

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

- Initial Assessment**
- Annual Surveillance Assessment (1_1)**
- Recertification Assessment** (Choose an item.)
- 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 10) - Bukit Puteri Palm Oil Mill and Bukit Puteri Estate
Date of Final Report: 4/7/2023

Report prepared by:
Muhammad Fadzli Masran (Lead Auditor)

Report Number: 3717764

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	4
1.6 Plantings & Cycle	4
1.7 Certified Tonnage of FFB	4
1.8 Uncertified Tonnage of FFB.....	5
1.9 Certified Tonnage	5
1.10 Actual Sold Volume (CPO).....	5
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	9
2.3 Accompanying Persons	9
2.4 Assessment Plan	9
Section 3: Assessment Findings	12
3.1 Details of audit results	12
3.2 Details of Nonconformities and Opportunity for improvement.....	12
3.3 Status of Nonconformities Previously Identified and OFI	15
3.4 Summary of the Nonconformities and Status.....	17
3.5 Issues Raised by Stakeholders	17
3.6 List of Stakeholders Contacted	19
Section 4: Assessment Conclusion and Recommendation	20
Appendix A: Summary of the findings by Principles and Criteria.....	21
Appendix B: Smallholder Member Details.....	119
Appendix C: Location and Field Map.....	120
Appendix D: List of Abbreviations	122

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
	Bukit Puteri Palm Oil Mill	536632004000	28/02/2024
	Bukit Puteri Estate	524186002000	31/10/2023
Address	Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia		
Management Representative	Shylaja Devi Vasudevan Nair Head, Sustainability Compliance Unit, GSD		
Website	www.simedarbyplantation.com	E-mail	shylaja.vasudevan@simedarbplantation.com
Telephone	+603-7848 4000	Facsimile	+603-7848 4363

1.2 Certification Information			
Certificate Number	Mill: MSPO 745404 Estate: MSPO 745405	Certificate Start Date	27/11/2022
Date of First Certification	27/11/2017	Certificate Expiry Date	26/11/2027
Scope of Certification	<input checked="" type="checkbox"/> Mill: Production of Sustainable Palm Oil and Palm Oil Products <input checked="" type="checkbox"/> Estate: Production of Sustainable Oil Palm Fruits		
Visit Objectives	<p>The objective of the assessment was to conduct an annual surveillance assessment 1_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 Bukit Puteri POM and Supply Base's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives.</p>		
Standard	<input type="checkbox"/> MSPO MS 2530-2:2013 – General Principles for Independent Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		
Recertification Assessment Visit Date (RA1)	05 - 08/04/2022		
Continuous Assessment Visit Date (CAV) 1_1	04 - 07/04/2023		
Continuous Assessment Visit Date (CAV) 1_2	-		
Continuous Assessment Visit Date (CAV) 1_3	-		
Continuous Assessment Visit Date (CAV) 1_4	-		

MSPO Public Summary Report

Revision 2 (Nov 2021)

1.3 Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 745406	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018	BSI Services Malaysia Sdn. Bhd.	24/10/2024
RSPO 745403	Malaysia National Interpretation 2019 of RSPO P&C for Sustainable Palm Oil Production 2018; with supply chain Mass Balance	BSI Services Malaysia Sdn. Bhd.	06/07/2026

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
Bukit Puteri Palm Oil Mill	KKS Bukit Puteri, PT976, Mukim Telang, 27200 Lipis, Pahang, Malaysia	4° 12' 09.19" N	101° 51' 45.43" E
Bukit Puteri Estate	Ladang Bukit Puteri, PT976, Mukim Telang, 27200 Lipis, Pahang, Malaysia	4° 11' 42.85" N	101° 53' 22.04" E

1.5 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Puteri Estate	3,660.82	21.36	160.33	3,842.51	95.27
Total (ha)	3,660.82	21.36	160.33	3,842.51	

1.6 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bukit Puteri Estate	473.73	1724.66	804.89	657.54	0.00	3,187.09	473.73
Total (ha)	473.73	1724.66	804.89	657.54	0.00	3,187.09	473.73

1.7 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (May 2022 - Apr 2023)	Actual (Apr 2022 - Mar 2023)	Forecast (May 2023 - Apr 2024)
Bukit Puteri Estate	69,287.00	35,117.49	53,680.72

MSPO Public Summary Report Revision 2 (Nov 2021)

Kerdau Estate	0.00	90.87	0.00
Mentakab Estate	0.00	109.98	0.00
Sg Mai Estate	0.00	85.46	0.00
Agarwal Oil Palm	0.00	1,420.16	0.00
MXF Gemilang Enterprise	0.00	4,323.94	0.00
Noor Azlan Bin Kasmani	0.00	53.79	0.00
Tee Chin Hock	0.00	29.38	0.00
Tee Ching Keong	0.00	69.81	0.00
Total (mt)	69,287.00	41,300.88	53,680.72

1.8 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (May 2022 - Apr 2023)	Actual (Apr 2022 - Mar 2023)	Forecast (May 2023 - Apr 2024)
Atil Mela Enterprise	0.00	16,087.02	0.00
CK Teik Ent	0.00	545.72	0.00
Pertiwi Palms Sdn Bhd	0.00	1,408.78	0.00
Total (mt)	0.00	18,041.52	0.00

1.9 Certified Tonnage

	Estimated (May 2022 - Apr 2023)	Actual (Apr 2022 - Mar 2023)	Forecast (May 2023 - Apr 2024)
	FFB	FFB	FFB
Mill Capacity: 20 MT/hr	69,287.00	41,300.88	53,680.72
SCC Model: MB	CPO (OER: 20.84%)	CPO (OER: 21.27%)	CPO (OER: 20.57%)
	14,439.41	8,785.32	11,004.55
	PK (KER: 4.88%)	PK (KER: 4.25%)	PK (KER: 4.30%)
	3,381.21	1,757.44	2,308.27

1.10 Actual Sold Volume (CPO)

CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
8,785.32	0.00	0.00	312.40	8,472.92	8,785.32

MSPO Public Summary Report
Revision 2 (Nov 2021)

1.11 Actual Sold Volume (PK)					
PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
1,757.44	0.00	0.00	1,757.44	0.00	1,757.44

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 04-07/04/2023. The audit programme is included as Section 2.4. The approach to the audit was to treat the Strategic Operating Unit (SOU 10) - Bukit Puteri Palm Oil Mill and Bukit Puteri Estate as a MSP0 Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. MS 2530-3:2013 or MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The Certification Unit were not using MSP0 certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSP0 Logo and related claims.

The estates or smallholders sample were determined based on formula $S = \sqrt{n}$ where n is the number of estates while when applicable, the smallholders sample were determined following the MSP0 Certification Requirement.

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

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

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

All the previous nonconformities are remains closed. The assessment findings from the reassessment is detailed in Section 4.2.

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

MSPO Public Summary Report
Revision 2 (Nov 2021)

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)
Bukit Puteri Palm Oil Mill	√	√	√	√	√
Bukit Puteri Estate	√	√	√	√	√

Tentative Date of Next Visit: April 1, 2024 - April 4, 2024

Total No. of Mandays: 7 Mandays

2.1 BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Muhamad Fadzli Masran (MFM)	Team Leader	<p>Education: Bachelor of Forestry Science from University Putra Malaysia.</p> <p>Work Experience: Started the career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day-to-day plantation operations and 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.</p> <p>Training attended: Completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018.</p> <p>Aspect covered in this audit: Environment and ecological, Waste management, environment aspect impact, and environment aspect impact Waste management, HCV, estate best practices, mill best practices, OHS.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English Language.</p>
Mohd Nur Amin Mohd Halim (MNA)	Team Member	<p>Education: Diploma Office Management & Technology, UiTM.</p> <p>Work Experience: He gained his career as sustainability practitioner in Government Link Company related to palm oil plantation for over 6 years and 10 months majorly handling operational excellent, environment, safety and health at</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

		<p>the upstream and downstream operations. He then joining an international certification body over the last 3 years and started his auditing career as qualified lead auditor for MSPO (OPMC and SCCS) scheme; and qualified auditor for ISCC Waste and Residue scheme. Concurrent, he was also a document controller and scheme coordinator for MSPO (OPMC and SCCS) prior to DSM accreditation.</p> <p>Training attended: He has completed Exemplar IMS (9001, 14001 & 45001) LA Course (2019), SA 8000 Course (2019), Endorse MSPO SCCS Course (2020), Endorse MSPO LA Course (2020), Endorse ISCC Waste and Residue Course (2020), HCV & HCS Course (2020), Endorse ISCC Basic & PLUS Course (2022), CQI & IRCA ISO 14001:2015 LA Course (2022), Endorse RSPO P&C LA Course (2022), Endorse RSPO SCCS LA Course (2022).</p> <p>Aspect covered in this audit: Worker’s welfare, stakeholder consultation, social, Land and Legal issues, contracts, long-term economic viability etc.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English Language.</p>
--	--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

2.2 Impartiality and conflict of interest

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

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	MFM	MNA
Monday 03/04/2023	PM	Audit Team Travelling	√	√
Tuesday 04/04/2023 Bukit Puteri Estate	08.30 - 09.00	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan 	√	√
	09.30 - 13.00	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, schedule waste management, worker housing, clinic, landfill etc.	√	√

MSPO Public Summary Report
Revision 2 (Nov 2021)

Date	Time	Subjects	MFM	MNA
	13.00 - 14.00	Lunch/Rest	√	√
	14.00 - 16.30	Continue with document review Document review P1 – P7 (MSPO 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 and P6: Best practices P7: Development of New Planting (if any)	√	√
	16.30 - 17.00	Interim Closing briefing	√	√
Wednesday 05/04/2023 Bukit Puteri Estate	09.00 - 13.00	Continue with unfinished item in day 1 Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√
	09.30 - 12.00	Stakeholder interviews		√
	13.00 - 14.00	Lunch/Rest	√	√
	14.00 - 16.30	Continue with unfinished item in day 1 Continue with document review Document review P1 – P7 (MSPO 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 and P6: Best practices P7: Development of New Planting (if any)	√	√
	16.30 - 17.00	Interim Closing briefing	√	√
Thursday 06/04/2023	09.00 - 13.00	Inspection: 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,	√	√

MSPO Public Summary Report
Revision 2 (Nov 2021)

Date	Time	Subjects	MFM	MNA
Bukit Puteri Palm Oil Mill		workers and contractor interview, housing and facility inspection, clinic, etc.		
	13.00 - 14.00	Lunch/Rest	√	√
	14.00 - 16.30	Continue with document review (MSPO 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 P6: Best practices	√	√
	16.30 - 17.00	Interim Closing briefing	√	√
Friday 07/04/2023 Bukit Puteri Palm Oil Mill	09.00 - 13.00	Continue with unfinished item in day 3 Continue with document review (MSPO 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 P6: Best practices		√
	12.00 - 12.30	Preparation of audit report	√	√
	12.30 - 1.00	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 zero (0) Major & two (2) Minor nonconformities and one (1) OFI raised. The SOU 10 Bukit Puteri Palm Oil Mill and Supply Base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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 #:	2330155-202304-N1	Issue Date:	07/04/2023
Due Date:	Next Assessment	Date of Closure:	Open
Area/Process:	Bukit Puteri Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.4.2 Minor
Requirements:	d) The occupational safety and health plan shall cover the following: The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).		
Statement of Nonconformity:	The appropriate PPE provided was not worn by the workers.		
Objective Evidence:	Bukit Puteri Estate Noted during site visit and interview with the sprayers, it was sighted that the sprayers were not wearing provided safety goggle during spraying. As per latest HIRARC, reviewed on 15/01/2022 for Spraying Process, under column Existing Risk Control stated that safety goggle was one of the PPE required for sprayers.		

MSPO Public Summary Report
Revision 2 (Nov 2021)

Corrections:	<ol style="list-style-type: none"> 1. The Estate immediately supplies anti fogged goggle to all sprayers and ensure they are being worn during spraying. Briefing is to be done to mandore to make sure that all sprayers wear full PPEs during spraying. 2. To conduct awareness briefing to sprayers in order to explain the importance to sanitize themselves before going back home and appoint mandore to record whether workers have sanitized themselves after spraying before returning home and report immediately to estate management if otherwise.
Root cause analysis:	<ol style="list-style-type: none"> 1. Lack of monitoring by mandore/ estate management of appropriate PPE usage by sprayers during the spraying operation. PPE checklist is available, however is ineffective as mandore/staff/assistant did not fully utilize it. Further checking with sprayers that the google provided by Estate management will fog when worn during operation. 2. Lack of monitoring by Estate management to ensure that the facility is used and no mechanism to ensure that the SOP is adhered to. Estate management has spoken to sprayers and the sprayers claimed that they are more comfortable showering at home rather than at the facility provided, and no monitoring is implemented.
Corrective Actions:	<ol style="list-style-type: none"> 1. Staff to do spot check on the compliance on PPE usage and mandore to ensure that PPE checklist is fulfilled. 2. To conduct refresher training on the importance of PPE usage during chemical handling. 3. To appoint staff-in-charge to monitor the overall records of showering facility usage periodically.
Assessment Conclusion:	The effectiveness implementation of the corrective action plan will be verified during next assessment.

Non-Conformity Report			
NCR Ref #:	2330155-202304-N2	Issue Date:	07/04/2023
Due Date:	Next Assessment	Date of Closure:	Open
Area/Process:	Bukit Puteri Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.6.1.1 Minor
Requirements:	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.		
Statement of Nonconformity:	Workers Housing Management Procedure is not consistently implemented to addressed complaint received from workers.		
Objective Evidence:	<p>Bukit Puteri Estate</p> <p>Site visit carried out at house# E25 (division B), damage complaint recorded in OPP against actual condition for main and room doorknob broken and bathroom water tub/container leaking were verified. Risk category rated as "low" however based on Appendix C; Recommended timeline for repair completion it should be rated as high for the main door broken and water tank leakage issue.</p> <p>For house# A8, in the OPP tracker/summary, damage complaint made on 24/1/2023 for broken ceiling, electrical plug point and no water supply for kitchen sink. Repair work completed on 18/2/23 and updated in OPP tracker/summary. Based on interview with house# A8 owner has confirmed that repair work has yet</p>		

MSPO Public Summary Report
Revision 2 (Nov 2021)

	to be completed. Status reported in OPP tracker/summary was found to be inconsistent with the actual status as to date.
Corrections:	<ol style="list-style-type: none"> Estate Management to update remark in the OPP for house# E25 (division B) repair on the categorization of risk category. The handyman was instructed to repair immediately, and repairs were completed on 05/04/2023 and additionally to update the OPP system on the work completion.
Root cause analysis:	<ol style="list-style-type: none"> During inspection the water leakage in bathroom container where the storage of water still available in overhead water tank and the door can be lock using door lock from inside. For the above reason the inspection was rated as low based on inspector justification on site. Estate overlooked to put comments in remark column in the OPP system to record the real conditions to explain why the case is rated as low. Miscommunication where handyman reported that the repair was completed to Estate Management. There is multiple complaint in one report. Part of the work was completed where some of the complaint is still pending for repair. Closure of report is made with communication with handyman alone rather than confirming with the occupants on work completion.
Corrective Actions:	<ol style="list-style-type: none"> Estate management representative has to follow the procedures and to report more precisely on the risk category and work completion in the remark column in the OPP system. To brief workers to report separately for each breakdown in on OPP system and to brief house owners to follow up with divisional executive if the repair pending more than a week. The house owner to sign and verify work done once work completed.
Assessment Conclusion:	The effectiveness implementation of the corrective action plan will be verified during next assessment.

Opportunity For Improvement			
Ref:	2330155-202304-I1	Clause:	MSPO Part 4: 4.4.5.11
Area/Process:	Bukit Puteri Palm Oil Mill		
Objective Evidence:	Bukit Puteri Palm Oil Mill's linesite inspection can be further improved to identify all potential issue which may lead to inconducive conditions.		

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

3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
NCR Ref #:	2186902-202204-N1	Issue Date:	08/04/2022
Due Date:	07/04/2023	Date of Closure:	07/04/2023
Area/Process:	Bukit Puteri Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.4.2 Minor
Requirements:	The occupational safety and health plan shall cover the following: b. The risks of all operations shall be assessed and documented.		
Statement of Nonconformity:	The action plan of the NRA was not fully implemented.		
Objective Evidence:	Noise Risk Assessment was received on 18/02/2022. The report states that the employer has to take action to control exposure within 30 days upon receiving the assessment report. As of to date the action plan and status of compliance has not been derived by the management. Verified that there was no action plan for the Audiometric Test to be conducted yet.		
Corrections:	Estate has requested quotation for Audiometric Test from three (3) vendors i.e. Sxxxxxxxx Mxxxxx Sxxxxx Sxxxxxxxx Sdn. Bhd, Best Hxxxxx Axx Cxxxxx and Cxxxxx Sxxxxxxxx via email on 15/04/2022. Training for targeted employees who exposed to excessive noise is included in OSH training Matrix for FY 2022.		
Root cause analysis:	Management is not aware that the audiometric test needs to be conducted as per recommended by Noise Risk Assessment (NRA) report.		
Corrective Actions:	Briefing on the requirement stated in Occupational Safety and Health (Noise Exposure) Regulations 2019 for person in-charge (Assistant/MA/SSSO) by RSQM personnel.		
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.		
Verification Statement:	Baseline Noise Risk Assessment was conducted on 24/09/2021 by assessor with DOSH reg. no. HQ/09/PEB/00/97. As per report, the estate was recommended to conduct audiometric test once a year. The estate has conducted Baseline & Annual Audiometric Test on 25/07/2022 by OHD with DOSH reg. no. HQ/22/DOC/00/00797. As per report, 11 workers were required to attend audiometric retest within 3 months. The estate has sent the affected workers for retest on 03/04/2023, conducted by OHD with reg. no. HQ/08/DOC/00/453. No reoccurrence of non-conformity. The evidence was adequate to close the minor non-conformity. Thus, the minor non-conformity was effectively closed on 07/04/2023.		

