

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

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

TDM PLANTATION SDN BHD
Client Company (HQ) Address: Head Office: Level 3, Bangunan UMNO Terengganu Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu, Terengganu, Malaysia
Certification Unit: Sungai Tong Palm Oil Mill & Plantations: Jaya Estate, Fikri Estate, Tayor Estate, Pelung Estate, Jerangau Estate, Pinang Emas Estate and Bukit Bidong Estate
Date of Final Report: 11/01/2023

Report prepared by:
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Report Number: 3812650

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

1.1 Organizational Information and Contact Person			
Company Name	TDM Plantation Sdn Bhd		
Mill/Estate	Certification Unit	MPOB License No.	Expiry Date
	Sungai Tong Palm Oil Mill	500042704000	31/03/2023
	Fikri Estate	503379102000	31/08/2023
	Jaya Estate	501497502000	31/03/2023
	Pelung Estate	502826702000	31/03/2023
	Tayor Estate	501496702000	31/01/2023
	Jerangau Estate	502250102000	31/08/2023
	Pinang Emas Estate	502606002000	28/02/2023
Bukit Bidong Estate	619539102000	31/08/2023	
Address	Level 3, Bangunan UMNO Terengganu, Lot 3224, Jalan Masjid Abidin, 20100 Kuala Terengganu, Terengganu, Malaysia		
Management Representative	Mohd Izwan Haffez bin Che Azmi		
Website	www.tdemberhad.com.my	E-mail	izwan.tdmp@tdemberhad.com.my
Telephone	09-6204 800	Facsimile	09-6204 803

1.2 Certification Information			
Certificate Number	Mill: MSPO 678754 Estate: MSPO 686825	Certificate Start Date	27/12/2022
Date of First Certification	27/12/2017	Certificate Expiry Date	26/12/2027
Scope of Certification	<input checked="" type="checkbox"/> Mill: Production of Sustainable Palm Oil and Palm Oil Products <input checked="" type="checkbox"/> Estate: Production of Sustainable Oil Palm Fruits		
Visit Objectives	<p>The objective of the assessment was to conduct a recertification assessment 1 and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organization's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organization's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.</p>		
Standard	<input type="checkbox"/> MSPO MS 2530-2:2013 – General Principles for Independent Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders <input checked="" type="checkbox"/> MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		

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Recertification 1 Assessment Visit Date (RAV)	19-22/12/2022
Continuous Assessment Visit Date (CAV) 1_1	-
Continuous Assessment Visit Date (CAV) 1_2	-
Continuous Assessment Visit Date (CAV) 1_3	-
Continuous Assessment Visit Date (CAV) 1_4	-

1.3 Other Certifications

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 595564	RSPO Principles & Criteria for Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019; with Mass Balance Supply Chain Module	BSI Services Malaysia Sdn Bhd	26/12/2023
MSPO 778500	MSPO Supply Chain Certification Standard, dated 1/10/2018	BSI Services Malaysia Sdn Bhd	04/01/2028

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
Sungai Tong Palm Oil Mill	Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu, Terengganu, Malaysia	5° 18' 29.88" N	102° 54' 37.80" E
Fikri Estate	Sungai Tong, 21500 Setiu, Terengganu, Malaysia	5° 19' 21.00" N	102° 53' 51.36" E
Jaya Estate	Sungai Tong, 21500 Setiu, Terengganu, Malaysia	5° 23' 43.61" N	102° 53' 0.32" E
Pelung Estate	Sungai Tong, 21500 Setiu, Terengganu, Malaysia	5° 16' 55.56" N	102° 49' 59.52" E
Tayor Estate	Sungai Tong, 21500 Setiu, Terengganu, Malaysia	5° 15' 57.60" N	102° 53' 27.60" E
Jerangau Estate	Jalan Jerangau, 21810 Ajil, Hulu Terengganu, Terengganu, Malaysia	4° 57' 39.60" N	103° 9' 46.79" E
Pinang Emas Estate	Bukit Besi, 23000 Dungun, Terengganu, Malaysia	4° 45' 39.96" N	103° 13' 25.68" E
Bukit Bidong Estate	Lot 2092, Jalan Merang-Terengganu, Kampung Gong Tengah, 22100 Permaisuri, Terengganu, Malaysia	5° 29' 20.51" N	102° 55' 30.20" E

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1.5 Certified Area					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Fikri Estate	3,119.64	0.00	491.38*	3,611.02*	86.40
Jaya Estate	3,365.50	0.00	90.29	3,455.79	97.39
Pelung Estate	1,342.24	0.00	1,669.96	3,012.20	44.56
Tayor Estate	2,119.27	5.00	95.65	2,219.92	95.47
Jerangau Estate	1,360.84	0.00	120.09	1,480.93	91.89
Pinang Emas Estate	2,823.91	0.00	1,046.27	3,870.18	72.97
Bukit Bidong Estate	2,307.00	0.00	287.50	2,594.50	88.92
Total (ha)	16,438.40	5.00	3,801.14	20,244.54	

Notes:
*Fikri Estate – Changes of total hectareage is as per the amendment in the land title issued in the year 2022. Reduction of 100.03 ha. The increase of infrastructure and other are the increase the plantable reserve hectareage.

1.6 Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Fikri Estate	908.16	0.00	92.93	1,748.53	370.02	2,211.48	908.16
Jaya Estate	0.00	0.00	1,648.77	1,350.71	366.02	3,365.50	0.00
Pelung Estate	502.99	534.71	0.00	304.54	0.00	839.25	502.99
Tayor Estate	636.62	0.00	10.59	1,147.97	324.09	1,482.65	636.62
Jerangau Estate	689.08	479.61	0.00	0.00	192.15	671.76	689.08
Pinang Emas Estate	823.69	331.32	146.26	979.89	542.75	2,000.22	823.69
Bukit Bidong Estate	0.00	760.17	1,546.83	0.00	0.00	2,307.00	0.00
Total (ha)	3,560.54	2,105.81	3,445.38	5,531.64	1,795.03	12,877.86	3,560.54

1.7 Certified Tonnage of FFB			
Estate	Tonnage / year		
	Estimated (Dec 2021 - Nov 2022)	Actual (Nov 2021 - Nov 2022)	Forecast (Dec 2022 - Nov 2023)
Fikri Estate	33,700.00	23,324.94	29,200.00
Jaya Estate	63,400.00	49,377.35	55,300.00
Pelung Estate	3,950.00	4,316.83	4,900.00
Tayor Estate	22,700.00	17,531.58	20,485.00

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Jerangau Estate	15,380.00	7,624.07	5,800.00
Pinang Emas Estate	23,100.00	5,960.68	10,900.00
Bukit Bidong Estate	26,910.00	11,819.62	17,570.00
Gajah Mati Estate	0.00	679.86	0.00
Total (mt)	189,140.00	120,634.93	144,155.00

1.8 Uncertified Tonnage of FFB

Estate	Tonnage / year		
	Estimated (Dec 2021 - Nov 2022)	Actual (Nov 2021 - Nov 2022)	Forecast (Dec 2022 - Nov 2023)
Third Parties	25,750.00	32,262.05	62,900.00
Total (mt)	25,750.00	32,262.05	62,900.00

1.9 Certified Tonnage

	Estimated (Dec 2021 - Nov 2022)	Actual (Nov 2021 - Nov 2022)	Forecast (Dec 2022 - Nov 2023)
	Mill Capacity: 60 MT/hr	FFB	FFB
	189,140.00	120,634.93	144,155.00
SCC Model: MB	CPO (OER: 19.42 %)	CPO (OER: 18.54 %)	CPO (OER: 20.38 %)
	36,736.82	22,369.00	29,378.79
	PK (KER: 4.38 %)	PK (KER: 4.62 %)	PK (KER: 5.03 %)
	8,275.23	5,574.11	7,251.00

1.10 Actual Sold Volume (CPO)

CPO (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
22,369.00	0.00	0.00	17,416.70	0.00	17,416.70

1.11 Actual Sold Volume (PK)

PK (mt)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
5,574.11	0.00	0.00	4,345.64	0.00	4,345.64

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 19-22/12/2022. The audit programme is included as Section 2.4. The approach to the audit was to treat the TDM Plantation Sdn Bhd - Sungai Tong Palm Oil Mill and Estates (Fikri Estate, Jaya Estate, Pelung Estate, Tayor Estate, Jerangau Estate, Pinang Emas Estate, and Bukit Bidong Estate) as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities. The Public Notification was posted on BSI website on 14/11/2022 which is more than 30 days prior to audit. The notification can be access through the [11-2-mspo-public-notification_recertification_tdm-sungai-tong-palm-oil-mill--supply-base_english.pdf](#) (bsigroup.com)

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

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

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

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

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

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

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

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

The following table would be used to identify the locations to be audited each year in the 5-year cycle.

Assessment Program					
Name (Mill / Plantation / Group smallholders)	Year 1 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Sungai Tong Palm Oil Mill	✓	✓	✓	✓	✓
Fikri Estate		✓			✓
Jaya Estate			✓		✓
Pelung Estate	✓		✓		
Tayor Estate	✓			✓	
Jerangau Estate	✓		✓		✓
Pinang Emas Estate		✓		✓	
Bukit Bidong Estate		✓		✓	

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

Total No. of Mandays: 15

2.1 BSI Assessment Team

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Ahmad Rufi bin Abu Talib Khan (ARK)	Team Leader	<p>Education: Bachelor Degree In Mechanical Engineering from Universiti Teknologi MARA Shah Alam, graduated in 2015.</p> <p>Work Experience: He started his career as Assistant Mill Manager, managing the day-to-day mill operations. In his five years' experience, he has experience handling the certification of ISO 9001, OHSAS 18001, ISO 14001 as well as Malaysia Sustainable Palm Oil (MSPO). He is a qualified Lead Auditor for MS 2530:2013 and has accumulated more than 300 audit days throughout his current career as the auditor for multiple disciplines covering all over Malaysia.</p>

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		<p>Training attended: He has completed CQI – IRCA approved ISO 9001, ISO 14001 and ISO 45001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor and RSPO SCC Auditor course.</p> <p>Aspect covered in this audit: Policy and commitment, internal audit, management review, occupational safety and health, HIRADC, trainings, mill and estate best practise.</p> <p>Language proficiency: Fluent in English and Bahasa Malaysia.</p>
Mohd Hidhir Zainal Abidin (MHZ)	Team Member	<p>Education: Bachelor’s Degree in Chemical Engineering, National University of Malaysia.</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1) 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. 2) Auditor for several standards including ISO 9001, ISO 14001, ISO 45001 and RSPO P&C as well as RSPO SCC. <p>Training attended:</p> <ol style="list-style-type: none"> 1) ISO 9001 Lead Auditor Course 2) ISO 14001 Lead Auditor Course 3) OHSAS 18001 Lead Auditor Course in 2012 4) Endorsed RSPO P&C Lead Auditor Course in 2013 5) MSPO Awareness Training in 2014 6) Endorsed RSPO SCCS Lead Auditor Course 7) SMETA Auditor training 8) HCV-HCS training 9) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course <p>Aspect covered in this audit: Social elements, employment conditions, worker welfare, pay and contract, workers and stakeholder consultation.</p> <p>Language proficiency: English and Bahasa Malaysia.</p>
Amir bin Bahari (ABM)	Team Member	<p>Education: Bachelor of Science (Hons) Chemistry, from Universiti Sains Malaysia (USM) in 1985 and Diploma in Palm Oil Milling Technology/Management in 1996 from MPOB, a registered Chemist with Institut Kimia Malaysia as AMIC.</p> <p>Work Experience: 34 years’ experience in the oil palm industry including in the mill and estates, 350 mandays in RSPO auditing, and 210 mandays in MSPO audit.</p> <p>Training attended: Attended RSPO Lead Assessor Course (Refresher) on May 2022 and MSPO Lead Auditor course in April 2016, as well as courses related to HCV & GHG, social and environmental related program.</p>

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		<p>Aspect covered in this audit: Mill and estate best practices, waste management, HCV, environmental management plan, usage of energy, reduction of pollution and water management together with legal aspect of mill and estates as well as traceability aspect.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English Language.</p>
Yusof Khairan Nizar (YKN)	Team Member	<p>Education: Diploma in Public Administration-ITM (1991), Certificate of Safety and Health Officer-MII (2003). Bachelor of Corporate Administration (Hons) UiTM (2003), Master of Science (Occupational Safety and Health) Management-UUM (2011).</p> <p>Work Experience: 17 years experiences working Japanese MNC in Manufacturing Silicone, Rubber and plastic products and components. Registered SHO with DOSH Malaysia. 16 years experiences working as Consultants, Trainers and Auditors with local, internationals CBs. 4 years experiences as HSE Advisors with Telco Company. Contract Trainer of OSH & Environment, HSE Legal & Other Requirements, Lead Auditors course for STS & NIOSH Cert. Approved (HRDF) Trainer. Assessor for Prime Minister’s Hibiscus Award.</p> <p>Training attended: Successfully attended course ISO 9001 IRCA/IATC A Lead Auditor Training IMTL (Kuala Lumpur), ISO 14001 IEMA Approved EMS Advanced Lead Auditor Training Course-Aspects Moody Certification Ltd (UK). OH&SMS IRCA Certified Lead Auditor Training Course-Moody International (KL). MS 1722 Lead Auditor Training NIOSH Cert. (KL), MSPO Auditing – SGS (Malaysia). RSPO P&C 2018 Refresher Lead Auditor Course – Checkmark Training. Also attended the Quality & Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment – For Bodied Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality Malaysia, ISO/IEC 17021. MSPO Peer Reviewer Training (MPOCC). HCV-HCS Integrated Concept & Brief Method and Social Knowledge for Assessing High Carbon Stock (Aiknow) and PT Remark Asia, SMETA Audit Training-BSI, Registered Environmental Audit Training (IEMAS). Capacity Development for MSPO MS2530:2022 (Part 1-4) & Scheme Documents Workshop-MPOCC.</p> <p>Aspect covered in this audit: Traceability, legal requirement, occupational, health & safety, best practises, and supply chain requirements.</p> <p>Language proficiency: English and Bahasa Malaysia.</p>
Mohd Sabre Salim (MSS)	Peer Reviewer	<p>Education: Master’s in Business Administration (MBA) from UiTM in 2006 and Bachelor Science Agribusiness from UPM in 1986.</p> <p>Work Experience:</p>

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		<p>He gained his working exposure in the plantation sector, serving as a Plantation Manager with Hap Seng Plantation Berhad and currently as consultant, free-lance lecturer, and trainer at MDV Management Sdn Bhd. He has more than 50 MSPO report that has been reviewed.</p> <p>Training attended: He has completed Endorsed Lead Auditor Course and Endorsed MSPO Lead Auditor Course and MSPO Peer Review certificate by MPOCC. He has attended MSPO Peer Reviewer 1 - 2017 by MPOCC.</p> <p>Expertise: General management, leadership & financial management, occupational safety & health management, plantation (agriculture & agribusiness) management, Malaysian Sustainable Palm Oil (MSPO).</p>
Muhammad Sufyan Azmi (MSA)	Peer Reviewer	<p>Education: Master's in Business Administration (MBA) from Open University of Malaysia and Bachelor Degree in Bioindustry from UPM in 2006.</p> <p>Work Experience: He gained his working exposure in the plantation sector with 15 years' experience, currently serving as a Plantation Manager with TSH Resources Berhad and previously as an Audit Executive with Kulim Malaysia Berhad.</p> <p>Training attended: He has attended MSPO Peer Reviewer 2 - 2017 by MPOCC.</p> <p>Expertise: General management, auditing, environment and plantation management.</p>

2.2 Impartiality and conflict of interest

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

2.3 Accompanying Persons

No.	Name	Role
	N/A	

2.4 Assessment Plan

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

Date	Time	Subjects	ARK	ABB	YKN	MHZ
Sunday, 18/12/2022		Audit team travel to Kuala Terengganu	√	√	√	√

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Date	Time	Subjects	ARK	ABB	YKN	MHZ
Monday, 19/12/2022 Tayor Estate – All Auditors	0800 0930	- Audit team travel to Tayor Estate Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). • Verification on previous audit findings. 	√	√	√	√
	0930 1230	- Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, worker housing, clinic, Landfill, etc.	√	√	√	√
	1230 1330	- Lunch	√	√	√	√
	1330 1700	- Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting	√	√	√	√
	1700 1730	- Interim closing meeting	√	√	√	√
Tuesday, 20/12/2022 Jerangau Estate – All Auditors	0900 1230	- Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting	√	√	√	√
	1230 1330	- Lunch	√	√	√	√
	1330 1700	- Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting	√	√	√	√
	1700 1730	- Interim closing meeting	√	√	√	√
Wednesday, 21/12/2022	0900 1230	- Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area	√		√	√

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Date	Time	Subjects	ARK	ABB	YKN	MHZ
Pelong Estate – All Auditors		(agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled wastes management, worker housing, clinic, Landfill, etc.				
	1230 - 1330	Lunch	√	√	√	√
	1330 - 1700	Document Review (MS 2530:2013 Part 3): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services, P6: Best practices, P7: Development of New Planting Document review (MS 2530:2013 Part 4): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices	√	√	√	√
	1700 - 1730	Interim closing meeting	√	√	√	√
Thursday, 22/12/2022 Sungai Tong POM - 3 Auditors (ARK, ABB, YKN)	0900 - 1230	Assessment: Plant visit, FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	√	
	1000 - 1200	Stakeholder Consultation Meeting – (Government, Village Rep, Smallholders, Union Leaders, Contractors) - Sungai Tong POM	√			
	1230 - 1330	Lunch	√	√	√	
	1330 - 1600	Document review (MS 2530:2013 Part 4): P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement, P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6: Best practices	√	√	√	
	1600 - 1630	Auditor Meeting - Preparation for Closing Meeting	√	√	√	
	1630 - 1700	Closing Meeting	√	√	√	

Section 3: Assessment Findings

3.1 Details of audit results

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

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

3.2 Details of Nonconformities and Opportunity for improvement

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

During the assessment there were Zero (0) Major non-conformance and Zero (0) Minor non-conformance, and four (4) Opportunity for Improvement (OFI) raised.

The below is the summary of the OFI raised during this assessment.

Non-Conformity Report			
NCR Ref #:	N/A	Issue Date:	N/A
Due Date:	N/A	Date of Closure:	N/A
Area/Process:	N/A	Clause & Category: (Major / Minor)	MSPO Part __:
Clause:	N/A		
Requirements:	N/A		
Statement of Nonconformity:	N/A		
Objective Evidence:	N/A		
Corrections:	N/A		
Root cause analysis:	N/A		
Corrective Actions:	N/A		
Assessment Conclusion:	N/A		

Opportunity For Improvement			
Ref:	2291141-202212-I1	Clause:	MSPO 2530 Part 3: 4.1.2.1
Area/Process:	All Estate		
Objective Evidence:	The management may improve on the root cause determination process of the Non-Conformity during internal audit in order to properly plan the correction and corrective action as per the root cause.		

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Opportunity For Improvement			
Ref:	2291141-202212-I2	Clause:	MSPO 2530 Part 3: 4.4.4.2(b)
Area/Process:	All Estate		
Objective Evidence:	Assessment of risk of newly Land Surf for Mechanise Spray and Badang with Scissors lift use in routine and non-routine operation to be further reviewed and considered.		

Opportunity For Improvement			
Ref:	2291141-202212-I3	Clause:	MSPO 2530 Part 3: 4.5.6.3
Area/Process:	Pelung Estate		
Objective Evidence:	There were declared HCV 4 covering for 3 rivers namely Sg Tengadoh, Tualang, Dagang Besar. The monitoring assessment did not specify the areas covered.		

Opportunity For Improvement			
Ref:	2291141-202212-I4	Clause:	MSPO 2530 Part 4: 4.4.4.2(b)
Area/Process:	Sungai Tong Palm Oil Mill		
Objective Evidence:	Assessment of risk of mill operation that was reviewed in 2022 to be further enhanced by having new Recommended Risk Control clearly indicated as priority for medium (score 5-14) and high risk (15-25).		

