mar</td> <td>1.58</td> <td>1.57</td> </tr> <tr> <td>Apr</td> <td>1.71</td> <td>1.96</td> </tr> <tr> <td>May</td> <td>1.84</td> <td>0.45</td> </tr> </tbody> </table>	Estate	Kulai Estate	Seri Pulai Estate	Jan	2.03	1.60	Feb	2.22	1.03	Mar	1.58	1.57	Apr	1.71	1.96	May	1.84	0.45	Complied
Estate	Kulai Estate	Seri Pulai Estate																			
Jan	2.03	1.60																			
Feb	2.22	1.03																			
Mar	1.58	1.57																			
Apr	1.71	1.96																			
May	1.84	0.45																			

**MSPO Public Summary Report
Revision 2 (Nov 2021)**

Criterion / Indicator		Assessment Findings			Compliance																	
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td>Jun</td><td style="text-align: center;">1.69</td><td style="text-align: center;">1.65</td></tr> <tr><td>Jul</td><td style="text-align: center;">1.67</td><td style="text-align: center;">1.07</td></tr> <tr><td>Aug</td><td style="text-align: center;">1.82</td><td style="text-align: center;">1.10</td></tr> <tr><td>Sep</td><td style="text-align: center;">2.53</td><td style="text-align: center;">1.29</td></tr> <tr><td>Oct</td><td style="text-align: center;">2.04</td><td style="text-align: center;">1.44</td></tr> <tr><td>Nov</td><td style="text-align: center;">1.86</td><td style="text-align: center;">1.14</td></tr> </table> <p>To ensure the vehicle and machinery works on optimize condition and used optimize fuel, the estate conduct preventive maintenance vehicle on daily basis. Reviewed the records of PMV for the month of December 2022 for vehicle no. TC 002, TC 005, TF 020 and HM 251 for Kulai Estate and TC003 for Seri Pulai Estate.</p>	Jun	1.69	1.65	Jul	1.67	1.07	Aug	1.82	1.10	Sep	2.53	1.29	Oct	2.04	1.44	Nov	1.86	1.14		
Jun	1.69	1.65																				
Jul	1.67	1.07																				
Aug	1.82	1.10																				
Sep	2.53	1.29																				
Oct	2.04	1.44																				
Nov	1.86	1.14																				
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estates visited has established the direct usage of non-renewable energy such as diesel and electricity base on the consumption of previous year.			Complied																	
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	No usage of renewable energy at the estate.			Complied																	
Criterion 4.5.3: Waste management and disposal																						

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																					
4.5.3.1	<p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>The OUs have identified the waste products and source pollution generated in the estates and mill. The waste are categorized as follows:</p> <table border="1"> <thead> <tr> <th>Type</th> <th>Item Description</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Scheduled Waste</td> <td>Used lubricant, used hydraulic oil, batteries, rags</td> <td>Workshop</td> </tr> <tr> <td>Clinical Waste</td> <td>Clinic</td> </tr> <tr> <td rowspan="2">Domestic waste</td> <td>Rubbish</td> <td rowspan="2">Workers housing complex, office, workshop, store</td> </tr> <tr> <td>Sewage</td> </tr> <tr> <td rowspan="2">Industrial Waste</td> <td>Tyre and Tubes</td> <td rowspan="2">Workshop</td> </tr> <tr> <td>Scrap Iron</td> </tr> <tr> <td rowspan="2">Recycle waste</td> <td>Empty Pesticide container</td> <td>Main store</td> </tr> <tr> <td>EFB</td> <td>Estate</td> </tr> </tbody> </table>	Type	Item Description	Location	Scheduled Waste	Used lubricant, used hydraulic oil, batteries, rags	Workshop	Clinical Waste	Clinic	Domestic waste	Rubbish	Workers housing complex, office, workshop, store	Sewage	Industrial Waste	Tyre and Tubes	Workshop	Scrap Iron	Recycle waste	Empty Pesticide container	Main store	EFB	Estate	Complied
Type	Item Description	Location																						
Scheduled Waste	Used lubricant, used hydraulic oil, batteries, rags	Workshop																						
	Clinical Waste	Clinic																						
Domestic waste	Rubbish	Workers housing complex, office, workshop, store																						
	Sewage																							
Industrial Waste	Tyre and Tubes	Workshop																						
	Scrap Iron																							
Recycle waste	Empty Pesticide container	Main store																						
	EFB	Estate																						
4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <p>a) Identifying and monitoring sources of waste and pollution</p> <p>b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p>- Major compliance -</p>	<p>Estates sampled has 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.</p> <p>Sighted the implementation as follows:</p> <p><u>Kulai Estate</u></p> <ol style="list-style-type: none"> The estate maintain the inventory of scheduled waste and empty containers. Reviewed the inventory records FY 2022. Empty container were triple rinse, reuse back as premix chemical containers or puncture disposed as recycle waste through licensed 	Complied																					

Criterion / Indicator		Assessment Findings	Compliance						
		<p>contractors, SS Setia. Reviewed latest disposal records dated 12/12/2022 receipt 2236.</p> <p>3. Domestic waste were collected by municipal contractors 2 times a week and disposed at MPKu municipal landfill.</p> <p><u>Seri Pulai Estate</u></p> <p>1. The estate conduct domestic waste collection 3 times a week and disposed at designated landfill in field P00 4. Noted during site visit, only domestic waste disposed in the landfill. For recycle waste, the segregation was conducted by the line sweeper.</p> <p>2. The estate applied EFB as nutrient cycle program. Reviewed the application records as todate November 2022 at 2,345.76 tons ha.</p> <p>3. Empty containers were disposed as recycle waste through licensed contractors, SS Setia. Reviewed latest disposal records dated 13/12/2022 receipt 2239 and 2238.</p>							
4.5.3.3	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p>- Major compliance -</p>	<p>Procedure for Scheduled Waste Management was established (SD/SDP/PSQM (ESH)/203-EN1 dated 26/2/2016. Proper disposal of waste material is carried out as per the company procedures.</p> <p>Both estates visited also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected at both estates visited.</p> <p>Sighted the latest disposal records as follows:</p> <p><u>Kulai Estate</u></p> <table border="1"> <thead> <tr> <th>Date</th> <th>SW</th> <th>Consignment notes no</th> </tr> </thead> <tbody> <tr> <td>25/11/2022</td> <td>410</td> <td>25382</td> </tr> </tbody> </table>	Date	SW	Consignment notes no	25/11/2022	410	25382	Complied
Date	SW	Consignment notes no							
25/11/2022	410	25382							

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings			Compliance						
		25/07/2022	305 404	25381 2022072509T7SENV							
		<p>Seri Pulai Estate</p> <table border="1"> <thead> <tr> <th>Date</th> <th>SW</th> <th>Consignment notes no</th> </tr> </thead> <tbody> <tr> <td>19/09/2022</td> <td>305</td> <td>28745</td> </tr> </tbody> </table> <p>For SW 410, oil filter, the vehicle servicing contractors, Sime Darby Industries brought out the schedule waste for disposal as they have acquired permission from DOE</p>			Date	SW	Consignment notes no	19/09/2022	305	28745	
Date	SW	Consignment notes no									
19/09/2022	305	28745									
4.5.3.4	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer’s labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p>- Major compliance -</p>	<p>Empty pesticides container was identified as recycle waste. All empty pesticides containers were triple rinse, puncture and stored at designated stored before disposed to licensed contractors, SS Setia Technology Enterprise. Refer approval letter from DOE no AS (B) J 91/110/619/069 Jld 3(37) dated 24/10/2018. Sighted the implementation of the triple rinse during site visit at the storage area. Empty container was triple rinse, reuse back as premix chemical containers or puncture disposed as recycle waste through licensed contractors, SS Setia. Reviewed latest disposal records dated as per official receipt no. 2236 dated 12/12/2022 for Kulai Estate and 2239 and 2238 dated 13/12/2022 for Seri Pulai Estate.</p>			Complied						
4.5.3.5	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p>- Minor compliance -</p>	<p>Domestic wastes were collected by municipal contractors 2 times a week and disposed at MPKu municipal landfill.</p>			Complied						
Criterion 4.5.4: Reduction of pollution and emission											

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance														
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	The estates visited has conducted the assessment of all polluting activities during Environmental Aspects identification, Environmental Impact Evaluation.	Complied														
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The action plan to reduce the identified significant impact has been documented in Pollution Prevention Plan and Waste Management Plan.	Complied														
Criterion 4.5.5: Natural water resources																	
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: <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. 	<p>Documented in Sime Darby Plantation Berhad Slope and River Protection Policy dated 15/1/2015 signed by the Managing Director stated that buffer zone shall be maintained on both side of the river banks.</p> <table border="1"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>< 5 meters</td> <td>5 meters</td> </tr> <tr> <td>*> 3 meters</td> <td>20 meters</td> </tr> </tbody> </table> <p>Monitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/ rivers, version 1, year 2008, issue no. 1, dated 01/11/2008.</p>	River width	Buffer zone	> 40 meters	50 meters	20 to 40 meters	40 meters	10 to 20 meters	20 meters	5 to 10 meters	10 meters	< 5 meters	5 meters	*> 3 meters	20 meters	Complied
River width	Buffer zone																
> 40 meters	50 meters																
20 to 40 meters	40 meters																
10 to 20 meters	20 meters																
5 to 10 meters	10 meters																
< 5 meters	5 meters																
*> 3 meters	20 meters																

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
<p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>	<p>The estate has established water management plan focusing on water quality and contingency plan. Sighted the implementation of the management plan as follows:</p> <p><u>Kulai Estate</u></p> <p>The estates monitor the natural water quality on quarterly basis. Reviewed the water sampling conducted on 06/07/2022 as per report no IE 983/2022 dated 18/08/2022. The results were not conform to Class IIA/ IIB of NWQS. The estate has issued Corrective/ Preventive Action Report for Non-Conforming Water Analysis Results on 20/08/2022 and resampling was conducted on 20/08/2022. The resampling records was conform to Class IIA/ IIB of NWQS.</p> <p>Reviewed also the water sampling conducted on 25/10/2022 as per report no IE 1517/2022 dated 05/12/2022. The results were conform to Class IIA/ IIB of NWQS.</p> <p>The estate provided the clean and treated water to their workers by own water treatment plant and from Syarikat Air Johor.</p> <p><u>Seri Pulai Estate</u></p> <p>Sighted the river buffer zone for Sg. Air Hitam in field P17 B3 and P16 A1. The vegetation was well maintained and no sign of chemical application along the buffer zone. The estate has erected signboard on prohibition of chemical application, swimming, and fishing at the buffer zone area.</p> <p>The estates monitor the natural water quality on quarterly basis. Reviewed the water sampling conducted on 28/07/2022 as per report no IE 1006/2022 dated 22/08/2022. The results were not conform to Class IIA/ IIB of NWQS. The estate has issued Corrective/ Preventive</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		Action Report for Non-Conforming Water Analysis Results on 26/08/2022.	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	Sighted no construction of bund, weirs and dams across Sg. Air Hitam passing through the Seri Pulai Estate.	Complied
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). - Minor compliance -	The practice water harvesting of water from road-side drains being directed and stored in conservation roadside pits was observed in estate visited.	Complied
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value			