MSPO Public Summary Report
Revision 2 (Nov 2021)

Non-Conformity Report			
NCR Ref #:	2186902-202204-N2	Issue Date:	08/04/2022
Due Date:	07/04/2023	Date of Closure:	07/04/2023
Area/Process:	Bukit Puteri POM	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.6.1.1 Minor
Requirements:	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.		
Statement of Nonconformity:	The procedures were not implemented adequately.		
Objective Evidence:	Lapses in the implementation of procedures were acknowledged as below: Water Quality for Domestic use is monitored on a monthly basis at the mill. The Water Analysis Test Report (Test Report Number: IE251/2022), Sampled on 17/02/2022 and Report issued on 01/03/2022. As per the SOP, Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System; SOP for Water Quality Monitoring; Date: 01/06/2016; 5.5 Evaluation of Laboratory Test Results, the mill is required to raise a Corrective/Preventive Action Report for Non-Conforming Water Analysis Results and the resampling has to be done within 7 days. Nevertheless, the Mill has not raised a Corrective/Preventive Action Report for Non-Conforming Water Analysis Results and the resampling has not been done as of to date.		
Corrections:	Mill will prepare Corrective/Preventive Action Report for any Non-Conforming of latest Water Analysis Result expected to be received by month-end from R&D. Immediately carry out water resampling and send to the R&D for analysis within 7 days.		
Root cause analysis:	Lack of understanding/awareness on the procedure to record the action taken due to changes/newly appointed person in-charge to monitor the water sampling process		
Corrective Actions:	<ol style="list-style-type: none"> 1. RSQM plan to conduct a refresher training on Water Quality Monitoring SOP to executive and lab personnel 2. Mill management will ensure the implementation of the said process by establish a checklist on the monitoring of water quality analysis 		
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.		
Verification Statement:	<p>The mill has conducted training on water quality monitoring. Reviewed the training records entitled SOP for water sampling and ETP training dated 08/02/2023 and 24/10/2022.</p> <p>The estate monitors the drinking water quality supplied by the mill on monthly basis. reviewed the analysis report no. ML 166/2023 and ML 167/2023 dated 08/03/2023 and ML 92/2023 and ML 93/2023 dated 10/02/2023. The results were confirmed with NSDWQ for domestic use.</p> <p>No reoccurrence of non-conformity. The evidence was adequate to close the minor non-conformity. Thus, the minor non-conformity was effectively closed on 07/04/2023.</p>		

MSP0 Public Summary Report
Revision 2 (Nov 2021)

Opportunity For Improvement			
Ref:	2186902-202204-I1	Clause:	MSP0 2530 Part 3: 4.5.3.2
Area/Process:	Bukit Puteri Estate		
Objective Evidence:	The segregation of domestic waste and recyclable waste could be further improved to ensure no recyclable waste are disposed via landfill.		
Verification Statement:	<p>Sighted during site visit at the landfill area in field P15 only domestic waste were disposed in the area. no evidence of recycle waste disposed in the landfill.</p> <p>The estate continuously promoted the reduce, reuse, and recycle (3R) program to the workers. Reviewed the briefing records dated 13/02/2023.</p> <p>The estate has contacted recycle waste contractor to collect the recycle waste generated.</p>		

Opportunity For Improvement			
Ref:	2186902-202204-I2	Clause:	MSP0 2530 Part 3: 4.5.5.1
Area/Process:	Bukit Puteri Estate		
Objective Evidence:	The mechanism of monitoring water usage in the estate could be further improved to include actual value and not solely depend on the PAPB water bill records.		
Verification Statement:	The estate monitors the water usage on monthly basis including usage for domestic estate daily operation. Reviewed the records FY 2022 recorded at 165090 L.		

3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
2186902-202204-N1	4.4.4.2 Part 3 - Minor	08/04/2022	Closed on 07/04/2023
2186902-202204-N2	4.6.1.1 Part 4 - Minor	08/04/2022	Closed on 07/04/2023
2330155-202304-N1	4.4.4.2 Part 3 - Minor	07/04/2023	Open
2330155-202304-N2	4.6.1.1 Part 3 - Minor	07/04/2023	Open

3.5 Issues Raised by Stakeholders

IS #	Description
1	<p>Feedbacks: Contractors (Mxxx Berxxxx Enterprise & Nxxx Azxxx)</p> <p>During interview sessions with contractors informed they signed contract agreement with Sime Darby Plantation Berhad prior to provide services. The terms and conditions being briefed by estate management prior to signed the contract included the payment term. During the briefing, the contractors agreed VCOBC and Integrity Pledges are signed prior the agreement signed. Payment made promptly after invoicing issued by the contractors and meet payment terms timeline. They informed, estate and mill management monitor their performance by monthly which includes due diligence consist of employment contract, payslip and other related applicable requirement.</p> <p>Management Responses:</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

	<p>Management continuously monitors every contractor performance and will continuously giving cooperation towards feedback related to all operations activities.</p> <p>Audit Team Findings: Reviewed due diligence document is available together with VCOBC and Vendor Integrity Pledges form signed by both parties.</p>
2	<p>Feedbacks: NUPW Representatives Interview with the representative attended, informed they were elected by the workers through online election in WhatsApp application. They informed always give good cooperation and participate any meeting conduct by management to discuss any issues related to workers. All issues reported were acted by the management and resolved accordingly. The representative informed she will attend monthly meetings at NUPW Temerloh Office to discuss any update related to collective agreement. Social Dialogue Meeting biweekly is one of the platforms discussed with workers on any work related and social issue with the management freely.</p> <p>Management Responses: Management always given full cooperation to union and support their activities without any interfered. Management always give freedom to workers to join any associations.</p> <p>Audit Team Findings: Reviewed the NUPW minutes meeting, Social Dialogue Tracking report and SIA management plan is available and up to dated.</p>
3	<p>Feedbacks: OCP Suppliers (Axxxxxx Oil Palm Plantations Sdn Bhd and Pxxxxxx Palms Sdn Bhd) Phone interviewed with the representative informed they been briefed the requirement and FFB quality by management. They informed satisfied with business dealing with Sime Darby Plantation Berhad of payment and continuously communicates on any issue regarding FFB quality. The representative informed terms and conditions being briefed by mill management prior to signed the contract included the payment term. During interview, the representative informed they been invited into mill program which is related to sustainable certification requirement and emergency requirement. During the briefing, the contractors agreed VCOBC and Integrity Pledges are signed prior the agreement signed. Payment made promptly after invoicing issued by them and meet payment terms timeline.</p> <p>Management Responses: Management continuously monitors FFB quality performance and will continuously communicate with them to deliver the sustainable palm oil products outcome.</p> <p>Audit Team Findings: Reviewed due diligence document is available together with VCOBC and Vendor Integrity Pledges form signed by both parties.</p>
4	<p>Feedbacks: Female Workers (Gender Committee) They informed that the management treated the female workers equally with male workers includes job opportunity and promotion of work based on work performance and capability. They also informed that no case of discrimination, sexual harassment and domestic violence reported. They are aware on the reporting channel if any case of sexual harassment and domestic violence occur in the estate and mill.</p> <p>Management Responses: Management always given full cooperation to gender committees and support their activities which is also includes the involvement from workers' family members.</p> <p>Audit Team Findings:</p>

MSP0 Public Summary Report
Revision 2 (Nov 2021)

	Reviewed records of meeting minutes for Gender Committee verified the discussion been recorded. Onsite interview confirmed no discrimination and sexual harassment lodged by female workers and minutes.
5	<p>Issues: Local workers</p> <p>They apply work with estate and mill based on the vacancy information spread through WhatsApp. They have been briefed on the terms and conditions and working environment in the plantation during the interview before been offer with the job they acquired. Their wages are paid according to Minimum Wage Order 2021 and Collective Agreement. They interested to join as member of union, and they not been stop by management. During high pick of crop, they been offer voluntary to do job task outside working hour (overtime) for additional income.</p>
	<p>Management Responses:</p> <p>The management encourage local communities surrounded to apply for job to work with estate and mill will all amenities, benefit and good salary offered. Unfortunately, number of local workers for estate vacancy applied below with manpower budget which still not enough to cover the operations job task. Therefore, management offered the job vacancy to foreigner. Management advertises the job vacancy in through WhatsApp to attract local worker continuously.</p>
	<p>Audit Team Findings:</p> <p>No issues on management decision to attract local people to join as workers in estate and mill.</p>
6	<p>Issues: Foreign workers</p> <p>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. Their wages are paid according to Minimum Wage Order 2021 and Collective Agreement. During high pick of 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:</p> <p>The number of local workers for estate vacancy applied below with manpower budget which still not enough to cover the operations job task especially skilled job. Therefore, management offered the job vacancy to foreigner. Management offers foreign workers for skilled job to be filled up due to current manpower shortage for harvesting and loading activities. Moreover, management continuously monitor workers performance and will continuously giving good benefits to them.</p>
	<p>Audit Team Findings:</p> <p>No issues on management continuously communicate with foreigner workers for better understanding on task offered.</p>



3.6 List of Stakeholders Contacted

<p>Government Officer:</p> <p>Nil</p>	<p>Community/neighbouring village:</p> <p>Nil</p>
<p>Suppliers/Contractors/Vendors:</p>	<p>Worker’s Representative/Gender Committee:</p>

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

Mxxx Berxxx Enterprise Nxxx Azxxx Enterprise Agarxxx Oil Palm Plantations Sdn Bhd Pertxxx Palms Sdn Bhd	Internal NUPW Representatives Gender Committee Local worker Foreign worker
------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------

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 10 Bukit Puteri Palm Oil Mill and Supply Base Certification Unit complies with the MS 2530-3:2013 or MS 2530-4:2013. It is recommended that the certification of SOU 10 Bukit Puteri Palm Oil Mill and Supply Base Certification Unit is continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Shylaja Devi Vasudevan Nair	Name: Muhammad Fadzi b. Masran
Company name: Sime Darby Plantation Bhd	Company Name: BSI Services Malaysia Sdn. Bhd.
Title: Head, Sustainability Compliance Unit, Group Sustainability Dept.	Title: Client Manager
Signature: 	Signature: 
Date: 03/07/2023	Date: 23/05/2023

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) maintain the current Group Sustainability & Quality Policy signed by Group Managing Director on 02/12/2019 include the statement on commitment towards MSPO implementation. The memo describes company commitment to comply on the MSPO standards implementation and towards certified sustainable palm oil products.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	SDPB maintain the current Group Sustainability & Quality Policy signed by Group Managing Director on 02/12/2019 include the statement on commitment towards MSPO implementation. From the memo describes company commitment on emphasizing to achieved systematic approach on ensuring continuous improvement in the operation, compliance to statutory, legal and other regulatory requirements and establishment of traceability within the supply chain in the above-mentioned memorandum.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for	SDPB update Internal Audit Procedure with Doc. No.: SDP/GSD/SCU/IAP approved on 10/01/2023. The frequency of the	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	further improvement. - Major compliance -	internal audit shall be carried out at least once a year and when is required. Document review on the internal audit plan, sighted Group Sustainability Department (GSD) conduct the internal audit plan for Bukit Puteri Estate on 08/02/2023.	
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 -	SDPB update Internal Audit Procedure with Doc. No.: SDP/GSD/SCU/IAP approved on 10/01/2023. Reviewed the latest internal audit conducted on 08/02/2023, HQ Department has identified non-conformities and certification unit response to close all findings on 07/03/2023 with identified root causes, corrections, and corrective actions. Based on the reports, Bukit Puteri Estate been raised with five (5) findings classified as majors.	Complied
4.1.2.3	Report shall be made available to the management for their review. - Major compliance -	SDPB update Internal Audit Procedure with Doc. No.: SDP/GSD/SCU/IAP approved on 10/01/2023. Onsite visit to Bukit Puteri Estate verified the internal audit report kept, available and discussed during management review meeting. As evidence, all findings from internal audit were responded within the acceptable timeframe.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	SDPB established SOP for Management Review documented in Standard Operation Manual, Sub-Section 5.6, dated: 25/5/2015. Based on the SOP established, the frequency for management review needs to be carried out at least once a year. Review minutes of Meeting conducted on 20/02/2023. The agenda	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>discussed as follows:</p> <ol style="list-style-type: none"> 1. Follow-up action taken of matters arising from previous meeting follow up (internal and external issues), the matters transferred into social impact assessment for follow up. 2. Result of the internal audit RSPO & MSPO Audit findings as per indicator 4.1.2.2 with correction and corrective action already closed. 3. As at the meeting scheduled, no pending of stakeholder feedback and complaints. 4. Customer feedback during stakeholder meeting identified in SIA Action Plan as monitoring. 5. Status of preventive and corrective actions as per internal and external audit findings. 6. Recommendation for improvement to monitor based on SIA Action Plan, Environmental Action Plan and Safety Action Plan. 7. Improvement of the effectiveness of the management system and processes. 8. Resources needs <p>Management maintained to conduct briefing and training to workers based on training program for Year 2023.</p>	
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>SDPB issued an inter-office mail (Ref. No.: SQM.RSPO.1811/22.11) dated 23/11/2018 regarding the statement on commitment towards MSPO implementation.</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>From the memo describes company commitment on emphasizing to achieved systematic approach on ensuring continuous improvement in the operation, compliance to statutory, legal and other regulatory requirements and establishment of traceability within the supply chain in the above-mentioned memorandum.</p> <p>Bukit Puteri Estate established individual continual improvement plan include with action plan to be taken updated for year 2023.</p> <p>Documented review, the management identified aspect and significant impact covered on environmental, safety and social.</p>	
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>Bukit Puteri Estate established annual training plan based on the training needs analysis.</p> <p>Review on the plan, no new technology applied. The online platform for complaints submission continuously applied and included as a topic of training.</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>Bukit Puteri Estate established annual training plan based on the training needs analysis.</p> <p>Review on the plan, sighted Bukit Puteri Estate remain to continuously give awareness to employee on the online platform for complaints submission as part of topic of training.</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</p>	<p>SDPB established Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/04/2008 to put in place a system to effectively communicate with external interested parties on matters</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	disclosure that could result in negative environmental or social outcomes. - Major compliance -	pertaining to performance of the estate. Timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation. Review on the procedure, describes estate manager as person in-charge and responsible to address the communication and requests from internal and external.	
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance -	The management disseminated the information of the documents that made publicly available such as management plan, OSH plan, audit reports and land titles upon request during the stakeholder meetings. Internal and external stakeholders could access to the SDPB' address website at https://simerdarbyplantation.com/sustainability/reports-policies-and-statements/ to obtain information such as policies, annual report and complaint procedures.	Complied
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	SDPB established Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/11/2008. The objective of the procedure is to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the estate. The procedure describes timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation. External stakeholders' meeting conducted 31/03/2023 for Bukit Puteri	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>POM and Bukit Puteri Estate. The meeting was attended by school, contractor, local authorities, local community representatives, neighbors, vendors and FFB suppliers.</p> <p>Internal stakeholders' meeting conducted for workers through Social Dialogue on Weekly Basis with latest dated 28/03/2023 discuss on workers issues related to housing and workers' benefits.</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>Review on the procedure, describes estate manager as person in-charge and responsible to address the communication and requests from internal and external.</p> <p>However, estate manager assigned social officer to assist them to handle issues related to social in estate with appointment letter for Assistant Manager dated 01/01/2022 signed by the Senior Manager.</p>	Complied
4.2.2.3	<p>List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.</p> <p>- Major compliance -</p>	<p>Bukit Puteri Estate maintained the List of Stakeholders FY 2023 includes categorized as Contractors, Vendors/Suppliers, Local Community and Other Interested Parties (Government Agencies, School, Hospitals, Balai Polis, OCP etc.)</p> <p>External stakeholders' meeting conducted 31/03/2023 for Bukit Puteri POM and Bukit Puteri Estate. The meeting was attended by school, contractor, local authorities, local community representatives, neighbors, vendors and FFB suppliers.</p> <p>Internal stakeholders' meeting conducted for workers through Social Dialogue on Weekly Basis with latest dated 28/03/2023 discuss on workers issues related to housing and workers' benefits.</p>	Complied
Criterion 4.2.3 – Traceability			
4.2.3.1	<p>The management shall establish, implement and maintain a standard operating procedure to comply with the requirements</p>	<p>SDPB update Standard Operating Procedure for Sustainable Supply Chain and Traceability, Doc. No.: SD/SDP/GSD/SCCS/0522/01; on</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	for traceability of the relevant product(s). - Major compliance -	2022. The objective of the procedure is to provide guideline for estates to establish and ensure effective implementation on sustainable supply chain and traceability of certified sustainable materials (FFB).	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Bukit Puteri Estate maintain the current practice with conduct inspection on the compliance of the traceability system on daily basis. Onsite interview with weighbridge operator informed they key in all the related data into the system and verified by the executive at the end of the day. Review on the weighbridge records and FFB delivery notes, sighted incoming and outgoing document been signed by operators and executives.	Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	Bukit Puteri Estate Senior Manager assigned Chief Clerk been appointed as person in charge for traceability system and the appointment letter maintained without any changes on dated 13/01/2020.	Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	Bukit Puteri Estate dispatched their harvested FFB to Bukit Puteri POM. Review on the records of FFB sale/dispatch to the mill as follows: Supplier: Bukit Puteri Estate Dated: 25/03/2023 Estate C/N No.: 150744, 150743, 150745 No. of Bunch: 683, 267, 200 Field No.: 1998F, 2018D Tractor: L5-B35, L5-B35, L7-B35 Mill W/B Ticket No.: 151799, 151789, 151805	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Nett Weight: 5.85 Mt, 7.25 Mt, 1.07 Mt MSPO certificate no.: MSPO 745405 MSPO certificate validity: 27/11/2022 – 26/11/2027</p> <p>Dated: 28/02/2023 Estate C/N No.: 150405, 150406, 150407, 150408, 150409, 150410 No. of Bunch: 470, 260, 370, 400, 402, 185 Field No.: 1998E, 1998F, 2009A, 2014C Tractor: L5-BPE3, L5-BPE9, L6-B37, L6-BPE3, L5-B37, Mill W/B Ticket No.: 151083, 151102, 151100, 151095, 151088, 151085 Nett Weight: 5.29 Mt, 2.62 Mt, 6.03 Mt, 5.75 Mt, 5.65 Mt, 5.65 Mt. MSPO certificate no.: MSPO 745405 MSPO certificate validity: 27/11/2022 – 26/11/2027</p> <p>Dated: 09/01/2023 Estate C/N No.: 150972, 150973, 150974, 150975, 150976 No. of Bunch: 420, 285, 300, 450, 330 Field No.: 2012A, 2012B, Tractor: L6-BPE7, L6-BPE16, L4-BPE7, L4-BPE16 Mill W/B Ticket No.: 149641, 149643, 149645, 149653, 149659 Nett Weight: 6.29 Mt, 4.86 Mt, 4.05 Mt, 6.08 Mt, 4.73 Mt. MSPO certificate no.: MSPO 745405 MSPO certificate validity: 27/11/2022 – 26/11/2027</p>	