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

3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report			
NCR Ref #:	2130030-202111-N1	Issue Date:	11/11/2021
Due Date:	22/12/2022	Date of Closure:	22/12/2022
Area/Process:	Pinang Emas Estate	Clause & Category (Major / Minor)	MSPO 2530 Part 3: 4.4.5.4 Minor
Requirements:	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.		
Statement of Nonconformity:	There is no evidence to show EPF and SOCSO contribution was made to the contractor's workers.		
Objective Evidence:	Payslip verified for the month of July, August and September 2021 for Mr. Abdul Wahab Bin Muda (SF Suria Enterprise) was found without any contribution to EPF		

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	and SOCSO as per legal requirements (EPF Act 1991 (Act 452) and SOCSO Act 1969 (Act 4).
Corrections:	A meeting has been conducted with the contractor, SF Suria Enterprise on 9/11/2021 to discuss further about the requirement of Employment Act 1955 for them to fulfil taking into consideration that TDM Plantation Sdn. Bhd. is one of MSPO certified company.
Root cause analysis:	There is no understanding of the contractor on the obligations of the Employment Act 1955 even though the requirement has been explained by the estate.
Corrective Actions:	To assist the contractor to make proper deduction and contribution (SOCSO & EPF) as per requirement under Employment Act 1955.
Assessment Conclusion:	The correction and corrective action are accepted. The evidence of effective implementation shall be verified in the next assessment visit.
Verification Statement:	<p>Proper deduction for EFP and SOCSO was made by the contractors at visited estate as per the following sample:</p> <p><u>Jerangau Estate</u></p> <p>One (1) contractor engaged for FFB harvesting activity under named Wan Family Legacy. Contract of employment and payslip under Wan Family Legacy (harvesting contractor, ref. LJR:38/22 dated 23/10/22) employees of contractor was verified. Latest salary payment on November 2022 has shown that the salary payment including (SOCSO and EPF contribution) meeting the latest minimum wages order 2022.</p> <p><u>Taylor Estate</u></p> <p>Rental of heavy machinery at nursery – Contractor, Koperasi Ladang Sawit Sg Tong, ref: LT-20/2022 dated 1/9/2022. Contract of employment and payslip under employees of contractor was verified. Latest salary payment on November 2022 has shown that the salary payment including (SOCSO and EPF contribution) meeting the latest minimum wages order 2022.</p> <p>Thus, the previous minor NC has been closed effectively on 22/12/22 with sufficient evidence of implementation.</p>

Non-Conformity Report			
NCR Ref #:	2130030-202111-N2	Issue Date:	11/11/2021
Due Date:	22/12/2022	Date of Closure:	22/12/2022
Area/Process:	Pinang Emas Estate	Clause & Category: (Major / Minor)	MSPO Part 4: 4.5.3.4 Minor
Requirements:	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.		
Statement of Nonconformity:	The level of awareness on restriction of open burning activities was not effectively implemented.		
Objective Evidence:	Sighted commitment by management on Zero Burning. Refer item no 5 in Polisi Biodiversiti & Alam Sekitar dated 01/04/2021 "Memastikan Pembakaran Sifar sentiasa diberi keutamaan". Training has been conducted on 08/03/2021. Refer "Laporan Latihan Dalaman; Bahan Buangan Terjadual dan Larangan Pembakaran terbuka". However, it was found portion of domestic waste burning activities at the		

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	Labour Quarters No. K62 that indicates the level of awareness on restriction of open burning activities was not satisfactory																												
Corrections:	A warning letter dated 8/11/2021 has been issued to the related worker that require him to take immediate action to clean up the burning traces. As stated in Perjanjian Menduduki Rumah Kediaman Kilang Kelapa Sawit Sungai Tong, the workers are not permissible to perform burning activities in residential areas. This agreement has been signed by the related worker on 1/3/2021. The signage on restriction of open burning had been installed at the line site to show that the management disallowed these activities. The restriction of open burning also were informed to the workers during morning briefing as a reminder.																												
Root cause analysis:	The enforcement on restriction of open burning activities is not fully deployed that cause the workers underestimate the restriction. They still conduct domestic waste burning activities, even though the collection of domestic waste has been provided through Majlis Daerah Setiu (MDS).																												
Corrective Actions:	The enforcement on restriction of open burning activities will be conducted through weekly line-site inspection. The existing line-site inspection will be reviewed and revised accordingly. If there are any burning activities were found in residential areas, the management will produce show cause letter and impose necessary action to the affected worker.																												
Assessment Conclusion:	The correction and corrective action are accepted. The evidence of effective implementation shall be verified in the next assessment visit.																												
Verification Statement:	<p>Site visit to the housing complex on 22/12/2022 shows no evidence of open burning being made. Domestic waste collection is made at a centralized point for onward disposal to Majlis Daerah Setiu landfill. The management provides weekly inspection at the among others also to observe any violation of such ruling. In addition, training in relation to environment were provided to the employees as listed below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendee</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>22/3/22</td> <td>SOP - Waste Management /SW</td> <td>11</td> </tr> <tr> <td>2</td> <td>22/6/22</td> <td>EIA - Concept & Awareness</td> <td>14</td> </tr> <tr> <td>3</td> <td>08/8/22</td> <td>RSPO / MSPO Refresher Briefing</td> <td>Entire</td> </tr> <tr> <td>4</td> <td>28/2/22</td> <td>Environmental Policy Briefing</td> <td>Entire</td> </tr> <tr> <td>5</td> <td>20/6/22</td> <td>No Open Burning</td> <td>Entire</td> </tr> <tr> <td>6</td> <td>13/6/22</td> <td>Water contamination awareness</td> <td>Entire</td> </tr> </tbody> </table> <p>Thus, the previous minor NC has been closed effectively on 22/12/22 with sufficient evidence of implementation.</p>		Date	Subject	Attendee	1	22/3/22	SOP - Waste Management /SW	11	2	22/6/22	EIA - Concept & Awareness	14	3	08/8/22	RSPO / MSPO Refresher Briefing	Entire	4	28/2/22	Environmental Policy Briefing	Entire	5	20/6/22	No Open Burning	Entire	6	13/6/22	Water contamination awareness	Entire
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5	20/6/22	No Open Burning	Entire																										
6	13/6/22	Water contamination awareness	Entire																										

Opportunity For Improvement			
Ref:	2130030-202111-I1	Clause:	MSPO 2530 Part 3: 4.4.1.1
Area/Process:	Jaya Estate, Fikri Estate, Pinang Emas Estate		
Objective Evidence:	Review of SIA was conducted based on issues identified in the initial report prepared by consultant. SIA review conducted on yearly basis could include current issues/facilities/conditions for each estate to mitigate negative impact and promote the positive ones.		
Verification Statement:	Revisited SIA was carried out by external consultant, Green Orbis Environmental Sdn Bhd on 14-16/06/2022. The estates have developed SIA Action Plan for 2022		

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	which covered both positive and negative social impact such as safety & health, education, housing & infrastructure and etc.
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Opportunity For Improvement			
Ref:	2130030-202111-I2	Clause:	MSPO 2530 Part 4: 4.4.1.1
Area/Process:	Sungai Tong POM		
Objective Evidence:	Review of SIA was conducted based on issues identified in the initial report prepared by consultant. SIA review conducted on yearly basis could include current issues/facilities/conditions to mitigate negative impact and promote the positive ones.		
Verification Statement:	The SIA review has been conducted and the management plan has listed all current issues, and all the impact from the issues were discussed in the management plan.		

Opportunity For Improvement																												
Ref:	2130030-202111-I3	Clause:	MSPO 2530 Part 3: 4.5.3.4																									
Area/Process:	Fikri Estate																											
Objective Evidence:	Management could improve on awareness of managing empty chemical container to avoid any risk of contamination to the environment																											
Verification Statement:	<p>The management has enhanced awareness to the employees on the managing of empty containers. Empty containers were recycled for use in the field spraying. Surplus units were tripled rinsed and holed and disposed as scheduled waste SW409 to Pentas Flora (Kelantan) Sdn Bhd. Awareness are also made through training sessions by the estates. The training held as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Subject</th> <th>Tayor</th> <th>Pelung</th> <th>Jerangau</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>RSPO/MSPO Policy</td> <td>24/03/22</td> <td>01/08/22</td> <td>10/08/22</td> </tr> <tr> <td>2</td> <td>Spraying at Buffer zone</td> <td>28/07/22</td> <td>01/08/22</td> <td>06/03/22</td> </tr> <tr> <td>3</td> <td>SW Management /Triple R</td> <td>12/04/22</td> <td>18/05/22</td> <td>16/10/22</td> </tr> <tr> <td>4</td> <td>S/holder environmental</td> <td>13/06/22</td> <td>12/11/22</td> <td>13/06/22</td> </tr> </tbody> </table>				Subject	Tayor	Pelung	Jerangau	1	RSPO/MSPO Policy	24/03/22	01/08/22	10/08/22	2	Spraying at Buffer zone	28/07/22	01/08/22	06/03/22	3	SW Management /Triple R	12/04/22	18/05/22	16/10/22	4	S/holder environmental	13/06/22	12/11/22	13/06/22
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4	S/holder environmental	13/06/22	12/11/22	13/06/22																								

3.4 Summary of the Nonconformities and Status

CAR Ref.	Clause & Category (Major / Minor)	Issued Date	Status & Date (Closure)
N/A	N/A	N/A	N/A

3.5 Issues Raised by Stakeholders



IS #	Description
1	<p>Feedbacks: <u>Gender Representatives</u> They are aware of the function of the committee and reported that there was no sexual harassment case reported. They were given equal opportunity to work in the company.</p>

	<p>Management Responses: The management will ensure the welfare and safety of female workers are protected.</p> <p>Audit Team Findings: No further issue.</p>
2	<p>Feedbacks: <u>Worker’s representative (Local, Indonesia and Bangladesh)</u> No issue with the management and always open for consultation and assistance. Equal opportunity to all workers regardless of their nationality, gender and race.</p> <p>Management Responses: No favouritism and all workers are equally treated.</p> <p>Audit Team Findings: No further issue.</p>
3	<p>Feedbacks: <u>Headmaster from Sekolah Kebangsaan Fikri ST</u> No issue with the management, always keeping touch with the company representative. Worker’s sons and daughters able to go to school as the company provide the transport. Able to explain the grievance channel provided with the company.</p> <p>Management Responses: Management has put priority to send worker’s child to school, and maintain good relationship with school management</p> <p>Audit Team Findings: No further issue.</p>
4	<p>Feedbacks: <u>Imam Masjid Kampung Pelong</u> The mill management has given good cooperation and given good working opportunity to the nearby community.</p> <p>Management Responses: Management will keep good relationship with the nearby mosque institution and will offer vacancy to the nearby community first before open to public.</p> <p>Audit Team Findings: No further issue.</p>
5	<p>Feedbacks: <u>Anika Agency – Supplier</u> The management has good relationship, the payment is paid accordingly within the stipulated time.</p> <p>Management Responses: Management will encourage more companies to do business with them and will give good cooperation.</p> <p>Audit Team Findings: No further issue.</p>

3.6 List of Stakeholders Contacted

Government Officer: Headmaster – Sekolah Kebangsaan Fikri ST	Community/ neighbouring village: Imam Masjid Kampung Pelong FELCRA Bhd - Pelong
Suppliers/Contractors/Vendors: Anika Agency	Worker’s Representative/Gender Committee: Gender Representative NUPW Representative

Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	
Based on the findings during the assessment Sungai Tong Palm Oil Mill and Supply Bases Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Sungai Tong Palm Oil Mill and Supply Bases Certification Unit is continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Mohd Izwan Hafez Bin Che Azmi	Name: Ahmad Rufi Bin Abu Talib Khan
Company name: TDM Plantation Sdn. Bhd.	Company name: BSI Services Malaysia Sdn Bhd
Title: Safety & Health Officer	Title: Client Manager
Signature: 	Signature: 
Date: 5/1/2023	Date: 03/01/2023

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 -	TDM Plantation Sdn Bhd (hereinafter referred as TDM) has established its MSPO policy approved by the Chief Executive Officer (Hamdan Bin Ibrahim) dated 01/01/2022. MSPO policy was briefed to workers at Tayor Estate on 24/03/2022, and 10/08/2022 at Jerangau Estate.	Complied
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	The established policy has included continual improvement emphasized on the adherence to the following key principles: 1. Management Commitment and Responsibility 2. Transparency 3. Compliance to Legal Requirements 4. Social Responsibility, Health, Safety and Employment Condition 5. Environment, Natural Resources, Biodiversity and Ecosystem Services 6. Best Practices 7. Development of New Plantings	Complied
Criterion 4.1.2 – Internal Audit			

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Criterion / Indicator		Assessment Findings	Compliance
4.1.2.1	<p>Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.</p> <p>- Major compliance -</p>	<p>Internal audits were planned to be conducted at least once a year. The objective of the internal audit is to determine the strong and weak points and potential area for further improvement.</p> <p>The internal audit plan was sent to all operating unit through email with the subject: Internal Audit (RSPO/MSPO/OSH) & Ergonomic Risk Assessment (ERA) Program dated 02/06/2022. The date of each Operating Unit Internal Audit is listed in the email.</p> <p>Latest internal audit was conducted at estates audited as follows:</p> <ol style="list-style-type: none"> 1. Tayor Estate – 12/10/2022 2. Jerangau Estate – 11/08/2022 3. Pelong Estate – 27/06/2022 <p>OFI is raised for the management to improve on the root cause determination process of the Non-Conformity during internal audit in order to properly plan the correction and corrective action as per the root cause.</p>	OFI
4.1.2.2	<p>The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.</p> <p>- Major compliance -</p>	<p>Internal audit procedure was established and maintained (MSPO/RSPO/ISCC Internal Audit Standard Operating Procedure (TDMP/02-2022). Total of five non-conformances was raised at Tayor Estate and has been followed up with root cause and corrective action taken was documented in Sustainability Corrective Action Report”.</p>	Complied
4.1.2.3	<p>Report shall be made available to the management for their review.</p> <p>- Major compliance -</p>	<p>Internal Audit report was available for verification, and it was taken into consideration as part of the management review meeting agendas</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																						
Criterion 4.1.3 – Management Review																									
4.1.3.1	<p>The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.</p> <p>- Major compliance -</p>	<p>Management Review Meeting was planned to be conducted at least once a year. However, management review for year 2022 has been incorporated with the operational meeting at the complex (certification unit) level which has been conducted on monthly basis and known as “Marketing & Operation Meeting” (MOM). Such as meeting conducted on 15/09/2022 through Microsoft Teams was chaired by CEO, attended by managers, plantation controller and etc has discussed on effective implementation of MSPO, changes, improvement and modification was verified as per minutes of meeting.</p>	Complied																						
Criterion 4.1.4 – Continual Improvement																									
4.1.4.1	<p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p>- Major compliance -</p>	<p>All the 3 estates have established continual improvement plan revised dated 01/01/2022 upon compilation of the social, operations and environmental impacts. Among other efforts are;</p> <table border="1"> <thead> <tr> <th></th> <th>Program</th> <th>Action /Initiatives</th> </tr> </thead> <tbody> <tr> <td rowspan="4">1</td> <td rowspan="4">Chemical Reduction</td> <td>Manual grass cutting</td> </tr> <tr> <td>Only circle and strip spraying in fields</td> </tr> <tr> <td>Apply low volume spraying equipment</td> </tr> <tr> <td>Follow manufacturer dosage</td> </tr> <tr> <td></td> <td></td> <td>Cattle integration - grassing in field.</td> </tr> <tr> <td rowspan="2">2</td> <td rowspan="2">Waste reduction</td> <td>Awareness among employees</td> </tr> <tr> <td>Enhancement of waste segregation.</td> </tr> <tr> <td rowspan="4">3</td> <td rowspan="4">Employment condition</td> <td>Enhancement of workers quarters</td> </tr> <tr> <td>Schedule repair and painting</td> </tr> <tr> <td>Conducive environment</td> </tr> <tr> <td>Housing roofing / ceiling upgrading</td> </tr> </tbody> </table>		Program	Action /Initiatives	1	Chemical Reduction	Manual grass cutting	Only circle and strip spraying in fields	Apply low volume spraying equipment	Follow manufacturer dosage			Cattle integration - grassing in field.	2	Waste reduction	Awareness among employees	Enhancement of waste segregation.	3	Employment condition	Enhancement of workers quarters	Schedule repair and painting	Conducive environment	Housing roofing / ceiling upgrading	Complied
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Criterion / Indicator		Assessment Findings		Compliance
		4	Labour ratio Expansion of in-field FFB collection- grabber Expand mechanization in manuring	
		5	Environmental Desilting field drain for maintenance	
		Details of expenditure are provided in respective estates under both CAPEX/OPEX. Inclusive are projects for improvement as described below among others:		
			Sections Description - Tayor Estate	
		1	Operation CANTAS - FFB cutter 4 unts RM4.7K - Feb 2023	
		2	Facilities Workers Houses 8 units - RM83K - Aug 2023	
		3	Facilities Housing Complex Water Piping - RM 100K May 2023	
			Sections Description - Pelung Estate	
		1	Facilities 1 unit Staff Houses RM173K - May 2022	
		2	Operation 1 unit Field Bridges RM90K - Mac 2023	
		3	Facilities Premix road - RM100K - Feb 2023	
			Sections Description - Jerangau Estate	
		1	Facilities Workers Houses 2 units - RM195K - Feb 2023	
		2	Facilities Community Hall - RM170K - Mac 2024	
		3	Facilities Futsal Field - RM125K - May 2023	
		4	Operation Chemical Mixing Store - RM 40K - June 2023	
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption. - Major compliance -	This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. a) The management team will be informed of such development during the monthly management meetings.		Complied

Criterion / Indicator		Assessment Findings	Compliance
		b) Dissemination of information by the PC and Head Office transacted during the monthly Managers meetings and emails. c) The management continuously reviewed the estates performance and work method for a continual improvement to achieve better results yield and costings.	
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	Where introduction of new machines and new work method, all level of employees will be trained to handle /implement the new techniques and work changes. Monitoring is made by the Estate Managers and Assistants throughout the on-the-job training and familiarization. The issue being included in the estates monthly meeting.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes. - Major compliance -	The estates maintained their records of request and response, land titles/land use right, SIA report, EIA report, etc. related to environmental and social issues, plans for pollution prevention, continuous improvement plan, complaints and grievances records that were made available upon request. The management has briefed the stakeholder regarding the publicly available documents as the following: <ol style="list-style-type: none"> 1. Geran Tanah / Land titles 2. Health and Safety Plan 3. Social Impact Assessment Report 4. Environment Impact Assessment Report 5. Pollution Prevention Plan 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		6. Continuous Improvement Plan 7. Environmental Management / Monitoring Plan 8. Communication Procedure 9. Company Policy 10. Workers Statistic	
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 information regarding sustainability and the company is available in website https://sustainability.tdemberhad.com.my/ and publicly available at the mill. The policies were also publicly displayed at the office notice board.	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 -	TDM Plantation Sdn Bhd has developed a Communication Procedure for POM/Estates and Flowchart to Handle Social Issue. Sighted the Standard Operating Procedure (Stakeholder Communication) dated 01/10/2022, Rev No: TDMP-01/2022. All issues shall be resolved within maximum of 28 working days. All internal and external stakeholders had been briefed on this procedure.	Complied
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance -	The Estate Managers were appointed as the management officials to be responsible in handling issues related to indicator 4.2.2.1 as per appointment letter (ref no: TDMP/HR-GEN(MSPO/RSPO) dated 17/10/2021) approved by Head of Human Resources TDM Plantation Sdn. Bhd.	Complied
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.	Stakeholder list was developed where all the affected stakeholders were included in the list such as government authorities, local communities, contractors and supplier, neighbouring schools, etc.	Complied