Criterion / Indicator	Assessment Findings	Compliance												
<p>4.5.6.1 Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <ul style="list-style-type: none"> a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has conducted HCV assessment for all certification units in SOU 24 Hadapan and documented in report titled HCV Re-Assessment for Strategic Operating Unit (SOU) 24 Hadapan, Final Report ver III dated June 2014 by Plantation Sustainability Quality Management (PSQM) Department.</p> <p>The Group Sustainability Department (GSQM) has conducted HCV verification and report review on the HCV area and documented in report titled:</p> <ol style="list-style-type: none"> 1. Addendum Report, High Conservation Vale Verification for Strategic Operating Unit (SOU) 24 Hadapan, Kulai Estate dated January 2020. 2. Addendum Report, High Conservation Vale Verification for Strategic Operating Unit (SOU) 24 Hadapan, Seri Pulai Estate dated January 2021. <p>Among the HCV identified in the estate as follows:</p> <table border="1" data-bbox="1050 963 1868 1129"> <thead> <tr> <th>Estate</th> <th>Area</th> <th>Hectare</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Kulai Estate</td> <td>Water Catchment at Kelan Division</td> <td>0.77</td> <td>HCV 4</td> </tr> <tr> <td>Seri Pulai Estate</td> <td>Sg. Ayer Hitam River Reserve</td> <td>27.61</td> <td>HCV 4</td> </tr> </tbody> </table>	Estate	Area	Hectare	HCV	Kulai Estate	Water Catchment at Kelan Division	0.77	HCV 4	Seri Pulai Estate	Sg. Ayer Hitam River Reserve	27.61	HCV 4	<p>Complied</p>
Estate	Area	Hectare	HCV											
Kulai Estate	Water Catchment at Kelan Division	0.77	HCV 4											
Seri Pulai Estate	Sg. Ayer Hitam River Reserve	27.61	HCV 4											
<p>4.5.6.2 If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <ul style="list-style-type: none"> a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to 	<p>No RTE species were identified in the assessment conducted as per:</p> <ol style="list-style-type: none"> 1. Addendum Report, High Conservation Vale Verification for Strategic Operating Unit (SOU) 24 Hadapan, Kulai Estate dated January 2020. 2. Addendum Report, High Conservation Vale Verification for Strategic Operating Unit (SOU) 24 Hadapan, Seri Pulai Estate dated January 2021. 	<p>Complied</p>												

Criterion / Indicator		Assessment Findings	Compliance
	<p>resolve human-wildlife conflicts.</p> <p>- Major compliance -</p>	<p>The estate has established HCV/Biodiversity Management Plan base on the HCV identified in the report. The plan was reviewed on annually basis.</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>The estate has established HCV/Biodiversity Management Plan base on the HCV identified in the report. Sighted the implementation of the management plan as follows:</p> <p><u>Kulai Estate</u></p> <ol style="list-style-type: none"> 1. Monitoring of HCV area was conducted on quarterly basis and recorded in Monitoring of present and potential HCV Areas East Estate logbook. The monitoring focusing on wildlife encounter, signage condition, area condition (rubbish, oil or other pollution), erosion, marking and spraying activity. Sighted during site visit, the condition of HCV area were satisfactory and consistent with HCV monitoring report. Reviewed the HCV monitoring 07/12/2022,22/09/2022, 15/06/2022. 2. Signage of prohibition on no fishing, no hunting and no swimming was erected at designated area along the HCV area. <p><u>Seri Pulai Estate</u></p> <ol style="list-style-type: none"> 1. Monitoring of HCV area was conducted on monthly basis and recorded in Monitoring of present and potential HCV Areas East Estate logbook. The monitoring focusing on wildlife encounter, signage condition, area condition (rubbish, oil or other pollution), erosion, marking and spraying activity. Sighted during site visit, the condition of HCV area was satisfactory and consistent with HCV monitoring report. Reviewed the HCV monitoring dated 	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		06/08/2022, 27/08/2022, 17/09/2022, 28/09/2022, 05/10/2022 and 11/11/2022. 2. The estate continuously conducted training to the workers on awareness of RTE and HCV. Reviewed training records dated 13/10/2022. 3. The estate conducted river water monitoring on quarterly basis.	
Criterion 4.5.7: Zero burning practices			
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -	Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law –EQA and Regulations 1974.	Complied
4.5.7.2	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop. - Major compliance -	No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	N/A
4.5.7.3	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws. - Major compliance -	No controlled burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	N/A
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	Noted based on the records on the land clearing and felling for the replanting at visited estates, method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>SOP was established for the Estates. Sime Darby Plantation Berhad SOP issued 2/1/2008 and Agricultural reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU 24 as a guidance document to conduct estate operation. The estates also holds the Safety Work Procedure. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc.</p> <p>Palm Mill holds two SOPs: sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill.</p> <p>For Health, Safety and Environment, both mill and estates, Sime Darby Plantation Berhad has issued Health, Safety and Environment (HSE) Management System and Standard Operating Procedures.</p> <p>Sime Darby Plantation Berhad continuously updated the SOP established. Among the updated SOP FY 2021 as follows:</p> <ol style="list-style-type: none"> 1. UM HSE Management System Manual, UM/HSE/MS/01 2. First Aid in Workplace Procedure, UM/HSE/OCP/01 3. Safety Harvesting Procedure, UM/HSE/OCP/02 4. Personal Protective Equipment Procedure, UM/HSE/OCP/03 5. Chemical Safety Management Procedure, UM/HSE/OCP/04 6. Permit to Work (PTW) Procedure, UM/HSE/OCP/05 	<p>Complied</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>7. OSH Risk Management Procedure, UM/HSE/SE/01</p> <p>Sime Darby Plantation Berhad has established a system to monitor the mill operation. The visited the operating units on timely basis. Their reports cover on all aspect of operation.</p> <p>Sime Darby Plantation Berhad Plantation has established mechanism to check the effective implementation of the procedure. Among the mechanism such as Mill/Plantation Advisor Visit, Performance Monitoring Visit, SORA/SCRA visit, Agronomist visit and Internal Audit.</p>	
4.6.1.2	<p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has established policy on slope protection and documented in Slope and River Protection Policy signed by the Managing Director in Jan 2015.</p> <p>The policy stated for slope more than 25 degree must be exclude from any new plantation development and replanting program. All the existing crop and vegetation shall be maintained accordingly.</p> <p>Landscapes of both estates visited are mostly flat. Sime Darby Plantation Berhad has established policy on slope protection and documented in Slope and River Protection Policy signed by the Managing Director in Jan 2015. The policy stated for slope more than 25 degree must be exclude from any new plantation development and replanting program. All the existing crop and vegetation shall be maintained accordingly.</p> <p>The policy was communicated to the employee during master briefing, townhall training and displayed in several notice board in the estate.</p>	Complied
4.6.1.3	<p>A visual identification or reference system shall be established for each field.</p> <p>- Major compliance -</p>	<p>Both Estates visited had a visual identification/reference system for each established field/block and maps established. Field numbers and hectare were marked on palms and in some areas on concrete slaps.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance																		
Criterion 4.6.2: Economic and financial viability plan																					
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	Business planning to ensure long-term economic and financial viability was evident. The annual budgets for the period 2022 to 2027 were sighted. The budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO/MSPO compliance etc. The budgets included projections on yield/ha, and total cost of production per MT & per ha. CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses	Complied																		
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance -	All estates established a replanting program spanned over a 5-year period till 2025. All programs were available for verification <table border="1" data-bbox="1048 858 1877 960"> <thead> <tr> <th>Year</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>Kulai Estate</td> <td>73.18</td> <td>127.07</td> <td>0</td> <td>0</td> <td>162.74</td> </tr> <tr> <td>Seri Pulai Estate</td> <td>73.37</td> <td>165.59</td> <td>144.58</td> <td>243.56</td> <td>76.09</td> </tr> </tbody> </table>	Year	2023	2024	2025	2026	2027	Kulai Estate	73.18	127.07	0	0	162.74	Seri Pulai Estate	73.37	165.59	144.58	243.56	76.09	Complied
Year	2023	2024	2025	2026	2027																
Kulai Estate	73.18	127.07	0	0	162.74																
Seri Pulai Estate	73.37	165.59	144.58	243.56	76.09																
4.6.2.3	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment - Major compliance -	The business and management plans were available in the annual budget. The annual budget provisions covered activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO & MSPO compliance etc. The budgets included projections on yield/ha, and total cost of production per MT & per ha.	Complied																		

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	The estates performance is recorded in the monthly progress report. a. Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein. b. The management also provides variance report on the performance and reviewed on a monthly basis. c. The supervisory personnel maintained a daily cost for the field operations. The SOU meeting involving the Managers sits monthly with the Regional CEO for the performance review.	Complied
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	The pricing mechanism was conducted as per contract agreement between the Contractors with Sime Darby Plantation Berhad. Pricing of the work were stated in the contract agreement. Reviewed sampled contract/Letter of Award between contractors and Sime Darby Plantation Berhad as follows: <u>Kulai Estate</u> Letter of Award between Pengangkutan Sutra Jaya (JM 0399782D) with Sime Darby Plantation Berhad dated 01/07/2022.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Payment terms for contract work were stated in the contract agreement. Noted during interview with the contractors, all payments were made as per payment terms stated in the contracts. No delayed of payments recorded.	Complied
Criterion 4.6.4: Contractor			

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	<p>The contractors were made to understand the MSPO requirements and shall provide the required documentation and information through meetings and trainings. Records of attendance of the meetings were available for verification.</p> <p>All contracted parties/vendors were required to signed Vendor Integrity Pledge (VIP) and to comply with para</p> <ul style="list-style-type: none"> - a (i); Vendor Code of Business Conduct (VCOBC) - a (ii); all applicable laws and regulations related anti-bribery, fraud and corruption. <p>Sighted the sampled contracts as follows:</p> <p><u>Kulai Estate</u></p> <ol style="list-style-type: none"> 1. Letter of Award between Pengangkutan Sutra Jaya (JM 0399782D) with Sime Darby Plantation Berhad dated 01/07/2022. <p><u>Seri Pulai Estate</u></p> <ol style="list-style-type: none"> 1. Addendum to Contract Agreement for Contractor Berwang Enterprise dated 01/01/2022, undersigned by the contractor on 06/01/2022. 2. Addendum to Contract Agreement for Contractor Pengangkutan Sutra Jaya dated 01/01/2022, undersigned by the contractor dated 06/01/2022. 	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Contract agreements between the mill and its contractors were made available. Generally, the elements of sustainability such as obligations to legal compliance, workers' welfare, safety and environmental issues.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.	Sime Darby Plantation Berhad has issued Memorandum to all contractors dated 01/01/2022. In the memorandum stated the contractors have to comply as follows;	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	<p>- Minor compliance -</p>	<ul style="list-style-type: none"> a. Comply with local legal requirements b. Attend the RSPO/ISCC/MSPO/SCCS briefing, or training organized by the company c. Having signed and enforceable agreement with the company d. Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary e. Having related working permits f. Ensure PPE utilization by contractors' employee while being in the company premise. <p>Additionally, all contracted parties/vendors have signed the 'Agreement Letter to be Audit by MSPO/SCCS Auditor' dated 01/01/2022.</p> <p>Sighted the memorandum accepted and signed by the contractors together with contracts as follows:</p> <ul style="list-style-type: none"> 1. Letter of Award between Pengangkutan Sutra Jaya (JM 0399782D) with Sime Darby Plantation Berhad – Kulai Estate dated 01/07/2022. 2. Seri Pulai Estate - Addendum to Contract Agreement for Contractor Berwang Enterprise dated 01/01/2022, undersigned by the contractor on 06/01/2022. 3. Seri Pulai Estate - Addendum to Contract Agreement for Contractor Pengangkutan Sutra Jaya dated 01/01/2022, undersigned by the contractor dated 06/01/2022. 	
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the	All works performed by the contractors at the estates are checked and verified by the estate's personnel. Projects where tenders are issued	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	by HQ are checked by representative from HQ usually from the Engineering and Mill Services Dept.	
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance -	Not Applicable, there are no new planting.	Not Applicable
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 -	Not Applicable, there are no new planting.	Not Applicable
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 -	Not Applicable, there are no new planting.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	Not Applicable, there are no new planting.	Not Applicable
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	Not Applicable, there are no new planting.	Not Applicable
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 -	Not Applicable, there are no new planting.	Not Applicable
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 -	Not Applicable, there are no new planting.	Not Applicable
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.	Not Applicable, there are no new planting.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	Not Applicable, there are no new planting.	Not Applicable
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	Not Applicable, there are no new planting.	Not Applicable
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 -	Not Applicable, there are no new planting.	Not Applicable
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	Not Applicable, there are no new planting.	Not Applicable
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	Not Applicable, there are no new planting.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	express their views through their own representative institutions. - Major compliance -		
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	Not Applicable, there are no new planting.	Not Applicable
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 -	Not Applicable, there are no new planting.	Not Applicable
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 -	Not Applicable, there are no new planting.	Not Applicable
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	Not Applicable, there are no new planting.	Not Applicable
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 -	Not Applicable, there are no new planting.	Not Applicable
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available.	Not Applicable, there are no new planting.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	Not Applicable, there are no new planting.	Not Applicable