Criterion / Indicator	Assessment Findings	Compliance	
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 estate continued to comply with the legal requirements. Among the evidence of legal compliance as follows: 1. MPOB License no. 524186002000 valid till 31/10/2023 2. MPOB License for Oil Palm Nursery no. 533567011000 valid till 31/10/2023 3. Permit for Scheduled Controlled Goods, Diesel Purchase and Storage permit no. KPDNHEP.PHG.RAUB.600-5/4/063 valid till 25/05/2025 4. Air Compressor Certificate of Fitness no. a. PMT-PH/22 56462 valid till 11/12/2023 b. PMT-PH/22 48427 valid till 24/04/2023	Complied
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 January 2023 with addition to applicable laws since last assessment as follows: 1. Minimum Wages Order 2022 2. Fire Services Act 1988 (Act 341) Amendment 2020 3. “Pembangunan Sumber Manusia Berhad” Act 2000 4. Anti-Sexual Harassment Act 2021 5. Employees’ Social Security (Amendment) Act 2022 6. Employment Insurance System (EIS) (Amendment) Act 2022	Complied

Criterion / Indicator		Assessment Findings	Compliance
		7. Control of Supplies Act 1961 8. Employment (Amendment) Act 2022	
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 in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 10. Group Sustainability Department (GSD) 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.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance -	Group Sustainability Department 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. The Asst. Manager has been appointed as person responsible to monitor any changes to the LORR and update, when necessary, as per appointment letter dated 03/01/2023 signed by the Estate Sr. Manager.	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. - Major compliance -	Bukit Puteri Estate demonstrated with legal ownership or leases with legal documents. Therefore, the estates cultivation activities have not diminished the land use rights of other users. Onsite visit verified there no evidence	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		to show that oil palm cultivation activities had diminished the land use rights of others.	
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 -	Bukit Puteri Estate demonstrated with legal ownership or leases with legal documents. Document review on the land titles were available at the estate office with quit rents payment official receipt dated 14/03/2023. Land title no.: 1. HS (D) 3xx 2. GRN 27xxx 3. GRN 27xxx 4. GRN 27xxx 5. GRN 27xxx 6. HS (D) 2xx 7. HS (D) 2xx	Complied
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The estate legal boundary was clearly demarcated with red colour concrete pole as sighted in field P98, adjacent with FELDA Sg. Koyan.	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 sampled estates. SDPB has the legal ownership documents as demonstrated by possessing land titles.	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
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 -	Not applicable since there is no customary rights. Land has been legally owned by the company and has been verified by the land title.	Not Applicable
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	Not applicable since there is no customary rights. Land has been legally owned by the company and has been verified by the land title.	Not Applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	Not applicable since there is no customary rights. Land has been legally owned by the company and has been verified by the land title.	Not Applicable
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 -	Bukit Puteri Estate kept Social Impact Assessment Report (SIA) Report SOU 10 Bukit Puteri with no changes since the document established by SDPB HQ dated 17/09/2015 - 18/09/2015. Based on the assessment conducted, Bukit Puteri Estate conduct social dialogue to update the progress of action taken for the issues raised by workers. The initiative will discuss during management review meeting and action taken accordingly. Verified the records of monitoring of issues and evidence of actions taken to resolve the issues raised by the workers.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.4.2: Complaints and grievances			
<p>4.4.2.1</p>	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p>- Major compliance -</p>	<p>SDPB established Standard Operation Manual, Procedure for External communication, version 1 Year 2008, Issue No 1 with no changes since dated 01/11/2008. The objective of the procedure is to ease the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.</p> <p>SDBP established Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/11/2018. The objective of the procedure is to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the mill and estates. The procedure describes timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation.</p> <p>SDPB established whistleblowing platform named as 'Suara Kami' for internal and external stakeholders to lodge on any grievance. The grievance mechanism can be access through https://simerdarbyplantation.com/sustainability/human-rights-statement/.</p> <p>In additional, SDPB established new online platform named as 'Oil Palm Pal' (OPP) and Workers Housing Management Procedure dated 26/11/2021 as guideline to certification unit's management in providing a safe, liveable workers housing condition including the process of handling housing repair. The procedure describes the timeline to investigate/ inspect the housing defect based on the risk category.</p>	<p>Complied</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
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>Bukit Puteri Estate adopt SDPB HQ Oil Palm Pal (OPP) online platform to record any housing repair from workers.</p> <p>Based on the records, all the complaints were lodged on defects of housing facility, and request of facility (e.g., room door damage, lamp malfunctions, etc.)</p> <p>There was no complaint or grievance lodged by external stakeholder since the last assessment. Verification of the records of complaints lodged the actions taken by the management were found to be appropriate and timely manner.</p> <p>Any communication/request/grievances from external stakeholder were recorded in the visit logbook, stakeholders’ minutes meetings, Social Dialogue Action Tracker and OPP system report.</p> <p>External stakeholders’ meeting conducted 31/03/2023 for Bukit Puteri POM and Bukit Puteri Estate. The meeting was attended by school, contractor, local authorities, local community representatives, neighbors, vendors and FFB suppliers.</p> <p>Internal stakeholders’ meeting conducted for workers through Social Dialogue on Weekly Basis with latest dated 28/03/2023 discuss on workers issues related to housing and workers’ benefits.</p>	Complied
4.4.2.3	<p>A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.</p> <p>- Minor compliance -</p>	<p>Bukit Puteri Estate adopt SDPB HQ Oil Palm Pal (OPP) online platform to record any housing repair from workers.</p> <p>The platform is available with QR code and both estate management established manual complain platform through Complaint Book available at estate.</p> <p>Onsite interviewed with attended external stakeholders informed they are aware of the complaint mechanism.</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		Onsite interviewed with sampled workers informed they aware on the online platform via OPP and 'Suara Kami'.	
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	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. Based on interview with the stakeholders, it was noted that they were aware of the complaint's procedure including the platform of 'Suara kami', Whistle Blowing, Workers Helpline, Oil Palm Pal (OPP) and Social Dialogue and they were briefed by the management during stakeholder meeting and morning briefing.	Complied
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	Bukit Puteri Estate maintained complaints record and resolutions record over the past 24 months were still available as at audit.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -	SDPB with joint venture with Sime Darby Foundation initiate contributions to local sustainable development on social support initiatives includes promoting educations and offering scholarships to deserving students, promoting the rights and well-being of marginalized communities, improving communities' access to healthcare, assisting communities with disaster relief & prevention, donations to the needy and tree planting and etc. Bukit Puteri Estate offer job opportunity to local communities, contribute donations to nearby school and temple.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Other contributions have been made are such as given 10kg of rice once every 2 months to all the workers.	
Criterion 4.4.4: Employees safety and health			
4.4.4.1	<p>An occupational safety and health policy and plan shall be documented, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>SDPB has established Group HSE Policy dated 15/05/2022 signed by the Group Managing Director.</p> <p>In the policy stated the company commitment to the well-being of its employee, providing safe and healthy working environment, pre-emptively preventing our employees and external parties in the operations from injury and ill health as well as operating in an environmentally responsible manner at global operating sites.</p> <p>Policy also stated the commitment to comply with statutory requirements, inculcating the culture of safety and health, improving the management of occupational safety, health related and environmental matters eliminating or minimizing any potential adverse effect on the environment arising from or business activities and to educate and encourage stakeholders in maintaining and enhancing the quality of the health, safety and environment.</p> <p>The GSD and RSQM Department is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition.</p> <p>The estate has established Safety and Health Plan and reviewed on annually basis. The plan covers on OSH Legal Compliance, Emergency Response Plan, OSH Management System and Risk Management, HIRADC, training, OSH committee meeting, workplace inspection, medical surveillance and etc.</p>	Complied

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

Criterion / Indicator		Assessment Findings	Compliance
		<p>Reviewed the implementation of the management plan FY 2022 as follows:</p> <ol style="list-style-type: none"> 1. The estate reviews the contractor’s OSH performance on monthly basis. Reviewed sample FFB Transporter Key Performance Indicator (KPI) Evaluation for contractors Mxxx Berxxxx Enterprise for the month of January, February and March 2023. 2. The estate updated the Chemical Register on annually basis. Reviewed the latest register dated 02/01/2023. 3. The estate conducted workplace inspection on quarterly basis. Reviewed the inspection reports conducted in March 2023, December 2022, September 2022, and June 2022. The results were discussed in the Safety and Health Committee Meeting. 	
4.4.4.2	<p>The occupational safety and health plan shall cover the following:</p> <ol style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: <ol style="list-style-type: none"> i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). 	<ol style="list-style-type: none"> a) SDPB has established Group HSE Policy dated 15/05/2022 signed by the Group Managing Director. The policy is written in Bahasa and English language that can be easily understood by all levels of its employees. The policy has been communicated to the workers through induction training for new workers, morning briefing, iCARE Safety and Health Townhall meeting, and displayed at various notice board within the estates. b) The estate has conducted assessment for risk on all the operations. Reviewed the risk assessment as follows: <ol style="list-style-type: none"> 1. HIRARC review was conducted at minimum of once a year, during accident occur or changes in operation. FY 2022 HIRARC review was conducted on 05/01/2023 for annual review and update to new HIRARC template. 	Minor Non-Conformity

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
<p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>2. Baseline Noise Risk Assessment was conducted on 24/09/2021 by assessor with DOSH reg. no. HQ/09/PEB/00/97.</p> <p>As per report, the estate was recommended to conduct audiometric test once a year. The estate has conducted Baseline & Annual Audiometric Test on 25/07/2022 by OHD with DOSH reg. no. HQ/22/DOC/00/00797. As per report, 11 workers were required to attend audiometric retest within 3 months. The estate has sent the affected workers for retest on 03/04/2023, conducted by OHD with reg. no. HQ/08/DOC/00/453.</p> <p>3. The estate has conducted Chemical Health risk Assessment on 10/06/2020 by assessor with DOSH reg. no. HQ/14/ASS/00/358. Refer report no. HQ/14/ASS/00/00001-2020/13.</p> <p>c) The estate has established training program for employees exposed to pesticides to ensure the continuous awareness to the employee. Reviewed the training plan and record as per criteria 4.4.6.1.</p> <p>d) All workers in the estate have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge according to the job type as per per CHRA report, NRA report, HIRARC, Safety Work Procedure Oil Palm Estate Operation dated 01/11/2021 and Personal Protective Equipment (PPE) Procedure, doc ref. no. UM/HSE/OCP/03 dated 09/03/2021.</p> <p>Reviewed the PPE issuance records for workers working at the sprayers and harvesters.</p>	

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

Criterion / Indicator	Assessment Findings	Compliance
	<p>Noted during site visit and interview with the sprayers, it was sighted that the sprayers were not wearing provided safety goggle during spraying. This was against the HIRARC dated 21/11/2022 for Spraying Process.</p> <p>e) Procedure for chemical handling was address in the Chemical Safety management Procedure, ver. 0, dated 09/03/2021. Refer doc. no. UM/HSE/OCP/04.</p> <p>Pesticides were found stored in the mill and estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and 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. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p> <p>f) The Sr. Managers has been appointed as Person Responsible/ Chairman for Safety and Health in the estate as per appointment letter dated 01/11/2022 signed by the Regional CEO, Central East Region. This is accordance to the Safety and Health Committee Procedures, ver. 0 dated 17/11/2021 under section 4. Roles & Responsibilities and section 6. Composition of Safety and Health Committee under subsection 6.2. Appointment of Chairman, Secretary and Other Members. Refer doc. No. UM/HSE/OCP/08.</p>	

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

Criterion / Indicator	Assessment Findings	Compliance								
	<p>g) The estate management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate Sr. Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, workplace inspection, and training.</p> <p>The operating units conducted safety and health committee meeting as per Safety and Health Committee Procedures, ver. 0 dated 17/11/2021 under section7. Meetings of Safety and health Committee under subsection 7.1. Frequency of Meetings of Committee. Reviewed the latest 4 minutes meeting conducted for in the estate as follows:</p> <table border="1" data-bbox="1093 900 1854 970"> <tr> <td>01/2023</td> <td>04/2022</td> <td>03/2022</td> <td>02/2022</td> </tr> <tr> <td>20/03/2023</td> <td>22/12/2022</td> <td>13/09/2022</td> <td>16/06/2022</td> </tr> </table> <p>h) SDPB has established Accident and emergency procedures under procedure as follows:</p> <ol style="list-style-type: none"> 1. Incidents, Accidents and Non-compliance Management Procedures, ver. 1, dated 01/06/2022. Refer doc. no. UM/HSE/SP/03 2. Emergency Preparedness Response Procedure, ver. 0, dated 17/11/2021. Refer doc. no. UM/HSE/SP/02 <p>The estate maintains the records of accidents including JKPP 6 forms reported to DOSH, medical leaves certificates, accidents investigations reports and HIRARC review. The accidents occurrence was reported to the Headquarters through Rapid 4</p>	01/2023	04/2022	03/2022	02/2022	20/03/2023	22/12/2022	13/09/2022	16/06/2022	
01/2023	04/2022	03/2022	02/2022							
20/03/2023	22/12/2022	13/09/2022	16/06/2022							

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>systems and DOSH by submitting the JKPP 6 form through MyKKP system.</p> <p>Reviewed the RAPID 4 report for the month of February and January 2023 and December 2022.</p> <p>The estate provided fire extinguisher at the housing area. Sighted during site visit, the fire extinguishers were in satisfactory condition. The estate conducted firefighting training/ Fire Drill on annually basis. Reviewed the training plan and record as per criteria 4.4.6.1. Noted during interview with the workers, the understanding of the emergency procedures and usage of firefighting equipment was satisfactory.</p> <p>i) SDPB has established First Aid in Workplace Procedure, ver. 0, dated 09/03/2021. Refer doc. No. UM/HSE/OCP/01.</p> <p>First aid kit and first aider present at various workstation at the estate. For estate operation, the estate has appointed the field mandore as trained first aider in the estate.</p> <p>The estates continuously provided training to the appointed first aider to enhance the knowledge training for appointed First Aider. Reviewed the training conducted on 13/02/2023. The estate also sends the trained first aider to attend Competent First Aider training. Reviewed the training certificate no. (PCA01) 38377, (PCA01) 38384 and (PCA01) 38388.</p> <p>The Estate Medical Assistant conducted First Aid monitoring and replenishing on monthly basis. reviewed the monitoring records for the month of January, February and March 2023.</p> <p>j) Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance						
		<p>updated. JKPP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2022 as reported to DOSH as follows:</p> <table border="1"> <thead> <tr> <th>Accident Cases</th> <th>LTA</th> <th>Report Ref. no.</th> </tr> </thead> <tbody> <tr> <td>3</td> <td>6</td> <td>JKKP 8/128156/2023 dated 13/01/2023</td> </tr> </tbody> </table>	Accident Cases	LTA	Report Ref. no.	3	6	JKKP 8/128156/2023 dated 13/01/2023	
Accident Cases	LTA	Report Ref. no.							
3	6	JKKP 8/128156/2023 dated 13/01/2023							
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>SDPB established Group Sustainability & Quality Policy signed Group Managing Director dated 02/12/2019. The policy is the commitment by the company in respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) last revised 2020.</p> <p>SDPB established Policy on the Protection of Human Rights Defenders (HRDs) with effective date on 25/03/2020. The policy is the commitment of the company in respect and safeguard human rights, notion of democracy and its institution. They recognize that Human Rights Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with SDPB. This Policy is applied to all stakeholders affected by the business activities and relationships including directors, employees, counterparties, business partners, workers in our operations and supply chains, and communities surrounding our operations.</p>	Complied						
4.4.5.2	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion,</p>	<p>SDPB established Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding</p>	Complied						