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Criterion / Indicator		Assessment Findings	Compliance																
	- Major compliance -	Stakeholder consultation was conducted through email and stakeholder feedback was received through survey form for the entire Sg. Tong Complex with the participation of internal and external stakeholders. The management has conducted the stakeholder meeting at Akademi TDM dated 16/11/2022. Sighted the minutes of meeting, together with the attendance list.																	
Criterion 4.2.3 – Traceability																			
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). - Major compliance -	An SOP has been established on the traceability of the FFB and described in the TDM Plantation Sdn. Bhd. Standard Operating Procedure dated 1/11/2012. Therein describing information of: a) Person in charge for traceability. b) FFB flow chart from harvesting designated block to mill weighbridge (tickets)	Complied																
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	The estates monitor the despatch to the mill on daily basis to tally and tracking the volume harvesting and tonnage despatch to the mill. Factors on the FFB balances in the fields are accounted for in the process. The field staff and assigned bunch counter cross checked the daily production of each harvester and total for the estates.	Complied																
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	An Assistant Manager is assigned as as the PIC via letters approved by the respective Estates Managers. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Estate</th> <th>PIC</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tayor</td> <td>En Ahmad Hazizi Abd Rahim</td> <td>01/02/2021</td> </tr> <tr> <td>2</td> <td>Pelung</td> <td>En Md Ismadairuz Yaacob</td> <td>01/03/2021</td> </tr> <tr> <td>3</td> <td>Jerangau</td> <td>En Md Zailani Mat Ali</td> <td>01/07/2022</td> </tr> </tbody> </table>		Estate	PIC	Date	1	Tayor	En Ahmad Hazizi Abd Rahim	01/02/2021	2	Pelung	En Md Ismadairuz Yaacob	01/03/2021	3	Jerangau	En Md Zailani Mat Ali	01/07/2022	Complied
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		The appointed letters were sighted and verified.																																																																			
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -	<p>The FFB weighbridge ticket/despatch notes are produced for all transaction to Sg Tong Palm Oil Mill. The set of document consists of the following information:</p> <p>a) Weighbridge ticket</p> <ul style="list-style-type: none"> - Date / D/O no / Quantity / w/bridge operator name - Total Bunches / Quality / field no <p>b) Despatch chit</p> <ul style="list-style-type: none"> - Serial no / field no / no of bunches / tractor no. <p>c) Delivery Note</p> <ul style="list-style-type: none"> - Date/ weight / w/bridge operator / MPOB licence no. <p>d) Grading report for the FFB consignment.</p> <p>e) Samples of FFB dispatches as listed below:</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Date</th> <th>D/N no</th> <th>Vehicle No</th> <th>Wt /mt</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tayor</td> <td>17/12/22</td> <td>2438</td> <td>TAU 6177</td> <td>9.330</td> </tr> <tr> <td>2</td> <td>Tayor</td> <td>17/12/22</td> <td>2439</td> <td>TAU 6177</td> <td>9.690</td> </tr> <tr> <td>3</td> <td>Pelung</td> <td>30/09/22</td> <td>0628</td> <td>TBT 3400</td> <td>6.990</td> </tr> <tr> <td>4</td> <td>Pelung</td> <td>31/10/22</td> <td>0697</td> <td>TBT 3400</td> <td>7.030</td> </tr> <tr> <td>5</td> <td>Pelung</td> <td>30/11/22</td> <td>0749</td> <td>TBT 3400</td> <td>8.110</td> </tr> <tr> <td>6</td> <td>Pelung</td> <td>15/12/22</td> <td>0559</td> <td>TAT 7510</td> <td>10.030</td> </tr> <tr> <td>7</td> <td>Jerangau</td> <td>01/09/22</td> <td>0728</td> <td>TAU9363</td> <td>5.300</td> </tr> <tr> <td>8</td> <td>Jerangau</td> <td>07/10/22</td> <td>0958</td> <td>TCH6793</td> <td>8.640</td> </tr> <tr> <td>9</td> <td>Jerangau</td> <td>28/11/22</td> <td>1066</td> <td>TCH6793</td> <td>9.390</td> </tr> <tr> <td>10</td> <td>Jerangau</td> <td>09/12/22</td> <td>1044</td> <td>TCH6793</td> <td>8.660</td> </tr> </tbody> </table>		Estate	Date	D/N no	Vehicle No	Wt /mt	1	Tayor	17/12/22	2438	TAU 6177	9.330	2	Tayor	17/12/22	2439	TAU 6177	9.690	3	Pelung	30/09/22	0628	TBT 3400	6.990	4	Pelung	31/10/22	0697	TBT 3400	7.030	5	Pelung	30/11/22	0749	TBT 3400	8.110	6	Pelung	15/12/22	0559	TAT 7510	10.030	7	Jerangau	01/09/22	0728	TAU9363	5.300	8	Jerangau	07/10/22	0958	TCH6793	8.640	9	Jerangau	28/11/22	1066	TCH6793	9.390	10	Jerangau	09/12/22	1044	TCH6793	8.660	Complied
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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 -	<p>All the audited estates continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. The estates had obtained and renewed license and permits as required by the law. The licenses and permits maintained by the estates among others include the following:</p> <table border="1"> <thead> <tr> <th></th> <th>Authority</th> <th>Details - Tayor Estate</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MPOB</td> <td>License 620785002000 FFB</td> <td>31/01/2023</td> </tr> <tr> <td>2</td> <td>MPOB</td> <td>License 616586011000 - Nursery</td> <td>30/06/2023</td> </tr> <tr> <td>3</td> <td>KPDNHEP</td> <td>Diesel Permit - 10000 L ref P001084</td> <td>03/08/2024</td> </tr> <tr> <td>4</td> <td>DOSH</td> <td>Air Compressor - ref no TG PMT 4424</td> <td>17/04/2023</td> </tr> <tr> <td>5</td> <td>DOE</td> <td>Pentas Flora (Kelantan) Sdn Bhd</td> <td>30/04/2023</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th></th> <th>Authority</th> <th>Details - Jerangau Estate</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MPOB</td> <td>License 50225010-2000 - FFB</td> <td>31/08/2023</td> </tr> <tr> <td>2</td> <td>DOE</td> <td>Pentas Flora (Kelantan) Sdn Bhd</td> <td>30/04/2023</td> </tr> <tr> <td>3</td> <td>DOSH</td> <td>Air Compressor - ref no TG PMT 7793</td> <td>21/08/2023</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th></th> <th>Authority</th> <th>Details - Pelung Estate</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MPOB</td> <td>License 502826702000 FFB</td> <td>31/03/2023</td> </tr> <tr> <td>2</td> <td>KPDNHEP</td> <td>Diesel Permit - 8190 L ref no P001094</td> <td>23/01/2023</td> </tr> <tr> <td>3</td> <td>DOSH</td> <td>Air Compressor - ref no TG PMT 5152</td> <td>16/01/2023</td> </tr> <tr> <td>4</td> <td>DOE</td> <td>Pentas Flora (Kelantan) Sdn Bhd</td> <td>30/04/2023</td> </tr> </tbody> </table>		Authority	Details - Tayor Estate	Validity	1	MPOB	License 620785002000 FFB	31/01/2023	2	MPOB	License 616586011000 - Nursery	30/06/2023	3	KPDNHEP	Diesel Permit - 10000 L ref P001084	03/08/2024	4	DOSH	Air Compressor - ref no TG PMT 4424	17/04/2023	5	DOE	Pentas Flora (Kelantan) Sdn Bhd	30/04/2023		Authority	Details - Jerangau Estate	Validity	1	MPOB	License 50225010-2000 - FFB	31/08/2023	2	DOE	Pentas Flora (Kelantan) Sdn Bhd	30/04/2023	3	DOSH	Air Compressor - ref no TG PMT 7793	21/08/2023		Authority	Details - Pelung Estate	Validity	1	MPOB	License 502826702000 FFB	31/03/2023	2	KPDNHEP	Diesel Permit - 8190 L ref no P001094	23/01/2023	3	DOSH	Air Compressor - ref no TG PMT 5152	16/01/2023	4	DOE	Pentas Flora (Kelantan) Sdn Bhd	30/04/2023	Complied
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Criterion / Indicator		Assessment Findings	Compliance
		Jerangau Estate purchases diesel from nearby petrol station for machinery/ vehicle consumption.	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	<p>The Legal & Other Requirements Register (LORR) covers all the necessary regulatory requirements titled TDM SOP Legal and Other Requirement Rev 2022 Estate dated 18/10/2022. The list of applicable legal and other requirements was made available during the assessment and complied prepared by Sustainability & Compliance Officer.</p> <p>The identified applicable laws and regulations relevant to its operations among others include the following:</p> <ul style="list-style-type: none"> a) Environmental Quality Act 1974 and its Regulations b) Factories and Machinery Act 1967 and its Regulations c) Occupational Safety and Health Act 1994 and its Regulations d) Pesticides Act, 1974 e) Worker’s Minimum Standards Housing Amenities Act, 2020 f) Employment Act 1955 Act 265 g) Wildlife Conservation Act 2010 h) Malaysian Palm Oil Board 1998 - Amendment 2021 i) Holiday Act 1951 j) Passport Act 1966 k) Workers Union Act 1959 l) Estate Hospital Assistants (Registration) Act 1965 m) Petroleum (safety Measures) Act 1984 n) Fire Services Act 1984 o) Uniform Building By Laws 1986 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>p) Weights And Measures Act 1972 (Act 71) (Amendment 1981)</p> <p>q) National Land Code 1965 Act 56</p> <p>r) Water Act 1920 Act 418</p> <p>s) Animal Act 1953</p> <p>t) Malaysian Anti Corruption A1567 Act 2018</p> <p>u) Energy Commission 2001 Act 610</p> <p>v) Perintah Gaji Minimum 2022</p> <p>w) Peraturan Kawalan Penyakit - Fasa Peralihan Endermik 01/4/22</p>	
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>The Sustainability Department based at Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills. Sustainability Department which is based in Head Office is responsible for tracking any changes to the Acts and Regulations. In addition, the Plantation Controller of Northern Region also played a role in disseminating new Acts & Regulations to all the mills and estates in the Region.</p> <p>a) This was made via communication with the publisher of the documents.</p> <p>b) This mechanism was outlined in its procedure.</p> <p>c) The updating of the legal register is made on a periodical basis.</p> <p>d) Changes in the legal register if any are communicated to the respective Region.</p> <p>The estates had entirely adopted the TDM established documented system for identifying, tracking, accessing and updating the legal requirements. It had ensured that all applicable legal requirements pertaining to MSPO are established, implemented and maintained. The</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																
		latest revision on the LORR was made dated 18/10/2022 mainly in relation to MCO requirement and min wages order 2022.																	
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 -	An Assistant Manager is assigned as as the PIC via letters approved by the respective Estates Managers. <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>PIC</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tayor</td> <td>En Ahmad Hazizi Abd Rahim</td> <td>01/02/2021</td> </tr> <tr> <td>2</td> <td>Pelung</td> <td>En Md Ismadairuz Yaacob</td> <td>01/03/2021</td> </tr> <tr> <td>3</td> <td>Jerangau</td> <td>En Md Zailani Mat Ali</td> <td>01/07/2022</td> </tr> </tbody> </table> <p>The appointed letters were sighted and verified. The mechanism of changes as described in 4.3.1.3 above.</p>		Estate	PIC	Date	1	Tayor	En Ahmad Hazizi Abd Rahim	01/02/2021	2	Pelung	En Md Ismadairuz Yaacob	01/03/2021	3	Jerangau	En Md Zailani Mat Ali	01/07/2022	Complied
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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 -	TDM Plantation Sdn Bhd did not diminish the land use rights of other users. Communities surrounding the estates are able to move freely without any issues or problems. Verified during remote audit that no such limitations had occurred.	Complied																
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. - Major compliance -	The management ensures that their oil palm cultivation activities do not diminish the land use rights of other users by having the land titles in place. E.g.: <ul style="list-style-type: none"> - Tayor Estate has 9 land titles with total area of 2219.92 Ha - Jerangau Estate has 4 land titles with a total area of 1480.90 Ha - Pelung Estate has 2 land titles with a total area of 3012.2 ha <p>Sample of land titles is as per the following:</p>	Complied																

Criterion / Indicator	Assessment Findings	Compliance
	<p><u>Jerangau Estate</u></p> <ol style="list-style-type: none"> 1. Land Title No: 12803 Lot No: 37 Lot hectarage: 456.89 ha File: PTG.TR.03/63/2014/A/005 2. Land Title No: 12816 Lot No: 1157 Lot hectarage: 580.5221 ha File: PTG.TR.03/55/2019/B/004 3. Land Title No: 12809 Lot No: 61326 Lot hectarage: 36.59 ha File: PTG.TR.03/63/2014/A/005 4. Land Title No: 10735 Lot No: 4050 Lot hectarage: 406.9 ha File: PTG.TR.02/63/2005/A/021 <p><u>Pelung Estate</u></p> <ol style="list-style-type: none"> 1. Land Title No: 12150 Lot No: 51902 Lot hectarage: 3002 ha File: PTG.TR.07/15/1992/0025 	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>2. Land Title No: 8124 Lot No: 16072 Lot hectarage: 102000 m² File: PTG.TR.07/19/1999/0026</p> <p><u>Tayor Estate</u></p> <p>1. Land Title No: 617 Lot No: 97 Lot hectarage: 1.1153 ha File: PTK.TR.879/77</p> <p>2. Land Title No: 1533 Lot No: 54 Lot hectarage: 1.8110 ha File: PTS.00/55/1991/A 001</p> <p>3. Land Title No: 865 Lot No: 3041 Lot hectarage: 1133.6485 ha File: PTK.TR.2/1291</p>	
4.3.2.3	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p>- Major compliance -</p>	<p>The estates have installed boundary markers as sighted during the visit at the estates and from records shown. This is confirmed that they have maintained boundary markers by installing the blue/white poles. There were areas where construction of fencing being made for enhanced security purposes.</p>	Complied

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Criterion / Indicator		Assessment Findings				Compliance
			Estate	Location	Boundary neighbors	
		1	Tayor	1998B1	Kg Bukit	
		2	Tayor	1998A1	Kg Tayor Tengah	
		3	Tayor	1998A1	Hutan Simpan Bkt Kesing	
		1	Jerangau	2011A	Kg Bahru Sg Binjal	
		2	Jerangau	2019A	FELDA Jerangau	
		3	Jerangau	2011A	MARDI Jerangau	
		1	Pelung	PR 20A2	Ldg FELCRA Pelung	
		2	Pelung	PR 20A1	Kg Pelong	
		3	Pelung	PR 21A	Hutan Simpan Bkt Kesing	
4.3.2.4	Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There was no land dispute at all the visited estates.				N/A
Criterion 4.3.3 – Customary rights						
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	Not Applicable. There was no land encumbered by customary rights.				N/A
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	Not Applicable. There was no land encumbered by customary rights.				N/A

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Criterion / Indicator		Assessment Findings	Compliance
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	Not Applicable. There was no land encumbered by customary rights.	N/A
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Revisited SIA was carried out by external consultant, Green Orbis Environmental Sdn Bhd on 14-16/06/2022. The assessment was covered the whole South and North Zone Complex. The assessment team has interviewed with the relevant stakeholders such contractors, local communities, internal workers included local and foreign and etc. The mill and estates have developed SIA Action Plan for Y2022 which covered the social profile such as safety & health, education, housing & infrastructure etc.	Complied
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	TDM Plantation Sdn Bhd has established a flowchart on handling social issue. Two-way communication was the method been utilized by the management. The management has to discuss the issue raised by stakeholders within 2 weeks for the first meeting. According to the procedure, all the complaints and grievances will be recorded in each individual form.	Complied
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	The forms can be filling and drop into the suggestion box at the office or send to PIC. The estate management has implemented House Maintenance Records to record any complaints related to housing by the workers. For e.g.: fuse box wiring problem on 12/12/2022 at Tayor Estate and repair works completed on 14/12/2022 and	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		acknowledged by complainant.	
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -	Complaint Logbook for Linesite Repair and Complaint/ Request form was established and implemented. No external stakeholders were recorded related on complaint and grievances.	Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	Grievance procedure flowchart also displayed on the office signboard and security post. Checked the complainants file noted that acknowledgement was evident in the complaint form. Interviewed with the workers' representatives confirmed that the management has addressed the issues raised by them.	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 -	Grievance procedure flowchart and complaint form displayed on the office signboard.	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 -	Estates has made contributions to the local communities and stakeholders. For example at Jerangau Estate: a. Donation to SK Landas Teachers and Parents Association @ PIBG for Academic Excellent Programme in June 2022. b. Donation to Kelas Al-Quran Fardhu Ain (KQF) Kg Baru Sungai Binjai in August 2022. c. Donation to JPKK Kampung Tok Dan for village programme.	Complied
Criterion 4.4.4: Employees safety and health			

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Criterion / Indicator		Assessment Findings	Compliance
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	Sighted during audit an OSH Policy, documented and approved by Haji Hamdan b. Ibrahim CEO of TDM Plantation Sdn. Bhd. dated 01/02/2022 and OSH Plan, Training Matrix and Training Schedule for FY 2022 in line with objective of legal requirements OSHA 1994 and has been communicated and implemented in Tayor, Jerangau and Pelung estates accordingly during several meetings and briefings sessions conducted by the estate management with all employees. The estates have established OSH Management Plan and documented in Environment, Safety and Health Plan FY 2022. The management plan includes the ESH Risk Management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring, Health monitoring.	Complied
4.4.4.2	The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: i. all employees involved shall be adequately trained on safe working practices ii. all precautions attached to products shall be properly observed and applied d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).	a) As above, documented OSH Policy, approved by Hamdan b. Ibrahim CEO of TDM Plantation Sdn. Bhd. dated 01/02/2022 and OSH Plan 2022 has been communicated to all employee and implemented. b) TDM Plantation Sdn Bhd have established SOP for HIRARC Edition TDMP/01 Revision TDMP 01/2018 dated 22/10/2018. Tayor Estate sampled have conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC). HIRARC is reviewed on annually on 26/09/2022 for Weeding in Immature Area approved by Shahrul Nizam Abu Bakar (Estate Manager). CHRA for Tayor Estate was conducted by Dr, Yasriza b. Yahaya from Occumed Consultancy & Services Sdn Bhd on 08/03/2022. Jerangau Estate has conducted Hirarc covering 30 activities such as Collection, Confined Space, Drainage, Transport, Prunning & Sanitation, Store, Workshop Operation, Maintenance and etc. Update and latest revision on 26/09/2022 approved by Estate Manager. Noise Risk Assessment	OFI

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>was conducted on Foreman (Workshop), Tractor Driver (Harvesting), Grass Cutter (Office), Mist Blower (Harvesting), Lorry Driver (Harvesting) in 2022. Based on Assessment Report by Klinik Ibra dated 22/11/2022 mentioned that all 6 cases of Permanent STS were reported to DOSH and reported as Occupational Noise Related Hearing Disorder (ONRHD). OFI is raised for the Assessment of risk of newly Land Surf for Mechanise Spray and Badang with Scissors lift use in routine and non-routine operation to be further reviewed and considered.</p> <p>In Pelung Estate, HIRARC was reviewed and updated on 20/11/2022 as sampled on Slashing Activity that approved by Estate Manager. Other activities were assessed accordingly and found implemented consistently. Noise Risk Assessment was conducted BHS Quantum Venture on 20/12/2020 and reported on 19/01/2021 by Assessor Irwan Jaafar (HQ/06/PEB/00/06) Pelong Estate has sent employee to Audiometric Test at Klinik Ihsan on 18/08/2022(:</p> <ul style="list-style-type: none"> • Sprayer (Mahyudin) Mist Blower Operator • Foreman (Che Wan Rozailani) <p>c) As sampled, all estates had established a training program for employees exposed to chemicals used at the palm oil estates to ensure continuous awareness to the employees. The training was conducted by the Manager, Asst. Manager, and representative from the chemical suppliers to the supervisors and operators. Sighted the training records in Jerangau Estate for Pesticides Handling Training conducted on 28/07/2022 and attended by 6 General Workers. Pelung Estate has conducted pesticides handling SOP training on 25/04/2022 and attended by 4 sprayers.</p>	

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	<p>d) Appropriate PPE were used by the workers where the management provide appropriate PPE to the workers based on the job type. The PPE given as per HIRARC and Standard Operating Procedure. PPE Matrix for Tayor Estate revised 12/12/2022. For Sprayer PPE required:</p> <p>Backpack: Nitrile Gloves, Goggles, Apron, Respirator, Wellington Boots, Caps/Topi Jerami, Long sleeve shirt and trouser.</p> <p>Mist Blower: Nitrile Gloves, Goggles, Apron, Respirator, Wellington Boots, Ear plugs. Caps/Topi Jerami, Long sleeve shirt and trouser.</p> <p>Harvester: Safety helmet, Wellington Boots and Sickles, Long Sleeve shirt and trouser.</p> <p>In Pelung Estate, PPE issuance records maintained for Rubber Gloves for 10 employees on 26/07/2022. Topi Mengkuang for 6 employees on 28/07/2022, on 21/01/2022 4 Mist Blower Operator received Rubber Gloves, apron, respirator and goggles. 8 employees received a safety helmets on 26/07/2022. On 23/01/2022 about 23 employees received a safety boots. Similar PPE Matrix as Tayor Estate sighted in Pelung Estate.</p> <p>e) Standard Operating Procedures for Handling of Chemicals were available in several documents. SOP in all operations including handling of chemicals has been established in estates within Sg. Tong POM complex to ensure proper and safe handling and storage. In Tayor Estate and Jerangau Estate sighted SOP for Spraying and Mixing of chemicals in a pictogram format and Malay Language used.</p> <p>f) Manager of Tayor Estate was appointed as SHC Chairman as Appointment Latter signed by Hamdan b. Ibrahim (CEO) dated 01/07/2022. Nor Hazirah Mohamad Hanapi (Compliance Officer)</p>	

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	<p>was appointed as Secretary of SHC by Estate Manager as Appointment Letter dated 23/03/2021. Ahmad Hazazi Abd Rahin (Asst Manager) was appointed as SHC member as Appointment Letter dated 02/01/2022 signed by Estate Manager. Manager of Jerangau Estate was appointed as SHC Chairman by CEO TDM Plantation Sdn Bhd as Appointment Letter dated 01/07/2022. Appointment of SHC members of Pelung Estate was made by Estate Manager (Hasmadi Ismail) as Appointment Letter dated 01/03/2022.</p> <p>g) The regular SHC committee meetings on quarterly basis were conducted and when accident occurs. The meeting discussed issues on employees' safety, health and welfare such as operational risks and health achievement report, estate security, safety compliance by contractors, workplace inspection, legal compliance, safety and health training. Sighted the SHC Meeting Minutes for 4th Quarter of 2022 held on 06/12/2022. 3rd Quarter on 12/09/2022, 2nd Quarter on 22/06/2022 and 1st Quarter on 15/03/2022. Issues OSH and accident discussed in the meeting as minutes sampled. Regular SHC meeting was conducted in 2022 and minuted on 02/03/2022, 12/06/2022, 07/03/2022, 21/11/22, 16/08/2022.</p> <p>h) Accident and Emergency procedures were available in the SOP Emergency Preparedness & Response Edition TDM/01, Revision TDMP-01/2018 dated 01/01/2018. The estates have established Emergency Response Team lead by the Estate Managers. The ERT chart and Fire Extinguisher Map was also available and verified. Sighted a Flow Chart for Accident and Injury for Tayor Estate. Also sighted a Flow Chart of ERM (Chemical Spillage) for Tayor Estate to protect environmental pollution and health hazard.</p>	