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 -	Sime Darby Plantation Berhad (SDPB) commitments towards MSPO compliance being established through Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha, Group Managing Director dated 02/12/2019. MSPO Briefing has been conducted to all internal and external stakeholders through the communicated to workers during Town Hall Session which was chaired by RSQM Team.	Complied
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	The sustainability goals are in line with United Nations Sustainable Development Goals (UNSDG) 2030, which committed to: 1. Promoting good governance and transparency 2. Contributing to a better society 3. Minimising environmental harm 4. Delivering sustainability quality This policy being guided by the commitments spelt out in the Company's: 1. Responsible Agriculture Charter (RAC) 2. Human Rights Charter (HRC) 3. Innovation and Productivity Charter (IPC)	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

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 -	Sime Darby Plantation Berhad, Plantation Sustainability and Quality Management (PSQM), Internal Audit Procedures, Doc No: SD/SDP/PSQM/IAP Revision 2 Date 01/11/2017. The internal audit being conducted annually to implement and maintain the respective standard requirements effectively within the Group. The Management had drawn an Internal Audit Plan and it being carried out once a year to the Estate. The Internal audit conducted by Sustainability Unit, GSQM Department and RSQM. Sighted Internal Audit Plan and conducted as below: Hadapan POM, internal audit conducted on 03/10/2022 by Sustainability Compliance Unit, Group Sustainability Department. There were 4 major and 1 Minor been raised during this internal audit.	Complied
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action. - Major compliance -	The Internal Audit was planned to be conducted annually. The MSPO Internal Audit for Hadapan POM was conducted on 03/10/2022 by Sustainability Compliance Unit, Group Sustainability Department. The Internal System Audit Report Summary was available for verification.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	The internal audit report was documented and made available for management review. As evidence, all findings from internal audit were responded by Mill Management within the acceptable timeframe.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.1.3 – Management Review			
<p>4.1.3.1</p>	<p>The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.</p> <p>- Major compliance -</p>	<p>The procedure for Management Review, Standard Operation Manual, Sub-Section 5.6, dated: 25/05/2015 was established. The frequency for management review needs to be carried out at least once a year. The Management Review meeting is on Operating Unit basis. The actual meeting date as below:</p> <p>Date: 01/11/2022 Venue: KKS Hadapan Attended: 6 people</p> <p>The agendas discussed in the meeting are the following:</p> <ul style="list-style-type: none"> a. Review of last meeting and confirmation of the minutes b. Review of status / issue of Input and Output c. Sustainability Management d. Resource evaluation, needs and plan e. Results from system audit f. Changes that could affect the Management Systems g. Recommendation for Improvement h. Other matters 	<p>Complied</p>

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 a consideration of the main social and environmental impact and opportunities for the company.</p> <p>- Major compliance -</p>	<p>The mill has emphasized on Continual Improvement Plan and amongst the projects plan in 2022/23 are:</p> <ol style="list-style-type: none"> 1. Construction of new furrow area 2. EFB Platform Replacement 3. EFB Yard roofing 4. Biocatalyst application and Monitoring System (BAMS) 5. 2 units of ETP Pond Desludging 6. TGO Dispatch pump 7. Emergency eyewash and shower for mini lab 8. Supply and Install Ceiling fan at Workers quarters 9. Upgrading asbestos ceiling and roofing 10. Workers quarters centralize petrol storage 	Complied
4.1.4.2	<p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.</p> <p>- Major compliance -</p>	<p>Any new technology and/or innovation equipment is subject to approval by Regional Offices and Headquarters.</p> <p>Any new information is updated to employees through morning briefings, memo, meetings, station training.</p> <p>Where new technology or system are introduced, awareness briefing is provided to the employees at all levels prior to the implementation.</p>	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
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>Sime Darby Plantation Berhad (SDPB) has established Communication Procedure either Internal or External Stakeholders. The information was available in two (2) languages English and Malay. This document was accessible to stakeholder as sighted at Mill notices board. The information being disseminated to the Internal and External Stakeholders either through Townhall Session or External Stakeholders' Meeting.</p> <p>In view of Internal Stakeholder communication, the details as below:</p> <p>Stakeholder/contractor briefing dated 12/09/2022</p> <p>Townhall record dated 30/08/2022</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>Sime Darby Plantation Berhad (SDPB) has established Mill Quality Management System, Level 2, Standard Operation Manual Sub – Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1, Year 2008, Issue No 1 dated 1st April 2008.</p> <p>The mechanism is to enable effective and timely communication with employees and external interested parties. The audit team observed that the above SOP specifies the means to communicate and consult with the relevant stakeholders pertaining to the company's safety & health, social, environmental and other aspects.</p> <p>Information relating to land titles, safety and health plans, pollution prevention plans was made available at all Mill. Among the documents that were made available for viewing were land titles, occupational health and safety plans, EIA reports, SIA reports,</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		details of complaints and grievances, negotiation procedures, continuous improvement plans, and human rights 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 -	<p>Sime Darby Plantation Berhad (SDPB) has established Mill Quality Management System, Level 2, Standard Operation Manual Sub – Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1, Year 2008, Issue No 1 dated 1st April 2008.</p> <p>The procedure for Internal Stakeholders was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Internal Issues.</p> <p>The mechanism is to enable effective and timely communication with employees and external interested parties.</p> <p>The SOP also specifies the timeframe to be taken to provide feedback to the stakeholder is:</p> <ol style="list-style-type: none"> Within 2 weeks from the date receiving the queries. Within one week of the completion of the investigation for communication requiring investigation. <p>The procedure for consultation and communication is also available through website address http://sime-darbyplantation.com</p>	Complied
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	The mill has appointed their person in charge to monitor Consultation and communication namely En. Ariff Bin Musa, through appointment letter dated 22/08/2022 signed Mill Manager.	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance	
4.2.2.3	<p>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.</p> <p>- Major compliance -</p>	<p>List of stakeholders for all the operating units were last updated on 01/09/2022. The list consists of various group of stakeholders such as government authorities, contractors/suppliers, NGOs, local communities and also internal stakeholders such as workers and representatives.</p> <p>Records of consultation generally recorded in the stakeholders' consultation minute of meeting, dated 12/09/2022 and townhall meeting dated 30/08/2022.</p>	Complied	
Criterion 4.2.3 – Traceability				
4.2.3.1	<p>The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has established SOP for traceability and documented in Sime Darby Plantation, Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022. Refer document no. SD/SDP/GSD/SCCS/0522/01.</p>	Complied	
4.2.3.2	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has established SOP for traceability and documented in Sime Darby Plantation, Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022. Refer document no. SD/SDP/GSD/SCCS/0522/01.</p> <p>The procedure requires validation of certificate of supplying estate and had identified critical control points to prevent contamination of non-certified FFB. The current traceability system is Sime Weigh System.</p> <p>Reviewed the records of FFB received as follows:</p> <p>Own certified Estate</p> <table border="1" style="width: 100%;"> <tr> <td> <p>Supplier: Seri Pulai Estate Product: FFB A Crop D/O no.: 21968</p> </td> </tr> </table>	<p>Supplier: Seri Pulai Estate Product: FFB A Crop D/O no.: 21968</p>	Complied
<p>Supplier: Seri Pulai Estate Product: FFB A Crop D/O no.: 21968</p>				

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Weighbridge no.: 248446 Date: 13/12/2022 Nett weigh: 11,480 kg MSPO cert. no.: MSPO 739514 Validity period: 15/02/2018 – 14/02/2023</p> <p>Supplier: Layang Estate Product: FFB A Crop D/O no.: 22962 Weighbridge no.: 248347 Date: 13/12/2022 Nett weigh: 10,890 kg MSPO cert. no.: MSPO 739514 Validity period: 15/02/2018 – 14/02/2023</p> <p>Diversion from other certified supplier</p> <p>Supplier: Tun Dr. Ismail Estate Product: FFB B Crop D/O no.: 36096 Weighbridge no.: 239733 Date: 19/03/2022 Nett weigh: 12,050 kg MSPO cert. no. CU-MSPO MS2530-3-863077 Validity period: 24/01/2018 – 23/01/2023</p> <p>Supplier: Lambak Elais Estate Product: FFB B Crop D/O no.: 3081 Weighbridge no.: 247630 Date: 22/11/2022 Nett weigh: 12,480 kg</p>	