Criterion / Indicator		Assessment Findings	Compliance
	<p>nationality, social origin or any other distinguishing characteristics.</p> <p>- Major compliance -</p>	<p>Principles on Business and Human Rights. They promote diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity union membership, political affiliation or age.</p> <p>The policy could be downloaded from https://simedarbyplantation.com/wp-content/uploads/2021/12/HRC-2020-1.pdf.</p>	
4.4.5.3	<p>Management shall ensure that employees’ pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>SDPB established employment contract for workers. The employment contract adopts by Bukit Puteri Estate as part as requirement to ensure the workers employment conditions received as accordingly.</p> <p>Review on the sampled of employment contracts verified terms and conditions outlined as per collective agreement and Employment Act 1955.</p> <p>The original copy kept by management demonstrated in workers’ origin language and signed by the worker.</p> <p>Onsite interview with sampled workers informed they been briefed on the employment conditions and benefits as stated in employment contract. They have also been handed a copy of the contract for own selves keeping and reference.</p> <p>Reviewed sampled of 14 workers employment contract and payslips for June 2022, November 2022 and March 2023 at Bukit Puteri Estate verified paid within minimum wages requirement as follow.</p> <ol style="list-style-type: none"> 1. ID#116xxx 2. ID#149xxx 3. ID#152xxx 4. ID#153xxx 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		5. ID#168xxx 6. ID#140xxx 7. ID#136xxx 8. ID#177xxx 9. ID#151xxx 10. ID#156xxx 11. ID#116xxx 12. ID#155xxx 13. ID#151xxx 14. ID#110xxx Review on the sampled employee payslip for ID#156xxx sighted the information such as wages for piece rated and daily rated. Other's information includes paid holiday, rest day, sick leave, overtime, SOCSO (employer contribution) and deduction.	
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance -	Based on review of the sampled payslip for all contractors' workers verified, is according to the requirement, which is applicable includes minimum wages, EPF and SOCSO contributions. Bukit Puteri Estate hired contractor for FFB evacuation to the mill and based payslip review sighted with SOCSO and EPF contribution for sampled workers as follow. 1. 970925-xx-xxxx 2. 860913-xx-xxxx Bukit Puteri Estate hired contractor for Machinery Rental-Backhoe and payslips review sighted with EPF and SOCSO contribution for sampled workers as follow.	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		1. 900529-xx-xxxx 2. 010119-xx-xxxx	
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>Bukit Puteri Estate registered all their workers into Employee Master Details Listing in SEMUA system.</p> <p>Review on the listing included workers' personal details such as full name, gender, date of birth, date join company, race, designation and wages were available.</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>Bukit Puteri Estate employed local and foreign workers and registered into Employee Master Details Listing in SEMUA system.</p> <p>Review on the listing, verified all workers are employed by SDPB's estates' management.</p> <p>Review on 14 sampled employment contracts verified signature of workers on the contract with terms and conditions applied according to Collective Agreement and Employment Act 1955.</p> <p>Onsite interview with sampled workers informed they signed on the employment contract prior to work and extension contract where the original contract has expired.</p>	Complied
4.4.5.7	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p>- Major compliance -</p>	<p>Bukit Puteri Estate registered all their workers into Employee Master Details Listing in SEMUA system. All the daily attendance and overtime work were recorded in Estate Daily Attendance Report. Onsite interview with sampled workers informed working time and break time is according to employment contract. Overtime offered to workers is voluntarily upon mutually agreement between management and workers.</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
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 -	Bukit Puteri Estate employed local and foreign workers and registered into Employee Master Details Listing in SEMUA system. Worker's attendance will be recorded daily in Estate Daily Attendance Report. Onsite interview with sampled workers informed working time and break time is according to employment contract. Overtime offered to workers is voluntarily upon mutually agreement between management and workers.	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 -	Bukit Puteri Estate manage workers' payslip through SAP system. Daily attendance and total hours of overtime will be recorded into SAP system. Wages and overtime were paid according to the Daily Attendance Report and productivity reports. Copy printed of the payslip will be kept to workers upon payday as evidence for reference. Refer to indicator 4.4.5.3.	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions. - Minor compliance -	SDPB through Bukit Puteri Estate contributed 10 kg of rice once every 2 months for all their workers. Apart from that, all the workers are provided with free medical facilities. In additional, all the workers are entitled with the phone allowance of RM5 for every month. Free housing facilities were provided to all the workers and their families.	Complied
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation. - Major compliance -	SDPB established Workers Housing Management Procedure 2022, Ver.01, dated 30/06/2022 as guidelines to continuously improve of living standards of their employee in estates and mill operations. Its shown company commitment in managing employee's housing repair and maintenance through digital platform named Digital Housing Complaint system or 'OilPalmPal'. To provide guidance to management in providing a safe, livable workers housing condition in accordance with Workers Minimum	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Standard of Housing & Amenities (Amendment) 2091 (Act A 1604). To integrate all past policies related to workers housing & amenities management in the operating units including.</p> <ol style="list-style-type: none"> 1. Workers minimum standard of housing amenities guidelines – Jan 2015 2. IOM – employees housing inspection & welfare – Dec 2020 3. IOM – rules & regulations at employee house – June 2021 4. IOIM – Safe handling & storage of Petrol – Mar 2021 5. IOM – Safe Fogging Procedure – June 2021. <p>Bukit Puteri Estate provided free housing facilities to all their workers. Basic amenities such as water, electricity, football field and etc. were provided to the workers. The housing condition was in accordance to the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446). Interview with the workers confirmed that they did not have any complaint or grievance related to housing to be reported.</p>	
4.4.5.12	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p>- Major compliance -</p>	<p>SDPB has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They seek to create a working environment with zero tolerance for sexual harassment and abuse and in which violence is never used to resolve issues or conflict.</p> <p>SDPB issued Inter-Office Mail (Ref. No.: CEOUM/064/10/2022) dated 11/10/2022 with topic 'Non-conformity on Gender Committee Meeting Frequency' from CEO, Upstream Malaysia' has incorporated its policy on violence and sexual harassment in the "Group Sustainability & Quality Policy Statement" mention in Indicator 4.1.1.2 where the</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>management is committed to prevent sexual harassment and other forms of violence. Interview with gender committee and woman workers representative showed no evidence of sexual harassment or violence happened so far.</p> <p>Gender Committee was established in Bukit Puteri Estate to monitor if there is any case of sexual harassment reported. Gender committee meeting conduct on 03/02/2023 which conduct for 1st phase for year 2023 for children, festive celebration, and health.</p>	
4.4.5.13	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p>- Major compliance -</p>	<p>SDPB established Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They respect the rights of their employees to form and join unions and bargain collectively.</p> <p>Social Dialogue was carried out by the management of Bukit Puteri Estate with workers to update the progress of action taken for the issues raised by workers. The initiative will discuss during management review meeting and action taken accordingly. All issues will be uploaded into Social Dialogue Online Tracker System (SDOTS) for monitoring.</p> <p>Verified the records of monitoring of issues and evidence of actions taken to resolve the issues raised by the workers.</p> <p>The workers that involved in the Social Dialogue were NUPW representatives, Gender Committee representatives and others' nationalities representatives.</p> <p>Bukit Puteri Estate management allowed their workers to form or join any association such as NUPW. Document reviewed on their payslip found that they are deducted for the NUPW subscription fees of RM 8</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>monthly.</p> <p>Meeting with NUPW representative was conducted on 13/01/2023 and 31/03/2023. Review minutes of meeting sighted topics discuss includes social matters at workers housing, Aidilfitri festive celebration and safety aspect.</p> <p>Interview with the workers informed they have freedom to join any association without any interference by management.</p>	
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.</p> <p>- Major compliance -</p>	<p>SDPB established Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography. They are eradicating child labour in all their supply chain and not employ anyone underage of 18 years.</p> <p>Document review workers masterlist confirmed Bukit Puteri Estate has not employed any child labour in operations.</p>	Complied
Criterion 4.4.6: Training and competency			
4.4.6.1	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p>- Major compliance -</p>	<p>The estate maintained the training records conducted. Reviewed the training records as follows:</p> <ol style="list-style-type: none"> 1. SOP and PPE awareness refresher for sprayer training dated 05/04/2023, 16/02/2023 2. Grievances handling briefing dated 29/03/2023 and 27/03/2023 3. Firefighting and drill training dated 01/02/2023 	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		4. Scheduled waste, open burning, buffer zone, HCV briefing dated 20/03/2023 5. SOP and PPE refresher for harvester training dated 09/03/2023, 11/01/2023 6. Prohibition of hunting or entering the set aside area briefing dated 06/03/2023 7. Human Right Charter, Defender and Policy briefing dated 24/02/2023 8. SOP manuring and PPE awareness training dated 20/02/2023 9. SOP rat baiting and PPE awareness training dated 04/02/2023 10. Chemical handling and spraying training dated 05/01/2023 11. ESWISS management training dated 02/12/2022 12. Chemical handling training dated 22/03/2022 13. First Aid training dated 13/02/2023 14. Reduce, Reuse and Recycle (3R) briefing dated 13/02/2023	
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	The estates visited has conducted training need analysis for all employee, management, and contractors. The need analysis was conducted based on the job designation and training required by the job type. Reviewed the training need analysis conducted on 28/03/2022 and 25/04/2022.	Complied
4.4.6.3	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure. - Minor compliance -	The estate has established training schedule FY 2023 based on training need analysis conducted. The training program covers Policy, operation and OSH/others.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		The program involves the executive, staff/ supervisor, workers and contractors. The identified training was programmed throughout the year.	
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	SDPB has established environmental policy documented in Group Sustainability and Quality Statement signed by Group Managing Director dated 2/12/2019 Group Health, Safety & Environment (HSE) Policy signed by the Group Managing Director dated 05/05/2022. In the Policy stated as follows: Group Sustainability and Quality Statement: Minimizing Environmental Harm: 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	Complied
4.5.1.2	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. - Major compliance -	The estate visited has established environmental management plan base on aspect and impacts analysis conducted. The environmental management plan was established based 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. The EAI/EIE and management plan was reviewed on annually basis. Latest review was conducted on 05/01/2023.	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.1.3 An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>The estate has established Environmental Management Plan. The plan was reviewed on annually basis. Reviewed the implementation of the management plan FY 2022 as follows:</p> <ol style="list-style-type: none"> 1. The estate has established river riparian buffer zone for Sg. Telang as sighted in field P09A. The riparian buffer zone was demarcated with red and white colour ring at the palm trunks. No evidence of chemical application sighted at the area. Signage on prohibition to conducts activities such as swimming, fishing and chemical applications has been erected at the buffer zone area. Noted during interview with the sprayers, the understanding on prohibition of activities in the buffer zone area is satisfactory. 2. 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, January and February 2023 for vehicle no. TC006 and TF018. 3. To ensure no electricity wastage due illegal wiring, the estate conducted weekly housing inspection. Reviewed the inspection records dated 15/03/2023, 22/03/2023 and 27/03/2023. 4. The estate continuously provided training on HCV and RTE to the workers to ensure the satisfactory understanding. Reviewed the training records conducted on 03/02/2023. 	<p>Complied</p>
<p>4.5.1.4 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 Environmental Management Plan.</p> <p>Among the promoted positive impact as follows:</p>	<p>Complied</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance															
		1. The estate applied EFB in the field as nutrient cycle program. Reviewed the application records FY 2022 recorded at 13002.19 tons. 2. The estate continuously promoted the reduce, reuse and recycle program to the workers. Reviewed the briefing records dated 13/02/2023.																
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. - Major compliance -	The estates continuously provide training to the workers to create awareness regarding the environmental policy and management plan established. Reviewed the training as per indicator 4.4.6.1.	Complied															
4.5.1.6	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. - Major compliance -	The estate discussed the issues on environmental concern during Environmental Performance Monitoring Committee meeting and Environmental Safety and Health Committee meeting. Reviewed the minutes meeting dated 20/03/2023 and 19/01/2023.	Complied															
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																		
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period. - Major compliance -	The estate has established Energy Management Plan. Reviewed implementation of the plan as follows: 1. The estates monitor the diesel and electricity consumption per ton FFB produce on monthly basis. Reviewed the records as follows: <table border="1" data-bbox="1093 1230 1796 1398"> <thead> <tr> <th>Month (2022)</th> <th>Diesel</th> <th>Electricity</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>2.29</td> <td>13.48</td> </tr> <tr> <td>Feb</td> <td>2.31</td> <td>13.42</td> </tr> <tr> <td>Mar</td> <td>2.11</td> <td>11.23</td> </tr> <tr> <td>Apr</td> <td>2.41</td> <td>12.20</td> </tr> </tbody> </table>	Month (2022)	Diesel	Electricity	Jan	2.29	13.48	Feb	2.31	13.42	Mar	2.11	11.23	Apr	2.41	12.20	Complied
Month (2022)	Diesel	Electricity																
Jan	2.29	13.48																
Feb	2.31	13.42																
Mar	2.11	11.23																
Apr	2.41	12.20																

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings			Compliance																											
		<table border="1"> <tr><td>May</td><td>2.25</td><td>12.69</td></tr> <tr><td>Jun</td><td>2.20</td><td>12.66</td></tr> <tr><td>Jul</td><td>2.02</td><td>13.08</td></tr> <tr><td>Aug</td><td>2.27</td><td>10.94</td></tr> <tr><td>Sep</td><td>2.08</td><td>10.11</td></tr> <tr><td>Oct</td><td>1.93</td><td>9.77</td></tr> <tr><td>Nov</td><td>1.88</td><td>8.93</td></tr> <tr><td>Dec</td><td>2.34</td><td>9.38</td></tr> <tr><td>Average</td><td>2.18</td><td>11.49</td></tr> </table>	May	2.25	12.69	Jun	2.20	12.66	Jul	2.02	13.08	Aug	2.27	10.94	Sep	2.08	10.11	Oct	1.93	9.77	Nov	1.88	8.93	Dec	2.34	9.38	Average	2.18	11.49			
May	2.25	12.69																														
Jun	2.20	12.66																														
Jul	2.02	13.08																														
Aug	2.27	10.94																														
Sep	2.08	10.11																														
Oct	1.93	9.77																														
Nov	1.88	8.93																														
Dec	2.34	9.38																														
Average	2.18	11.49																														
		<p>2. 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, January and February 2023 for vehicle no. TC006 and TF018.</p> <p>3. To ensure no electricity wastage due illegal wiring, the estate conducted weekly housing inspection. Reviewed the inspection records dated 15/03/2023, 22/03/2023 and 27/03/2023.</p>																														
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 estate has established the direct usage of non-renewable energy such as diesel and electricity base on the consumption of the previous year consumption.			Complied																											
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	No possible usage of renewable energy in the estate.			Complied																											
Criterion 4.5.3: Waste management and disposal																																

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance									
<p>4.5.3.1</p> <p>All waste products and sources of pollution shall be identified and documented.</p> <p>- Major compliance -</p>	<p>The operating units has identified the waste generated from the estate operations documented in the Waste Management Plan. Reviewed the waste identification categorized as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Category</th> <th>Types/Location</th> </tr> </thead> <tbody> <tr> <td>Domestic Waste</td> <td> <ul style="list-style-type: none"> Rubbish (Worker’s housing Complex, Office, Workshop, Store, Shop) Sewage (Septic Tank at workers Housing Complex & Office) </td> </tr> <tr> <td>Industrial Waste</td> <td> <ul style="list-style-type: none"> Scrap metal </td> </tr> <tr> <td>Scheduled Waste</td> <td> <ul style="list-style-type: none"> Used lubricant container, pesticide/ Chemical container, fertilizer bags (inner) Used batteries Contaminated rags Clinical waste </td> </tr> <tr> <td>Recyclable Waste</td> <td> <ul style="list-style-type: none"> Empty pesticide container, reuse empty container EFB POME Domestic waste </td> </tr> </tbody> </table>	Category	Types/Location	Domestic Waste	<ul style="list-style-type: none"> Rubbish (Worker’s housing Complex, Office, Workshop, Store, Shop) Sewage (Septic Tank at workers Housing Complex & Office) 	Industrial Waste	<ul style="list-style-type: none"> Scrap metal 	Scheduled Waste	<ul style="list-style-type: none"> Used lubricant container, pesticide/ Chemical container, fertilizer bags (inner) Used batteries Contaminated rags Clinical waste 	Recyclable Waste	<ul style="list-style-type: none"> Empty pesticide container, reuse empty container EFB POME Domestic waste 	<p>Complied</p>
Category	Types/Location											
Domestic Waste	<ul style="list-style-type: none"> Rubbish (Worker’s housing Complex, Office, Workshop, Store, Shop) Sewage (Septic Tank at workers Housing Complex & Office) 											
Industrial Waste	<ul style="list-style-type: none"> Scrap metal 											
Scheduled Waste	<ul style="list-style-type: none"> Used lubricant container, pesticide/ Chemical container, fertilizer bags (inner) Used batteries Contaminated rags Clinical waste 											
Recyclable Waste	<ul style="list-style-type: none"> Empty pesticide container, reuse empty container EFB POME Domestic waste 											
<p>4.5.3.2</p> <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>The estate 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>Reviewed the implementation of the management plan as follows:</p> <p>1. The estate maintains the inventory records of the recycle waste and scheduled waste generated in the estate. Inventory for scheduled waste were notify to DOE through ESWISS. Reviewed</p>	<p>Complied</p>										

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																		
		<p>the fifth scheduled dated 03/04/2023, 31/03/2023, and 08/02/2023.</p> <p>2. The estate applied EFB in the field as nutrient cycle program. Reviewed the application records FY 2022 recorded at 13002.19 tons.</p> <p>3. The estate continuously promoted the reduce, reuse and recycle program to the workers. Reviewed the briefing records dated 13/02/2023.</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>The estate also has a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected at the estate and in satisfactory conditions.</p> <p>Reviewed the latest disposal records as follows:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>SW</th> <th>Consignment notes no</th> </tr> </thead> <tbody> <tr> <td>14/11/2022</td> <td>404</td> <td>2022111417FS57DH</td> </tr> <tr> <td rowspan="3">04/02/2023</td> <td>305</td> <td>2023020412F8Q5CP</td> </tr> <tr> <td>306</td> <td>2023020412MZ81YC</td> </tr> <tr> <td>409</td> <td>20221223220YR907</td> </tr> <tr> <td rowspan="2">23/12/2022</td> <td>306</td> <td>2022122322DVBWXM</td> </tr> <tr> <td>305</td> <td>2022122322H2TL1G</td> </tr> </tbody> </table> <p>For SW 305 spent lubricant and SW 410 oil filter, the vehicle servicing contractors, Sxxx Dxxxx Ixxxxxxxxx Sdn. Bhd. and Kxxxxx Malaysia Sdn. Bhd. brought out the schedule waste for disposal as they have</p>	Date	SW	Consignment notes no	14/11/2022	404	2022111417FS57DH	04/02/2023	305	2023020412F8Q5CP	306	2023020412MZ81YC	409	20221223220YR907	23/12/2022	306	2022122322DVBWXM	305	2022122322H2TL1G	Complied
Date	SW	Consignment notes no																			
14/11/2022	404	2022111417FS57DH																			
04/02/2023	305	2023020412F8Q5CP																			
	306	2023020412MZ81YC																			
	409	20221223220YR907																			
23/12/2022	306	2022122322DVBWXM																			
	305	2022122322H2TL1G																			