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	<p>i) First aiders were assigned to various workstation at the estates. The mandores and staffs were responsible for first aid boxes at each workstation assigned to them by the management. Sighted Basic First Aid and CPR & AED Training Certificate from CERT Academy belongs to Nor Hazirah Mohd Hanapi in Tayor Estate. Attended on 23-24/03/2022. The first aid box was recently replenished with all stated items available in the box. A total of 29 Boxes allocated in Tayor Estate kept by Mandores, Manager, Lorry Driver, Van Driver and staffs in Office. Monthly First Aid Maintenance for Month of November 2022 was sampled which contained 16 items. In Jerangau Estate during site visit found 1st Aid Box standby for emergency purpose at Scheduled Waste Store and Bathing Room. While sighted the Inspection Checklist for 1st Aid Box for month of November 2022 which contains 19 items. A total of 19 unit available in the estate and checked by Siti Saiyidah Najihah (Compliance Officer). In Pelung Estate, the First aid Box inspection done monthly as checklist dated 09/01, 06/02, 06/03/10/04,13/11 and 07/12/2022. As sampled from List of First Aider in Pelung Estate a total of 11 boxes assigned to First Aider named Zainal Abidin Hamzah (17A/18A), Zulkifli Mahmud (97A/97B), Rahat Mia) Ramp), Tengku Nur Fathiah (Chemical Store), Saiful Anuar b. Sulong (Housing 1) and ect. Contact number of each First Aider clear stated for reference and ensuring easy access by employee.</p> <p>j) As minute in 4th Meeting of SHC, no accident was reported and discussed accordingly ion Tayor Estate. Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records of accident involving Faridah bt. Omar on 26/10/2021 while doing slashing and fall in a hole and cuts on her fingers. MC</p>	

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		8 days till 01/11/2021. Form JKPP 6 was filled up and submitted to DOSH on 25/10/2021. On 26/10/2022 a meeting of SHC was held to discuss and investigate the accident accordingly. In Jerangau Estate the JKPP 6 was sent to DOSH for accident occurred on 09/08/2022 involving Mohamad Mosharof Hossen (Bangladeshi Harvester). 6 days MC awarded by medical doctor. JKPP 7 was sent on 27/11/2022 due to health issues of Azmi Ismail (Tractor Driver) with right ear hearing impairment as repeat audiogram conducted whose exposed to noise since 1991 as tractor driver. Another case involving Mohd Rafi Ibrahim (Tractor Driver) with of STS with sensori-nueral hearing loss. Repeat audiogram and exposed to noise as tractor driver since 2005. 4 others also have hearing impairment issues as repeat audiogram done by Klinik Ibra and reported to DOSH accordingly on 27/22/2022. JKPP 8 form submitted to DOSH for incident statistics in 2021. 4 cases of Occupational Disease (Noise exposure related) reported for 2 Tractor Drivers, 2 Mist Blower Operators. In Pelung Estate 2 JKPP 7 Form notified to DOSH on Mist Blower and Tractor Driver Noise related disease on 14/12/2022 by Estate Manager.	
Criterion 4.4.5: Employment conditions			
4.4.5.1	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees. - Major compliance -	TDM Plantation Sdn Bhd has newly revised the Human Rights Policy dated 01/01/2022 which signed by new CEO, Hamdan Ibrahim. The management is committed to support the principle of Universal Declaration of Human Rights and ILO Core Convention on Labour Standards. They evaluated and managed the human rights activities parallel to the policy such as workers, contractors and suppliers, local communities and etc. The policy was displayed at the notice board in front of office and muster ground area.	Complied

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4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	TDM Plantation Sdn Bhd has newly revised the Social Policy dated 01/01/2022 which signed by new CEO, Hamdan Ibrahim. TDM Plantation Sdn Bhd is committed to treat all the workers equally during the recruitment and promotion process without discrimination based on nationality, race, ethnic, religion, sexual orientation, age and etc. There was no evidence of any form of discrimination based on race, national origin, religion, gender, union and political affiliation and is covered in the policy as well.	Complied
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	The payroll and pay slip records of employees showed that all employees are paid with the monthly salary are compliance with the local minimum wage requirements. Payslips for the month July 2022 – low, October 2022 – medium and January 2022 – peak were reviewed. Total of sample workers is calculated based on sampling square root of (total workers) x 0.8. <u>Tayor Estate</u> Total of 9 workers sampled from total of 125 workers. <u>Jerangau Estate</u> Total of 10 workers sampled from total of 156 workers. <u>Pelung Estate</u> Total of 8 workers sampled from total of 108 workers. Review the pay slip of employees pay statements has been carried out and confirm that their basic salary wages are comply with Minimum Wage Order 2020 of RM 1200/ month or RM 46.15 / day and RM1500/month or RM57.69 per day effective from 01/05/2022 based on latest Minimum Wages Order 2022.	Complied
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the	For example, at Jerangau Estate, one (1) contractor engaged for FFB harvesting activity under named Wan Family Legacy. Contract of	Complied

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	<p>employment contract agreed between the contractor and his employee.</p> <p>- Minor compliance -</p>	<p>employment and payslip under Wan Family Legacy (harvesting contractor, ref. LJR:38/22 dated 23/10/22) employees of contractor was verified. Latest salary payment on November 2022 has shown that the salary payment including (SOCSO and EPF contribution) meeting the latest minimum wages order 2022.</p> <p><u>Taylor Estate</u></p> <p>Rental of heavy machinery at nursery – Contractor, Koperasi Ladang Sawit Sg Tong, ref: LT-20/2022 dated 1/9/2022. Contract of employment and payslip under employees of contractor was verified. Latest salary payment on November 2022 has shown that the salary payment including (SOCSO and EPF contribution) meeting the latest minimum wages order 2022.</p>	
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- Major compliance -</p>	<p>The management have a list or record for all workers and record under master list workers contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</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>There is a contract and agreement for staff and workers and made reference to (MAPA/NUPW agreement on the wages of harvester, harvesting kanganies, loaders and other loaders on oil palm estates 2019) including foreign workers and pay and conditions are documented and are above the industry minimum standard. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker. For foreign workers contract, employment contract varies from 2-3 years based on nationality in line with VISA/work permit</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>issued by Immigration Department. Total of sample workers is calculated based on sampling square root of (total workers) x 0.8.</p> <p><u>Tayor Estate</u> Total of 9 workers sampled from total of 125 workers.</p> <p><u>Jerangau Estate</u> Total of 10 workers sampled from total of 156 workers.</p> <p><u>Pelung Estate</u> Total of 8 workers sampled from total of 108 workers.</p>	
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>Estates established a time recording system using Check Roll Book for all employees at different station. The working hours for all employees have been clearly documented in the Check Roll Book as well as their pay slip under OT section to ensure transparent for both employees and employer. Time recording system has been carried out manually on daily basis for field and office staff & executives. For office staff & executives, the working hours are recorded in the Executives & Staff Attendance List. For field workers, they record the working hours in the Daily Time Record. The overtime working hours always approved by the assistant manager. The documented working hours available in the daily check roll records</p>	Complied
4.4.5.8	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p> <p>- Major compliance -</p>	<p>Through the verification of the O/T form, overtime sheet and also the sampled payslip. There is no overtime more than the legal permitting 104 hours.</p>	Complied

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4.4.5.9	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p>- Major compliance -</p>	<p>Pay slips of all employees are available as evidence of salary payment. The pay slip contains the following information:</p> <ul style="list-style-type: none"> a. Opening Balance b. Price bonus c. Wages d. Pendahuluan tunai e. EIS f. EPF g. SOCSO h. Bayaran lebih masa <p>Based on verification of the pay slips and time recording, the overtime was found to be accurately paid in accordance to the legal regulations.</p>	Complied
4.4.5.10	<p>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.</p> <p>- Minor compliance -</p>	<p>The management also provides free housing facilities with water and electricity. In addition, clinic facilities are prepared in the estate and the VMO visit twice per month.</p>	Complied
4.4.5.11	<p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p>- Major compliance -</p>	<p>On-site living quarters are provided to general workers and staff. Observed that the living quarters are habitable and have amenities such as water, electricity etc. Transportation to send children to neighbouring school was provided as well.</p> <p>Line site inspection was carried out on weekly basis as per the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) requirement. VMO will come and visit the estate for clinic visit</p>	Complied

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		<p>and other amenities (creche and line site). Any comments will be reported in the logbook and presented to management.</p> <table border="1"> <tr> <td>Estate</td> <td>Line site inspection</td> </tr> <tr> <td>Jerangau</td> <td>28/11, 21/11,14/11, 7/11</td> </tr> <tr> <td>Pelantoh</td> <td>29/11, 22/11, 15/11, 8/11</td> </tr> </table>	Estate	Line site inspection	Jerangau	28/11, 21/11,14/11, 7/11	Pelantoh	29/11, 22/11, 15/11, 8/11	
Estate	Line site inspection								
Jerangau	28/11, 21/11,14/11, 7/11								
Pelantoh	29/11, 22/11, 15/11, 8/11								
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>TDM Plantation Sdn Bhd has revised the Gender Policy dated 1/1/22 which signed by new CEO, Hamdan Ibrahim. They are responsible to ensure the workplaces are free from any harassment related to sexual, religion, nationality and etc. The policy has been displayed at the notice board in front of office.</p> <p>From the interview with gender committee chairperson in Jerangau Estate that they aware regarding to policy and guidelines to prevent all form of sexual harassment. Meeting minute dated 20/10/22 available for review. Based on recorded minute, the was no sexual harassment case and violence reported.</p> <p>At Pelung Estate, the latest gender committee meeting was carried out on 26/10/2022 and Tayor Estate on 23/11/2022.</p>	Complied						
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>TDM Plantation Sdn Bhd has newly revised Freedom of Association Policy dated 01/01/2022 which signed by new CEO, Hamdan Ibrahim. The workers were able to join or form any association according to the Employment Act without any restriction.</p> <p>Interview of staff and workers also confirmed their awareness of freedom of association. The only worker union available is NUPW at the moment.</p> <p>At Pelung Estate, the latest union meeting conducted on 09/09/2022. Various issues being discussed between the union representatives</p>	Complied						

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		and also management. The Issue already been taken by management available in Social Management Plan. <u>Tayor Estate</u> The latest union meeting was carried out on 05/09/2022. The meeting was attended by the management and workers representative from Tayor Estate. No unresolved issues recorded.	
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children and young persons is acceptable on family farms, under adult supervision, and when not interfering with their education. They shall not be exposed to hazardous working conditions. - Major compliance -	TDM Plantation Sdn. Bhd. has newly revised Protection of Children Policy dated 01/01/2022 which signed by new CEO, Hamdan Bin Ibrahim. They are committed not to exploit or recruit any individual less than 16 years old in the plantations. Estate maintains an accurate record of all employees under the list of workers. Through document reviewed on the employee master listing confirmed that the workers recruited are above 18 years old. Evidence that there is no underage worker (below 18 years old) employed at the work locations visited.	Complied
Criterion 4.4.6: Training and competency			
4.4.6.1	All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept. - Major compliance -	All estates within Sg. Tong POM complex has established an annual training program that covers all aspects of the operations as well certifications (MSPO & RSPO) requirements. The details were available for verification in the document below: <ul style="list-style-type: none"> • OSH Plan, Training Matrix & Training Schedule 2022 for Tayor Estate which cover all level of staff included Manager, Asst. Managers, Clerks, Mandores, Sprayers, Manurers and harvester etc. Type of Training required for each of them clearly stated such as covering aspect of OSH, Environment, Social, Legal, Emergency, 	Complied

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	<p>Operation (Spraying, Manuring, Weeding, Harvesting and ect). The plan date and actual were clearly stated too as verified.</p> <p>In Jerangau Estate training record kept as sampled:</p> <ul style="list-style-type: none"> • Environmental Briefing was conducted on 08/08/2022 and attended by 11 workers. • Tractor Driver Training was conducted on 28/09/2022 and attended by 4 drivers, mandores and Foreman and Field Assistant. • Contractor Workers training was conducted on 15/09/2022 and attended by 6 workers. • Bomba Briefing was conducted on 28/08/2022 by JBPM Kuala Berang and attended by 15 employees. • Traceability Training was conducted an attended by 13 workers on 07/08/2022, on 01/08/2022 attended by 16 workers. • 1st Aid Box and First Aider Training was conducted on 19/07/2022 by Mohd Syahiran Abu Bakar (Ha) and attended by 17 staffs included mandore, External Officer, Compliance Officer and ect. • Land Surf Training at Workshop Landas Division was conducted on 25/05/2022 attended by 35 workers. • Basic 1st Aid and CPR (BOFA-C) and AED was conducted on 23-24/03/2022 by Trainer from CERT Acedemy. 2 staff (Ahmad Hafizi and Siti Saiyidah Najihah) from Jerangau Estate, 2 From Tayor Estate (Nor Hazirah and Raja Adam) attended as namelist. <p>Training records kept for training conducted in 2022 in Pelung Estate</p> <ul style="list-style-type: none"> • Fire Fighting Training on 28/06/2022 attended by 38 employees included trainer from JBPM from Setiu. 	

Criterion / Indicator		Assessment Findings	Compliance
4.4.6.2	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p>- Major compliance -</p>	<p>Training needs of individual employees was established as per sample Tayor, Jerangau Estates OSH Plan, Training Matrix & Training Schedule 2022 for Tayor Estate. Trainings identified for all estate employees including manager, assistant managers, staffs and workers continuously in year 2022 as sighted.</p>	Complied
4.4.6.3	<p>A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p> <p>- Minor compliance -</p>	<p>In Tayor Estate, Jerangau Estate, Pelung Estate during audit, sighted a document titled Training Schedule for Year 2022, where continuous training programme implemented to ensure sprayers, manurers, harvester and other employee trained and perform job responsibly as training procedure. In Jerangau Estate continuous programme such as:</p> <ul style="list-style-type: none"> • Manuring training planned on 23/03/2022 and implemented on 17/02/2022. • Rat Baiting training planned on 17/03/2022 and implemented on 25/10/2022. • Spraying training planned on 22/03/2022 and implemented on 24/02/2022. • Land Surf Spraying training planned on 22/03/2022 and implemented on 25/05/2022. • Harvesting training planned on 22/02/2022 and implemented on 20/02/2022. • Tractor Driving Training planned on 07/04/2022 and implemented on 28/09/2022. <p>In Pelung Estate the continuous programme included under SOP Training such as:</p> <ul style="list-style-type: none"> • Boundary Marking in February 2022 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Harvesting and Pruning in February 2022 • Manuring in March 2022 • Control of Pest Insect and Tar Baiting in May 2022 • Spraying in March 2022 • Tractor Driver in March 2022 • Workshop and Foreman in April 2022 	
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	<p>An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.</p> <p>- Major compliance -</p>	<p>There is a Group Policy titled "Environmental & Biodiversity Policy" dated 01/01/2022 signed by the Group CEO mainly in relation to environmental protection. Therein the policy among others contained commitment towards:</p> <ol style="list-style-type: none"> 1. To protecting the environment and conserving biodiversity through sustainable development. 2. Abide by all legislative requirement 3. Manages environmental risk and providing reasonable resources to minimize risk and pollution to environment 4. Continuing and improving efficiency towards enhancing environment. <p>During the field visits and interviews with the workers on 20/12/22 there is no open burning being practiced in the estate.</p>	Complied

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Criterion / Indicator		Assessment Findings		Compliance																																															
<p>4.5.1.2</p>	<p>The environmental management plan shall cover the following:</p> <p>a) An environmental policy and objectives;</p> <p>b) The aspects and impacts analysis of all operations.</p> <p>- Major compliance -</p>	<p>The aspect and impact analysis for all the estate operations are documented on 2019 and revised annually latest being on 20/06/2022. Records were compiled in EAI/2022 form with description made to activities, aspect and impact to the environment in the comprehensive report, the study of aspect and impact are aimed to:</p> <ol style="list-style-type: none"> 1. Plan to avoid negative impact and to promote positive impacts. 2. Reduction disposal of waste taking into consideration of social responsibilities. 3. Plan to reduce pollution and release of GHG. 4. Development and implementations. <p>Aspect and impact covered the following activities/operations among others:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Activities</th> <th></th> <th>Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Poisoning of VOP/ woodies</td> <td>9</td> <td>Grass slashing</td> </tr> <tr> <td>2</td> <td>Circle spraying</td> <td>10</td> <td>Fertilizer application</td> </tr> <tr> <td>3</td> <td>Management empty containers</td> <td>11</td> <td>FFB Transportation</td> </tr> <tr> <td>4</td> <td>Rat baiting</td> <td>12</td> <td>Vehicle maintenance</td> </tr> <tr> <td>5</td> <td>Triple rinsing</td> <td>13</td> <td>Chemical storage</td> </tr> <tr> <td>6</td> <td>Drainage construction</td> <td>14</td> <td>P & D census</td> </tr> <tr> <td>7</td> <td>Rat Baiting</td> <td>15</td> <td>Boundary maintenance</td> </tr> <tr> <td>8</td> <td>Road maintenance</td> <td>16</td> <td>SW management</td> </tr> </tbody> </table> <p>Management Plan & Initiative to reduce the impact on is listed below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Impact</th> <th>Source</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Soil pollution</td> <td rowspan="2">Empty chemical containers</td> <td>Recycle used containers.</td> </tr> <tr> <td>2</td> <td>Water pollution</td> <td>Disposed to vendor as SW409.</td> </tr> </tbody> </table>			Activities		Activities	1	Poisoning of VOP/ woodies	9	Grass slashing	2	Circle spraying	10	Fertilizer application	3	Management empty containers	11	FFB Transportation	4	Rat baiting	12	Vehicle maintenance	5	Triple rinsing	13	Chemical storage	6	Drainage construction	14	P & D census	7	Rat Baiting	15	Boundary maintenance	8	Road maintenance	16	SW management		Impact	Source	Action plan	1	Soil pollution	Empty chemical containers	Recycle used containers.	2	Water pollution	Disposed to vendor as SW409.	<p>Complied</p>
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		<p>Additionally, the following efforts were initiated by the management to reduce impact on the environment.</p> <table border="1"> <thead> <tr> <th></th> <th>Issue</th> <th>Initiative</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reduce chemical spillage</td> <td>Implement mixing at designated area</td> </tr> <tr> <td>2</td> <td>Smoke emission from vehicles</td> <td>Implement PMV</td> </tr> <tr> <td>3</td> <td>Diesel spillage during infilling</td> <td>Establish trap, tray & spill kit</td> </tr> </tbody> </table>		Issue	Initiative	1	Reduce chemical spillage	Implement mixing at designated area	2	Smoke emission from vehicles	Implement PMV	3	Diesel spillage during infilling	Establish trap, tray & spill kit	
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4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p>- Major compliance -</p>	<p>The estates had established an environmental improvement plan with details to reduce and control the pollution (negative impacts) and action plan to sustain the environmental impact (positive) has been developed with details as follows among others:</p> <table border="1"> <thead> <tr> <th></th> <th>Jadual</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>4.1</td> <td>Rumusan Skor Untuk Impak Negatif Alam Sekitar Paling KETARA</td> </tr> <tr> <td>2</td> <td>4.2</td> <td>Pelan Pengurusan (Management Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang</td> </tr> <tr> <td>3</td> <td>4.3</td> <td>Pelan Tindakan (Action Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang Dan Mengawal Pencemaran (Impak Positif)</td> </tr> </tbody> </table> <p>All the above documents were dated on 20/06/2022 and thereafter subject to review annually.</p>		Jadual	Details	1	4.1	Rumusan Skor Untuk Impak Negatif Alam Sekitar Paling KETARA	2	4.2	Pelan Pengurusan (Management Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang	3	4.3	Pelan Tindakan (Action Plan) Bagi Mengurangkan Impak Alam Sekitar Dari Aktiviti Ladang Dan Mengawal Pencemaran (Impak Positif)	Complied
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4.5.1.4	<p>A programme to promote the positive impacts should be included in the continual improvement plan.</p> <p>- Minor compliance -</p>	<p>The program to promote the positive impacts is illustrated in 4.5.1.2 and 4.5.1.3 above. In addition, there are other initiative planned for improvement in promoting environmental and social issues as listed</p>	Complied												

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		<p>below. Inclusive are projects for improvement as described below among others:</p> <table border="1"> <thead> <tr> <th></th> <th>Sections</th> <th>Description - Tayor Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Operation</td> <td>CANTAS - FFB cutter 4 units RM4.7K - Feb 2023</td> </tr> <tr> <td>2</td> <td>Facilities</td> <td>Workers Houses 8 units - RM83K - Aug 2023</td> </tr> <tr> <td>3</td> <td>Facilities</td> <td>Housing Complex Water Piping - RM 100K May 2023</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th></th> <th>Sections</th> <th>Description - Pelung Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Facilities</td> <td>1 unit Staff Houses RM173K - May 2022</td> </tr> <tr> <td>2</td> <td>Operation</td> <td>1 unit Field Bridges RM90K - Mac 2023</td> </tr> <tr> <td>3</td> <td>Facilities</td> <td>Premix road - RM100K - Feb 2023</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th></th> <th>Sections</th> <th>Description - Jerangau Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Facilities</td> <td>Workers Houses 2 units - RM195K - Feb 2023</td> </tr> <tr> <td>2</td> <td>Facilities</td> <td>Community Hall - RM170K - Mac 2024</td> </tr> <tr> <td>3</td> <td>Facilities</td> <td>Futsal Field - RM125K - May 2023</td> </tr> <tr> <td>4</td> <td>Operation</td> <td>Chemical Mixing Store - RM 40K - June 2023</td> </tr> </tbody> </table> <p>Program to promote the positive impacts included in the continual improvement plans of estates within Sg. Tong POM complex including the Integrated Pest Management Program which continuously reduce the use of chemicals with introduction of biological pests such as barn owl for rat control. Other positive impacts including the use of compost fertilizer to reduce the use of inorganic fertilizers.</p>		Sections	Description - Tayor Estate	1	Operation	CANTAS - FFB cutter 4 units RM4.7K - Feb 2023	2	Facilities	Workers Houses 8 units - RM83K - Aug 2023	3	Facilities	Housing Complex Water Piping - RM 100K May 2023		Sections	Description - Pelung Estate	1	Facilities	1 unit Staff Houses RM173K - May 2022	2	Operation	1 unit Field Bridges RM90K - Mac 2023	3	Facilities	Premix road - RM100K - Feb 2023		Sections	Description - Jerangau Estate	1	Facilities	Workers Houses 2 units - RM195K - Feb 2023	2	Facilities	Community Hall - RM170K - Mac 2024	3	Facilities	Futsal Field - RM125K - May 2023	4	Operation	Chemical Mixing Store - RM 40K - June 2023	
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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.	A training program is available in the Annual Training Program updated on a yearly basis or revised as per the management requirement. Included in this programme are subjects related to environment e.g. environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training. Other	Complied																																							