Criterion / Indicator		Assessment Findings	Compliance
		<div style="border: 1px solid black; padding: 2px;"> MSPO cert. no.: MSPO 686845 Validity period: 09/11/2018 – 17/12/2022 </div> <p>Non-certified outside supplier</p> <div style="border: 1px solid black; padding: 2px;"> Supplier: Bingan Jaya Product: FFB A Crop D/O no.: 206069 Weighbridge no.: 242233 Date: 13/06/2022 Nett weigh: 39,720 kg MSPO cert. no.: N/A Validity period: N/A </div> <div style="border: 1px solid black; padding: 2px;"> Supplier: VR Plantation Product: FFB B Crop D/O no.: 64121 Weighbridge no.: 248343 Date: 10/12/2022 Nett weigh: 32,920 kg MSPO cert. no.: N/A Validity period: N/A </div>	
4.2.3.3	The management shall identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The estate has appointed personnel to be responsible for Supply Chain Certification System as per appointment letter which state the responsible of the PIC as follows: 1. Assisting Assistant on Supply Chain Certification System 2. Other related issues on SCCS	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		The mill has appointed the Asst. Managers as Person Responsible for SCCS as per Appointment Letter dated 22/08/2022 signed by the Mill Manager.	
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	<p>The mill maintain the records of CPO/PK storage and recorded in the Daily Production Summary Report.</p> <p>For CPO and PK dispatch, the mill maintain records in Oil Dispatch Summary form. Sighted the CPO and PK dispatch as follows:</p> <p>CPO</p> <div style="border: 1px solid black; padding: 5px;"> <p>Customer: SDOPKR Product: Crude Palm Oil (CPO) – RSPO MB DO. No.: 63589 Weighbridge ticket. No.: 022451 Contract no.: S/PSD/2206/CPO0144 Weight: 28,560 kg</p> </div> <p>PK</p> <div style="border: 1px solid black; padding: 5px;"> <p>Customer: SDO Carey KCP Product: Palm Kernel – RSPO MB DO. No. 68345 Weighbridge ticket. No.: 021964 Contract no.: S/C-PSD/2112/PKL0111 Weight: 35,220 kg</p> </div> <p>No MSPO certified products were sold since last audit.</p>	Complied
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	The operating unit continued to comply with the legal requirements. Among the evidence of legal compliance as follows: 1. DOE license no. 006385 with compliance schedule no. JAS.JHQ.600 – 3/1/16 (19). Valid till 30/06/2023 2. DOE Contradiction License no. 005392 with compliance schedule no. JPLP/PUB/2022/005392. Valid till 31/12/2022 3. MPOB License no. 510425004000. Valid till 28/02/2023 4. Permit to purchase, store and use of Sodium Hydroxine no. 011396. Valid till 31/12/2022 5. License to Divert or Abstract River Water no. 08/A/KJ/043. Valid till 31/12/2022 6. Private Installation License no. 009954/2022. Valid till 27/08/2022.	Complied
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -	All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. Refer to legal register dated November 2022 with addition to applicable laws as follows: 1. Anti-Sexual Harassment Act 2021 2. Employees’ Social Security (Amendment) Act 2022 3. Employment Insurance System (EIS) (Amendment) Act 2022	Complied
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. - Major compliance -	Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10/12/2008. A mechanism to ensure compliance to legal and other requirement has been documented	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 24. GSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p>Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.</p>	
4.3.1.4	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p>- Minor compliance -</p>	<p>Group Sustainability will update the operating regarding any changes on applicable laws to the operating units. The person responsible appointed at the operating units will update the changes in the Legal Register.</p> <p>The mill has appointed the Asst. Managers as person responsible to monitor any changes to the LORR and update when necessary.</p>	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad (SDPB) did not acquire land from landowners, but leased it directly from the government. There were no issues of land disputes. For mill situated under Layang Estate (Hadapan Division), the land title available at estate document.</p>	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>The mill located in Layang Estate, Hadapan Division under land title no. 08 HS (D) 00039413, lot no. 07 MLO 00006529. A copy of the land title were available at the office for review.</p>	Complied
4.3.2.3	<p>Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p>	<p>The mill located in the sister estate. The land title was under Layang Estate. The mill boundary was clearly demarcated with fences.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
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 was no land dispute at the certification unit. The company has the legal ownership documents as demonstrated by possessing land titles.	N/A
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land within or surrounding in the Mill. There are also no land disputes or claims involving the Mill. The company has proper legal land titles for the land ownership.	N/A
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	There is no customary land within or surrounding in the Mill. There are also no land disputes or claims involving the Mill. The company has proper legal land titles for the land ownership.	N/A
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	There is no customary land within or surrounding in the Mill. There are also no land disputes or claims involving the Mill. The company has proper legal land titles for the land ownership.	N/A
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
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 -	The mill has last reviewed their SIA conducted 3 - 7/2/2014 by Social and Environment Project unit, PSQM Department. The method of identifying the social impacts was by conducting both internal and external stakeholder meeting. Among the group of stakeholders outreached by the governmental organization, gender representatives, NGO, neighboring estates, religious representatives, employees, contractors, suppliers and village representatives. Generally, among the impacts identified were those related to compliance with legal requirements, workers welfare, handling of complaints & grievances and socio-economic impact on surrounding communities.	Complied
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 -	Management System, Level 2, Standard Operation Manual Sub – Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1 Year 2008, Issue No 1 dated 1st Nov 2008. The procedure for handling internal social issue was described in the Sustainable Plantation Management System, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008 on Flowchart and Procedures on handling Social Issues. The mechanism is to enable effective and timely communication with employees and external interested parties. Under Group policies and authority’s GPA No 85 Whistleblowing channels are established to help all stakeholders raise concerns, without fear or retaliation.	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 -	The mill is having a format to record complaints or requests from the stakeholders. Based on the records, most of the complaints were about defects of housing facility. Verification of the records of complaints has been made in the OPP Housing complain Logbook.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	The complaint forms were available at the operating unit’s office, where the stakeholders can easily access should it be needed. Among the information available in the form is name of requestor/complainant, date of request, details of complaint/grievance, details of action taken including dates and acknowledgement signature of the requestor. The management has developed new ways to lodge complaint which include the social dialogue, Suara Kami, Oil Palm Pal, and Ulula network. Interviewed with the stakeholder confirmed that the management has trained them on the usage of the complaint platform. Training was conducted during the Townhall meeting dated 30/08/2022.	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 -	Training conducted with workers and evaluation available to confirm their understanding of the complaint and grievance process. There is no grievance recorded for the pass 2 years. Only request for maintenance housing are made by workers. Employees and the surrounding communities were made aware that complaints or suggestions can be made any time through various meetings such as morning muster, training/briefing and stakeholder consultation.	Complied
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	Sighted all internal complaints filled, responded and the records being maintained for the last 24 months. No negative complaints made by external stakeholders within last 24 months at the mill.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			

Criterion / Indicator		Assessment Findings	Compliance
4.4.3.1	<p>Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.</p> <p>- Minor compliance -</p>	<p>The mill management has made contribution to the stakeholders such as contributed of cooking oil to all the workers during festive season, subsidized of electricity and water, provide clinic facilities etc. Programmed with stakeholders (internal and external) was also plan and included in the social improvement plan such as family days, sport event etc.</p>	Complied
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad have established the Group Policy on Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 01/06/2020. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice boards within the mill.</p> <p>The GSM team is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition.</p> <p>Hadapan Palm Oil Mill have established Safety and Health Management Plan and documented in Environment, Safety and Health Plan FY 2022. The management plan includes the ESH risk management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring and Health monitoring.</p> <p>Nevertheless, the occupational safety and health plan were not effectively implemented.</p> <p>a. The risks and hazards associate to the operations of the Shovel at the Reception Station was not assessed in the HIRARC. This was against the UM HSE Management System – OSH Risk Management Procedure (Doc Number: UM/HSE/SP/01) which</p>	Major Non-Compliance

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>states "To identify all the hazards in the workplace."</p> <p>b. The mechanism to monitor faulty machineries were not effectively implemented. It was noticed that the Shovel reverse siren was not functioning. Interview with the driver indicated that the siren has not been functioning for the last 2 months. Nevertheless, the shovel driver has not reported the issue to the current management. Verified that the daily checklist prior to operation did not capture faulty parts as well.</p> <p>It was noticed that the reception station attendant was wearing rubber boots. This was not in line with the SOU 24 Hadapan POM HIRARC for Reception Station that states Existing Control: Safety Shoes for all activities at the Reception Station. Thus, Major NC is raised.</p>	
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 palm oil mill: <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as 	<p>The occupational safety and health plan cover the following:</p> <ul style="list-style-type: none"> a) Sime Darby Plantation Berhad have established the Health, Safety & Environment (HSE) Policy Statement signed by the CEO on 01/06/2020. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the mill. The policy has been briefed to all workers on 30/08/2022. b) The risk assessment was guided by the documented procedure UM HSE Management System; OSH Risk Management Procedure; Doc Number: HSE/SP/01; Dated: 2021. HIRARC was available for all operations within the Mill to identify the hazards, assess and recommended control measures to minimize the risks. Among the HIRARC sampled were Effluent Treatment Plant, Kernel Station, Boiler Station and Processing. HIRARCs have been recently reviewed due to accidents that 	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
<p>identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>occur in regard to the related activity.</p> <p>Chemical Health Risk Assessment (CHRA) was conducted in compliance with Occupational Safety and Health (USECHH) regulation 2000 on 28/11/2018 by DOSH Registered Assessor, ENV Consultancy & Monitoring Services Sdn Berhad (HQ/04/ASS/00/193) with the CHRA Report available for verification. The CHRA Report (Report Ref Number: HQ/04/ASS/00/193-2018/079) was available for verification.</p> <p>Medical Surveillance was conducted to establish workers health status when they work in an environment where they are exposed to hazards such a Manganese and N-Hexane. The Mill has conducted the medical surveillance on 05 – 07/12/2022 for the workers at Klinik Rengam where the results have not been obtained as of yet. As for the previous Medical Surveillance conducted on 29/12/2021, the Medical Surveillance Report was available for verification. The results indicated there were no workers with abnormal results (Occupational Caused).</p> <p>Noise Risk Assessment was conducted by Etosh Consult & Engineering Plt on 23/09/2020 and 09/10/2020 for Hadapan POM by a Noise Risk Assessor, Iszaiffah Bte Mohd Eshabah (NRA Reg: JH/07/01/3175). The NRA Report (Report Number: HQ/LPROYKPEB/21/00314) was available for verification.</p> <p>Audiometric Test was conducted on 27/01/2021 by Spectrum Laboratories (Johore) Sdn. Berhad. (In collaboration with PAC Testing & Consulting Sdn Berhad). A total of 47 workers were tested due to being exposed to excessive noise in the mill. The results indicated that 5 workers had Hearing Impairment, 11 workers with NIHL and 4 workers with STS. The 4 workers with STS were required to undergo retest within 3 months.</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Audiometric and Medical Check Up was then conducted on 26/04/2021 and resulted temporary STS which was non occupational.</p> <p>c) The mill has established a training and awareness program for employees exposed to chemicals used at the palm oil mill to ensure continuous awareness to the employees. The trainings were conducted by the Manager, Asst. Manager and representative form the chemical suppliers to the supervisors and operators.</p> <p>Chemical Handling Training conducted on 17/03/2022.</p> <p>d) The mill has provided appropriate PPE to all workers according to the job type and requirements. The PPE given as per HIRARC and Pictorial Safety Standard (PSS) Palm Oil Mill dated 17/03/2008. Sighted the PPE issuance records documented in 'PPE Issuance Record' logbook. The PPE issued recorded by workers and job designation.</p> <p>e) Procedures of chemical handling is presented in several documents, such as Sime Darby Plantation, Chemical Safety Management; Document No. SD/SDP/PSQM (ESH)/202-OH4; dated 26/02/2015.</p> <p>f) The Mill Manager, Mr. Muhammad Saufi Bin Baharudin was appointed to be the Chairman of OSH Committee at the Mill as stated in the appointment letter dated 29/08/2022 undersigned by the Regional General Manager (Southern Region). Estate management has appointed Safety Committee Members consists of OSH Coordinator, Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate Manager.</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>g) The Mill Management conducted regular OSH committee meetings on quarterly basis and when necessary due to accidents that occur. In the meeting, discussed issue on employees' safety, health and welfare such as mill safety and health achievement report, mill security, safety compliance by contractors, workplace inspection, legal compliance, safety and health training. Sighted the latest OSH Meeting Minutes dated 17/11/2022 (04/2022), 18/08/2022 (03/2022), 19/05/2022 (02/2022) and 17/01/2022 (01/2022) available for verification.</p> <p>h) Accident and emergency procedures are available in the ESH Management System Manual; Emergency Preparedness & Response Guidelines and Procedures; Doc No: SD/SDP/SQM (ESH)/001-2-6; Revision:0; Date 01.07.2012.</p> <p>The mill has established Emergency Response Team lead by the Mill Engineer. Emergency and Fire Drill Training was conducted on 18/08/2022 at the mill.</p> <p>i) First aiders were present at various workstations at the mill such as ramp, boiler station and workshop. The first aiders were responsible for first aid box at each workstation assigned to them by the management. The first aid box was recently replenished with records of monthly monitoring available for verification. The latest First Aid Competency Training was conducted on 16 & 17/11/2022.</p> <p>Accident records are recorded and maintained in the mill and discussed during the quarterly held JKKP Meetings. There was no reported accident for the year 2021 in the workplace. Sighted the JKKP 8 form submission to JKKP for the year 2021, submitted on 06/01/2022. 1 accident cases were reported for the year 2022 as of to date. The accident investigation has</p>	