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>acquired approval to conduct off-site scheduled waste disposal from DOE as per approval letter as follows:</p> <ol style="list-style-type: none"> 1. Approval letter to Sxxx Dxxxx Ixxxxxxxxx Sdn. Bhd. no. AS(BB)91/110/619/161 Jilid 14 (69) dated 06/09/2011 2. Approval letter to Kxxxxx Malaysia Sdn. Bhd. no. JAS 600-3/25/11 Jilid 14(17) dated 13/04/2022 <p>Reviewed the sample collection records as follows:</p> <ol style="list-style-type: none"> 1. Bring Back Scheduled Waste Form Serial No. 1603 dated 27/02/2023 2. "Borang Penghantaran Buangan Terjadual" no. SWD AE no. 00154 dated 16/03/2023 	
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 XXXXXX TecXXXXX EXXXXXXX. Refer approval letter from DOE no. AS (B) J 91/110/XXX/XXX Jld 3(37) dated 24/10/2018. Sighted the implementation of the triple rinse during site visit at the storage area.</p> <p>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. 2247 dated 23/12/2022.</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>The estate collected the domestic waste 3 times a week. Reviewed the collection records for the month of January, February and March 2023. The domestic waste was disposed in designated landfill located away from waterways and housing area. Sighted during site visit at the landfill area in field P15 only domestic waste were disposed in the area.</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.5.4: Reduction of pollution and emission			
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	The estate 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 estate sampled has established Pollution Prevention Plan. Among the plan as follows: Replanting Activities <ol style="list-style-type: none"> 1. To minimize soil erosion during replanting by planting LCC 2. To prevent the destruction to riparian by area demarcation 3. To ensure all Scheduled Waste management must be accordance as per legal requirement 4. To maintain oil trap as to prevent oil spillage and to provide proper spill kit 5. To carry out refresher training on spillage management 6. Monitoring effectiveness of preventive maintenance vehicle (PMV) checklist 7. To provide tray and prevent pesticides direct contact to soil. 8. To erect no open burning signage. 	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	The estate has established Water Management Plan and reviewed on annually basis. Reviewed the implementation of the management plan as follows:	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
<p>(surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate. e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented. f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. <p>- Major compliance -</p>	<ul style="list-style-type: none"> a. The sampled estates provided clean water to the workers from government water supply, PAIP for division A and mill water supply for division B. The estate monitors the drinking water quality supplied by the mill on monthly basis. reviewed the analysis report no. ML 166/2023 and ML 167/2023 dated 08/03/2023 and ML 92/2023 and ML 93/2023 dated 10/02/2023. The results were conformed with NSDWQ for domestic use. b. The estate conducted water sampling for Sg. Telang on quarterly basis as per SOP established. Reviewed latest sampling conducted on 28/12/2022 as per water analysis report no. IE67/2023 dated 13/01/2023. The results were conformed with Class IIA/IIB of NWQS for natural waterways. c. The Water Management Plan FY 2022 focusing on contingency during water shortage, monitor the usage of fresh water on monthly basis, to reuse/ recycle wastewater and to avoid soil erosion/ bund collapse. d. The estate has established river riparian buffer zone for Sg. Telang as sighted in field P09A. The riparian buffer zone was demarcated with red and white colour ring at the palm trunks. No evidence of chemical application sighted at the area. Noted during interview with the sprayers, the understanding on prohibition of activities in the buffer zone area if satisfactory. e. The estate monitors the water usage on monthly basis including usage for domestic estate daily operation. Reviewed the records FY 2022 recorded at 165090 L. 	
<p>4.5.5.2 No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p>	<p>Verified during site visit, no bunds, weirs or dams were constructed for Sg. Telang which flows through the estates sampled.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance														
	- Minor compliance -																
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																	
4.5.6.1	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover: a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities. b) Conservation status (<i>e.g.</i> The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities. - Major compliance -	SDPB has conducted reassessment on High Conservation Value and High Biodiversity Value area in the SOU 10 Bukit Puteri POM and Supply Base documented in High Conservation Valuee (HCV) Re-Assessment for Pahang Zone: Strategic Operating Unit (SOU): 10 Bukit Puteri, Final Report (Version II) dated March 2016 by PSQM Department. The High Conservation Value and High Biodiversity Value identified in the operating units documented in Table 5: Summary of revised HCV areas and hectarage. Among the HCV area identified in the sampled operating units as follows: <table border="1" data-bbox="1048 1043 1865 1177"> <thead> <tr> <th>Estate</th> <th>HCV Area</th> <th>Hectare</th> <th>HCV Class</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Bukit Puteri Estate</td> <td>River Reserve (Sg. Telang)</td> <td>17.77</td> <td>HCV 4</td> </tr> <tr> <td>Water Catchment</td> <td>2.81</td> <td>HCV 4</td> </tr> <tr> <td>Pond</td> <td>0.78</td> <td>HCV 4</td> </tr> </tbody> </table>	Estate	HCV Area	Hectare	HCV Class	Bukit Puteri Estate	River Reserve (Sg. Telang)	17.77	HCV 4	Water Catchment	2.81	HCV 4	Pond	0.78	HCV 4	Complied
Estate	HCV Area	Hectare	HCV Class														
Bukit Puteri Estate	River Reserve (Sg. Telang)	17.77	HCV 4														
	Water Catchment	2.81	HCV 4														
	Pond	0.78	HCV 4														
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: a) Ensuring that any legal requirements relating to the protection of the species are met. b) Discouraging any illegal or inappropriate hunting, fishing or	No RTE species were identified in the assessment conducted as per High Conservation Valuee (HCV) Re-Assessment for Pahang Zone: Strategic Operating Unit (SOU): 10 Bukit Puteri, Final Report (Version II) dated March 2016.	Complied														

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	collecting activities; and developing responsible measures to resolve human-wildlife conflicts. - Major compliance -	The estate has established HCV/Biodiversity Management Plan base on the HCV identified in the report. The plan was reviewed on annually basis.	
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. - Major compliance -	<p>The estate has established HCV/Biodiversity Management Plan base on the HCV identified in the report. Reviewed and sighted the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. The estate continuously provided training on HCV and RTE to the workers to ensure the satisfactory understanding. Reviewed the training records conducted on 03/02/2023. 2. The estate conducted monitoring on HCV area on monthly basis. The monitoring focusing on encroachment/ sign of trespassing, wildlife issues/ conflicts/ Sightings, Pollution/ erosion issues and others. Reviewed the HCV area monitoring records dated 08/03/2023, 02/02/2023 and 03/01/2023. Noted during site visit, the condition of the HCV area was consistent with the reports. 3. The estate has established river riparian buffer zone for Sg. Telang as sighted in field P09A. The riparian buffer zone was demarcated with red and white colour ring at the palm trunks. No evidence of chemical application sighted at the area. Signage on prohibition to conducts activities such as swimming, fishing and chemical applications has been erected at the buffer zone area. Noted during interview with the sprayers, the understanding on prohibition of activities in the buffer zone area if satisfactory. 	Complied
Criterion 4.5.7: Zero burning practices			

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
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 -	Addressed in the Responsible Agriculture Charter, revised in 2020, under section 3.2: Commitment Towards No Deforestation and New Development on Peat, stated as follows: 3.2.5: Zero use of fire for land preparation and establish effective monitoring and prevention as well as proactive firefighting measures within a reasonable radius beyond our operational boundaries.	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.	Not Applicable
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	Not Applicable
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	Noted based on the records on the land clearing and felling for the replanting at visited estates, method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	For estates daily operation, the estate adopted the Sime Darby Plantation Agricultural Reference Manual, latest update issue no. 2, dated June 2021. The SOP covers as follows:	Non-compliance

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

Criterion / Indicator	Assessment Findings	Compliance
	<ol style="list-style-type: none"> 1. Planting Materials 2. Nursery Techniques 3. Replanting 4. Land Preparation 5. Planting Density 6. Maturity Age 7. Field upkeep 8. Manuring 9. Canopy Management 10. Water Management in Coastal and Peat Planting 11. Ablation 12. Ripeness Standard 13. Harvesting Interval 14. Loose fruit collection 15. Crop Protection 16. Weed Control 17. Leguminous Cover Crop Establishment 18. Rainfall Recording <p>For Health, Safety and Environment, both mill and estates, SDPB has issued Health, Safety and Environment (HSE) Management System and Standard Operating Procedures.</p> <p>SDPB continuously updated the SOP established. Among the latest updated SOP as follows:</p> <ol style="list-style-type: none"> 1. UM HSE Management System Manual, UM/HSE/MS/01 	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>2. First Aid in Workplace Procedure, UM/HSE/OCP/01</p> <p>3. Safety Harvesting Procedure, UM/HSE/OCP/02</p> <p>4. Personal Protective Equipment Procedure, UM/HSE/OCP/03</p> <p>5. Chemical Safety Management Procedure, UM/HSE/OCP/04</p> <p>6. Permit to Work (PTW) Procedure, UM/HSE/OCP/05</p> <p>7. OSH Risk Management Procedure, UM/HSE/SE/01</p> <p>SDPB 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> <p>Non-conformity</p> <p>Site visit carried out at house# E25 (division B), damage complaint recorded in OPP against actual condition for main and room doorknob broken and bathroom water tub/container leaking were verified. Risk category rated as "low" however based on Appendix C; Recommended timeline for repair completion it should be rated as high for the main door broken and water tank leakage issue.</p> <p>For house# A8, in the OPP tracker/summary, damage complaint made on 24/1/2023 for broken ceiling, electrical plug point and no water supply for kitchen sink. Repair work completed on 18/2/23 and updated in OPP tracker/summary. Based on interview with house# A8 owner has confirmed that repair work has yet to be completed. Status reported in OPP tracker/summary was found to be inconsistent with the actual status as to date.</p> <p>This shows that the Workers Housing Management Procedure is not consistently implemented to address complaint received from workers. Thus, Minor NC was raised.</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.6.1.2	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals. - Major compliance -	Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.1 Protect and conserve biodiversity and ecosystems stated as follows: "3.1.2 - Management of erosion by protection of steep slopes and river reserves within our operations and promote restoration programs." SDPB has also established Interim Guideline titled Reclassification of Conservation Aet Aside (CSA) for Upstream Operation. Refer doc. no. PSQM/ENV/GD/INT02, ver. 2 dated 01/04/2019 under section 3.0 The Reclassification Process. The guideline stated as follows: "3.1.2 - R&D-PAU will provide the estate with geo-referenced elevation map for them to demarcate the above 25-degree areas in the replant. *No replanting is allowed of any individual, contiguous area of steep slopes (greater than 25 degrees) larger than 25 ha within the Unit of Certification."	Complied
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	Both Estates visited had a visual identification/reference system for each established field/block and maps established. Field numbers and hectare were marked on palms and in some areas on concrete slaps.	Complied
Criterion 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 -	SOU 10 has continued its commitment to long term sustainability and improvements through a capital expenditure program. The management has forecasted 5 years business plan from FY 2023 – FY 2027	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance						
		<p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. Sighted the annual budget FY 2023 and business plan FY 2023 – FY 2027</p> <p>In the 5 years business plan include items as follows:</p> <p>Oil Palm Estate</p> <ul style="list-style-type: none"> i. Total crop projection and yield potential ii. Activity direct cost <ul style="list-style-type: none"> a. Mature upkeep b. Manuring c. Harvesting and collection d. Transportation e. Nursery iii. Estate administration <ul style="list-style-type: none"> a. Admin Cost iv. Labour overhead v. Road and bridges vi. Cost of production. <p>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2027) and well documented upon request.</p>							
4.6.2.2	<p>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.</p> <p>- Major compliance -</p>	<p>SOU 10 has long range replanting program until FY 2027. Replanting planned for the palm older than 25 years, non-performance field (yield) and Ganoderma infected palm. Observed the replanting program for the next financial year as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;"></td> <td style="width: 15%;">2023</td> <td style="width: 15%;">2024</td> <td style="width: 15%;">2025</td> <td style="width: 15%;">2026</td> <td style="width: 15%;">2027</td> </tr> </table>		2023	2024	2025	2026	2027	Complied
	2023	2024	2025	2026	2027				

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings						Compliance
		Bukit Puteri	160.59	163.24	212.67	181.70	99.93	
4.6.2.3	<p>The business or management plan may contain:</p> <ul style="list-style-type: none"> a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment <p>- Major compliance -</p>	<p>All relevant information contained in the annual budget plan for as sighted in annual budget FY2023 such as:</p> <ul style="list-style-type: none"> i. Total crop projection and yield potential ii. Activity direct cost <ul style="list-style-type: none"> a. Mature upkeep b. Manuring c. Harvesting and collection d. Transportation e. Nursery iii. Estate administration <ul style="list-style-type: none"> a. Admin Cost iv. Labour overhead v. Road and bridges vi. Cost of production. 						Complied
4.6.2.4	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p> <p>- Major compliance -</p>	<p>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2027) and well documented. The document was available for review upon request.</p>						Complied
Criterion 4.6.3: Transparent and fair price dealing								
4.6.3.1	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p>- Major compliance -</p>	<p>SDPB established pricing mechanism and conducted as per contract agreement with contractors.</p>						Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Review on the contract agreement, sighted pricing of the job task is available. Sampled contract/Letter of Award to contractors as follows.</p> <ol style="list-style-type: none"> 1. Letter of Award to Mxxx Bxxx Enterprise dated 22/02/2022. 2. Letter of Award to Nxxx Axxx Bxxx Kxxx dated 25/01/2022. 3. Letter of Award to Jxxx Axxx Enterprise dated 30/06/2020. 	
4.6.3.2	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>SDPB established pricing mechanism and conducted as per contract agreement with contractors.</p> <p>Review on the contract agreement, sighted pricing of the job task is available. Payment terms for contract work were stated in the contract agreement.</p> <p>Onsite interview with contractors informed their payments were made as per payment terms stated in the contracts. No delayed of payments recorded.</p>	Complied
Criterion 4.6.4: Contractor			
4.6.4.1	<p>Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p>	<p>SDPB established contractor agreement with letter of Award & Acceptance (LOA) with contractor as follow.</p> <ol style="list-style-type: none"> 1. Mxxx Bxxx Enterprise for FFB evacuation to the mill with contract completion from 22/02/2022 until 31/12/2023. 2. Nxxx Axxx Bxxx Kxxx for machinery rental-backhoe with contract completion from 25/01/2022 until 25/12/2022. 3. Jxxx Axxx Enterprise for replanting with contract completion from 30/06/2020 until 31/12/2023. <p>SDPB established Ikrar Integriti Vendor which signed by contractor follow.</p> <ol style="list-style-type: none"> 1. Mxxx Bxxx Enterprise dated 20/02/2021. 	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>2. Nxxx Axxx Bxxx Kxxxi dated 21/01/2022.</p> <p>3. Jxxx Axxx Enterprise dated 25/02/2021.</p> <p>The contractors engaged by the estates' management has signed on a letter for the compliance of RSPO/ ISCC/ MSPO/ SCCS. All the contractors need to follow the RSPO/ ISCC/ MSPO/ SCCS requirements in accordance with SDPB of Estate Quality Management System.</p> <p>Onsite interviewed with contractors informed they were understood the MSPO requirements.</p>	
4.6.4.2	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p>- Major compliance -</p>	<p>Bukit Puteri Estate engaged contractors for works such as FFB & EFB transporting. Sampled of the agreement/ letter of award (LOA)/ contract between company and the contractors as below:</p> <ol style="list-style-type: none"> 1. Mxxx Bxxx Enterprise for FFB evacuation to the mill with contract completion from 22/02/2022 until 31/12/2023. 2. Nxxx Axxx Bxxx Kxxxi for machinery rental-backhoe with contract completion from 25/01/2022 until 25/12/2022. 3. Jxxx Axxx Enterprise for replanting with contract completion from 30/06/2020 until 31/12/2023 <p>Pricing of the works/ services and mechanism were clearly stated in the LOA and Terms & Conditions of Purchase Order and agreed by the contractors.</p>	Complied
4.6.4.3	<p>The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.</p> <p>- Minor compliance -</p>	<p>Contractors have signed on the letter for the compliance of RSPO/ ISCC/ MSPO/ SCCS requirements in accordance with SDPB HQ Estate Quality Management System which mentioned the contractor shall provide access to the RSPO/ ISCC/ MSPO/ SCCS auditors to contractors' operation site(s) and employees whenever deemed necessary. Seen the letter and signed as follow.</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		1. Mxxx Bxxx Enterprise dated 20/02/2021. 2. Nxxx Axxx Bxxx Kxxxi dated 21/01/2022. 3. Jxxx Axxx Enterprise dated 25/02/2021.	
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	SDPB responsible for the observance of the control points applicable to the tasks performed by the contract, checking and signing the assessment of the contractor for each task and season contracted. All works performed of estate are checked and verified by the estate's personnel.	Complied
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance -	No development of new planting within the certification units.	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 -	No development of new planting within the certification units.	Not Applicable
Criterion 4.7.2: Peat Land			

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	No development of new planting within the certification units.	Not Applicable
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 -	No development of new planting within the certification units.	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 -	No development of new planting within the certification units.	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 -	No development of new planting within the certification units.	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 -	No development of new planting within the certification units.	Not Applicable