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	- Major compliance -	<p>training organized in relation to environmental issues and activities among other as listed below:</p> <table border="1"> <thead> <tr> <th></th> <th>Subject</th> <th>Tayor</th> <th>Pelung</th> <th>Jerangau</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Zero Burning</td> <td>24/03/22</td> <td>05/05/22</td> <td>10/08/22</td> </tr> <tr> <td>2</td> <td>RSPO/MSPO Policy</td> <td>24/03/22</td> <td>01/08/22</td> <td>10/08/22</td> </tr> <tr> <td>3</td> <td>Spraying at Buffer zone</td> <td>28/07/22</td> <td>01/08/22</td> <td>06/03/22</td> </tr> <tr> <td>4</td> <td>SW Management /Triple R</td> <td>12/04/22</td> <td>18/05/22</td> <td>16/10/22</td> </tr> <tr> <td>5</td> <td>HCV Management</td> <td>14/06/22</td> <td>01/08/22</td> <td>06/03/22</td> </tr> <tr> <td>6</td> <td>S/holder environmental</td> <td>13/06/22</td> <td>12/11/22</td> <td>13/06/22</td> </tr> </tbody> </table>		Subject	Tayor	Pelung	Jerangau	1	Zero Burning	24/03/22	05/05/22	10/08/22	2	RSPO/MSPO Policy	24/03/22	01/08/22	10/08/22	3	Spraying at Buffer zone	28/07/22	01/08/22	06/03/22	4	SW Management /Triple R	12/04/22	18/05/22	16/10/22	5	HCV Management	14/06/22	01/08/22	06/03/22	6	S/holder environmental	13/06/22	12/11/22	13/06/22	
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4.5.1.6	<p>Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>Subjects concerning environmental are also included and discussed in the EPMC (Environmental Performance Monitoring Committee) meetings. The dates of meeting held by the estates are recorded below.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>1st</th> <th>2nd</th> <th>3rd</th> <th>4th</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tayor</td> <td>04/12/22</td> <td>14/09/22</td> <td>27/06/22</td> <td>27/03/22</td> </tr> <tr> <td>2</td> <td>Jerangau</td> <td>07/11/22</td> <td>08/08/22</td> <td>06/04/22</td> <td>16/02/22</td> </tr> <tr> <td>3</td> <td>Pelung</td> <td>06/11/22</td> <td>27/09/22</td> <td>09/06/22</td> <td>14/03/22</td> </tr> </tbody> </table> <p>Agenda in relation to environmental among others include:</p> <ul style="list-style-type: none"> a) Lapuran Pematuhan Undang-Undang b) Lapuran Kesihatan & Kawasan Perumahan c) Lapuran Bahan Buangan Terjadual/Isu Alam Sekitar <p>Regular communications of environmental policies and objectives were conducted during daily muster briefings and during environmental committee meeting sessions among the committee members (Jawatankuasa Pengawasan Prestasi Alam Sekitar).</p>		Estate	1 st	2 nd	3 rd	4 th	1	Tayor	04/12/22	14/09/22	27/06/22	27/03/22	2	Jerangau	07/11/22	08/08/22	06/04/22	16/02/22	3	Pelung	06/11/22	27/09/22	09/06/22	14/03/22	Complied											
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Criterion 4.5.2: Efficiency of energy use and use of renewable energy																																																																																						
4.5.2.1	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p>- Major compliance -</p>	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented in the estates. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Monitoring is made using diesel/mt FFB, commentary on variance on irregularity variances.</p> <table border="1" data-bbox="1048 710 1861 1217"> <thead> <tr> <th></th> <th>2022</th> <th>Tayor</th> <th>Pelung</th> <th>Jerangau</th> </tr> </thead> <tbody> <tr><td>1</td><td>Jan</td><td>3.59</td><td>4.32</td><td>5.09</td></tr> <tr><td>2</td><td>Feb</td><td>2.54</td><td>7.12</td><td>4.55</td></tr> <tr><td>3</td><td>Mac</td><td>4.25</td><td>8.94</td><td>4.45</td></tr> <tr><td>4</td><td>April</td><td>4.17</td><td>8.14</td><td>4.41</td></tr> <tr><td>5</td><td>May</td><td>4.49</td><td>9.41</td><td>4.12</td></tr> <tr><td>6</td><td>June</td><td>4.69</td><td>11.37</td><td>4.17</td></tr> <tr><td>7</td><td>July</td><td>5.56</td><td>12.97</td><td>3.63</td></tr> <tr><td>8</td><td>Aug</td><td>4.07</td><td>9.75</td><td>3.18</td></tr> <tr><td>9</td><td>Sept</td><td>3.67</td><td>5.01</td><td>3.00</td></tr> <tr><td>10</td><td>Oct</td><td>2.60</td><td>6.28</td><td>2.69</td></tr> <tr><td>11</td><td>Nov</td><td>2.65</td><td>12.51</td><td>3.28</td></tr> <tr><td>12</td><td>Dec</td><td>-</td><td>-</td><td>-</td></tr> <tr><td></td><td>Total</td><td>3.71</td><td>8.44</td><td>3.50</td></tr> <tr><td></td><td>Baseline</td><td>5.00</td><td>5.00</td><td>3.65</td></tr> </tbody> </table> <p>The Environment Management Plan 2022 for efficiency of fossil fuel usage are detailed below:</p> <table border="1" data-bbox="1048 1297 1861 1329"> <thead> <tr> <th></th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		2022	Tayor	Pelung	Jerangau	1	Jan	3.59	4.32	5.09	2	Feb	2.54	7.12	4.55	3	Mac	4.25	8.94	4.45	4	April	4.17	8.14	4.41	5	May	4.49	9.41	4.12	6	June	4.69	11.37	4.17	7	July	5.56	12.97	3.63	8	Aug	4.07	9.75	3.18	9	Sept	3.67	5.01	3.00	10	Oct	2.60	6.28	2.69	11	Nov	2.65	12.51	3.28	12	Dec	-	-	-		Total	3.71	8.44	3.50		Baseline	5.00	5.00	3.65		Target	Objective	Action plan					<p>Complied</p>
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		1	Backhoe tractor/ Machines To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel
		2	Van/ Supervisory vehicle To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.
		3	Electrical supply To reduce reliance on gen-sets for power supply	Utilization of TNB sources
<p>Performance variation in view of several factors i.e.</p> <ul style="list-style-type: none"> a) Infrastructure of estates b) Community size / no of gen-sets c) No. of vehicles / age of machine d) Weather interference / crop production volume 				

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4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations. - Major compliance -	The estates made estimate on the diesel consumption in the annual budget. Mainly the diesel usage is for the estate machinery for FFB collection and transportation to the mill. Data in litre otherwise stated. <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tayor</td> <td>61000</td> <td>62000</td> <td>62000</td> </tr> <tr> <td>2</td> <td>Pelung</td> <td>32530</td> <td>33000</td> <td>34000</td> </tr> <tr> <td>3</td> <td>Jerangau</td> <td>74300</td> <td>75800</td> <td>77400</td> </tr> </tbody> </table>		Estate	2022	2023	2024	1	Tayor	61000	62000	62000	2	Pelung	32530	33000	34000	3	Jerangau	74300	75800	77400	Complied
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4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	There was no opportunity to use renewable energy in the estates at current technology. Mainly such practices are made in the mills whereby fibre and shell are used as fuel in the boiler for steam production thereafter for power generation.	Complied																				
Criterion 4.5.3: Waste management and disposal																							
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	TDM Estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2022 were established to mitigate and control the identified wastes and source of pollution. The common significant environmental receptors for the estate and mill operations among others as summarized below: <table border="1"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Sources from smoke and particulate), vehicle & generator (smoke and gases), field processes (ETP, EFB dumping) - GHG</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/operations activities</td> </tr> <tr> <td>3</td> <td>Land</td> <td>Scheduled waste, domestic waste and industrial/field operations.</td> </tr> </tbody> </table>		Receptor	Sources	1	Air	Sources from smoke and particulate), vehicle & generator (smoke and gases), field processes (ETP, EFB dumping) - GHG	2	Water	Cleaning water/run-off/operations activities	3	Land	Scheduled waste, domestic waste and industrial/field operations.	Complied								
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4.5.3.2	<p>A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:</p> <ul style="list-style-type: none"> a) Identifying and monitoring sources of waste and pollution b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products <p>- Major compliance -</p>	<p>The estates in the CU, procedure TDM Section B ref no 89 – Scheduled Wastes (Hazardous Waste) Management has been established and adopted.</p> <ul style="list-style-type: none"> a) Waste Management Plan 2022 has been established in Jan 2022. b) Based on Environmental Impact Evaluation and Environment Aspect and Impact Identification improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination. c) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner. 	Complied																											

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		<p>d) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The Estates scheduled waste are disposed to licensed contractor Pentas Flora (Kelantan) Sdn Bhd registration no 004878 valid till 31/04/2023.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Date</th> <th>SW410</th> <th>SW305</th> <th>SW409</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tayor</td> <td>12/12/22</td> <td>-</td> <td>-</td> <td>0.0339</td> </tr> <tr> <td>2</td> <td>Tayor</td> <td>19/09/22</td> <td>0.0150</td> <td>-</td> <td>0.7150</td> </tr> <tr> <td>3</td> <td>Tayor</td> <td>12/04/22</td> <td>0.0050</td> <td>-</td> <td>0.0473</td> </tr> <tr> <td colspan="6"> </td> </tr> <tr> <td>1</td> <td>Pelung</td> <td>24/11/22</td> <td>0.015</td> <td>0.030</td> <td>0.060</td> </tr> <tr> <td>2</td> <td>Pelung</td> <td>17/05/22</td> <td>0.320</td> <td>0.100</td> <td>0.070</td> </tr> <tr> <td>3</td> <td>Pelung</td> <td>24/04/22</td> <td>0.015</td> <td>0.030</td> <td>0.060</td> </tr> <tr> <td colspan="6"> </td> </tr> <tr> <td>1</td> <td>Jerangau</td> <td>11/10/22</td> <td>-</td> <td>0.180</td> <td>-</td> </tr> <tr> <td>2</td> <td>Jerangau</td> <td>05/10/22</td> <td>0.080</td> <td>-</td> <td>0.250</td> </tr> <tr> <td>3</td> <td>Jerangau</td> <td>19/03/22</td> <td>0.070</td> <td>0.550</td> <td>0.030</td> </tr> </tbody> </table> <p>Domestic waste for the operating units in SOU was disposed internally as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Unit</th> <th>Disposal site</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tayor</td> <td>MD Setiu</td> <td>Collection 2x week</td> </tr> <tr> <td>2</td> <td>Pelung</td> <td>MD Setiu</td> <td>Collection 2x week</td> </tr> <tr> <td>3</td> <td>Jerangau</td> <td>MD Hulu Tggn</td> <td>Collection 2x week</td> </tr> </tbody> </table>		Estate	Date	SW410	SW305	SW409	1	Tayor	12/12/22	-	-	0.0339	2	Tayor	19/09/22	0.0150	-	0.7150	3	Tayor	12/04/22	0.0050	-	0.0473							1	Pelung	24/11/22	0.015	0.030	0.060	2	Pelung	17/05/22	0.320	0.100	0.070	3	Pelung	24/04/22	0.015	0.030	0.060							1	Jerangau	11/10/22	-	0.180	-	2	Jerangau	05/10/22	0.080	-	0.250	3	Jerangau	19/03/22	0.070	0.550	0.030		Unit	Disposal site	Remarks	1	Tayor	MD Setiu	Collection 2x week	2	Pelung	MD Setiu	Collection 2x week	3	Jerangau	MD Hulu Tggn	Collection 2x week	
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Criterion / Indicator		Assessment Findings	Compliance
		D/N No 9480 dated 30/11/2022 for Tayor Estate was sighted and verified.	
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>TDM Estates had established SOP for chemical handling. The SOP of handling of chemicals is available in the following document</p> <ul style="list-style-type: none"> i. Manual Ladang - Agriculture Policy dated Sept 2019 <ul style="list-style-type: none"> - Prosedure Kerja Selamat ii. Manual Sustainability dated Mac 2020 <ul style="list-style-type: none"> - Prosedur Kerja Selamat - Prosedur membancuh Racun di PREMIX - Pengendalian Bahan Kimia - Pengurusan Bahan Buangan <p>The procedures for handling used chemicals classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by Sustainability Department and implemented in all estates for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows:</p> <ul style="list-style-type: none"> i. Management of class 2 (and higher) chemical containers. ii. Management of fertilizer bags. <p>These documents were established on 01/9/2019 issued throughout the Group Estates and remain effective for practice in all operating units with annual revision where applicable.</p>	Complied

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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>This is available and detailed in document titled "KITAR SEMULA BEKAS RACUN PEROSAK" The objective of the guidelines is to:</p> <ul style="list-style-type: none"> i. To protect the environment ii. To comply with the gap iii. Avoid misuse of empty pesticide containers <p>The guidelines also reasoned out the need of triple rinsing. The current practice of disposal of empty containers for the estates is delivery as SW409 to licensed buyer. Pictorial guidelines on the methods of triple rinsing are also shown in the document. Under the operational control procedure established as given in 4.5.3.3 above the guideline and practice for handling empty pesticides are as follows:</p> <ul style="list-style-type: none"> i. All class 3 and above containers are tripled rinsed and hole punctured at the bottom only if the waste generator is to dispose as non-scheduled waste. ii. Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process. <p>These guidelines are based on Department of Agriculture ref 91/120/038/014 dated 7/11/2002.</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>Disposal of domestic wastes is to respective local municipal landfill (Majlis Daerah) with guidance of TDM SOP June 2017; section B8: Recyclable wastes such as plastic bottles, aluminum cans and paper are disposed through 3rd party contractor. Domestic waste for the operating units in region is disposed as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Estate</th> <th style="width: 33%;">Disposal site</th> <th style="width: 33%;">Remarks</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Estate	Disposal site	Remarks				Complied
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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 -	<p>The estates assessed their polluting activities incorporated in the Environmental Improvement Plan/Pollution Prevention Plan 2022. Details as provided in 4.5.1.3 and 4.5.1.4. Therein is given potential sources of pollutants, objective & targets and action to be taken.</p> <table border="1"> <thead> <tr> <th></th> <th>Pollution</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Vehicle & machines exhaust</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water & run-off</td> </tr> <tr> <td>3</td> <td>Land</td> <td>SW, domestic waste & industrial waste</td> </tr> </tbody> </table> <p>The GHG final emissions summarized from the estate activities is shown as tCO2e/tFFB.</p>					Pollution	Source	1	Air	Vehicle & machines exhaust	2	Water	Cleaning water & run-off	3	Land	SW, domestic waste & industrial waste	Complied
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4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	<p>The estates assessed their polluting activities and is tabulated under the environmental management program. Therein is given potential sources of pollutants, objective & targets and action to be taken. Sighted targeted area assessed among other as follows.</p> <table border="1"> <thead> <tr> <th></th> <th>Sources/objective & target</th> <th>Action steps</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Management of HCV river reserve where applicable</td> <td>To train/ retrain sprayers/ manuring gang to avoid any chemical-related works at the area</td> </tr> <tr> <td>2</td> <td>To monitor waste management plan for its suitability</td> <td>SW disposal monitoring. Delivery to Pentas Flora Sdn Bhd</td> </tr> </tbody> </table>					Sources/objective & target	Action steps	1	Management of HCV river reserve where applicable	To train/ retrain sprayers/ manuring gang to avoid any chemical-related works at the area	2	To monitor waste management plan for its suitability	SW disposal monitoring. Delivery to Pentas Flora Sdn Bhd	Complied			
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Criterion / Indicator		Assessment Findings		Compliance												
		3	To improve employees awareness on pollution prevention at housing complex including zero burning policy.	Continuous reminders												
		4	To minimize spillage of oil/chemical onto the ground	Continuous training and use of spill trays												
		5	To review aspect identification & impact evaluation to identify significant critical points for control.	Review through EA/EIE												
Criterion 4.5.5: Natural water resources																
4.5.5.1	<p>The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> a. Assessment of water usage and sources of supply. b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate’s current activities. c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate. 	<p>The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing TDM policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in TDM Plantation Sdn Bhd revised on 01/02/2020). The buffer zones established are as follows:</p> <table border="1"> <thead> <tr> <th>River Width</th> <th>Buffer Zone</th> </tr> </thead> <tbody> <tr> <td>>40 meter</td> <td>50 meter</td> </tr> <tr> <td>20 – 40 meter</td> <td>40 meter</td> </tr> <tr> <td>10 – 20 meter</td> <td>20 meter</td> </tr> <tr> <td>5 -10 meter</td> <td>10 meter</td> </tr> <tr> <td><5 meter</td> <td>5 meter</td> </tr> </tbody> </table>		River Width	Buffer Zone	>40 meter	50 meter	20 – 40 meter	40 meter	10 – 20 meter	20 meter	5 -10 meter	10 meter	<5 meter	5 meter	Complied
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<p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>			Sg Tayor		Sg Balo				
		Estate		Point A	Point B	Point A		Point B	
	1	Tayor	28/6/22	/	/	/		/	
	2	Tayor	28/6/22	/	/	/		/	
				Sg Tengadoh		Sg Tualang			
	1	Pelung	14/8/22	/		/			
	2	Pelung	14/8/22	Sg Dagang Besar					
	3	Pelung	14/8/22	/	/				
	<p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the Sustainability Dept. During the field visit there was no spraying activities or signs left in such an area. The buffer zones identified at the estates are as follows:</p>								
		Estate	Area	Area	Area				
	1	Tayor	Sg Tayor	Sg Balo	-				
	2	Pelung	Sg Tengadoh	Sg Tualang	Sg Dagang Besar				
	3	Jerangau	Nil	Nil	Nil				
	<p>Samples are taken for detection of any pollution arising from the estates activities by ERA Lab (KT) Sdn Bhd annually.</p> <p>Among others management plan taken:</p> <ul style="list-style-type: none"> a) Regular inspection at buffer/HCV areas b) Monitor water from surrounding areas c) Track, measure and report all activities around river d) Train and educate workers. 								