Criterion / Indicator		Assessment Findings	Compliance
		been submitted to the HQ and available for verification accordingly.	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has established Group Sustainability and Quality Policy Statement signed by Mohamad Helmy Othman Basha; Group Managing Director dated 02/12/2019. Human rights element being spelt out under the followings: - Human Rights Charter – Clause 3.2, We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ol style="list-style-type: none"> 1. Providing equal opportunities 2. Respecting freedom of association 3. Eradicating any form of exploitation 4. Ensuring favorable working conditions 5. Enhancing safety and health 6. Respecting community rights and the rights of indigenous people 7. Protecting the Rights of vulnerable people 8. Protecting the rights of children 9. Eliminating violence and sexual harassment <p>Responsible Agriculture Charter – Human Rights and Social Development Commitments Clause 2.1, Respect Human Rights & empower communities and Clause 2.2 Protect Labor standards and enhance employment conditions.</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Sime Darby Plantation Group, Vendor COBC dated 30/5/2018 under Clause 5, Labor and Human Rights.</p> <p>Communication of all the policies to workforce is through Town hall meeting dated 30/08/2022. The briefing material available for review in mill.</p>	
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>Sime Darby Plantation Berhad, Non-Discrimination and Equal Opportunity Policy stated in Sime Darby Plantation Human Rights Charter under 3.2 Respect and Uphold Labour Rights, 3.2.5 Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>Based on worker employment master record, there are mixed of India, Nepal, Bangladesh and Indonesia foreign workers lives and work with local employees. Interview with office staff and general workers whom mentioned their job selection process was fair and transparent.</p> <p>This policy is available in English and Malay displayed at the Mill office wall and notice boards. No evidence of discrimination based on race, skin color, religion, gender, national origin, ancestry, disability, marital status, and sexual orientation was found in the Mill.</p>	Complied
4.4.5.3	<p>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>Pay and conditions are documented in the workers' Contract Agreement and wage payment records / pay slip. The salary is according to 'Guidelines on the Implementation on the Minimum</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	<p>Wages'. National Wages Consultative Council Act 2022 (Act 732) Malaysian minimum salary is RM1500.00 as stated in the guidelines. Rate of pay is based on MAPA / NUPW Agreement Salary Scale as seen in the Contract Agreement and pay-slip. All the workers are under Mill pay-roll system. Sample taken on the workers below:</p> <ol style="list-style-type: none"> 1. Employee ID: 0000164686 2. Employee ID: 0000157612 3. Employee ID: 0000134198 4. Employee ID: 0000150346 5. Employee ID: 0000139368 6. Employee ID: 0000017622 7. Employee ID: 0000164110 8. Employee ID: 0000165518 9. Employee ID: 0000168513 10. Employee ID: 0000167920 	
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>	Not applicable since no workers contractor in Mill.	N/A
4.4.5.5	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.	Sime Darby Plantation Berhad has established Check-roll Employee Listing system for all data of their workers. Sighted at Hadapan POM the Personal Particulars data for all the workers in The Check-roll Employee Listing. The report stated the Offered Position,	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	Personal Details, Date Employed, Educational background and Family Data.	
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>Employment contract stated the offered position, wages implied, working hours, OT, allowances, rest day, working on holiday etc. The contract is in their origin country languages or English. as it is easy to be understood by workers.</p> <p>This contract is signed by both employee and employer and accompanied with respective witnesses. Workers employed consisted of Malaysian, Indian and Indonesian. Sample taken on the following workers for Hadapan POM sample on the following workers:</p> <ol style="list-style-type: none"> 1. Employee ID: 0000164686 2. Employee ID: 0000157612 3. Employee ID: 0000134198 4. Employee ID: 0000150346 5. Employee ID: 0000139368 6. Employee ID: 0000017622 7. Employee ID: 0000164110 8. Employee ID: 0000165518 9. Employee ID: 0000168513 10. Employee ID: 0000167920 	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p>- Major compliance -</p>	The management had established a time recording system that makes working hours and overtime transparent using the Punch Card and Pocket Check roll system.	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Sighted the Punch Cards record and pocket check roll record of the following workers:</p> <ol style="list-style-type: none"> 1. Employee ID: 0000164686 2. Employee ID: 0000157612 3. Employee ID: 0000134198 4. Employee ID: 0000150346 5. Employee ID: 0000139368 6. Employee ID: 0000017622 7. Employee ID: 0000164110 8. Employee ID: 0000165518 9. Employee ID: 0000168513 10. Employee ID: 0000167920 	
4.4.5.8	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p>- Major compliance -</p>	<p>The working hours and breaks of the individual worker indicated in the time records complied with legal regulations and collective agreements. The working hours and break times was exhibited on notice boards. Working time from 8.00am to 4.00pm were given a 1 hour and 15 minutes break. The workers could take their breaks at their own convenient times. No changes from previous audit.</p>	Complied
4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p>	<p>The payslip and the inputs were reviewed to confirm the wages and overtime is in line with legal requirements of Employment Act 1955 and worker's employment contract. The payroll for the following sampled workers for January 2021 and September 2021 were verified to be consistent with the Minimum Wages Order 2020</p>	Complied
4.4.5.10	<p>Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good</p>	<p>All workers have been provided with medical and accident insurance.</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. - Minor compliance -	With regards to local and foreign workers, staffs and executives, all of them are covered under EPF & SOCSO as required by the Malaysian Laws and Regulations. All workers are provided with housing facilities at workers line site. Medical Assistant is responsible to carry out the monitoring at workers quarters.	
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	The mill workers are provided with free housing facilities which includes potable water and electricity. Housing inspection by the medical assistants was also carried out on weekly basis which criteria is mainly focusing on cleanliness and safety. Records of inspection were well maintained for verification.	Complied
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	Sighted in Sime Darby Plantation Berhad Human Rights Charter under 3.2 Respect and Uphold Labour Rights clause: - - 3.2.5 We will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. - 3.2.6 Creating a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. The mill have formed Gender Committee. Sighted the Gender Committee Handbook (First Edition) in English details out specifically on establishing & managing gender committee and complaints and grievance procedures to address gender-based issues. There is also a specific procedure (in the form of a flowchart) in both English and Malay namely Sexual Harassment Procedure which outlines the basic framework for handling of sexual harassment complaints.	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance						
		There is no sexual harassment case reported through interview and document reviewed at Mill							
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	The management respected 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. Gender meeting conducted on 25/11/2022. Sime Darby Plantation Berhad establish Term of Reference for Gender representative and Gender Committees dated March 2021.	Complied						
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. - Major compliance -	Based on the employee's record compiled in Check-roll Employee Listing, sighted that there is no child labour or young person employed by the Mill.	Complied						
Criterion 4.4.6: Training and competency									
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance -	Hadapan POM have established a training program for all workers based on the training need analysis conducted on a yearly basis. COVID-19 training, and briefings were sighted for the mill. Interview with the sampled workers and staff indicated that they were aware on the SOPs such as social distancing, regular sanitization, and use of PPE (Face Mask). Records of trainings were maintained by the estates as below:	Complied						
		<table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Hearing Conservation Training</td> <td>18/08/2022</td> </tr> <tr> <td>Safety Briefing & Training</td> <td>02/12/2022</td> </tr> </tbody> </table>	Training	Date	Hearing Conservation Training	18/08/2022	Safety Briefing & Training	02/12/2022	
Training	Date								
Hearing Conservation Training	18/08/2022								
Safety Briefing & Training	02/12/2022								

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance
		Laboratory Safety Training	28/10/2022	
		Chemical Handling & Schedule Waste	17/03/2022	
		HIRARC Training	17/12/2021	
		Effluent Operational Training	20/03/2021	
		Chemical Spillage Training	06/09/2021	
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 -	Hadapan POM has conducted training need analysis for all employees, management and contractors. The training need analysis was conducted based on the job designation and training required by the job type. Sighted the Training Requirement for Operating Units (Mill – SOU 24) for the year 2022 for verification.		Complied
4.4.6.3	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure. - Minor compliance -	A training programme has been developed and available in the Training Requirement for Hadapan POM ESH Activities for 2022. The trainings were sighted to have also included Gender Specific Training and involves staffs, workers and contractors.		Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services				
Criterion 4.5.1: Environmental Management Plan				
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	Sime Darby Plantation Berhad has established environmental policy documented in Group Sustainability and Quality Statement signed by Group Managing Director dated 2/12/2019 and Upstream Malaysia Health, Safety and Environment (HSE) Policy Statement signed by CEO Upstream Malaysia dated 1/6/2020. In the Policy stated as follows: Group Sustainability and Quality Statement:		Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Minimizing Environmental Harm:</p> <ul style="list-style-type: none"> i. Protecting and enhancing biodiversity and ecosystem ii. No deforestation and no new development on peat land iii. Enhancing resilience against climate change impact iv. Adopting responsible consumption and production <p>Upstream Malaysia Health, Safety and Environment (HSE) Policy Statement Environment</p> <ul style="list-style-type: none"> i. Comply to emission and effluent standard ii. Efficient use of water and energy iii. Minimize waste iv. Protect the ecosystem and biodiversity <p>The Policy has been communicated to the workers during townhall meeting.</p>	
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations <p>- Major compliance -</p>	<p>The estate visited has established environmental management plan base on aspect and impacts analysis conducted.</p> <p>The environmental management plan was established base on Environmental Aspect Impact Identification and Environmental Impact Evaluation conducted and documented in Pollution Prevention Plan. The EAI/EIE was reviewed by the estate management team.</p> <p>The EAI/EIE and management plan was reviewed on annually basis. Latest review was conducted on 25/07/2022 for all area of operation including construction of new furrow area.</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance						
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p>- Major compliance -</p>	<p>The estate has established Environmental Management Plan FY 2022. The plan was reviewed on annually basis. Sighted the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. The mill monitor the effluent discharge to furrow system on daily basis to ensure compliance to DOE license. Reviewed the records in Effluent Flow Chart Reading log book FY 2022. 2. The mill monitor the furrow system on daily basis. Noted during site visit at furrow area, at least last 2 compartment were not filled with effluent to ensure no overflow as per Compliance Schedule. 3. The mill maintain the records of scheduled waste inventory generated in BIN card and notified to DOE through ESWISS. Reviewed the inventory records for the month of September, October and November 2022. <p>The mill has appointed 3rd party to conduct environmental audit as per compliance schedule. Reviewed the audit report no. JAS.JHQ600-3/1/16 (19) dated 07/11/2022 and AS (B) J31/152/000/084 Jld.10 (04) dated 16/05/2022.</p>	Complied						
4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>Program to promote positive impact was documented in Pollution Prevention Plan.</p> <p>Among the promote positive impact as follows:</p> <ol style="list-style-type: none"> 1. The mill disposed EFB through field application as nutrient cycle strategy. Reviewed the records of EFB land application as to date November 2022 as follows: <table border="1"> <thead> <tr> <th>Month</th> <th>Ton</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>4332.39</td> </tr> <tr> <td>Feb</td> <td>3045.22</td> </tr> </tbody> </table>	Month	Ton	Jan	4332.39	Feb	3045.22	Complied
Month	Ton								
Jan	4332.39								
Feb	3045.22								