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.7.4: Soil and topographic information			
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	No development of new planting within the certification units.	Not Applicable
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 -	No development of new planting within the certification units.	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 -	No development of new planting within the certification units.	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 -	No development of new planting within the certification units.	Not Applicable
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	No development of new planting within the certification units.	Not Applicable
Criterion 4.7.6: Customary land			

Criterion / Indicator		Assessment Findings	Compliance
4.7.6.1	No new plantings are established on recognised customary land without the owners' free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. - Major compliance -	No development of new planting within the certification units.	Not Applicable
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	No development of new planting within the certification units.	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 -	No development of new planting within the certification units.	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 -	No development of new planting within the certification units.	Not Applicable
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	No development of new planting within the certification units.	Not Applicable

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	No development of new planting within the certification units.	Not Applicable
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	No development of new planting within the certification units.	Not Applicable
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 -	No development of new planting within the certification units.	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) maintain the current Group Sustainability & Quality Policy signed by Group Managing Director on 02/12/2019 include the statement on commitment towards MSPO implementation. The memo describes company commitment to comply on the MSPO standards implementation and towards certified sustainable palm oil products.	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 -	SDPB maintain the current Group Sustainability & Quality Policy signed by Group Managing Director on 02/12/2019 include the statement on commitment towards MSPO implementation. From the memo describes company commitment on emphasizing to achieved systematic approach on ensuring continuous improvement in the operation, compliance to statutory, legal and other regulatory requirements and establishment of traceability within the supply chain in the above-mentioned memorandum.	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	SDPB update Internal Audit Procedure with Doc. No.: SDP/GSD/SCU/IAP approved on 10/01/2023. The frequency of the internal audit shall be carried out at least once a year and when is required.	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		Document review on the internal audit plan, sighted Group Sustainability Department (GSD) conduct the internal audit plan for Bukit Puteri POM on 07/02/2023.	
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 -	SDPB update Internal Audit Procedure with Doc. No.: SDP/GSD/SCU/IAP approved on 10/01/2023. Reviewed the latest internal audit conducted on 08/02/2023, HQ Department has identified non-conformities and certification unit response to close all findings on 24/03/2023 with identified root causes, corrections, and corrective actions. Based on the reports, Bukit Puteri POM been raised with six (6) findings classified as majors.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	SDPB update Internal Audit Procedure with Doc. No.: SDP/GSD/SCU/IAP approved on 10/01/2023. Onsite visit to Bukit Puteri POM verified the internal audit report kept, available and discussed during management review meeting. As evidence, all findings from internal audit were responded within the acceptable timeframe.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	SDPB established SOP for Management Review documented in Standard Operation Manual, Sub-Section 5.6, dated: 25/5/2015. Based on the SOP established, the frequency for management review needs to be carried out at least once a year. Review minutes of Meeting conducted on 22/03/2022. The agenda discussed during the meeting as follows: 1. Process performance and product conformity are meet since no	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>feedback from customers as at the meeting date.</p> <ol style="list-style-type: none"> 2. Result of the internal audit RSPO & MSPO Audit findings as per indicator 4.1.2.2 with correction and corrective action already closed. 3. Follow-up action taken of matters arising from previous meeting follow up (internal and external issues), the matters transferred into social impact assessment for follow up. 4. No changes of operations in the mill that could affect the management system as at the meeting date. 5. Recommendation for improvement based on internal and external RSPO and MSPO audit findings. 6. No complaints and grievances lodged by stakeholders. 7. No additional resource needs as at the meeting date. 	
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>SDPB issued an inter-office mail (Ref. No.: SQM.RSPO.1811/22.11) dated 23/11/2018 regarding the statement on commitment towards MSPO implementation.</p> <p>From the memo describes company commitment on emphasizing to achieved systematic approach on ensuring continuous improvement in the operation, compliance to statutory, legal and other regulatory requirements and establishment of traceability within the supply chain in the above-mentioned memorandum.</p> <p>Bukit Puteri POM established individual continual improvement plan include with action plan to be taken updated for year 2023.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Documented review, the management identified aspect and significant impact covered on environmental, safety and social.	
4.1.4.2	<p>The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.</p> <p>- Major compliance -</p>	<p>Bukit Puteri POM established annual training plan based on the training needs analysis.</p> <p>The management team will be informed of such new information, new technology or new development during the monthly management meetings. Dissemination of information by the RCEO and RGM are transacted during the monthly Managers meetings and emails.</p> <p>Upon confirmation all employees will be briefed of any new development in basic understanding during the weekly briefings. As at the audit, no new information, new technology or new development in Bukit Puteri POM’s facilities.</p> <p>Review on the plan, no new technology applied. The online platform for complaints submission continuously applied and included as a topic of training.</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 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>SDPB established Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/04/2008 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the estate.</p> <p>Timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		investigation for communication requiring investigation. Review on the procedure, describes mill manager as person in-charge and responsible to address the communication and requests from internal and external.	
4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance -	The management disseminated the information of the documents that made publicly available such as management plan, OSH plan, audit reports and land titles upon request during the stakeholder meetings. Internal and external stakeholders could access to the SDPB' address website at https://simeidarbyplantation.com/sustainability/reports-policies-and-statements/ to obtain information such as policies, annual report and complaint procedures.	Complied
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	SDPB established Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/11/2008. The procedure describes timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation. The mechanism is to enable effective and timely communication with employees and external interested parties. External stakeholders' meeting conducted 31/03/2023 for Bukit Puteri POM and Bukit Puteri Estate. The meeting was attended by school, contractor, local authorities, local community representatives, neighbours, vendors and FFB suppliers.	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	Review on the procedure, describes mill manager as person in-charge and responsible to address the communication and requests from internal and external. However, mill manager assigned social officer to assist them to handle issues related to social in estate with appointment letter for Assistant Engineer dated 01/03/2019 signed by the Mill Manager.	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. - Major compliance -	Bukit Puteri POM established the List of Stakeholders FY 2023 includes categorized as Contractors, Vendors/Suppliers, Local Community and Other Interested Parties (Government Agencies, School, Hospitals, Balai Polis, OCP and etc.). External stakeholders' meeting conducted 31/03/2023 for Bukit Puteri POM and Bukit Puteri Estate. The meeting was attended by school, contractor, local authorities, local community representatives, neighbours, vendors and FFB suppliers.	Complied
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. - Major compliance -	SDPB update Standard Operating Procedure for Sustainable Supply Chain and Traceability, Doc. No.: SD/SDP/GSD/SCCS/0522/01; on 2022. The objective of the procedure is to provide guideline for estates to establish and ensure effective implementation on sustainable supply chain and traceability of certified sustainable materials (FFB). The Standard Operating Procedures also specifies the identified CCPs of which the risk of mixing of certified and non-certified FFB is possible as well as the control of the flow and transportation of the FFB from the harvesting block to the weighbridge and subsequently to the POM.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.2.3.2 The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -</p>	<p>SDPB update Standard Operating Procedure for Sustainable Supply Chain and Traceability, Doc. No.: SD/SDP/GSD/SCCS/0522/01; on 2022. The objective of the procedure is to provide guideline for estates to establish and ensure effective implementation on sustainable supply chain and traceability of certified sustainable materials (FFB).</p> <p>The procedure had identified critical control points to prevent contamination of non-certified FFB. The current traceability system is Sime Weigh System.</p> <p>Bukit Puteri POM maintain the current practice with conduct inspection on the compliance of the traceability system on daily basis.</p> <p>Onsite interview with weighbridge operator informed they key in all the related data into the system and verified by the executive at the end of the day.</p> <p>Review on the weighbridge records and FFB delivery notes, sighted incoming and outgoing document been signed by operators and executives.</p> <p>Reviewed the records of FFB received as follows: Own certified Estate</p> <p>Supplier: Bukit Puteri Estate</p> <p>Estate C/N No.: 150744, 150743, 150745</p> <p>No. of Bunch: 683, 267, 200</p> <p>Field No.: 1998F, 2018D</p> <p>Tractor: L5-B35, L5-B35, L7-B35</p> <p>Mill W/B Ticket No.: 151799, 151789, 151805</p>	<p>Complied</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Nett Weight: 5.85 Mt, 7.25 Mt, 1.07 Mt</p> <p>MSPO certificate no.: MSPO 745405</p> <p>MSPO certificate validity: 27/11/2022 – 26/11/2027</p>	
4.2.3.3	<p>The management shall identified and assign suitable employees to implement and maintain traceability system.</p> <p>- Minor compliance -</p>	<p>Bukit Puteri POM appointed Assistant Engineer as Person Responsible for traceability system with appointment letter dated 01/01/2020 signed by the Mill Manager.</p>	Complied
4.2.3.4	<p>Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.</p> <p>- Major compliance -</p>	<p>The mill maintains the records of CPO and PK storage and recorded in the Daily Production Summary Report. Sighted the report dated FY 2022 as at 31/12/2022 and FY 2023 as at 06/04/2023.</p> <p>For CPO and PK dispatch, the mill maintains records in Oil Dispatch Summary form. Sighted the CPO and PK dispatch as follows:</p> <p><u>CPO</u></p> <p>Customer: xxx</p> <p>Product: Crude Palm Oil (CPO) – RSPO MB</p> <p>DO. No. 5063</p> <p>Date: 06/04/2023</p> <p>Weighbridge ticket. No.: 005862</p> <p>Weight: 38.56 Mt</p> <p>MPOB Form: MPOB L3 (No. G270941)</p> <p><u>PK</u></p> <p>Customer: xxx</p> <p>Product: Palm Kernel – RSPO MB</p> <p>DO. No. 1767</p> <p>Date: 03/04/2023</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Weighbridge ticket. No.: 005856 Weight: 33.79 Mt.	
4.3 Principle 3: Compliance to legal requirements			
Criterion 4.3.1 – Regulatory requirements			
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	<p>The mill had continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and SQM sustainability team.</p> <p>The mill had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were:</p> <ol style="list-style-type: none"> 1. MPOB License no. 5366632004000, valid till 29/02/2024. 2. DOE license no. 004160 with compliance schedule no. JAS.CHQ 600-3/1/2/32(44), valid till 30/06/2023 3. Private Installation License no. 2022/03034, valid till 19/09/2023 4. Fire Certificate no. JBPM:PH:6/0191/2017, valid till 07/11/2023. 5. Water Resource Use License no. 0066 valid till 31/12/2022. The mill has been applied for renewal On 05/12/2022 and the Department were in progress to send the certificate as per communication email dated 06/04/2023. 6. Machineries/equipment’s certificate of fitness no: <ol style="list-style-type: none"> a. PMT-PH/22 50380 valid till 20/05/2023 b. PMT-PH/22 50379 valid till 20/05/2023 c. PMD-PH/22 51422 valid till 20/05/2023 7. Competent person 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> a. Authorised Entrant and standby Person for Confined Space: <ul style="list-style-type: none"> i. NW-HQ-AE-0895-V valid till 14/02/2025 ii. NW-HQ-AE-0896-V valid till 14/02/2025 iii. NW-HQ-AE-0897-V valid till 14/02/2025 iv. NW-HQ-AE-0898-V valid till 14/02/2025 v. NW-HQ-AE-8056-U valid till 26/10/2024 vi. NW-HQ-AE-7385-U valid till 28/09/2024 b. Steam Engineer 2nd grade cert. no. 049/2009 c. Engine driver 1st grade cert. no. PA/052014 d. Engine driver 2nd grade cert. no. PH/19/EIS/02/00078 e. CePSWaM cert. no. CePSWaM/2215234 f. CePPOME cert. no. CePPOME/00260 	
4.3.1.2	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p>- Major compliance -</p>	<p>All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. Refer to legal register dated January 2023 with addition to applicable laws since last assessment as follows:</p> <ol style="list-style-type: none"> 1. Minimum Wages Order 2022 2. Fire Services Act 1988 (Act 341) Amendment 2020 3. "Pembangunan Sumber Manusia Berhad" Act 2000 4. Anti-Sexual Harassment Act 2021 5. Employees' Social Security (Amendment) Act 2022 6. Employment Insurance System (EIS) (Amendment) Act 2022 7. Control of Supplies Act 1961 8. Employment (Amendment) Act 2022 	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 10. 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.	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements. - Minor compliance -	Group Sustainability Department 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. The Asst. Manager has been appointed as person responsible to monitor any changes to the LORR and update, when necessary, as per appointment letter dated 01/03/2019 signed by the Mill Manager.	Complied
Criterion 4.3.2 – Lands use rights			
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	Bukit Puteri POM demonstrated with legal ownership or leases with legal documents. Therefore, milling activities has not diminished the land use rights of other users.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Onsite visit verified there no evidence to show that milling activities had diminished the land use rights of others.	
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	Bukit Puteri POM demonstrated with legal ownership or leases with legal documents. Document review on the land titles demonstrated with SDPB name written as evidence of the legal ownership of the lands with no claims issued by external party. Review on the land title verified there were no changes on the land area. Bukit Puteri POM is located inside the land of Bukit Puteri Estate. Sighted the copy of the land title with Title No.: HS (D) 3xxx.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The mill is not adjacent to any third party. The mill located in Bukit Puteri Estate's land title and occupied approximately around 10 Ha of the area. The mill compound was demarcated with fences.	Complied
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute in the Bukit Puteri POM. SDPB has the legal ownership documents as demonstrated by possessing land titles.	Not Applicable
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 -	Not applicable since there is no customary rights. Land has been legally owned by the company and has been verified by the land title.	Not Applicable

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	Not applicable since there is no customary rights. Land has been legally owned by the company and has been verified by the land title.	Not Applicable
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	Not applicable since there is no customary rights. Land has been legally owned by the company and has been verified by the land title.	Not Applicable
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	SDPB established Standard Operation Manual, Procedure for External communication, version 1 Year 2008, Issue No 1 with no changes since dated 01/11/2008. The objective of the procedure is to ease the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner. SDBP established Procedure for External Communication, Appendix 5.5.3.2, version 1 dated 01/11/2018. The objective of the procedure is to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the mill and estates. The procedure describes timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation. SDPB established whistleblowing platform named as 'Suara Kami' for internal and external stakeholders to lodge on any grievance.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>The grievance mechanism can be access through https://simedarbyplantation.com/sustainability/human-rights-statement/.</p> <p>In additional, SDPB established new online platform named as 'Oil Palm Pal' (OPP) and Workers Housing Management Procedure dated 26/11/2021 as guideline to certification unit's management in providing a safe, liveable workers housing condition including the process of handling housing repair. The procedure describes the timeline to investigate/ inspect the housing defect based on the risk category.</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>Bukit Puteri POM adopt SDPB HQ Oil Palm Pal (OPP) online platform to record any housing repair from workers.</p> <p>Based on the records, all the complaints were lodged on defects of housing facility, and request of facility (e.g. room door damage, lamp malfunctions, etc.)</p> <p>There was no complaint or grievance lodged by external stakeholder since the last assessment. Verification of the records of complaints lodged the actions taken by the management were found to be appropriate and timely manner.</p> <p>Any communication/request/grievances from external stakeholder were recorded in the visit logbook, stakeholders' minutes meetings, Social Dialogue Action Tracker and OPP system report.</p> <p>External stakeholders' meeting conducted 31/03/2023 for Bukit Puteri POM and Bukit Puteri Estate. The meeting was attended by</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		school, contractor, local authorities, local community representatives, neighbours, vendors and FFB suppliers.	
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 -	Bukit Puteri POM adopt SDPB HQ Oil Palm Pal (OPP) online platform to record any housing repair from workers. The platform is available with QR code and both estate management established manual complain platform through Complaint Book available at estate. Onsite interviewed with attended external stakeholders informed they are aware of the complaint mechanism. Onsite interviewed with sampled workers informed they aware on the online platform via OPP and 'Suara Kami'.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	Bukit Puteri POM established communication book/form for internal and external complaint. The communication logbook/forms are available at mill office. In case the complainant would want to make an anonymity complaint it can be made through electronic Complaint form such as 'Suara kami', Whistle Blowing, Workers Helpline, Oil Palm Pal (OPP) and Social Dialogue.	Complied
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. - Minor compliance -	Based on interview with the stakeholders, it was noted that they were aware of the complaint's procedure including the platform of 'Suara kami', Whistle Blowing, Workers Helpline, Oil Palm Pal (OPP) and Social Dialogue and they were briefed by the management during stakeholder meeting and morning briefing.	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.	Bukit Puteri POM maintained complaints record and resolutions record over the past 24 months were still available as at audit.	Complied