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		<p>Water sampling was taken annually to test against the industrial effluent water analysis and pesticide analysis. Among others parameters as shown below:</p> <table border="1"> <thead> <tr> <th></th> <th>Parameter</th> <th>Standard</th> <th></th> <th>Parameter</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>6-9</td> <td>4</td> <td>SS</td> <td>50</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>3</td> <td>5</td> <td>AN</td> <td>0.3</td> </tr> <tr> <td>3</td> <td>COD</td> <td>25</td> <td>6</td> <td>DO</td> <td>5-7</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th></th> <th>Parameter</th> <th>Standard</th> <th></th> <th>Parameter</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Aldrin</td> <td>0.02 ppb</td> <td>5</td> <td>Heptachlor</td> <td>0.05 ppb</td> </tr> <tr> <td>2</td> <td>Dieldrin</td> <td>0.02 ppb</td> <td>6</td> <td>lindane</td> <td>2 ppb</td> </tr> <tr> <td>3</td> <td>t-DDT</td> <td>0.1 ppb</td> <td>7</td> <td>Endosulfan</td> <td>10 ppb</td> </tr> <tr> <td>4</td> <td>BHC</td> <td>2 ppb</td> <td>8</td> <td>Chlordane</td> <td>0.08 ppb</td> </tr> </tbody> </table> <p>There were no issues on the water quality for the sampling points from verification of the water analysis results.</p>		Parameter	Standard		Parameter	Standard	1	pH	6-9	4	SS	50	2	BOD	3	5	AN	0.3	3	COD	25	6	DO	5-7		Parameter	Standard		Parameter	Standard	1	Aldrin	0.02 ppb	5	Heptachlor	0.05 ppb	2	Dieldrin	0.02 ppb	6	lindane	2 ppb	3	t-DDT	0.1 ppb	7	Endosulfan	10 ppb	4	BHC	2 ppb	8	Chlordane	0.08 ppb	
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4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	This is in compliance by the estates. This requirement is also audited internally by the SD personnel. During the field visit no construction of such was observed. This was further supported through facts obtained from interviews among the employees.	Complied																																																						
4.5.5.3	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles). - Minor compliance -	During the site visit practices of water harvesting are noted mainly in the estates for washing and machine cleaning. Road silt pits where applicable are constructed at every 3 palm rows, to divert in event of water overflowing and also to benefit the nearest palm at the pit end to obtain additional moisture.	Complied																																																						
Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value																																																									

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<p>4.5.6.1</p> <p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <p>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</p> <p>b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.</p> <p>- Major compliance -</p>	<p>Information was collated in a recent High Conservation Value (HCV) Bio-Diversity Assessment by Green Orbis Environmental Sdn Bhd for all estates in the region beginning June to Sept 2022. The HCV Toolkit for Malaysia was used with guidance to the flora and fauna composition WWF – Malaysia was used. There were appropriate consultation processes as per the HCV Toolkit- Malaysia which covers the three main components of identification, management and monitoring.</p> <p>The assessment among others covers the following areas:</p> <p>a) Overview of HCV assessment.</p> <p>b) Description of assessment areas.</p> <p>c) Finding and discussion</p> <ul style="list-style-type: none"> - Landscape context - HCV criteria and application to agriculture <p>d) HCV monitoring and management</p> <p>e) The HCV identified in the assessment as listed below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>HCV Description</th> <th>Taylor</th> <th>Pelung</th> <th>Jerangau</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Surau</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> <td style="text-align: center;">HCV 6</td> </tr> <tr> <td>2</td> <td>River Buffer Zone</td> <td style="text-align: center;">HCV 4</td> <td style="text-align: center;">HCV 4</td> <td style="text-align: center;">-</td> </tr> <tr> <td>3</td> <td>Abandoned area/ Unplanted</td> <td style="text-align: center;">HCV 4</td> <td style="text-align: center;">-</td> <td style="text-align: center;">-</td> </tr> </tbody> </table>		HCV Description	Taylor	Pelung	Jerangau	1	Surau	-	-	HCV 6	2	River Buffer Zone	HCV 4	HCV 4	-	3	Abandoned area/ Unplanted	HCV 4	-	-	<p>Complied</p>
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2	River Buffer Zone	HCV 4	HCV 4	-																		
3	Abandoned area/ Unplanted	HCV 4	-	-																		
<p>4.5.6.2</p> <p>If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:</p> <p>a) Ensuring that any legal requirements relating to the protection of the species are met.</p> <p>b) Discouraging any illegal or inappropriate hunting, fishing or</p>	<p>The high biodiversity is included in the HCV Re-assessment report dated June to Sept 2022 respectively for the estates. Refer Section 4.3 Endangered, Rare and Threaten Species (ERT) and Birds, mammals, reptiles, insect (least concern and vulnerable) and totally protected and protected wildlife were identified based on the latest HCV report. For example, vulnerable animal; bearded pig (mammals) under category totally protected. There is no RTE recorded. Evidence</p>	<p>Complied</p>																				

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Criterion / Indicator		Assessment Findings	Compliance
	collecting activities; and developing responsible measures to resolve human-wildlife conflicts. - Major compliance -	during site verification, discourage illegal or hunting, fishing or collecting activities signboard were maintained and implemented. Sighted HCV Inspection Checklist latest conducted on Nov 2022. Refer "Jadual Pemeriksaan Kawasan HCV/ Conservation Area.	
4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. - Major compliance -	All operating units have developed Management Plan for the HCV and conservation area to protect from any encroachment. Habitat protection includes prevention of disturbance by workers through awareness campaigns and regular patrols of the area. The estates have installed signboards at prominent areas to prohibit hunting, disturbance of protected areas and the lighting of fires. Inspection of housing areas and interview of residents confirmed workers were aware of the company policy that prohibits hunting and collecting activities. Monitoring is carried out by the security and staff in charge for the respective area. TDM Plantation Sdn Bhd in addition established their own disciplinary measures if found any staff or workers found to capture, harm, collect or kill the RTE species in the estate. On-going monitoring for HCV areas for the estates has been verified. The monitoring was conducted on monthly basis. OFI has been raised for the declared HCV 4 covering for 3 rivers namely Sg Tengadoh, Tualang, Dagang Besar regarding the monitoring assessment did not specify the areas covered.	OFI
Criterion 4.5.7: Zero burning practices			
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. - Major compliance -	TDM Plantation Sdn Bhd has established Zero Burning Policy and documented in Environmental & Biodiversity Policy signed by the CEO dated 01/01/2022. No evidence of open burning sighted during site visit made at Jerangau Estate.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>There was no land preparation in region Estates by burning ever since TDM practiced zero burning as per the policy in:</p> <p>a) TDM P01-SOP-Section 01/2011 - Under felling/clearing & land preparation</p> <p>b) Carbon Policy</p> <p>TDM has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estates. No fire was used for waste disposal.</p>	
4.5.7.2	<p>A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop.</p> <p>- Major compliance -</p>	N/A. Details in 4.5.7.1 above	N/A
4.5.7.3	<p>Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws.</p> <p>- Major compliance -</p>	N/A. Details in 4.5.7.1 above	N/A
4.5.7.4	<p>Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.</p> <p>- Minor compliance -</p>	<p>This is included in the specification of work orders in event of land preparation during a replanting. It is a standard practice in TDM Plantation Sdn Bhd. However, there are variations of practices between inland and coastal estates. Trunks are felled and chipped without having to shred and windrowed in certain conditions. Adjustment of work requirement are finalized from the directive of the replanting unit and the Regional Office.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance	
4.6 Principle 6: Best Practices			
Criterion 4.6.1: Site Management			
4.6.1.1	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p>- Major compliance -</p>	<p>SOP for estates operation was based on TDM Plantation Sdn. Bhd. Agriculture Policy # 01.01 – 14.03. Monitoring of implementation was conducted on periodical basis through inspection visits by Plantation Controller, Agricultural Services Personnel as well as certification audits internally and externally.</p> <p>The standard operation procedure SOP for the estates operations is available which is prepared on Group basis. There are levels of the documentation identified as follows:</p> <ul style="list-style-type: none"> a) Level 1 standard operating procedure b) Level 2 work instruction c) Level 3 records. <p>Amendments are made should there be requirement to suit the local issues/situation. All documents were sighted and verified.</p> <p>The operations listed and described in the SOP are as follows:</p> <ul style="list-style-type: none"> a) Nursery / Land preparation / Oil palm planting b) Maturity age / Field upkeep c) Fertilizer application / Canopy management d) Water management in coastal and peat plantings e) Ablation / Harvesting f) Pest and diseases / Weed control 	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p>g) Foliar sampling for fertilizer recommendation h) Legume cover (LCC) establishment i) Labour requirement j) Safety & Security</p> <p>Inclusive are other practices such as zero burning practices, scheduled waste handling and prohibited activities at riparian buffer zone, stipulated therein in the Group SOP.</p> <p>Documented Safe Operating Procedure dated 2019 with recent review on 2022 was available at the office and on site, which covered the safe working practices of all the field operations such as harvesting, manuring, herbicides and pesticides application, workshop, gen-set operation, oil trap, scheduled waste store. Daily reports are submitted to the Manager for the monitoring of the estate operations:</p> <p>a) Interval report / Crop book b) Cost book / Daily muster chit c) Stores issues / Office administrative documents.</p> <p>Monthly report includes the following:</p> <p>a) Monthly accounts b) Crop production vs budget c) Total fertilizer application and status of work program d) Total areas of weeding and status vs the budget</p>	

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 -	<p>There was no current replanting in TDM Plantation Sdn Bhd, however the construction of terraces is guided by The Agricultural Policy Manual 2019. The guidance having details among others as follows.</p> <table border="1"> <thead> <tr> <th>Slope (degrees)</th> <th>Terrace width (metre)</th> </tr> </thead> <tbody> <tr> <td><2</td> <td>Straight planting</td> </tr> <tr> <td>2-5</td> <td>Straight planting. Water conservation terraces at 32m interval</td> </tr> <tr> <td>6-18</td> <td>4.25</td> </tr> <tr> <td>>18</td> <td>3.60</td> </tr> </tbody> </table> <p>Areas with gradient more than 25-degree slope are left uncultivated for biodiversity purposes.</p>	Slope (degrees)	Terrace width (metre)	<2	Straight planting	2-5	Straight planting. Water conservation terraces at 32m interval	6-18	4.25	>18	3.60	Complied
Slope (degrees)	Terrace width (metre)												
<2	Straight planting												
2-5	Straight planting. Water conservation terraces at 32m interval												
6-18	4.25												
>18	3.60												
4.6.1.3	A visual identification or reference system shall be established for each field. - Major compliance -	<p>TDM Plantation Sdn Bhd has maintained a visual identification or reference system and established for the field. This was sighted during the field visit at Jerangau Estate. Block markers were displayed in the estate's corners of every field in the property. The markers consist of the following information consisting the below details:</p> <p>a) Field No / Task no / b) Total Hectare c) Type of clone / Year planted.</p>	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 -	Documented business or management were established as following samples: All estates audited, business or management plan was documented as Budget (Business Plan) 2021 – 2026; Updated Aug 2021 which includes the estimate for estate field hectarage (FFB	Complied										

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Criterion / Indicator		Assessment Findings	Compliance																														
		tonnage, yield (MT/HA)), General Charges (general overheads, labour overheads), Summary of Upkeep and Cultivation (harvesting and collection) Summary of upkeep of Immature Area and Capital Budget. In Jerangau Estate and Pelung Estate documented Business Plan 2023-2027 updated July 2021 to demonstrate attention to economic and financial viability through long-term management planning.																															
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years. - Major compliance -	<p>Long term replanting programme were established and reviewed annually as following samples in Jerangau Estate for period 2021-2027. Only have plan in 2022 but will be postpone to 2023 as below:</p> <table border="1"> <thead> <tr> <th>Year Planted</th> <th>Block</th> <th>Size (Ha)</th> </tr> </thead> <tbody> <tr> <td>1992</td> <td>C7</td> <td>90.88</td> </tr> <tr> <td>1993</td> <td>A1</td> <td>92.74</td> </tr> <tr> <td>1996</td> <td>A1</td> <td>55.64</td> </tr> </tbody> </table> <p>While in Pelung Estate has similar Annual Replanting Programme was documented and sighted programme in 2025 and 2026 as below:</p> <table border="1"> <thead> <tr> <th>Year Planted</th> <th>Block</th> <th>Size (Ha)</th> </tr> </thead> <tbody> <tr> <td></td> <td>2025</td> <td></td> </tr> <tr> <td>1997</td> <td>A1</td> <td>122.11</td> </tr> <tr> <td>1997</td> <td>A2</td> <td>63.33</td> </tr> <tr> <td></td> <td>2026</td> <td></td> </tr> <tr> <td>1999</td> <td>A1</td> <td>59.09</td> </tr> </tbody> </table>	Year Planted	Block	Size (Ha)	1992	C7	90.88	1993	A1	92.74	1996	A1	55.64	Year Planted	Block	Size (Ha)		2025		1997	A1	122.11	1997	A2	63.33		2026		1999	A1	59.09	Complied
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4.6.2.3	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB	As sampled in Tayor and Jerangau Estate, the business plan covers: <ul style="list-style-type: none"> • Hectarage statement, • FFB yield per Ha, • CPO yield per HA & PK yield per Ha, • Mature area expenditures, 	Complied																														

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Criterion / Indicator		Assessment Findings	Compliance						
	d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment - Major compliance -	<ul style="list-style-type: none"> • Immature area expenditures, • Capital Expenditures including crop projection for next year, • Cost of production/MT, and gross operational profit and loss P&L 							
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -	TDM Plantation Sdn Bhd monitored the estate performance against the targets. The estates performance is recorded in the monthly progress report. In Taylor Estate, Estate Operation Meeting was held to present the performance of estate to TDM Plantation Sdn Bhd Top management included CEO as minutes dated 15/09/2022 (05/2022). In Jerangau Estate the performance of estate in achieving goals and objective monitored and presented CEO, Plantation Administration Manager, Plantation Controller and others by Estate Manager on 15/09/2022 as Minutes of Marketing & Operation Meeting (04/2022). In Pelung Estate the Minutes of Marketing and Operation Meeting (Meeting 05/2022) was conducted on 15/09/2022.	Complied						
Criterion 4.6.3: Transparent and fair price dealing									
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Generally, the pricing mechanism is guided by TDM Plantation Sdn Bhd Delegation of Authority Limit Policy, rev. 2017/02, dated 15/8/2017 and Procurement Unit SOP Guideline, doc. No.: TDM/PU/2019/01, rev. PP/2019/Rev 01, dated 19/9/2019. Based on verification of contract awards and interview with contractors, the implementation of the tender procedure is satisfactorily demonstrated. In Taylor Estate sighted Slide Rule on Rate of Pay (Based on CPO Price Range) as below:	Complied						
		<table border="1"> <thead> <tr> <th>CPO Price Range (RM/MT)</th> <th>FFB Price Range (RM/MT)</th> <th>Harvesting Rate (RM/MT FFB)</th> </tr> </thead> <tbody> <tr> <td>≥4,000-3,501</td> <td>800.00</td> <td>175.00</td> </tr> </tbody> </table>	CPO Price Range (RM/MT)	FFB Price Range (RM/MT)	Harvesting Rate (RM/MT FFB)	≥4,000-3,501	800.00	175.00	
CPO Price Range (RM/MT)	FFB Price Range (RM/MT)	Harvesting Rate (RM/MT FFB)							
≥4,000-3,501	800.00	175.00							

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Criterion / Indicator		Assessment Findings			Compliance
		≥3,500-3,000	700.00	150.00	
		≥3,000-2,501	600.00	130.00	
		≥2,501-2,000	500.00	110.00	
		≤2,000	400.00	90.00	
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Verification of contract agreement, records of payment and interview with contractors showed that contracts was fair, legal and transparent and agreed payments were made in timely manner. Sighted Payment Voucher PV 211/11 dated 14/11/2022 for Mohd Heireey b. Ibrahim for Payment Agreement LT-016/2022 (Oct) harvesting (13.4 MT @ RM 175.00) based on Work Order dated 01/06/2022 for 100 MT at rate RM 175/MT from 01/06/2022 to 31/12/2022 approved by Plantation Controller. Payment made in timely manner as cheque ready No. MBB 810626 dated 19/12/2022. Payment for transportation of FFB from ramp of Pelung Estate to Sg. Tong POM from Block 97A1, 97B1, 99A1, 17A1 and 17A2 in November 2022 as Payment Voucher No. PV 202/12 dated 12/12/2022. Cheque No. BiMB 019917 issued to pay for services provided			Complied
Criterion 4.6.4: Contractor					
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	Briefing to contractors was conducted on 05/10/2022 as recorded in Internal training Report where content included informing all policy of TDM Plantation Sdn Bhd, comply with all terms and conditions. In Jerangau Estate sighted Minutes of Stakeholder Meeting held on 16/11/2022 at Akedemi TDM where policies, MSPO requirements, contractor requirement and documents and information available for them. On 21/09/2022, Pelung Estate has conducted briefing to contractor on policies, MSPO requirements attended by contractor's representative such as Koperasi Sejahtera.			Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Sighted in Tayor Estate Work Oder No LT-20/2022 to Koperasi Ladang Sawit Sg. Tong dated 01/08/2022 for Rental case (JCB) to carry out work at nursery, road repair, installation of culvert, trenching at Tayor Estate from 01/08/2022 to 31/12.2022. Work for 1000 hr at rate of RM 40/Hr. In Jerangau Estate sighted Work Order (LJR:38/22) dated 23/10/22 for Wan Family Legacy with Vendor Registration No 220-WFLE. Job contracted for conduct harvesting in Jerangau Estate in 2022 at Block 11A1 Quantity 220 MT and 13B2 Quantity 220 MT. Unit Price RM 175.00. Period between 11/11/2022 till 30/112022. Signed by both parties. In Pelung Estate sighted a Work Order (LP 17/22) to Koperasi Sejahtera Kampung Sri Kenangan dated 26/05/2022 for transportation and delivery of FFB from Ramp to Sg.Tong POM from 01/06/2022 to 31/12/2022. Rate at RM 14/MT. Agreed by representative of the contractor as signature and rubber stamped on document.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	The requirement of accepting MSPO accredited auditors to audit against the contractors was mentioned in the work order and addendum in jobs specifications. Briefing to 3 contractor was conducted on 05/10/2022.	Complied
4.6.4.4	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. - Major compliance -	All works performed at the Tayor Estate are checked and verified by the management before any payment is approved. The records of performance evaluation were made available for verification for JCB Job performed by Koperasi Sejahtera as document 71229 dated 24/11/2022. Checking and verified done by Mohd Azwa Jusoh (External Officer) on 25/11/2022 for Nursery job (6.5 Hr), Road Repair (3 Hr), Total 9.5 Hr. In Jerangau Estate, Wan Family Legacy contracted for harvesting job in November 2022 from Invoice LJR:38/22 dated 30/11/2022. (Block 11A1-RM 175 X 162.16 MT). Verification done on	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Contractor Work Completion for Month of November 2022. Confirmation by Estate Manager which stated as all details of work performed by contractor confirmed by staff and PIC as correct and accurate. Signed on 06/12/2022. In Pelung Estate, checking and signing the assessment of the contractor for each task and season contracted has been conducted as evidence from Work Completion for Month of November 2022. Confirmation by Estate Manager which stated as all details of work performed by contractor (LP 17/22) confirmed by staff and PIC as correct and accurate for transportation of FFB Pelung Estate ramp to Sg. Tong POM. Signed on 01/12/2022.	
4.7 Principle 7: Development of new planting			
Criterion 4.7.1: High biodiversity value			
4.7.1.1	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.1.2	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia’s National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance -	Not Applicable, there are no new planting available.	N/A
Criterion 4.7.2: Peat Land			

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 -	Not Applicable, there are no new planting available.	N/A
Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)			
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.3.2	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.3.4	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed. - Minor compliance -	Not Applicable, there are no new planting available.	N/A

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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 -	Not Applicable, there are no new planting available.	N/A
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	Not Applicable, there are no new planting available.	N/A
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils			
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.5.2	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	Not Applicable, there are no new planting available.	N/A
Criterion 4.7.6: Customary land			

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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 -	Not Applicable, there are no new planting available.	N/A
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.3	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.4	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	Not Applicable, there are no new planting available.	N/A

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Criterion / Indicator		Assessment Findings	Compliance
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available. - Major compliance -	Not Applicable, there are no new planting available.	N/A
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. - Minor compliance -	Not Applicable, there are no new planting available.	N/A

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

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy			
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	TDM Plantation Sdn Bhd (hereinafter referred as TDM) has established its MSPO policy approved by newly appointed Chief Executive Officer (Hamdan b. Ibrahim) dated 01/01/2022.	Complied
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	The established policy has included continual improvement emphasized on the adherence to the following key principles - Management Commitment and Responsibility: <ul style="list-style-type: none"> • Transparency • Compliance to Legal Requirements • Social Responsibility, Health, Safety and Employment Condition • Environment, Natural Resources, Biodiversity and Ecosystem Services. • Best Practices • Development of New Plantings 	Complied
Criterion 4.1.2 – Internal Audit			
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	Internal audits were planned to be conducted at least once a year. The objective of the internal audit is to determine the strong and weak points and potential area for further improvement. Latest internal audit was conducted at Sg. Tong POM audited on	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		19/06/2022 as stated on OSH RSPO/MSPO Audit & ERA Programme Plan FY 2022	
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 -	Internal audit procedure was established and maintained (MSPO Internal Audit Standard Operating Procedure (TDMP/01, Rev: TDMP01/2017). Total of 5 non-conformances was raised has been followed up but root cause needs to be further improved and clearly mentioned with corrective action taken was documented in Sustainability Corrective Action Report”.	Complied
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	Internal Audit report was available for verification, and it was taken into consideration as part of the management review meeting agendas and presented to Top management included CEO during Marketing & Operation Meeting” (MOM) 04/2022. Such as meeting conducted on 12/09/2021.	Complied
Criterion 4.1.3 – Management Review			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification. - Major compliance -	Management Review Meeting was planned to be conducted at least once a year. However, management review for year 2022 has been incorporated with the operational meeting at the complex (certification unit) level which has been conducted on monthly basis and known as “Marketing & Operation Meeting” (MOM) 04/2022. Such as meeting conducted on 12/09/2021 through Microsoft Teams was chaired by CEO, attended by managers, plantation controller and etc has discussed on effective implementation of MSPO, changes, improvement and modification was verified as per minutes of meeting.	Complied