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance																																													
		<table border="1"> <tr><td>Mar</td><td>4632.14</td></tr> <tr><td>Apr</td><td>3820.49</td></tr> <tr><td>May</td><td>3191.76</td></tr> <tr><td>Jun</td><td>2851.34</td></tr> <tr><td>Jul</td><td>4562.19</td></tr> <tr><td>Aug</td><td>3499.04</td></tr> <tr><td>Sep</td><td>3026.86</td></tr> <tr><td>Oct</td><td>2634.17</td></tr> <tr><td>Nov</td><td>3411.14</td></tr> <tr><td>Dec</td><td>0.00</td></tr> </table> <p>2. The mill used shell and fiber as renewable fuel for boiler. Reviewed the power generated per CPO produced as todate November 2022 as follows:</p> <table border="1"> <tr><td>Month</td><td>Ton</td></tr> <tr><td>Jan</td><td>105.68</td></tr> <tr><td>Feb</td><td>118.86</td></tr> <tr><td>Mar</td><td>103.05</td></tr> <tr><td>Apr</td><td>126.34</td></tr> <tr><td>May</td><td>123.05</td></tr> <tr><td>Jun</td><td>111.74</td></tr> <tr><td>Jul</td><td>124.36</td></tr> <tr><td>Aug</td><td>115.23</td></tr> <tr><td>Sep</td><td>300.43</td></tr> <tr><td>Oct</td><td>103.70</td></tr> <tr><td>Nov</td><td>115.49</td></tr> <tr><td>Dec</td><td>0.00</td></tr> </table>	Mar	4632.14	Apr	3820.49	May	3191.76	Jun	2851.34	Jul	4562.19	Aug	3499.04	Sep	3026.86	Oct	2634.17	Nov	3411.14	Dec	0.00	Month	Ton	Jan	105.68	Feb	118.86	Mar	103.05	Apr	126.34	May	123.05	Jun	111.74	Jul	124.36	Aug	115.23	Sep	300.43	Oct	103.70	Nov	115.49	Dec	0.00	
Mar	4632.14																																																
Apr	3820.49																																																
May	3191.76																																																
Jun	2851.34																																																
Jul	4562.19																																																
Aug	3499.04																																																
Sep	3026.86																																																
Oct	2634.17																																																
Nov	3411.14																																																
Dec	0.00																																																
Month	Ton																																																
Jan	105.68																																																
Feb	118.86																																																
Mar	103.05																																																
Apr	126.34																																																
May	123.05																																																
Jun	111.74																																																
Jul	124.36																																																
Aug	115.23																																																
Sep	300.43																																																
Oct	103.70																																																
Nov	115.49																																																
Dec	0.00																																																
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy,	The estates visited continuously provide training to the workers to create awareness regarding the environmental policy and		Complied																																													

Criterion / Indicator		Assessment Findings	Compliance																						
	objectives and management plans and are working towards achieving objectives. - Major compliance -	management plan established. Sighted the training records as stated in criteria 4.4.6.1.																							
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	The mill has discussed on environmental issue during Environmental Performance Monitoring Committee meeting where representative of the management and employee raised their concerns about environmental quality in the mill. Reviewed the minutes meeting conducted on 17/11/2022, 18/08/2022, 19/05/2022 and 17/01/2022.	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 -	<p>The mill has established Energy Management Plan. The estate has tabulated the data of non-renewable energy usage.</p> <p>1. The diesel reported monthly to head office through SAP system. The monitoring of non-renewable energy usage was conducted on monthly basis. Sighted the records as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Consumption / ton CPO</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>0.18</td></tr> <tr><td>Feb</td><td>0.23</td></tr> <tr><td>Mar</td><td>0.25</td></tr> <tr><td>Apr</td><td>0.29</td></tr> <tr><td>May</td><td>0.36</td></tr> <tr><td>Jun</td><td>0.28</td></tr> <tr><td>Jul</td><td>0.22</td></tr> <tr><td>Aug</td><td>0.34</td></tr> <tr><td>Sep</td><td>0.33</td></tr> <tr><td>Oct</td><td>0.29</td></tr> </tbody> </table>	Month	Consumption / ton CPO	Jan	0.18	Feb	0.23	Mar	0.25	Apr	0.29	May	0.36	Jun	0.28	Jul	0.22	Aug	0.34	Sep	0.33	Oct	0.29	Complied
Month	Consumption / ton CPO																								
Jan	0.18																								
Feb	0.23																								
Mar	0.25																								
Apr	0.29																								
May	0.36																								
Jun	0.28																								
Jul	0.22																								
Aug	0.34																								
Sep	0.33																								
Oct	0.29																								

**MSPO Public Summary Report
Revision 2 (Nov 2021)**

Criterion / Indicator		Assessment Findings	Compliance																								
		<table border="1"> <tr> <td>Nov</td> <td>0.31</td> </tr> </table> <p>2. The mill used shell and fiber as renewable fuel for boiler. Reviewed the power generated per CPO produced as todate November 2022.</p> <p>To ensure the vehicle and machinery works on optimize condition and used optimize fuel, the mill conduct vehicle inspection on weekly basis. Reviewed the records in Vehicle Integrity Declaration for the month of December 2022 for tractor and front loader.</p>	Nov	0.31																							
Nov	0.31																										
4.5.2.2	<p>Palm oil millers shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations.</p> <p>- Major compliance -</p>	<p>The mill has established the direct usage of non-renewable energy such as diesel and electricity base on the consumption of previous year.</p>	Complied																								
4.5.2.3	<p>The use of renewable energy should be applied where possible.</p> <p>- Minor compliance -</p>	<p>The mill used shell and fiber as renewable fuel for boiler. Reviewed the power generated per CPO produced as todate November 2022 as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>KWH/ CPO Produced</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>105.68</td></tr> <tr><td>Feb</td><td>118.86</td></tr> <tr><td>Mar</td><td>103.05</td></tr> <tr><td>Apr</td><td>126.34</td></tr> <tr><td>May</td><td>123.05</td></tr> <tr><td>Jun</td><td>111.74</td></tr> <tr><td>Jul</td><td>124.36</td></tr> <tr><td>Aug</td><td>115.23</td></tr> <tr><td>Sep</td><td>300.43</td></tr> <tr><td>Oct</td><td>103.70</td></tr> <tr><td>Nov</td><td>115.49</td></tr> </tbody> </table>	Month	KWH/ CPO Produced	Jan	105.68	Feb	118.86	Mar	103.05	Apr	126.34	May	123.05	Jun	111.74	Jul	124.36	Aug	115.23	Sep	300.43	Oct	103.70	Nov	115.49	Complied
Month	KWH/ CPO Produced																										
Jan	105.68																										
Feb	118.86																										
Mar	103.05																										
Apr	126.34																										
May	123.05																										
Jun	111.74																										
Jul	124.36																										
Aug	115.23																										
Sep	300.43																										
Oct	103.70																										
Nov	115.49																										

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance													
		Dec	0.00														
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>The mil has identified the waste products and source pollution and documented in Waste Management Plan. The plan was reviewed on annually basis. The waste has been identified as follows:</p> <table border="1"> <thead> <tr> <th>Type</th> <th>Item Description</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Scheduled Waste</td> <td>Used lubricant, used hydraulic oil, batteries, rags, used lubricant container, spent chemical container</td> </tr> <tr> <td>Clinical Waste</td> </tr> <tr> <td rowspan="2">Domestic waste</td> <td>Rubbish</td> </tr> <tr> <td>Sewage</td> </tr> <tr> <td>Industrial Waste</td> <td>Scrap Iron</td> </tr> <tr> <td rowspan="2">Recycle waste</td> <td>POME</td> </tr> <tr> <td>EFB</td> </tr> </tbody> </table>		Type	Item Description	Scheduled Waste	Used lubricant, used hydraulic oil, batteries, rags, used lubricant container, spent chemical container	Clinical Waste	Domestic waste	Rubbish	Sewage	Industrial Waste	Scrap Iron	Recycle waste	POME	EFB	Complied
Type	Item Description																
Scheduled Waste	Used lubricant, used hydraulic oil, batteries, rags, used lubricant container, spent chemical container																
	Clinical Waste																
Domestic waste	Rubbish																
	Sewage																
Industrial Waste	Scrap Iron																
Recycle waste	POME																
	EFB																
4.5.3.2	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p>- Major compliance -</p>	<p>The mill has 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.</p> <ol style="list-style-type: none"> The mill disposed EFB through field application as nutrient cycle strategy. Reviewed the records of EFB land application as to date November 2022. The mill used shell and fiber as renewable fuel for boiler. Reviewed the power generated per CPO produced as todate November 2022. 		Complied													

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance														
		The mill maintain the records of scheduled waste inventory generated in BIN card and notified to DOE through ESWISS. Reviewed the inventory records for the month of September, October and November 2022.															
4.5.3.3	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p>- Major compliance -</p>	<p>Procedure for Scheduled Waste Management was established (SD/SDP/PSQM (ESH)/203-EN1 dated 26/2/2016. Proper disposal of waste material are carried out as per the company procedures.</p> <p>Both estate visited also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected at both estate visited.</p> <p>Sighted the latest disposal records as follows:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>SW</th> <th>Consignment note no</th> </tr> </thead> <tbody> <tr> <td rowspan="5">05/10/2022</td> <td>110</td> <td>2022100515QCHDY8</td> </tr> <tr> <td></td> <td>2022100515FPHROI</td> </tr> <tr> <td>322</td> <td>2022100515P9FEAH</td> </tr> <tr> <td>410</td> <td>2022100515YZLPXB</td> </tr> <tr> <td>409</td> <td>2022100515LB21NQ</td> </tr> </tbody> </table>	Date	SW	Consignment note no	05/10/2022	110	2022100515QCHDY8		2022100515FPHROI	322	2022100515P9FEAH	410	2022100515YZLPXB	409	2022100515LB21NQ	Complied
Date	SW	Consignment note no															
05/10/2022	110	2022100515QCHDY8															
		2022100515FPHROI															
	322	2022100515P9FEAH															
	410	2022100515YZLPXB															
	409	2022100515LB21NQ															
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 were collected at 3 times a week and disposed at landfill located in sister estate, Layang Estate.	Complied														
Criterion 4.5.4: Reduction of pollution and emission including greenhouse gas																	
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.	The mill has conducted assessment of all polluting activities in the Environmental Aspect Impact and Environmental Impact Evaluation. A management plan has been established based on the	Complied														

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance															
	- Major compliance -	significant aspect and DOE license compliance schedule which include documented in Pollution prevention Plan.																
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 and DOE license compliance schedule which include documented in Pollution prevention Plan. The plan was reviewed on annual basis. Reviewed the implementation of the management plan as follows: 1. The mill continuously provided training on no open burning and segregation of waste to the workers. Reviewed the briefing records dated 26/09/2022 and 25/10/2022. 2. The mill monitor the furrow system on daily basis. Noted during site visit at furrow area, at least last 2 compartment were not filled with effluent to ensure no overflow as per Compliance Schedule.	Complied															
4.5.4.3	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations. - Major compliance -	Treated POME discharge was regularly monitored as prescribed under Compliance Schedule License no. 006385. Limit of Biochemical Oxygen Demand (BOD) discharge is 2500 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: 2 nd quarter 2022 <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Month</th> <th>Test</th> <th>Results</th> </tr> </thead> <tbody> <tr> <td rowspan="3">April</td> <td>pH</td> <td style="text-align: right;">8.10</td> </tr> <tr> <td>BOD</td> <td style="text-align: right;">119.00</td> </tr> <tr> <td>Suspended Solid</td> <td style="text-align: right;">640.00</td> </tr> <tr> <td rowspan="2">May</td> <td>pH</td> <td style="text-align: right;">8.10</td> </tr> <tr> <td>BOD</td> <td style="text-align: right;">63.00</td> </tr> </tbody> </table>	Month	Test	Results	April	pH	8.10	BOD	119.00	Suspended Solid	640.00	May	pH	8.10	BOD	63.00	Complied
Month	Test	Results																
April	pH	8.10																
	BOD	119.00																
	Suspended Solid	640.00																
May	pH	8.10																
	BOD	63.00																