Criterion / Indicator		Assessment Findings	Compliance
- Major compliance -			
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	<p>Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.</p> <p>- Minor compliance -</p>	<p>SDPB with joint venture with Sime Darby Foundation initiate contributions to local sustainable development on social support initiatives includes promoting educations and offering scholarships to deserving students, promoting the rights and well-being of marginalized communities, improving communities' access to healthcare, assisting communities with disaster relief & prevention, donations to the needy and tree planting and etc.</p> <p>Bukit Puteri Estate offer job opportunity to local communities, contribute donations to nearby school and temple.</p> <p>Other contributions have been made are such as given 10kg of rice once every 2 months to all the workers.</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>SDPB has established Group HSE Policy dated 15/05/2022 signed by the Group Managing Director.</p> <p>In the policy stated the company commitment to the well-being of its employee, providing safe and healthy working environment, pro-actively preventing our employees and external parties in the operations from injury and ill health as well as operating in an environmentally responsible manner at global operating sites.</p> <p>Policy also stated the commitment to comply with statutory requirements, inculcating the culture of safety and health, improving the management of occupational safety, health related and environmental matters eliminating or minimizing any potential</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>adverse effect on the environment arising from or business activities and to educate and encourage stakeholders in maintaining and enhancing the quality of the health, safety and environment.</p> <p>The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate.</p> <p>The GSD and RSQM Department is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition.</p> <p>The mill has established Safety and Health Plan and reviewed on annually basis. The plan covers on OSH Legal Compliance, Emergency Response Plan, OSH Management System and Risk Management, HIRADC, training, OSH committee meeting, workplace inspection, medical surveillance and etc.</p> <p>Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. The mill conducted inspection, testing and service of fire protection system 4 times a year by appointed contractors, Bxxxxx Exxxxxxxxx Sdn. Bhd. Reviewed the service and defect report for month of December 2022 dated 13/12/2022 and October 2022 dated 04/10/2022. 2. The mill conducted first aid monitoring on monthly basis. Reviewed the First Aid Check Sheet Records for the month of January, February and March 2023. 3. The mill conducted medical surveillance for workers expose to N-Hexane and Manganese Welding Fumes. Latest medical surveillance was conducted on 29 – 30/03/2022. 9 workers were sent for surveillance, conducted by OHD with DOSH reg. 	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>no. HQ/14/DOC/00/369. 2 workers were found with abnormal results and Medical Removal Protection was imposed from 26/04/2022 – 26/07/2022. Retest was conducted on 26/07/2022 and the workers were found fit to work.</p> <p>4. The mill conducted Baseline and Annual Audiometric Test report on 25/07/2022 by OHD with DOSH reg. no. HQ/22/DOC/00/00797 as per recommendation in NRA report. 19 workers were found with abnormal results and retest were conducted on 19/09/2022. 11 workers were found with STS and DOSH has been notify through JKKP 7 form in MyKKP System on 08/11/2022.</p> <p>5. Workplace inspection was conducted on quarterly basis prior to Safety and Health Committee meeting. Reviewed the inspection report dated 07/03/2023, 08/12/2022 and 14/09/2022.</p>	
4.4.4.2	<p>The occupational safety and health plan should cover the following:</p> <p>a. A safety and health policy, which is communicated and implemented.</p> <p>b. The risk of all operations shall be assessed and documented.</p> <p>c. An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:</p> <p style="margin-left: 20px;">i. All employees involved are adequately trained on safe working practices;</p> <p style="margin-left: 20px;">ii. All precautions attached to products should be properly observed and applied;</p> <p>d. The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as</p>	<p>a. SDPB has established Group HSE Policy dated 15/05/2022 signed by the Group Managing Director. The policy is written in Bahasa and English language that can be easily understood by all levels of its employees.</p> <p>The policy has been communicated to the workers through induction training for new workers, morning briefing, iCARE Safety and Health Townhall meeting, and displayed at various notice board within the mill.</p> <p>Reviewed the training records as follows:</p> <ol style="list-style-type: none"> 1. LFI and Safety briefing dated 05/10/2022 2. Company Policies training dated 09/03/2022 <p>b. The operating units sampled has conducted assessment for risk on all the operations. Reviewed the risk assessment as follows:</p>	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>	<ol style="list-style-type: none"> 1. Latest CHRA was conducted on 10/06/2020 by assessor with DOSH reg. no. HQ/14/ASS/00/358. Refer report no. HQ/14/ASS/00/00001-2020/8. 2. Baseline Noise Risk Assessment was conducted on 04/08/2020 and 02/02/2021 by assessor with DOSH reg. no. HQ/11/PEB/00/118. 3. HIRARC review was conducted at minimum of once a year, during accident occur or changes in operation. Latest HIRARC review was conducted on 08/03/2022 due to accident occur on 11/02/2022 at Effluent Treatment Plan. 4. There is a construction of bund wall for CPO storage tanks in the mill. The contractor has submitted the Job Safety Analysis to the mill. Reviewed the JSA dated 06/03/2023. <p>c. The mill has established training program for employees exposed to chemicals used at the palm oil mill to ensure the continuous awareness to the employee. Reviewed the training plan and record as per criteria 4.4.6.1.</p> <p>d. The mill provided appropriate PPE to all workers according to the job type. The PPE given as per CHRA report, NRA report, HIRARC, Safety Work Procedure Oil Palm Estate Operation dated 01/11/2021 and Personal Protective Equipment (PPE) Procedure, doc ref. no. UM/HSE/OCP/03 dated 09/03/2021.</p> <p>Reviewed the PPE issuance records for workers working at the kernel plant, boiler station, workshop and laboratory.</p> <p>e. Procedure for chemical handling was address in the Chemical Safety management Procedure, ver. 0, dated 09/03/2021. Refer doc. no. UM/HSE/OCP/04.</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>The chemical for water treatment and laboratory for boiler were stored in the designated store under lock and key, in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and Occupational Safety Health (Classification Packaging and Labelling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f. The Mill Manager has been appointed as Person Responsible / Chairman for Safety and Health in the estate as per appointment letter dated 01/11/2021 signed by the Regional CEO, Central East Region. This is accordance to the Safety and Health Committee Procedures, ver. 0 dated 17/11/2021 under section 4. Roles & Responsibilities and section 6. Composition of Safety and Health Committee under subsection 6.2. Appointment of Chairman, Secretary and Other Members. Refer doc. No. UM/HSE/OCP/08.</p> <p>g. The mill management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, workplace inspection, and training.</p> <p>The operating units conducted safety and health committee meeting as per Safety and Health Committee Procedures, ver. 0 dated 17/11/2021 under section7. Meetings of Safety and</p>	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance								
	<p>health Committee under subsection 7.1. Frequency of Meetings of Committee. Reviewed the minutes meeting conducted as follows:</p> <table border="1" data-bbox="1131 536 1865 603"> <tr> <td>01/2023</td> <td>04/2022</td> <td>03/2022</td> <td>02/2022</td> </tr> <tr> <td>07/03/2023</td> <td>08/12/2022</td> <td>14/09/2022</td> <td>01/06/2022</td> </tr> </table> <p>h. SDPB has established Accident and emergency procedures under procedure as follows:</p> <ol style="list-style-type: none"> 1. Incidents, Accidents and Non-compliance Management Procedures, ver. 1, dated 01/06/2022. Refer doc. no. UM/HSE/SP/03 2. Emergency Preparedness Response Procedure, ver. 0, dated 17/11/2021. Refer doc. no. UM/HSE/SP/02 <p>The mill maintains the records of accidents including JKPP 6 forms reported to DOE, medical leaves certificates, accidents investigations reports and HIRARC review. The accidents occurrence was reported to the Headquarters through Rapid 4 systems and DOSH by submitting the JKPP 6 form through MyKKP system. Reviewed JKPP 6 for accident occurred on 11/02/2022 and 08/01/2022.</p> <p>The mill was equipped the mill and housing area with appropriate firefighting equipment. Sighted during site visit, the fire extinguishers were in satisfactory condition. The mill conducted firefighting training/ Fire Drill on annually basis. Reviewed the training plan and record as follows:</p> <ol style="list-style-type: none"> 1. Fire drill training dated 19/08/2022 2. Firefighting equipment training dated 05/10/2022 	01/2023	04/2022	03/2022	02/2022	07/03/2023	08/12/2022	14/09/2022	01/06/2022	
01/2023	04/2022	03/2022	02/2022							
07/03/2023	08/12/2022	14/09/2022	01/06/2022							

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance				
		<p>3. Fire evacuation droll and fire extinguisher demo dated 22/02/2022</p> <p>Noted during interview with the workers, the understanding of the emergency procedures and usage of firefighting equipment was satisfactory.</p> <p>i. SDPB has established First Aid in Workplace Procedure, ver. 0, dated 09/03/2021. Refer doc. No. UM/HSE/OCP/01.</p> <p>First aid kit and first aider present at various workstation at the mill. The mill has appointed the field supervisor as trained first aider. The mill continuously provided training to the appointed first aider to enhance the knowledge training for appointed First Aider. Reviewed the training conducted on 17/02/2023 and 22/03/2023. The estate also sends the trained first aider to attend Competent First Aider training.</p> <p>j. Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKKP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2022 as follows:</p> <table border="1"> <thead> <tr> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>6</td> <td>26</td> </tr> </tbody> </table>	Accident Cases	LTA	6	26	
Accident Cases	LTA						
6	26						
Criterion 4.4.5: Employment conditions							
4.4.5.1	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy	SDPB established Group Sustainability & Quality Policy signed Group Managing Director dated 02/12/2019. The policy is the commitment by the company in respecting, upholding & no-	Complied				

Criterion / Indicator		Assessment Findings	Compliance
	<p>shall be signed by the top management and communicated to the employees.</p> <p>- Major compliance -</p>	<p>exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) last revised 2020.</p> <p>SDPB established Policy on the Protection of Human Rights Defenders (HRDs) with effective date on 25/03/2020. The policy is the commitment of the company in respect and safeguard human rights, notion of democracy and its institution. They recognize that Human Rights Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with SDP. This Policy is applied to all stakeholders affected by the business activities and relationships including directors, employees, counterparties, business partners, workers in our operations and supply chains, and communities surrounding our operations.</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>SDPB established Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They promote diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity union membership, political affiliation or age.</p> <p>The policy could be downloaded from https://simedarbyplantation.com/wp-content/uploads/2021/12/HRC-2020-1.pdf.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.4.5.3 Management shall ensure that employees’ pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- Major compliance -</p>	<p>SDPB established employment contract for workers. The employment contract adopts by Bukit Puteri POM as part as requirement to ensure the workers employment conditions received as accordingly.</p> <p>Review on the sampled of employment contracts verified terms and conditions outlined as per collective agreement and Employment Act 1955.</p> <p>The original copy kept by management demonstrated in workers’ origin language and signed by the worker.</p> <p>Onsite interview with sampled workers informed they been briefed on the employment conditions and benefits as stated in employment contract. They have also been handed a copy of the contract for own selves keeping and reference.</p> <p>Reviewed sampled seven (7) workers contract and pay slips for the month of July 2022, November 2022 and March 2023 for workers with employment ID as follows:</p> <ol style="list-style-type: none"> 1. ID#232xx 2. ID#1485xx 3. ID#232xx 4. ID#1628xx 5. ID#1607xx 6. ID#1599xx 7. ID#1000xx <p>Review on the sample employee payslip for ID#1607xx, ID#1599xx and ID#1000xx; sighted the information such as wages for daily</p>	<p>Complied</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		rated. Other's information includes shift allowance rest day overtime, SOCSO (Employer contribution) and deduction.	
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>Based on review of the sampled payslip for all contractors' workers verified, is according to the requirement, which is applicable includes minimum wages, EPF and SOCSO contributions.</p> <p>Bukit Puteri POM hired contractor for grass cutting works in the mill compound.</p> <p>Based payslip review sighted with EPF and SOCSO contribution for workers with ID no. as follows:</p> <ol style="list-style-type: none"> 1. 7011xx-xx-XXXX 2. 7703xx-xx-XXXX 3. 9808xx-xx-XXXX 	Complied
4.4.5.5	<p>The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>Bukit Puteri POM registered all their workers into Employee Master Details Listing in SEMUA system.</p> <p>Review on the listing included workers' personal details such as full name, gender, date of birth, date join company, race, designation and wages were available.</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p>- Major compliance -</p>	<p>Bukit Puteri POM employed local and foreign workers and registered into Employee Master Details Listing in SEMUA system.</p> <p>Review on the listing, verified all workers are employed by SDPB's estates' management.</p> <p>Review on seven (7) sampled employment contracts verified signature of workers on the contract with terms and conditions applied according to Collective Agreement and Employment Act 1955.</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		Onsite interview with sampled workers informed they signed on the employment contract prior to work and extension contract where the original contract has expired.	
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	Bukit Puteri POM registered all their workers into Employee Master Details Listing in SEMUA system. All the daily attendance and overtime work were recorded in Mill Daily Attendance Report. Onsite interview with sampled workers informed working time and break time is according to employment contract. Overtime offered to workers is voluntarily upon mutually agreement between management and workers.	Complied
4.4.5.8	The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable. - Major compliance -	Bukit Puteri POM employed local and foreign workers and registered into Employee Master Details Listing in SEMUA system. Worker's attendance will be recorded daily in Mill Daily Attendance Report. Onsite interview with sampled workers informed working time and break time is according to employment contract. Overtime offered to workers is voluntarily upon mutually agreement between management and workers.	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 -	Bukit Puteri POM manage workers' payslip through SAP system. Daily attendance and total hours of overtime will be recorded into SAP system. Wages and overtime were paid according to the Daily Attendance Report and productivity reports. Copy printed of the payslip will be kept to workers upon payday as evidence for reference. Refer to indicator 4.4.5.3.	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional	SDPB through Bukit Puteri POM contributed 10 kg of rice once every 2 months for all their workers. Apart from that, all the workers are provided with free medical facilities. In additional, all the workers	Complied

Criterion / Indicator		Assessment Findings	Compliance
	development, medical care provisions and improvement of social surroundings. - Minor compliance -	are entitled with the phone allowance of RM5 for every month. Free housing facilities were provided to all the workers and their families.	
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 -	<p>SDPB established Workers Housing Management Procedure 2022, Ver.01, dated 30/06/2022 as guidelines to continuously improve the living standards of our employee in the operations the management had established the housing repair and maintenance policy in the form of workers housing management procedure and a digital platform for workers to lodge their complaints with regards to housing, called the 'OilPalmPal' Digital Housing Complaint system.</p> <p>To provide guidance to management in providing a safe, livable workers housing condition in accordance with Workers Minimum Standard of Housing & Amenities (Amendment) 2091 (Act A 1604).</p> <p>To integrate all past policies related to workers housing & amenities management in the operating units including.</p> <ol style="list-style-type: none"> 1. Workers minimum standard of housing amenities guidelines – Jan 2015 2. IOM – employees housing inspection & welfare – Dec 2020 3. IOM – rules & regulations at employee house – June 2021 4. IOIM – Safe handling & storage of Petrol – Mar 2021 5. IOM – Safe Fogging Procedure – June 2021. <p>Bukit Puteri POM management has provided free housing facilities to all the workers. Basic amenities such as water and electricity were provided to the workers.</p> <p><u>Opportunity for Improvement</u></p>	OFI

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		The mill's linesite inspection can be further improved to identify all potential issue which may lead to inconducive conditions.	
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	SDPB has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They seek to create a working environment with zero tolerance for sexual harassment and abuse and in which violence is never used to resolve issues or conflict. Gender Committee was established in Bukit Puteri POM together with the estate to monitor if there is any case of sexual harassment reported. Combine meeting for SOU 10 was conducted and attended by Bukit Puteri Estate.	Complied
4.4.5.13	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. - Major compliance -	SDPB established Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They respect the rights of their employees to form and join unions and bargain collectively. Social Dialogue was carried out by the management of Bukit Puteri POM with workers to update the progress of action taken for the issues raised by workers. The initiative will discuss during management review meeting and action taken accordingly. All issues will be uploaded into Social Dialogue Online Tracker System (SDOTS) for monitoring. Verified the records of monitoring of issues and evidence of actions	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>taken to resolve the issues raised by the workers.</p> <p>The workers that involved in the Social Dialogue were NUPW representatives, Gender Committee representatives and others' nationalities representatives.</p> <p>Bukit Puteri POM management allowed their workers to form or join any association such as NUPW. Document reviewed on their payslip found that they are deducted for the NUPW subscription fees of RM 8 monthly.</p> <p>Interview with the workers informed they have freedom to join any association without any interference by management.</p>	
4.4.5.14	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p>- Major compliance -</p>	<p>SDPB established Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography. They are eradicating child labour in all their supply chain and not employ anyone underage of 18 years.</p> <p>Document review workers masterlist confirmed Bukit Puteri POM has not employed any child labour in operations.</p>	Complied
Criterion 4.4.6: Training and competency			
4.4.6.1	<p>All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p>	<p>The mill maintained the training records conducted. Reviewed the training records as follows:</p> <ol style="list-style-type: none"> 1. SCCS training dated 17/03/2022 	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	2. JKPP 6, 7, 8 and Rapid 4 report training dated 21/02/2022 3. Hearing conservation training dated 21/02/2023 4. SOP for water sampling and ETP training dated 08/02/2023 and 24/10/2022 5. Working at height training dated 01/12/2022 6. Safety harness training dated 15/07/2022 7. Accident investigation training dated 11/10/2022 8. PPE awareness training dated 15/07/2022 9. SOP for Kernel Plant training dated 15/07/2022 10. Safe procedure in handling Oxygen and Acetylene training dated 03/07/2022 11. Chemical handling training dated 08/04/2022	
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	The mill has conducted training need analysis for all employee, management and contractors. The need analysis was conducted based on the job designation and training required by the job type. Reviewed the training need analysis conducted FY 2022 and 2023.	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 -	The mill has established training schedule FY 2023 based on training need analysis conducted. The training program covers Policy, operation and OSH/others. The program involves the executive, staff/ supervisor, workers and contractors. The identified training was programmed throughout the year.	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.5.1: Environmental Management Plan			
<p>4.5.1.1</p>	<p>An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>SDPB 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 01/06/2020.</p> <p>In the Policy stated as follows: Group Sustainability and Quality Statement: 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. Reviewed the records for Company Policies training dated 09/03/2022.</p>	<p>Complied</p>

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance											
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 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 05/01/2023.</p>	Complied											
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. The plan was reviewed on annually basis. Reviewed the implementation of the management plan FY 2022 as follows:</p> <ol style="list-style-type: none"> The mill uses the by-product such as fiber and shells as boiler fuel. Reviewed the fiber and shell usage as follows: <table border="1" style="margin-left: 20px;"> <tr> <td>Fiber, MT</td> <td>FFB, MT</td> <td>Usage / FFB (MT)</td> </tr> <tr> <td>4,871.72</td> <td rowspan="2">60,221.51</td> <td>0.08</td> </tr> <tr> <td>Shell, MT</td> <td>Usage / FFB (MT)</td> </tr> <tr> <td>7,226.58</td> <td></td> <td>0.12</td> </tr> </table> The mill disposed EFB through field application as nutrient cycle strategy at sister estate, Bukit Puteri Estate and submitted to DOE through Quarterly Return Form on quarterly basis. Reviewed the EFB disposal records for Quarter 3 and 4 FY 2022. The domestic waste was disposed in designated landfill located away from waterways and housing area. Sighted during site visit at the landfill area in field P15 only domestic waste were disposed in the area. 	Fiber, MT	FFB, MT	Usage / FFB (MT)	4,871.72	60,221.51	0.08	Shell, MT	Usage / FFB (MT)	7,226.58		0.12	Complied
Fiber, MT	FFB, MT	Usage / FFB (MT)												
4,871.72	60,221.51	0.08												
Shell, MT		Usage / FFB (MT)												
7,226.58		0.12												