Criterion / Indicator		Assessment Findings	Compliance																											
Criterion 4.1.4 – Continual Improvement																														
4.1.4.1	<p>The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.</p> <p>- Major compliance -</p>	<p>The mill has established continual improvement plan revised dated 02/08/2022 upon consideration of the social, operations and environmental impacts. Among others efforts are:</p> <table border="1"> <thead> <tr> <th></th> <th>Program</th> <th>Action /Initiatives</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Waste reduction</td> <td>Awareness among employees Enhancement of waste segregation</td> </tr> <tr> <td>2</td> <td>Employment condition</td> <td>Enhancement of workers quarters Schedule repair and painting Conducive environment Housing roofing / ceiling upgrading</td> </tr> </tbody> </table> <p>Details of expenditure are provided under both CAPEX/OPEX. Inclusive are projects for improvement as described below among others:</p> <table border="1"> <thead> <tr> <th></th> <th>Sections</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Operation</td> <td>ESP commission in Sept 22 - RM3.5M</td> </tr> <tr> <td>2</td> <td>Operation</td> <td>Effluent fencing 920 m - RM 92K - July 2023</td> </tr> <tr> <td>3</td> <td>Facilities</td> <td>Workers housing 24 units RM2.3M - Apr - Oct 2023</td> </tr> <tr> <td>4</td> <td>Operation</td> <td>EFB roofing area - July 2023 - RM250K</td> </tr> <tr> <td>5</td> <td>Facilities</td> <td>1 Van Oct 2023 - RM 160K</td> </tr> </tbody> </table>		Program	Action /Initiatives	1	Waste reduction	Awareness among employees Enhancement of waste segregation	2	Employment condition	Enhancement of workers quarters Schedule repair and painting Conducive environment Housing roofing / ceiling upgrading		Sections	Description	1	Operation	ESP commission in Sept 22 - RM3.5M	2	Operation	Effluent fencing 920 m - RM 92K - July 2023	3	Facilities	Workers housing 24 units RM2.3M - Apr - Oct 2023	4	Operation	EFB roofing area - July 2023 - RM250K	5	Facilities	1 Van Oct 2023 - RM 160K	Complied
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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>This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings.</p> <p>a) The management team will be informed of such development during the monthly management meetings.</p>	Complied																											

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Criterion / Indicator		Assessment Findings	Compliance
		b) Dissemination of information by the PC and Head Office transacted during the monthly Managers meetings and emails. c) The management continuously reviewed the estates performance and work method for a continual improvement to achieve better results yield and costings.	
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms. - Major compliance -	Sg Tong POM maintained their records of request and response, land titles/land use right, SIA report, EIA report, etc. related to environmental and social issues, plans for pollution prevention, continuous improvement plan, complaints and grievances records that were made available upon request	Complied
4.2.1.2	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. - Major compliance -	The information regarding sustainability and the company is available in website https://sustainability.tdmberhad.com.my/ and publicly available at the mill. The policies were also publicly displayed at the office notice board.	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 -	TDM Plantation Sdn Bhd has developed a Communication Procedure for POM/Estates and Flowchart to Handle Social Issue. Maximum of 28 working days shall be taken to resolve issues. All internal and external stakeholders had been briefed on this procedure.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . - Minor compliance -	Sg Tong POM Manager was appointed as the management official to be the person responsible in handling issues related to indicator 4.2.2.1 as per appointment letter (ref no: TDMP/HR-GEN(MSPO/RSPO) dated 17/10/2021) approved by Head of Human Resources TDM Plantation Sdn. Bhd.	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 -	Stakeholder list was developed where all the affected stakeholders were included in the list such as government authorities, local communities, contractors and supplier, neighbouring schools, etc. for the mill. Stakeholder consultation was conducted the meeting with the stakeholder dated 16/11/2022 at TDM Akademi, the minutes of meeting is sighted and verified the attendance list. Total of 3 feedbacks were received with no negative issues raised. Internal stakeholder consultation was verified as per "Employee Representative Meeting Minutes 2022" which was conducted on 14/07/2022. The meeting has discussed current workers social issues arises. The management has recorded all the request and communication from the year 2013 until now in the communication record log book.	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 -	The mill has established an SOP on traceability stated in the following procedure to provide guideline on delivery of FFB to the mill. "Manual Kilang & SOP section 8.0 Mengangkut BTS ke Kilang (TDM/STPOM/01) dated 1/11/2012)". Therein describing documents among others maintained were: a) Nota Penghantaran BTS	Complied

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Criterion / Indicator		Assessment Findings	Compliance												
		b) Slip Akuan Penerimaan (weighbridge ticket) c) Slip Grading d) Sijil Mutu BTS													
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Various means were available on how to monitor the traceability where among others the updating of FFB delivery records, through month end account closing and internal audit. Based on the records of FFB delivery, it was found that the procedure of traceability was well implemented and effective.	Complied												
4.2.3.3	The management shall identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	The PIC is Pn Norwati Mamat designation as Compliance Executive appointed by the Mill Manager via letter dated 04/01/2021. The letter was sighted and verified.	Complied												
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	Verification of the records and documents mentioned in 4.2.3.1 showed that the deliveries of FFB were well maintained. Crosschecking between the daily FFB delivery records and the transportation documents showed that the records were accurate and well maintained. The Mill manager has appointed a SCC Committee which consist of 9 personals (Assistant Manager, Weighbridge Clerk, Operation Supervisor, Laboratory Assistant, FFB Grader and Auxiliary Police). TDM Plantation Sdn Bhd have established MSPO Supply Chain Certification procedure where mechanism for handling of non-conformance material & document was outlined in the procedure. Downgrading of products will be done if any non-conformance has been identified along the process. The dispatches as sampled during the audit assessment as listed below: <table border="1" style="margin-left: 20px; margin-top: 10px;"> <thead> <tr> <th>Date</th> <th>Type</th> <th>Ticket no</th> <th>Vehicle no</th> <th>Qty/mt</th> <th>Destination</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Date	Type	Ticket no	Vehicle no	Qty/mt	Destination							Complied
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		1	18/12/22	CPK	ST63240	QCK766	40.38	Hup Lee Oil Mill																																	
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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>Sg Tong Palm Oil Mill continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and TDM sustainability team. The Mill had obtained and renewed license and permits as required by the law. The licenses/permit viewed among others were:</p> <table border="1"> <thead> <tr> <th></th> <th>License / Permit / Regulatory Requirement</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MPOB License no 5000-4270-4000</td> <td>31/03/2023</td> </tr> <tr> <td>2</td> <td>DOE – Jadual Pematuhan Ref 004090</td> <td>30/06/2023</td> </tr> <tr> <td>3</td> <td>KKM - Permit to purchase NaOH ref 006539</td> <td>31/12/2022</td> </tr> <tr> <td>4</td> <td>BPMBMBA - Fire Certificate ref no 321823</td> <td>19/05/2023</td> </tr> <tr> <td>5</td> <td>KPDNHEP - ref J 001116 - 20000L diesel</td> <td>23/02/2023</td> </tr> <tr> <td>6</td> <td>Energy Commission ref 00054 for 3845KW</td> <td>14/03/2023</td> </tr> <tr> <td>7</td> <td>Lesen Pengabstrakan Air ref A0001</td> <td>31/12/2022</td> </tr> <tr> <td>8</td> <td>Metrology Corporation ref B2002719 - 80 mt</td> <td>Eff 21/9/22</td> </tr> <tr> <td>9</td> <td>Metrology Corporation ref B2002718 - 70 mt</td> <td>Eff 21/1/22</td> </tr> <tr> <td>10</td> <td>Monorail Crane TG PMA 80224</td> <td>29/06/2023</td> </tr> </tbody> </table>							License / Permit / Regulatory Requirement	Validity	1	MPOB License no 5000-4270-4000	31/03/2023	2	DOE – Jadual Pematuhan Ref 004090	30/06/2023	3	KKM - Permit to purchase NaOH ref 006539	31/12/2022	4	BPMBMBA - Fire Certificate ref no 321823	19/05/2023	5	KPDNHEP - ref J 001116 - 20000L diesel	23/02/2023	6	Energy Commission ref 00054 for 3845KW	14/03/2023	7	Lesen Pengabstrakan Air ref A0001	31/12/2022	8	Metrology Corporation ref B2002719 - 80 mt	Eff 21/9/22	9	Metrology Corporation ref B2002718 - 70 mt	Eff 21/1/22	10	Monorail Crane TG PMA 80224	29/06/2023	Complied
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Criterion / Indicator		Assessment Findings		Compliance																								
		11	Boiler no 1 TG PMD 61	29/06/2023																								
		12	Boiler no 2 TG PMD 424	02/01/2023																								
		13	Air Receiver Tank TG PMT 80366	02/01/2023																								
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		17	Air Compressor Receiver TG PMT 108128	29/06/2023																								
		18	Air Compressor Receiver TG PMT 784	29/06/2023																								
		19	Steam Drier TG PMT 7024	02/01/2023																								
		<p>Sungai Tong POM operated under MPOB license issued on 03/04/2022/23 the approved FFB processed/year is maximum 300,000 mt and the actual FFB processed in 2021 was 155,287.40 mt compliance to the regulations. The mill was designed at 60 mt/hr.</p> <p><i>Factory and Machinery Act 1967 –</i></p> <p>The following competency requirements were verified:</p> <table border="1"> <thead> <tr> <th></th> <th style="text-align: center;">Competent person</th> <th style="text-align: center;">No of personnel.</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Steam engineer</td> <td>Ist Grade 1 - 2nd grade – 2</td> </tr> <tr> <td>2</td> <td>Engine Driver (BHC)</td> <td>2 - Ist Grade /1- 2nd Grade</td> </tr> <tr> <td>3</td> <td>Boiler men</td> <td>2 - Ist Grade / 3-2nd grade</td> </tr> <tr> <td>4</td> <td>AESP (Authorised Entrant and Standby Person Confined Space)</td> <td>9 competent persons</td> </tr> <tr> <td>5</td> <td>AGTES (Authorised Gas Tester Entry Supervisor Confined Space)</td> <td>2 competent person</td> </tr> <tr> <td>6</td> <td>Electrical Chargemen</td> <td>3 - A4 Chargemen</td> </tr> <tr> <td>7</td> <td>Fire Safety Watch 22653/ 26640</td> <td>2 persons</td> </tr> </tbody> </table>				Competent person	No of personnel.	1	Steam engineer	Ist Grade 1 - 2 nd grade – 2	2	Engine Driver (BHC)	2 - Ist Grade /1- 2 nd Grade	3	Boiler men	2 - Ist Grade / 3-2 nd grade	4	AESP (Authorised Entrant and Standby Person Confined Space)	9 competent persons	5	AGTES (Authorised Gas Tester Entry Supervisor Confined Space)	2 competent person	6	Electrical Chargemen	3 - A4 Chargemen	7	Fire Safety Watch 22653/ 26640	2 persons
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Criterion / Indicator		Assessment Findings	Compliance								
		<p><i>EQ (Prescribed Premise) Crude Palm Oil Regulations 1977</i></p> <ol style="list-style-type: none"> Requirement in "Jadual Pematuhan" License no/ validity period – 004090 till 30/06/23 at 60mt/hr Discharge method – water discharge Sg Nerus. Scheduled waste (CePSWaM): 2 Mill Manager/Engineer - 28/08/2019 Effluent treatment (CePPOME) 1 person Mill Engineers - 18/04/22. <p><i>Air Monitoring +</i></p> <ol style="list-style-type: none"> Particulate – Stack sampling was carried out on quarterly basis. Noted that monitoring was conducted on (at 12.0%) CO₂. <table border="1"> <thead> <tr> <th>Boiler ref</th> <th>Date</th> <th>Dust concentration</th> <th>EQA std</th> </tr> </thead> <tbody> <tr> <td>TG PMD 424</td> <td>15/08/22</td> <td>310.5 mg/m³</td> <td>150 mg/m³</td> </tr> </tbody> </table> <p>The stack sampling was carried out by <i>Environmental Science (M) Sdn Bhd</i>. The mill had the ESP installation in Jan 2022 and commissioned in Sept 2022. The report concluded that Sungai Tong POM boiler no 2 has not fulfilled the 2nd schedule regulation 13 of the Environmental Quality (Clean Air) Regulation 2014. This however has obtained violation of compliance (<i>lesen langgar</i>) via DOE letter ref 004079 for a duration of 01/07/22 - 31/12/22.</p>	Boiler ref	Date	Dust concentration	EQA std	TG PMD 424	15/08/22	310.5 mg/m ³	150 mg/m ³	
Boiler ref	Date	Dust concentration	EQA std								
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4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register.	The Legal & Other Requirements Register (LORR) covers all the necessary regulatory requirements titled TDM SOP Legal and Other	Complied								

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Criterion / Indicator	Assessment Findings	Compliance
<p>- Major compliance -</p>	<p>Requirement Rev 2022 Mill dated 18/10/2022. The list of applicable legal and other requirements was made available during the assessment and complied prepared by Sustainability & Compliance Officer.</p> <p>The identified applicable laws and regulations relevant to its operations among others include the following:</p> <ol style="list-style-type: none"> 1. Environmental Quality Act 1974 and its Regulations 2. Factories and Machinery Act 1967 and its Regulations 3. Occupational Safety and Health Act 1994 and its Regulations 4. Pesticides Act, 1974 5. Worker’s Minimum Standards Housing Amenities Act, 2020 6. Employment Act 1955 Act 265 7. Wildlife Conservation Act 2010 8. Malaysian Palm Oil Board 1998 - Amendment 2021 9. Holiday Act 1951 10. Passport Act 1966 11. Workers Union Act 1959 12. Estate Hospital Assistants (Registration) Act 1965 13. Petroleum (safety Measures) Act 1984 14. Fire Services Act 1984 15. Uniform Building By Laws 1986 16. Weights And Measures Act 1972 (Act 71) (Amendment 1981) 17. National Land Code 1965 Act 56 	

Criterion / Indicator		Assessment Findings	Compliance
		18. Water Act 1920 Act 418 19. Animal Act 1953 20. Malaysian Anti Corruption A1567 Act 2018 21. Energy Commission 2001 Act 610 22. Perintah Gaji Minimum 2022 23. Peraturan Kawalan Penyakit - Fasa Peralihan Endermik 01/4/22	
4.3.1.3	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p>- Major compliance -</p>	<p>The Sustainability Department based at Head Office is responsible to track changes in the law and the information was disseminated to all of its plantations and mills. Sustainability Department which is based in Head Office is responsible for tracking any changes to the Acts and Regulations. In addition, the Plantation Controller of Northern Region also played a role in disseminating new Acts & Regulations to all the mills and estates in the Region.</p> <ol style="list-style-type: none"> 1. This was made via communication with the publisher of the documents. 2. This mechanism was outlined in its procedure. 3. The updating of the legal register is made on a periodical basis. 4. Changes in the legal register if any are communicated to the respective Region. <p>The mill had entirely adopted the TDM established documented system for identifying, tracking, accessing and updating the legal requirements. It had ensured that all applicable legal requirements pertaining to MSPO are established, implemented and maintained.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		The latest revision on the LORR was made dated 18/10/2022 mainly in relation to MCO requirement and min wages order 2022.	
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 -	The PIC is Pn Norwati Mamat designation as Compliance Executive appointed by the Mill Manager via letter dated 04/01/2021. Letter was sighted and verified.	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 -	Milling activities does not diminish the land use rights of other users. Ownership documents sighted i.e. State Title; Ownership # 6521 Lot #7663 Area: 58.7685 ha District: Kuala Terengganu Mukim Belara Date: 18/11/1976 Owner: Perbadanan Memajukan Iktisad Negeri Terengganu Leasing to: Kumpulan Ladang-ladang Terengganu Sdn. Bhd.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	Legal ownership as mentioned above was made available by management for verification.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	The palm oil mill is located within the estate compound properly demarcated with fences. It is located within the vicinity of TDM Plantation Sdn Bhd owned estate Ladang Fikri.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.3.2.4	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). - Minor compliance -	There is no land dispute in the Sungai Tong Certification Units at the time of audit. The land belongs to TDM Plantation Sdn. Bhd. and land ownership documents verified.	Complied
Criterion 4.3.3 – Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	There is no customary land within or surrounding in the Mill. There are also no land disputes or claims involving the Mill. The company has proper legal land titles for the land ownership.	N/A
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	There is no customary land within or surrounding in the Mill. There are also no land disputes or claims involving the Mill. The company has proper legal land titles for the land ownership.	N/A
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	There is no customary land within or surrounding in the Mill. There are also no land disputes or claims involving the Mill. The company has proper legal land titles for the land ownership.	N/A
4.4 Principle 4: Social responsibility, health, safety and employment condition			
Criterion 4.4.1: Social Impact Assessment (SIA)			
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.	Initial Social Impact Assessment (SIA) Kompleks Sungai Tong; Report dated May 2012 by SRA Consultancy. Based on this initial	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	<p>assessment, action plan was established on annual basis by all the sampled estates as evident in Action Plan Revision 2022/2023.</p> <p>Some examples of area of concerns were housing and infrastructure (poor facilities and infrastructure not meeting legal requirement, poor waste dumpsite, etc.), worship area (worship area not clean, building condition and require some repair), and etc. Action plan /recommendation, person in-charge, time frame and positive impact was identified.</p> <p>Review of SIA was conducted based on issues identified in the initial report prepared by consultant. SIA review conducted on yearly basis already consider current issues/facilities/conditions for each estate, and review has discussed the issues related with proper action plan and impact.</p>	
Criterion 4.4.2: Complaints and grievances			
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	A system for dealing with complaints and grievances were established and documented in a Flowchart on Handling Social Issue and Complaint/Grievance Procedure. Any issue raised by stakeholders will be discussed within 2 weeks for the first meeting and issues to be resolved within 28 working days.	Complied
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. - Major compliance -	Based on the records of complaints, it was verified that all complaints and action able to be resolved in effective, timely and appropriate manner. Verification of resolution signatures by Officer, Assistant Manager and Manager were sighted.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints.	Complaint form for line site repair (Laporan Kerosakan Rumah) and Complaint/ Request form is available and well implemented. There	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	was no complaint or grievance received from external stakeholders since last assessment. Sample of complaint from the Laporan Kerosakan Rumah is: 1. Name: Zainal Bin Nur Amin, dated 14/11/2022, date of completion: 4/12/2022 2. Name: Muhammad Yusof Bin Amar, dated: 07/08/2022, date of completion: 09/08/2022	
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 -	Interview with internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure, and they had been briefed by the management during stakeholder meeting.	Complied
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. - Major compliance -	The complaint logbook/ complaint files that recorded complaints and solutions for the past 24 months were well maintained and available to affected stakeholders upon request.	Complied
Criterion 4.4.3: Commitment to contribute to local sustainable development			
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation. - Minor compliance -	Among the contributions delivered by the mill since the last audit were: - Sample provided (POME) to BOMBA Kuala Terengganu - Universiti Malaysia Terengganu - To use the estate field for training purposes - Meeting with NUPW on 12/02/2022 - Providing working opportunities to local communities.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.4.4: Employees safety and health			
<p>4.4.4.1</p>	<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>Sighted during audit an OSH Policy, documented and approved by Haji Hamdan b. Ibrahim CEO of TDM Plantation Sdn. Bhd. dated 01/02/2022 and OSH Plan, Training Matrix and Training Schedule for FY 2022 in line with objective of legal requirements OSHA 1994 and has been communicated and implemented in Tayor, Jerangau and Pelung Estates accordingly during several meetings and briefings sessions conducted by the estate management with all employees. The estates have established OSH Management Plan and documented in Environment, Safety and Health Plan FY 2022. The management plan includes the ESH Risk Management, Emergency Response Procedure, Chemical Safety Management, Noise Boundary Monitoring, Health monitoring.</p>	<p>Complied</p>
<p>4.4.4.2</p>	<p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill: <ul style="list-style-type: none"> i. All employees involved are adequately trained on safe working practices; ii. All precautions attached to products should be properly observed and applied; d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as 	<ul style="list-style-type: none"> a) As above, documented OSH Policy, approved by Hamdan b. Ibrahim CEO of TDM Plantation Sdn. Bhd. dated 01/02/2022 and OSH Plan 2022 has been communicated to all employee and implemented. b) TDM Plantation Sdn Bhd have established SOP for HIRARC Edition TDMP/01 Revision TDMP 01/2018 dated 22/10/2018. Sg. Tong POM has conducted risk assessments for all the operations and documented in the Hazard Identification, Risk Assessment, and Risk Control (HIRARC) FY 2022/2023. HIRARC is reviewed on annually on 26/09/2022 prepared by Norwati b. Mamat and Approved by Mill Manager (Hj Shahbudin b. Usop) for 22 activites such as Working at Height, Water Treatment, Office, Security, EFB Shredder, Laboratory, Store, Worksop 	<p>OFI</p>

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<p>identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p>- Major compliance -</p>	<p>(Mechanical & Electrical), Kernel Plant Station, Boiler Station and etc.</p> <p>Sampled Pressing Station HIRARC dated 26/06/2022 as prepared by Norwati Mamat and approved by Hj. Saifuddin Muhamad (Asst Manager). Found Risk of body injury from sharp edge of worn out stirring arms hazard with scored 6 (Medium). Backpain from ergonomic hazard with scored 9 (Medium) not having new recommended control measure.</p> <p>Sampled Nut Cracking Hirarc dated 26/06/2022 found:</p> <p>Lost of limb due to moving blade with score 10 (Medium) not having new recommended risk control. Stuck between moving part of moving part hazard while checking drive coupling with score 10 (Medium) also not having new recommended risk control.</p> <p>Generally, assessment was conducted for all operations however for improvement assessment of risk of mill operation that reviewed in 2022 to be further enhanced by having new Recommended Risk Control clearly indicated as priority for medium (score 5-14) and high risk (15-25), thus OFI has been raised for this issue.</p> <p>CHRA was conducted by Muhamad Khairul Najib (HQ/08/ASS/00/259) on 05/08/19 as report sampled. NRA was conducted by Assessor Mohd Hazry Yusof (HQ/09/PEB/00/97) on 16/03/2020 as report sampled. Audiometric Test was conducted by SI Energy Sdn Bhd (OHD Samsuri Ismail) in April for total of 108 employee from 7 departments. A total of 34 employee with hearing impairment (required retest within 3 months), 10 with Standard Temporary Threshold Shift and 36</p>	