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings		Compliance																																					
			<table border="1"> <tr> <td></td> <td>Suspended Solid</td> <td>430.00</td> </tr> <tr> <td rowspan="3">June</td> <td>pH</td> <td>8.20</td> </tr> <tr> <td>BOD</td> <td>133.00</td> </tr> <tr> <td>Suspended Solid</td> <td>11060.00</td> </tr> <tr> <td colspan="3">3rd quarter</td> </tr> <tr> <td>Month</td> <td>Test</td> <td>Results</td> </tr> <tr> <td rowspan="3">July</td> <td>pH</td> <td>8.10</td> </tr> <tr> <td>BOD</td> <td>114.00</td> </tr> <tr> <td>Suspended Solid</td> <td>675.00</td> </tr> <tr> <td rowspan="3">August</td> <td>pH</td> <td>8.20</td> </tr> <tr> <td>BOD</td> <td>245.00</td> </tr> <tr> <td>Suspended Solid</td> <td>570.00</td> </tr> <tr> <td rowspan="3">September</td> <td>pH</td> <td>8.27</td> </tr> <tr> <td>BOD</td> <td>63.00</td> </tr> <tr> <td>Suspended Solid</td> <td>380.00</td> </tr> </table> <p>The effluent analysis confirm with condition prescribed under Compliance Schedule</p>		Suspended Solid	430.00	June	pH	8.20	BOD	133.00	Suspended Solid	11060.00	3 rd quarter			Month	Test	Results	July	pH	8.10	BOD	114.00	Suspended Solid	675.00	August	pH	8.20	BOD	245.00	Suspended Solid	570.00	September	pH	8.27	BOD	63.00	Suspended Solid	380.00	
	Suspended Solid	430.00																																							
June	pH	8.20																																							
	BOD	133.00																																							
	Suspended Solid	11060.00																																							
3 rd quarter																																									
Month	Test	Results																																							
July	pH	8.10																																							
	BOD	114.00																																							
	Suspended Solid	675.00																																							
August	pH	8.20																																							
	BOD	245.00																																							
	Suspended Solid	570.00																																							
September	pH	8.27																																							
	BOD	63.00																																							
	Suspended Solid	380.00																																							
Criterion 4.5.5: Natural water resources																																									
4.5.5.1	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <p>a) Assessment of water usage and sources.</p>	<p>The mill has established water management plan documented in Environmental Management Plan under section Water Management. The plan was reviewed on annually basis. The plan focusing on monitoring of water quality of main water inlet and outlet for pollutants from mill's operations, monitor the quality of water for domestic usage and monitor the usage of treated water</p>		Complied																																					

**MSPO Public Summary Report
Revision 2 (Nov 2021)**

Criterion / Indicator	Assessment Findings	Compliance																									
<p>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill’s current activities.</p> <p>c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>- Major compliance -</p>	<p>and monitor usage by flowmeter. Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> The estate conducted water sampling for river water at sampling point agreed by DOE as per compliance schedule requirement on monthly basis and reported to DOE. Reviewed the water sampling records for the month of September 2022 dated 07/10/2022, report no. IE1218/2022, October 2022 dated 08/11/2022, report no. IE1370/2022 and November dated 07/12/2022, report no. IE 1535/2022. The mill monitor the water consumption per FFB process on monthly basis. reviewed the records as follows: <table border="1" data-bbox="1128 810 1722 1249"> <thead> <tr> <th>Month</th> <th>Water consumption / FFB process</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>1.09</td></tr> <tr><td>Feb</td><td>0.98</td></tr> <tr><td>Mar</td><td>0.88</td></tr> <tr><td>Apr</td><td>1.04</td></tr> <tr><td>May</td><td>1.21</td></tr> <tr><td>Jun</td><td>0.93</td></tr> <tr><td>Jul</td><td>1.03</td></tr> <tr><td>Aug</td><td>1.03</td></tr> <tr><td>Sep</td><td>0.54</td></tr> <tr><td>Oct</td><td>0.98</td></tr> <tr><td>Nov</td><td>0.89</td></tr> <tr><td>Dec</td><td>0.00</td></tr> </tbody> </table> The mill continuously conducted training and briefing to the workers on water consumption with care. Reviewed the briefing records conducted on 05/09/2022. 	Month	Water consumption / FFB process	Jan	1.09	Feb	0.98	Mar	0.88	Apr	1.04	May	1.21	Jun	0.93	Jul	1.03	Aug	1.03	Sep	0.54	Oct	0.98	Nov	0.89	Dec	0.00
Month	Water consumption / FFB process																										
Jan	1.09																										
Feb	0.98																										
Mar	0.88																										
Apr	1.04																										
May	1.21																										
Jun	0.93																										
Jul	1.03																										
Aug	1.03																										
Sep	0.54																										
Oct	0.98																										
Nov	0.89																										
Dec	0.00																										

Criterion / Indicator		Assessment Findings	Compliance
4.5.5.2	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations. - Major compliance -	Treated POME discharge was regularly monitored as prescribed under Compliance Schedule License no. 006385. Limit of Biochemical Oxygen Demand (BOD) discharge is 2500 mg/l for land application. Regular monitoring was done on monthly basis and every quarterly via Quarterly return form to DOE for compliance. The effluent analysis confirms with condition prescribed under Compliance Schedule.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Mill Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	The mill processing system is documented in the Sustainability Plantation Management System MQMS/SQM/08 v 1 dated 01/11/2008 which includes: a. The mill SOP b. The Mill Quality Management Manual v.1 2008/MQMS/QMM/08. These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from: a. The reception, sterilization, threshing, pressing b. Clarification, depericarping (nut polishing) station c. Effluent, laboratory, workshop, dispatches etc.	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		Sime Darby Plantation Berhad has established a system to monitor the mill operation. The Mill advisor, Structured Oil Recovery Assessment (SORA) and Performance Monitoring Unit (PMU) visits the operating units on timely basis. Their reports cover on all aspect of operation where they rate the performance of the mill and estates.	
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	The monitoring of the mill process is made through the shift supervision headed by assistant mill managers. All process parameters are documented and summarized in a daily report. The external monitoring is made through visits by Regional General Manager, Mill Advisor, SQM and GCAD. This is to ensure compliance with policies, procedures in relation mill operations, financial, OSH, welfare to name a few.	Complied
Criterion 4.6.2: Economic and financial viability plan			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	The annual business plan is available. The document is in the form of annual budget and the projection for 5 years (2022-2027) prepared as guidance for future planning. The business plan contains: a. FFB processed production of CPO & CPK. b. Component of operating expenditure includes – process labour – maintenance external/maintenance parts – consumable/EVIT – admin cost/labour overhead. Inclusive in the business plan is also Capital Expenditure (CAPEX) among others replacement/ upgrading of building/ machinery,	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

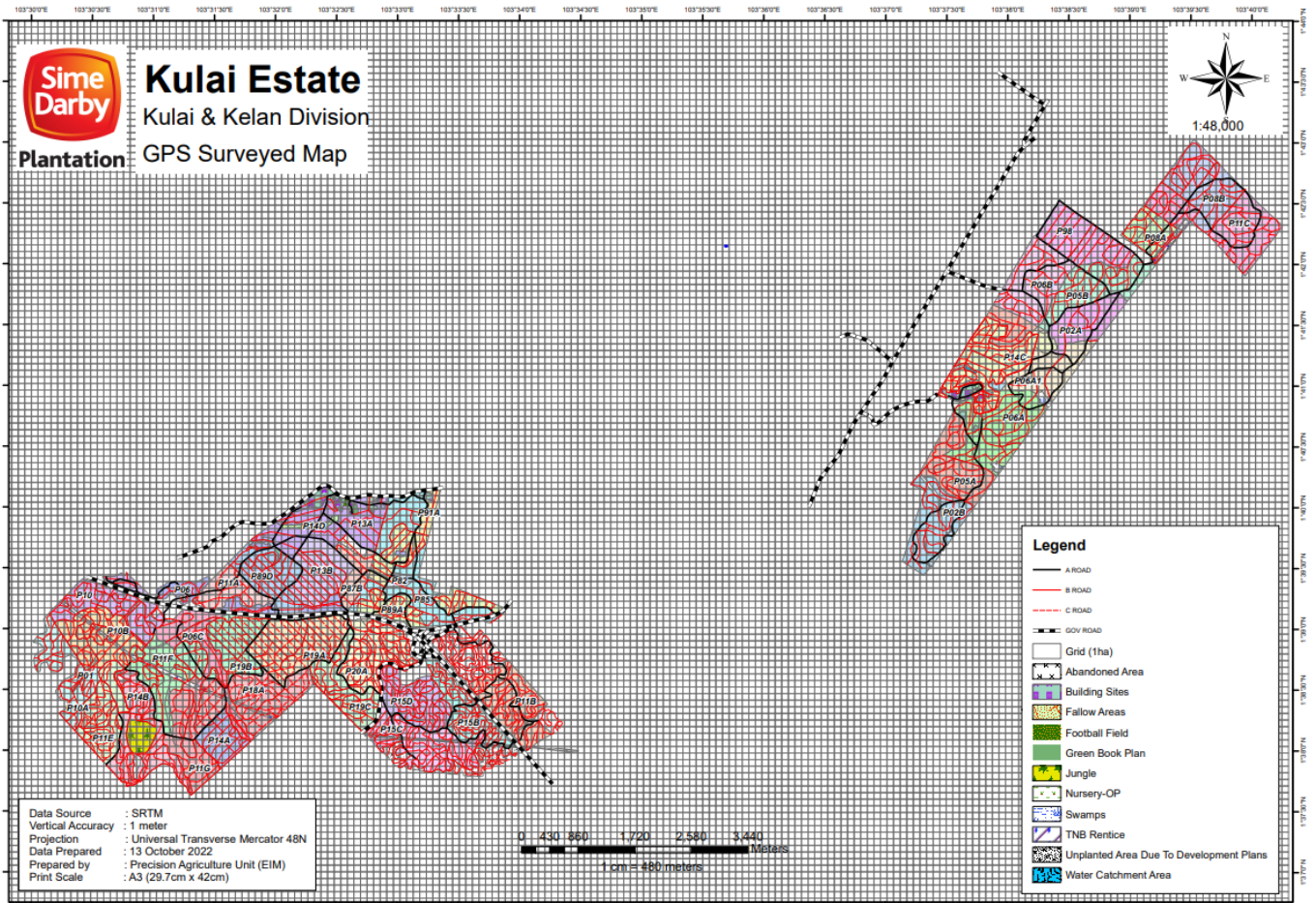
Criterion / Indicator		Assessment Findings	Compliance
		workers amenities for the mill. The M Plan for 2022 was made available for verification which include the calculation of seeking the profitability quantum. This is a standard format provided from the Regional CEO to the Manager and treated in high confidentiality.	
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Pricing mechanisms for the products and other services being documented and effectively implemented in the Mill. All the pricing will be based on HQ approval. Projects are tendered from the approved vendors registered with HQ. Payments are processed and made by HQ through system named MEX. This is made upon job verification by the mill personnel.	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	The contract agreements between the management and the contractors e.g. Guna Sons Earthwork Construction] were verified. The rate of payment was clearly stated in the agreement. Based on verification of sampled payment vouchers, the payment was made on timely manner by the Head Quarter after received invoice from the contractor.	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	The contractor has been informed that the Mill is under the MSPO certification. The contractor has agreed to adhere and comply with the MSPO standard requirements as stated in the Vendor Integrity Pledge. a. Guna Sons Earthwork Construction Ana Majid Enterprise	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