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Program to promote positive impact was documented in Environmental Management Plan. Among the promote positive impact as follows: 1. The mill disposed the EFB through field application at sister estate as nutrient cycle program. Reviewed the application records at Bukit Puteri Estate FY 2022 recorded at 13002.19 tons. 2. The mill continuously promoted the reduce, reuse and recycle program to the workers through training and signages at the housing area. 3. The mill uses the by-product such as fiber and shells as boiler fuel. Reviewed the fiber and shell usage as FY 2022.	Complied
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives. - Major compliance -	The estates continuously provide training to the workers to create awareness regarding the environmental policy and management plan established. Reviewed the training as per indicator 4.4.6.1.	Complied
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed. - Major compliance -	The estate discussed the issues on environmental concern during Environmental Performance Monitoring Committee meeting and Environmental Safety and Health Committee meeting. Reviewed the minutes meeting dated 20/03/2023.	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	The mill has established Energy Management Plan. Reviewed implementation of the plan as follows:	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																	
	<p>assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period</p> <p>- Major compliance -</p>	<p>1. The mill monitors the diesel consumption per ton FFB produce on monthly basis. Reviewed the records as follows:</p> <table border="1"> <thead> <tr> <th>Diesel, (MT)</th> <th>FFB, (MT)</th> <th>Diesel / FFB (MT)</th> </tr> </thead> <tbody> <tr> <td>3,472.00</td> <td>60,221.51</td> <td>0.24</td> </tr> </tbody> </table> <p>2. The mill uses the by-product such as fiber and shells as boiler fuel. Reviewed the fiber and shell usage as follows:</p> <table border="1"> <thead> <tr> <th>Fiber, MT</th> <th>FFB, MT</th> <th>Usage / FFB (MT)</th> </tr> </thead> <tbody> <tr> <td>4,871.72</td> <td rowspan="2">60,221.51</td> <td>0.08</td> </tr> <tr> <td>Shell, MT</td> <td>Usage / FFB (MT)</td> </tr> <tr> <td>7,226.58</td> <td></td> <td>0.12</td> </tr> </tbody> </table>	Diesel, (MT)	FFB, (MT)	Diesel / FFB (MT)	3,472.00	60,221.51	0.24	Fiber, MT	FFB, MT	Usage / FFB (MT)	4,871.72	60,221.51	0.08	Shell, MT	Usage / FFB (MT)	7,226.58		0.12	
Diesel, (MT)	FFB, (MT)	Diesel / FFB (MT)																		
3,472.00	60,221.51	0.24																		
Fiber, MT	FFB, MT	Usage / FFB (MT)																		
4,871.72	60,221.51	0.08																		
Shell, MT		Usage / FFB (MT)																		
7,226.58		0.12																		
4.5.2.2	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p>- Major compliance -</p>	<p>The mill has established the direct usage of non-renewable energy such as diesel and electricity base on the consumption of the previous year consumption.</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 uses the by-product such as fiber and shells as boiler fuel. Reviewed the fiber and shell usage as follows:</p> <table border="1"> <thead> <tr> <th>Fiber, MT</th> <th>FFB, MT</th> <th>Usage / FFB (MT)</th> </tr> </thead> <tbody> <tr> <td>4,871.72</td> <td rowspan="2">60,221.51</td> <td>0.08</td> </tr> <tr> <td>Shell, MT</td> <td>Usage / FFB (MT)</td> </tr> <tr> <td>7,226.58</td> <td></td> <td>0.12</td> </tr> </tbody> </table>	Fiber, MT	FFB, MT	Usage / FFB (MT)	4,871.72	60,221.51	0.08	Shell, MT	Usage / FFB (MT)	7,226.58		0.12	Complied						
Fiber, MT	FFB, MT	Usage / FFB (MT)																		
4,871.72	60,221.51	0.08																		
Shell, MT		Usage / FFB (MT)																		
7,226.58		0.12																		
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>Addressed in the Waste Management Procedure for Estates & Mill dated May 2022 with reference number</p>	Complied																	

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance						
<p>- Major compliance -</p>	<p>SD/SDH/GSD/HSE/0522/01. Waste management were based on their categorization which is:</p> <ul style="list-style-type: none"> • Scheduled Waste • Hazardous waste • Non-Hazardous waste • Industrial waste • Construction waste • Agricultural waste • Office waste • General waste <p>Bukit Puteri POM has established Waste Management Plan 2023. Among details in the management plan as follows:</p> <table border="1" data-bbox="1088 900 1861 1319"> <thead> <tr> <th>Waste Generation</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>Scheduled waste</td> <td> <ol style="list-style-type: none"> 1. Comply with Schedule waste regulation 2. Update inventory of SW in E-Swiss on monthly basis 3. Ensure storage of SW not exceed 180 days 4. Ensure each SW have labels </td> </tr> <tr> <td>Industrial waste</td> <td> <ol style="list-style-type: none"> 1. Liaise with Procurement Department for tendering process to appoint vendor to collect scrap metals 2. Ensure the contractor to dispose the debris after work completion </td> </tr> </tbody> </table>	Waste Generation	Action Plan	Scheduled waste	<ol style="list-style-type: none"> 1. Comply with Schedule waste regulation 2. Update inventory of SW in E-Swiss on monthly basis 3. Ensure storage of SW not exceed 180 days 4. Ensure each SW have labels 	Industrial waste	<ol style="list-style-type: none"> 1. Liaise with Procurement Department for tendering process to appoint vendor to collect scrap metals 2. Ensure the contractor to dispose the debris after work completion 	
Waste Generation	Action Plan							
Scheduled waste	<ol style="list-style-type: none"> 1. Comply with Schedule waste regulation 2. Update inventory of SW in E-Swiss on monthly basis 3. Ensure storage of SW not exceed 180 days 4. Ensure each SW have labels 							
Industrial waste	<ol style="list-style-type: none"> 1. Liaise with Procurement Department for tendering process to appoint vendor to collect scrap metals 2. Ensure the contractor to dispose the debris after work completion 							

Criterion / Indicator		Assessment Findings		Compliance
		Domestic waste	<ol style="list-style-type: none"> 1. Identify landfill at least 500m distances from nearest waterways, river 2. Allocate sufficient amount of dustbin at office and housing compound 3. Collect waste at estate compound at least 3 times a week 4. Arrange licenced contractors to de sludge septic tank periodically 	
		Operational waste	<ol style="list-style-type: none"> 1. Fertilizer bag re used for loose fruit collection or return to supplier 2. Old tyres used for landscaping or return to supplier 	
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> <ol style="list-style-type: none"> a) Identifying and monitoring sources of waste and pollution. b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products. <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> <p>Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. The scheduled waste was stored at designated store under lock and key. The storage has containment bund to prevent any scheduled waste spillage flow into perimeter drain. The store also provided with adequate spill kit. 2. The mill disposed EFB through field application as nutrient cycle strategy at sister estate, Bukit Puteri Estate and submitted to DOE through Quarterly Return Form on quarterly basis. Reviewed the EFB disposal records for Quarter 3 and 4 FY 2022. 		Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance												
4.5.3.3	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p>- Major compliance -</p>	<p>Procedure for Scheduled Waste Management was established (SD/SDP/PSQM (ESH)/203-EN1 dated 26/02/2016. Proper disposal of waste material is carried out as per the company procedures.</p> <p>The estate also has a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected at the estate and in satisfactory conditions.</p> <p>Reviewed the latest disposal records as follows:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>SW</th> <th>Consignment notes no</th> </tr> </thead> <tbody> <tr> <td rowspan="4">23/12/2022</td> <td>322</td> <td>20221223171Z17JD</td> </tr> <tr> <td>110</td> <td>2022122317TV3QJN</td> </tr> <tr> <td>410</td> <td>2022212317EKJBHS</td> </tr> <tr> <td>409</td> <td>20221223176THFOI</td> </tr> </tbody> </table>	Date	SW	Consignment notes no	23/12/2022	322	20221223171Z17JD	110	2022122317TV3QJN	410	2022212317EKJBHS	409	20221223176THFOI	Complied
Date	SW	Consignment notes no													
23/12/2022	322	20221223171Z17JD													
	110	2022122317TV3QJN													
	410	2022212317EKJBHS													
	409	20221223176THFOI													
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>	<p>Domestic waste was managed by the mill. The estate collected the domestic waste 3 times a week. Reviewed the collection records for the month of January, February and March 2023.</p> <p>The domestic waste was disposed in designated landfill located away from waterways and housing area. Sighted during site visit at the landfill area in field P15 only domestic waste were disposed in the area.</p>	Complied												
Criterion 4.5.4: Reduction of pollution and emission															
4.5.4.1	<p>An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.</p> <p>- Major compliance -</p>	<p>The 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 significant aspect and DOE license compliance schedule which include documented in Pollution prevention Plan.</p>	Complied												

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance																								
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.	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 -	<p>Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE accordingly. Reviewed the Quarterly Return Form to DOE as follows:</p> <table border="1"> <thead> <tr> <th>Report Date</th> <th>Quarter/Week</th> <th>BOD (Limit=100mg/L)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">10/01/2023</td> <td>1stweek/1stmonth</td> <td>56.00</td> </tr> <tr> <td>5thweek/2ndMonth</td> <td>32.00</td> </tr> <tr> <td>9thweek/3rdMonth</td> <td>50.00</td> </tr> <tr> <td rowspan="3">07/10/2022</td> <td>1stweek/1stmonth</td> <td>64.00</td> </tr> <tr> <td>5thweek/2ndMonth</td> <td>55.00</td> </tr> <tr> <td>9thweek/3rdMonth</td> <td>63.00</td> </tr> <tr> <td rowspan="3">08/07/2022</td> <td>1stweek/1stmonth</td> <td>63.00</td> </tr> <tr> <td>5thweek/2ndMonth</td> <td>43.00</td> </tr> <tr> <td>9thweek/3rdMonth</td> <td>39.00</td> </tr> </tbody> </table>	Report Date	Quarter/Week	BOD (Limit=100mg/L)	10/01/2023	1 st week/1 st month	56.00	5 th week/2 nd Month	32.00	9 th week/3 rd Month	50.00	07/10/2022	1 st week/1 st month	64.00	5 th week/2 nd Month	55.00	9 th week/3 rd Month	63.00	08/07/2022	1 st week/1 st month	63.00	5 th week/2 nd Month	43.00	9 th week/3 rd Month	39.00	Complied
Report Date	Quarter/Week	BOD (Limit=100mg/L)																									
10/01/2023	1 st week/1 st month	56.00																									
	5 th week/2 nd Month	32.00																									
	9 th week/3 rd Month	50.00																									
07/10/2022	1 st week/1 st month	64.00																									
	5 th week/2 nd Month	55.00																									
	9 th week/3 rd Month	63.00																									
08/07/2022	1 st week/1 st month	63.00																									
	5 th week/2 nd Month	43.00																									
	9 th week/3 rd Month	39.00																									
Criterion 4.5.5: Natural water resources																											
4.5.5.1	The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include: a) Assessment of water usage and sources.	<p>Bukit Puteri POM has established water management plan for the year 2023. Among the management plan as follows:</p> <table border="1"> <thead> <tr> <th>Objective</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>To monitor quality of main water inlet/outlet for pollutants from estate operations</td> <td>Water analysis results by R&D</td> </tr> </tbody> </table>	Objective	Action Plan	To monitor quality of main water inlet/outlet for pollutants from estate operations	Water analysis results by R&D	Complied																				
Objective	Action Plan																										
To monitor quality of main water inlet/outlet for pollutants from estate operations	Water analysis results by R&D																										

Criterion / Indicator		Assessment Findings				Compliance
	b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities. c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). - Major compliance -	Contingency during water shortage	Purchasing water from JBA			
		Contingency during water shortage	Establish drain blocking system in field to conserve water			
		To monitor the usage of fresh water in monthly basis	Awareness to workers on water consumption			
		To monitor the plumbing system	To carry out immediately repair of broken pipelines and identified any			
		Harvesting rainwater	To use for general cleaning, operation, gardening and etc.			
		The mill monitors the water usage for processing FFB on monthly basis. Water for processing is abstracted from water catchment. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record Bukit Puteri POM. Average data as below:				
		Year	FFB Processed, MT	Water/L	Water/FFB	
		2022	60.221.51	114,303.00	1.89	
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. 004160. 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						

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Standard Operating Procedures (SOPs) for the estate and mill has been prepared. 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. For Health, Safety and Environment, both mill and estates, SDPB has issued Health, Safety and Environment (HSE) Management System and Standard Operating Procedures. SDPB continuously updated the SOP established. Among the updated SOP FY 2022/2023 as follows: 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 7. OSH Risk Management Procedure, UM/HSE/SE/01	Complied
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	A mechanism on checking the consistency of estate and mill implementation of their procedures were in place. Among the mechanism such as Performance Monitoring Visit, SORA visit, and Internal Audit. The mill maintains all the records of monitoring and actions taken for all issues raised during the visit.	Complied
Criterion 4.6.2: Economic and financial viability plan			

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

Criterion / Indicator		Assessment Findings	Compliance
4.6.2.1	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p>- Major compliance -</p>	<p>The mill continued its commitment to long term sustainability and improvements through a capital expenditure program. The management has forecasted 5 years business plan from FY 2023 – FY 2027</p> <p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. Sighted the annual budget FY 2023 and business plan FY 2023 – FY 2027</p> <p>In the 5 years business plan include items as follows:</p> <ul style="list-style-type: none"> a. Palm oil mill <ul style="list-style-type: none"> i. Mill intake – FFB input ii. Production of CPO iii. Production of PK iv. Total Palm Oil Extraction v. Total Palm Kernel Extraction vi. Mill cost <p>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2027) and well documented upon request.</p>	Complied
Criterion 4.6.3: Transparent and fair price dealing			
4.6.3.1	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p>- Major compliance -</p>	<p>SDPB established pricing mechanism and conducted as per contract agreement with contractors.</p> <p>Review on the contract agreement, sighted pricing of the job task is available. Sampled contract/Letter of Award to contractors as follows.</p>	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		1. Letter of Award to Axxx Mxxx Enterprise dated 01/02/2023. 2. Letter of Award to Mxxx Gxxxx Enterprise dated 02/02/2023. 3. Letter of Award to Nxxx Axxx Bxxx Kxxx dated 01/01/2023.	
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	SDPB established pricing mechanism and conducted as per contract agreement with contractors. Review on the contract agreement, sighted pricing of the job task is available. Payment terms for contract work were stated in the contract agreement. Onsite interview with contractors informed their payments were made as per payment terms stated in the contracts. No delayed of payments recorded.	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 -	SDPB established contractor agreement with letter of Award & Acceptance (LOA) and Ikrar Integriti Vendor which signed by contractor as follow. 1. Axxx Mxxx Enterprise for CPO and PK transportation with contract dated 01/02/2023. 2. Mxxx Gxxxx Enterprise for FFB supplying with contract dated 02/02/2023. 3. Nxxx Axxx Bxxx Kxxx for grass cutting with contract dated 01/01/2023. The contractors engaged by the mill' management has signed on a letter for the compliance of RSPO/ ISCC/ MSPO/ SCCS. All the contractors need to follow the RSPO/ ISCC/ MSPO/ SCCS requirements in accordance with SDPB of Estate Quality	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Management System.</p> <p>Onsite interviewed with contractors informed they were understood the MSPO requirements.</p> <p>Bukit Puteri POM conduct OCP meeting with contractors dated 08/12/2022.</p>	
4.6.4.2	<p>The management shall provide evidence of agreed contracts with the contractor.</p> <p>- Major compliance -</p>	<p>Bukit Puteri POM engaged contractors for works such as FFB, CPO, PK and OCP vendors. Sampled of the agreement/ letter of award (LOA)/ contract between company and the contractors as below:</p> <ol style="list-style-type: none"> 1. Axxx Mxxx Enterprise for CPO and PK transportation with contract dated 01/02/2023. 2. Mxxx Gxxxx Enterprise for FFB supplying with contract dated 02/02/2023. 3. Nxxx Axxx Bxxx Kxxx for grass cutting with contract dated 01/01/2023. <p>Pricing of the works/ services and mechanism were clearly stated in the LOA and Terms & Conditions of Purchase Order and agreed by the contractors.</p>	Complied
4.6.4.3	<p>The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.</p> <p>- Minor compliance -</p>	<p>Contractors have signed on the letter for the compliance of RSPO/ ISCC/ MSPO/ SCCS requirements in accordance with SDPB HQ Mill Quality Management System which mentioned the contractor shall provide access to the RSPO/ ISCC/ MSPO/ SCCS auditors to contractors' operation site(s) and employees whenever deemed necessary. Seen the letter and signed as follow.</p> <ol style="list-style-type: none"> 1. Axxx Mxxx Enterprise for CPO and PK transportation with contract dated 01/02/2023. 2. Mxxx Gxxxx Enterprise for FFB supplying with contract dated 	Complied

MSPO Public Summary Report
Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>02/02/2023.</p> <p>3. Nxxx Axxx Bxxx Kxxx for grass cutting with contract dated 01/01/2023.</p> <p>SDPB responsible for the observance of the control points applicable to the tasks performed by the contract, checking and signing the assessment of the contractor for each task and season contracted.</p> <p>All works performed of estate are checked and verified by the mill's personnel.</p>	

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