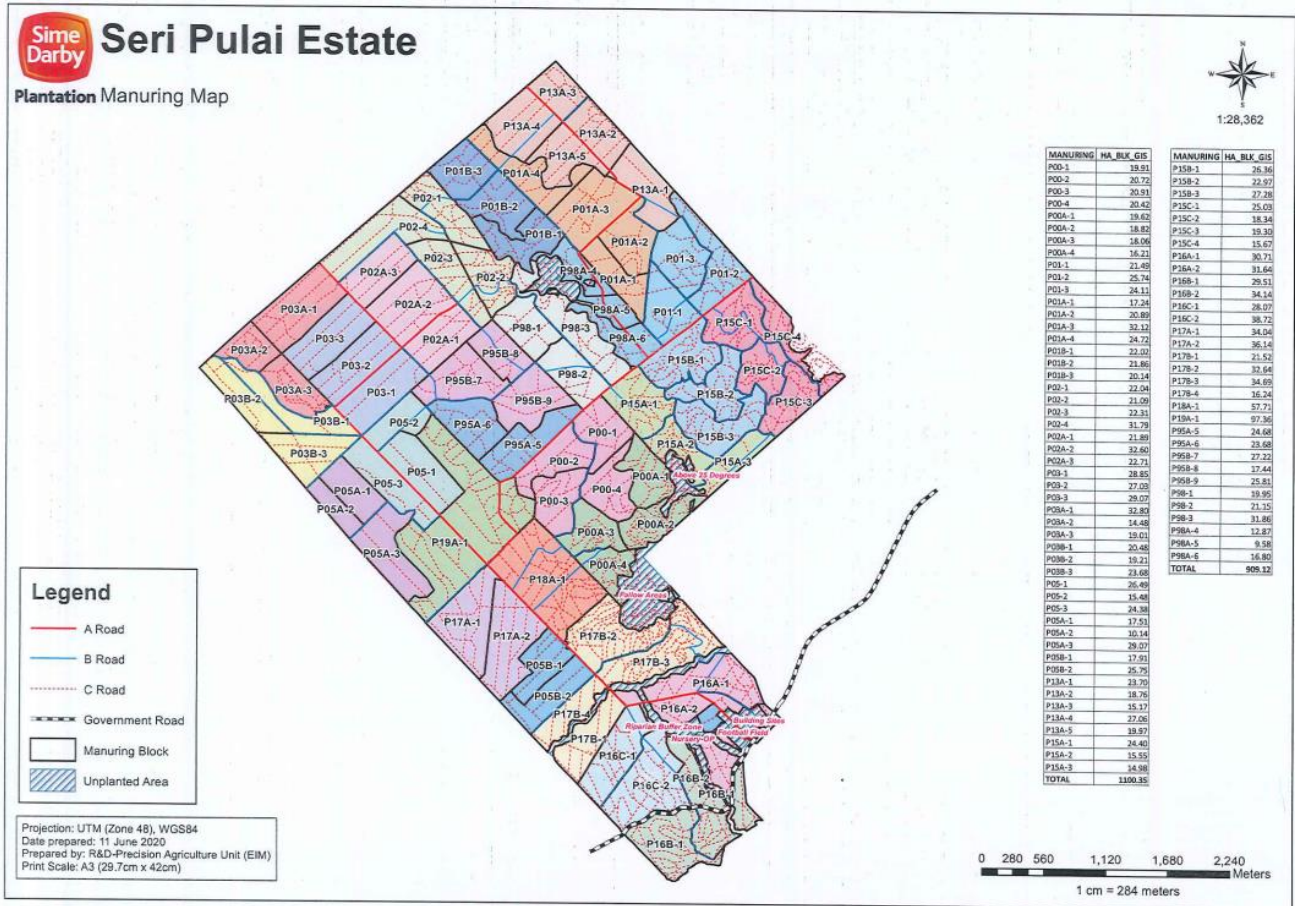
Criterion / Indicator		Assessment Findings	Compliance
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Sampled contract agreements as mentioned in Indicator 4.6.3.2, between the estates and the contractors were available for verification. The agreements were signed by both parties. At the point of this assessment, all the agreements were still valid. a. Contract Agreement between Sime Darby Plantation Berhad and Guna Sons Earthwork Construction; Dated 01/01/2022; Contract Number: JM 0584860-T; Contract Period: 01/01/2022 – 31/12/2022. b. Contract Agreement between Sime Darby Plantation Berhad and Ana Majid Enterprise; Dated 01/08/2022; Contract Period: 01/08/2022 – 31/07/2023.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	The mill was audited by BSI MSPO auditor and the Management accept the BSI MSPO Auditors to verify through a physical inspection if required for audit purposed. The Sustainable Palm Oil Department have briefed to all contractors on the verification assessment by Auditors through Taklimat RSPO & MSPO early this year.	Complied

Appendix C: Location and Field Map

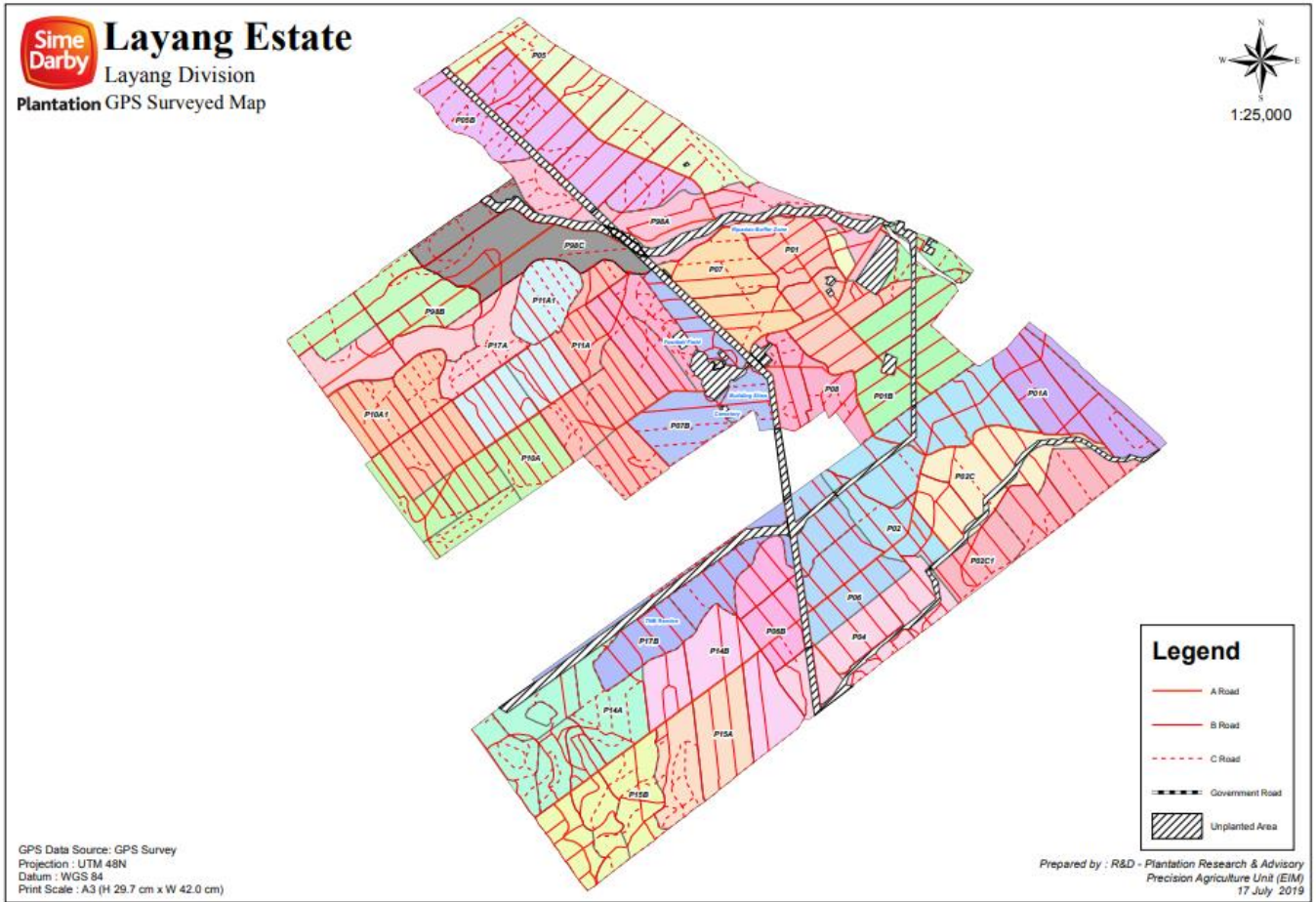
Kulai Estate

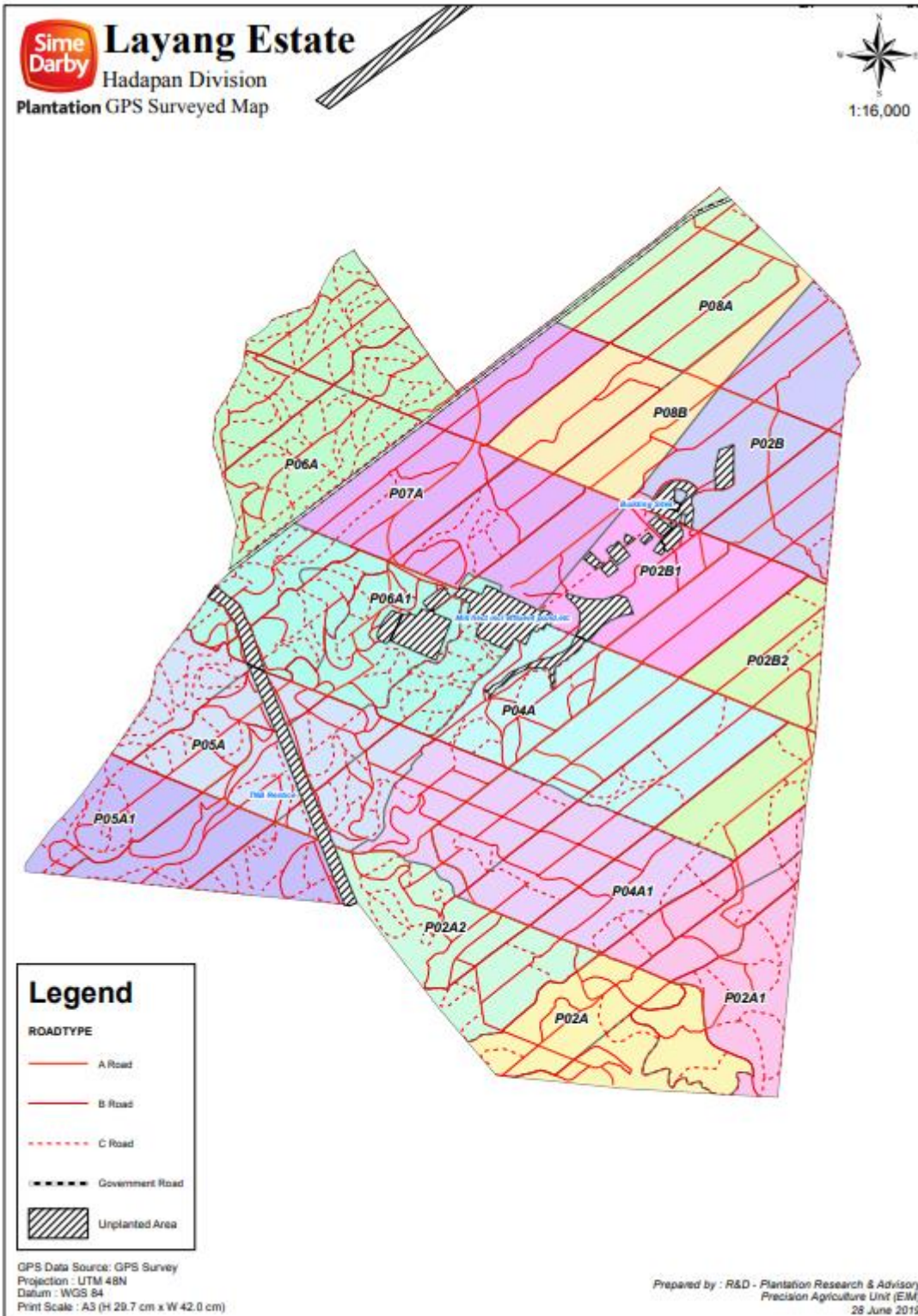


Seri Pulai Estate



Layang Estate





Hadapan Palm Oil Mill



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