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	<p>having hearing loss. Retest was conducted on April 2022 for only 11 workers between may-June 2022 as List of Worker for Repeat Audiometry Test from Dr Shamsuri Ismail dated 14/05/2022.</p> <p>c) As sampled, all estates had established a training program for employees exposed to chemicals used at the palm oil estates to ensure continuous awareness to the employees. The training was conducted by the Manager, Asst. Manager, and representative from the chemical suppliers to the supervisors and operators. Sighted the training records in Sg. Tong POM. Training conducted on 28/07/2022 and attended by 6 General Workers.</p> <p>d) Appropriate PPE were used by the workers where the management provide appropriate PPE to the workers based on the job type. The PPE given as per HIRARC and Standard Operating Procedure. PPE Issuance record maintained such as:</p> <ul style="list-style-type: none"> • Wan Mohd Osman b. Wan Jusoh: Safety Shoe (23/06/22), (20/08/2022), Face Mask (18/09/2022), Safety Helmet (01/12/2022), Ear plugs (01/12/2022). • Ajemain Ismail: Safety Shoes (20/06/2022), Safety Helmet & Ear Muff (Yellow)(01/12/2022), Safety Vest (01/12/2022). • Mohd Khairuddin Mat Jusoh: Safety Shoe (25/06/2022), Safety Helmet (12/07/2022), Safety Vest (10/08/2022), Safety Helmet (Yellow), Ear Muff 30/11/2022). • AB Rashid Mohd Ripin: Safety Helmet, Ear Muff, Safety Vest (01/12/2011). <p>e) Standard Operating Procedures for Handling of Chemicals were available in several documents. SOP in all operations including</p>	

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	<p>handling of chemicals has been established in estates within Sg. Tong POM complex to ensure proper and safe handling and storage.</p> <p>f) Appointment Letter dated 01/07/2022 from Hamdan Ibrahim (CEO) to Sg. Tong POM Manager as SHC Chairman. Other member appointed on 01/03/2021 such as Nik Azmi Mamat, Che Wan Mazuan b. Che Wan Mohamad, Mohd Akhimie Salleh, Mohd Fauzi Jantan, Azman Mohamad and etc.</p> <p>g) The regular SHC committee meetings on quarterly basis were conducted and when accident occurs. The meeting discussed issues on employees' safety, health and welfare such as operational risks and health achievement report, estate security, safety compliance by contractors, workplace inspection, legal compliance, safety and health training. Sighted the SHC Meeting Minutes dated 21/09/2022, 22/06/2022, 22/03/2022. Another one to be conducted before end of 2022.</p> <p>h) Accident and Emergency procedures were available in the SOP Emergency Preparedness & Response Edition TDM/01, Revision TDMP-01/2018 dated 01/01/2018. The estates have established Emergency Response Team lead by the Mill Manager. The ERT chart and Fire Extinguisher Map was also available and verified. Included OSH & Environmental Emergencies including Accident/Incident Flow Chart. Emergency Response in the Event of Fire Flow Chart. Emergency Response in the Event Of Explosion, Emergency Response in the Event of Oil Spill and also included Flow Chart for Effluent Spillage.</p> <p>i) First aiders were assigned to various workstation at the estates. Available a map showing location of First Aid Boxes in the mill. The mandores and staffs were responsible for first aid boxes at</p>	

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		<p>which contained 16 items as sampled in Store and Workshop. Inspection checklist done on monthly basis and last recorded on 30/11/2022. First Aider Certificate from Academy of Safety and Emergency Care (ASEC) on 09-10/01/2019m issued to Shasrul Azwan Aby Bakar, Basic First Aid training was conducted on 26/05/2022 and attended by 11 employees.</p> <p>j) As minute in all Minutes of Meeting of SHCin 2022, incident was reported and discussed accordingly in Sg. Tong POM. Records of all accidents are kept. In 2022 among accident reported involved Mohd Zaki Abdul Patah (Operator) on 07/08/2022 during Kernel recycling activity and caused elbow cuts with 3 days MC. This was discussing in SHC meeting conducted on 21/09/2022.</p> <p>For those classified as having hearing impairment after Audiometric Test, a JKPP 7 Form were submitted to DOSH accordingly on 27/07/2022 by Mill Manager. Form JKPP 8 was notified to DOSH on 09/01/2022 for statistic of incident in 2021, where 52 employees exposed to NEL and no occupational accident under JKPP 6.</p>	
Criterion 4.4.5: Employment conditions			
4.4.5.1	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn Bhd has developed Human Rights Policy dated 01/01/2022 and Social Policy dated 01/01/2022 which were signed by their CEO. Workers were briefed about the policy and records of briefing were available at the mill. The policies were also displayed at the office notice boards. Policy was briefed to workers on 13/06/2022.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.4.5.2	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. - Major compliance -	It is stated in the Human Rights and Social Policies that the management is committed to treat everyone equally without any discrimination and provide equal opportunities regardless of race, nationality, gender, etc. Interview with workers confirmed that no discrimination was practiced by the management.	Complied
4.4.5.3	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage. - Major compliance -	The management have ensured that employees' pay and conditions meet applicable legal requirements i.e. National Minimum Wages Order 2022. Based on verification of pay slips, the wages received by the workers found to be meeting all the legal minimum standards. The following workers' pay slips were sampled for the month of August 2022, September 2022 and October 2022: SM0900230 SM0900202 SM0900476 SM00082 SM0900178 SM00058	Complied
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance -	The management ensures the employees of contractors are paid based on legal or industry minimum standard by obtaining the pay slips of the contractors' employees and verify against legal requirements.	Complied
4.4.5.5	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and	Sg Tong POM has their list of employees which has the information about name, division, pay, NRIC/Passport no, employment	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment. - Major compliance -	category, nationality, date of birth, date joined age, race and status in the HR/Payroll system.	
4.4.5.6	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records. - Major compliance -	All employees were provided with fair contracts that have been signed by both employee and employer. Based on interview, the employees confirmed that they were given a copy of the contract for their retention. The following workers' pay slips were sampled for the month of August 2022, September 2022 and October 2022: SM0900230 SM0900202 SM0900476 SM00082 SM0900178 SM00058	Complied
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers. - Major compliance -	Sg Tong POM is using thumbprint and check roll for the computation of working hours and overtime that is transparent for both employees and employers.	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 -	Working hours is 8 hours/day with normal working hours is from 8.00 a.m. – 4.00 p.m and 4.00 p.m. – 11.59 p.m and working days from Monday to Saturday. Total monthly working hours is 208 hours. The maximum overtime is 104 hours which is in-line with the Employment Act 1955. Interview with the workers revealed that	Complied

Criterion / Indicator		Assessment Findings	Compliance
		overtime work is to be done on mutual agreement between the employees and the employer.	
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Based on verification of the pay slips and time recording, the wages and overtime payment were found to be accurately paid in accordance to the legal regulations. The following workers' pay slips were sampled for the month of August 2022, September 2022 and October 2022: SM0900230 SM0900202 SM0900476 SM00082 SM0900178 SM00058	Complied
4.4.5.10	Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings. - Minor compliance -	Other forms of social benefits for workers including the insurance as following: - Subsidy given for electricity bill (RM 5.00 per employee) - Free water - Monthly bonus price - Free medical treatment - Free housing - Free transportation to school for employee's kids	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. - Major compliance -	On-site living quarters are provided and visit to the housing area/line site showed quarters are decently habitable and equipped with basic amenities of free water supply and subsidy given for	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		electricity including other facilities such as mosque, community hall, sundry store, canteen, children’s crèche and football field.	
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	TDM Plantation Sdn Bhd has developed Gender Policy and Reproductive Policy dated 01/01/2022 which is signed by the CEO. The management will ensure the workplace and surrounding are free from any types of harassment including ethnic harassment, religions, gender, country of origin, etc. There was no evidence of any kind of harassment recorded at the mill.	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 -	TDM Plantation Sdn Bhd has developed Freedom of Association Policy dated 01/01/2022 which is signed by the CEO. Based on interview with the workers, there was no evidence that the employer is restricting anyone from joining any trade union. There are 38 workers joining NUPW, sighted the list of union member.	Complied
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. - Major compliance -	TDM Plantation Sdn Bhd has developed Child Protection Policy dated 01/01/2022 which is signed by the CEO. Based on verification of workers register, there was no evidence that anyone below 18 years of age was recruited for employment	Complied
Criterion 4.4.6: Training and competency			
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training. - Major compliance -	Sg. Tong POM has established an annual training program that covers all aspects of the operations as well certifications (MSPO & RSPO) requirements. The details were available for verification in the document below:	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • ERP Training was conducted on 17/11/2022 and attended by 15 employee. • Boiler and Engine Room Training was conducted on 01/11/2022 and attended by 13 employee. • Confined Space Training was conducted on 12/10/2022 and attended by 10 employee. • OSH, Policies amd RSPPO/MSPO Briefing was conducted on 05/10/2022 and attended by 4+5+5+7 employee. • MSPO/RSPO Principles Training was conducted on 08/08/2022 and attended by 26 employees. • Supply Chain and Traceability Training was conducted on 04/08/2022 and attended by 6 employees. • EIA Training was conducted on 22/06/2022 and attended by 12 employees. • Chemical Handling Training was conducted on 12/05/2022 and attended by 8 employees. • Basic First Aid training was conducted on 26/05/2022 and attended by 11 employees. <p>OSH Plan, Training Matrix & Training Schedule 2022 for mill employee included Mill Manager, Asst. Managers, Clerks, Supervisor, Boilerman, Foreman, General Workers ect. Type of Training required for each of them clearly stated such as covering aspect of OSH, Environment, Social, Legal, Emergency, Operation (Loading, Engine Room, Workshop, POME, Water Treatment and etc.). The plan date and actual were clearly stated too as verified.</p>	
4.4.6.2	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in	Training needs of individual employees was established in Sg. Tong POM covering OSH Plan, Training Matrix & Training Schedule 2022.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	order to provide the specific skill and competency required to all employees based on their job description. - Major compliance -	Trainings identified for all estate employees including Mill Manager, Assistant, Clerk, Weightbridge Operator, Grader, Chargeman, Store Clerk, Foreman and general workers continuously in year 2022 as sighted.	
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 -	Continuous Training as in OSH Plan, Training matrix & Training Schedule 2022 (updated 03/02/2022) sampled and included training to ensure that all employees are well trained in their job function and responsibility in accordance with the documented training procedure: <ul style="list-style-type: none"> • Reception (Feb & August) • Laboratory (April) • Sterilizer (February & August) • Threshing (April & September) • Boiler (May & October) • Water Treatment Plant (July) and etc. 	Complied
4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services			
Criterion 4.5.1: Environmental Management Plan			
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented. - Major compliance -	There is a Group Policy titled "Environmental & Biodiversity Policy" dated 01/01/2022 signed by the Group CEO mainly in relation to	Complied

Criterion / Indicator		Assessment Findings	Compliance																		
		<p>environmental protection. Therein the policy among others contained commitment towards:</p> <ol style="list-style-type: none"> 1. To protecting the environment and conserving biodiversity through sustainable development 2. Abide by all legislative requirement 3. Manages environmental risk and providing reasonable resources to minimize risk and pollution to environment 4. Continuing and improving efficiency towards enhancing environment. <p>During the field visits and interviews with the workers on 20/12/22 there is no open burning being practiced in the mill and entire housing complex.</p>																			
4.5.1.2	<p>The environmental management plan shall cover the following:</p> <ol style="list-style-type: none"> a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations <p>- Major compliance -</p>	<p>The Policy is available, and objectives stated therein. Among others the objectives are to comply with DOE regulatory requirement. Initiative in plan as tabled below; In addition, the mill has initiated the following projects for enhancement to the environmental and social issues.</p> <table border="1"> <thead> <tr> <th></th> <th>Sections</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Operation</td> <td>ESP commission in Sept 22 - RM3.5M</td> </tr> <tr> <td>2</td> <td>Operation</td> <td>Effluent fencing 920 m - RM 92K - July 2023</td> </tr> <tr> <td>3</td> <td>Facilities</td> <td>Workers housing 24 units RM2.3M - Apr - Oct 2023</td> </tr> <tr> <td>4</td> <td>Operation</td> <td>EFB roofing area - July 2023 - RM250K</td> </tr> <tr> <td>5</td> <td>Facilities</td> <td>1 Van Oct 2023 - RM 160K</td> </tr> </tbody> </table> <p>The environmental aspects and impact evaluation has been established for the mill operations covering activities in relation to reception, sterilization, oil room operation, kernel processing, boiler operation, power generation, crude palm oil storage leakage and</p>		Sections	Description	1	Operation	ESP commission in Sept 22 - RM3.5M	2	Operation	Effluent fencing 920 m - RM 92K - July 2023	3	Facilities	Workers housing 24 units RM2.3M - Apr - Oct 2023	4	Operation	EFB roofing area - July 2023 - RM250K	5	Facilities	1 Van Oct 2023 - RM 160K	Complied
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Criterion / Indicator		Assessment Findings	Compliance																
		spillage, ruptured, effluent pond operations and diesoline storage tank. The analysis was reviewed in Jan 2022.																	
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -	<p>The mill monitors aspects and impacts among others the following activities This plan is available and similar to the reduction of pollution and emission. Mainly the areas relating to significant impact to the environment and the effort implemented are summarized below.</p> <table border="1"> <thead> <tr> <th></th> <th>Environmental</th> <th>Solution Procedure/Action Plan</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water Quality</td> <td>Continuous monitoring water quality at identified points of river for detection of quality/pollution Analysis made at certified laboratory Advisory/ guidance from Health Ministry</td> <td>River, Water Treatment Plant</td> </tr> <tr> <td>2</td> <td>Air Quality</td> <td>Adherence to the legislative requirement on boiler emission Prohibition of open burning Fibre and shell are used as fuel in the boiler furnace Monitoring of CEMS system</td> <td>Boiler operation mill complex</td> </tr> <tr> <td>3</td> <td>Scheduled waste</td> <td>Scheduled wastes are managed in accordance with the regulatory requirements.</td> <td>Source of generation/store</td> </tr> </tbody> </table> <p>Records of periodical reporting of the listed issues were available. These were the evidence which showed that the plans been</p>		Environmental	Solution Procedure/Action Plan	Location	1	Water Quality	Continuous monitoring water quality at identified points of river for detection of quality/pollution Analysis made at certified laboratory Advisory/ guidance from Health Ministry	River, Water Treatment Plant	2	Air Quality	Adherence to the legislative requirement on boiler emission Prohibition of open burning Fibre and shell are used as fuel in the boiler furnace Monitoring of CEMS system	Boiler operation mill complex	3	Scheduled waste	Scheduled wastes are managed in accordance with the regulatory requirements.	Source of generation/store	Complied
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Criterion / Indicator		Assessment Findings				Compliance																		
		monitored. The plans were reviewed annually during the EPMC meetings where environmental issues were discussed. <table border="1" style="margin-left: 20px;"> <thead> <tr> <th></th> <th>ST POM</th> <th></th> <th>ST POM</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>21/09/2022</td> <td>3</td> <td>22/03/2022</td> </tr> <tr> <td>2</td> <td>22/06/2022</td> <td>4</td> <td>12/12/2021</td> </tr> </tbody> </table>					ST POM		ST POM	1	21/09/2022	3	22/03/2022	2	22/06/2022	4	12/12/2021							
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4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Details are included in the continual improvement plan for both environmental and social related programs. Details as summarized below: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th></th> <th>Sections</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Operation</td> <td>ESP commission in Sept 22 - RM3.5M</td> </tr> <tr> <td>2</td> <td>Operation</td> <td>Effluent fencing 920 m - RM 92K - July 2023</td> </tr> <tr> <td>3</td> <td>Facilities</td> <td>Workers housing 24 units RM2.3M - Apr - Oct 2023</td> </tr> <tr> <td>4</td> <td>Operation</td> <td>EFB roofing area - July 2023 - RM250K</td> </tr> <tr> <td>5</td> <td>Facilities</td> <td>1 Van Oct 2023 - RM 160K</td> </tr> </tbody> </table>					Sections	Description	1	Operation	ESP commission in Sept 22 - RM3.5M	2	Operation	Effluent fencing 920 m - RM 92K - July 2023	3	Facilities	Workers housing 24 units RM2.3M - Apr - Oct 2023	4	Operation	EFB roofing area - July 2023 - RM250K	5	Facilities	1 Van Oct 2023 - RM 160K	Complied
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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 -	A training program is available and updated on yearly basis or revised as per the management requirement. Included in this programme are subjects related to environment among others listed below: <ol style="list-style-type: none"> 1. Environmental Quality Act & Regulations 1974 2. Environmental, safety & health policy 3. ERP Oil /chemical spill 4. Scheduled Waste Management 5. Environmental responsibility, HCV & Biodiversity. <table border="1" style="margin-left: 20px;"> <thead> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendee</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>22/3/22</td> <td>SOP - Waste Management/ SW</td> <td>11</td> </tr> </tbody> </table>					Date	Subject	Attendee	1	22/3/22	SOP - Waste Management/ SW	11	Complied										
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		2	22/6/22	EIA - Concept & Awareness	14	
		3	08/8/22	RSPO/ MSPO Refresher Briefing	Entire	
		4	28/2/22	Environmental Policy Briefing	Entire	
		5	20/6/22	No Open Burning	Entire	
		6	13/6/22	Water contamination awareness	Entire	
4.5.1.6	<p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p>- Major compliance -</p>	<p>The environmental issues are discussed in a meeting by the EPMC (Environmental Performance Monitoring Committee) Meeting is held 4x /year. The agenda discussed among others as follows:</p> <ol style="list-style-type: none"> 1. Matters arising 2. Performance of environment compliance 3. Report on environmental pollution 4. Self-compliance checklist performance 5. Effluent treatment/ clean air/ scheduled waste 6. Audit report on EMS/ RSPO/ MSPO 7. Domestic waste issues <p>Sighted minutes of meeting dated 02/05/2022 and 03/09/2022 among others discussing the following:</p> <ol style="list-style-type: none"> 1. Effluent treatment and performance 2. Scheduled wastes and others waste management 3. Clean air monitoring 4. Environmental Programs <p>In addition, environmental issues were also discussed during the quarterly ESH meetings and also briefed during the weekly muster.</p>				Complied

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Criterion / Indicator		Assessment Findings	Compliance																		
Criterion 4.5.2: Efficiency of energy use and use of renewable energy																					
4.5.2.1	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period</p> <p>- Major compliance -</p>	<p>The monitoring is recorded in environment performance indicator-electricity generated by steam turbine tabulated for the financial year Jan-Dec. It is calculated as electricity generated from turbine that produces power for the mill entire complex operation unit in kwh/mt FFB. A monthly record on energy consumption for both renewable and non-renewable sources were also maintained documented. It is monitored to optimize use of renewable energy. The data is compiled for comparison and control for future improvement with aim of gradual reduction particularly diesel.</p> <p>Under the annual energy management plan 2022 the mill aimed for reduction plan among others:</p> <ol style="list-style-type: none"> 1. Educate workers on fuel saving practice 2. Avoid leakages during vehicles maintenance 	Complied																		
4.5.2.2	<p>Palm oil millers shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations.</p> <p>- Major compliance -</p>	<p>The mill records the following data and tabulates the ratio against the FFB processed to determine the efficiency of their operations:</p> <ol style="list-style-type: none"> 1. All the diesel used (non-renewable) for the mill operations 2. Fibre/shell used (renewable) <p>The utilization of fossil fuel in 2022 is being monitored with records shown below. The mill diesel utilization in 2022 is 147500 liters which tally with the GHG declared figures. Other records in the CU as recorded below calculated in diesel/FFB mt.</p> <table border="1"> <thead> <tr> <th></th> <th>Month</th> <th>Diesel/FFB</th> <th></th> <th>Month</th> <th>Diesel/FFB</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jan</td> <td>0.50</td> <td>7</td> <td>July</td> <td>0.62</td> </tr> <tr> <td>2</td> <td>Feb</td> <td>1.03</td> <td>8</td> <td>Aug</td> <td>0.27</td> </tr> </tbody> </table>		Month	Diesel/FFB		Month	Diesel/FFB	1	Jan	0.50	7	July	0.62	2	Feb	1.03	8	Aug	0.27	Complied
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Criterion / Indicator		Assessment Findings						Compliance
		3	Mac	0.95	9	Sept	0.92	
		4	Apr	0.88	10	Oct	0.87	
		5	May	0.46	11	Nov	1.04	
		6	Jun	0.86	12	Dec	-	
		Factors relating to weather condition, FFB ramp balances, vehicles breakdown, gen-set breakdown are the attributes to the variation in the diesel/FFB ratio performance. Baseline is 12490L in quantity.						
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	The fibre and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fibre are delivered to estates for multi purposes or sold to outside buyers. EFB is used in the estates for mulching.						Complied
Criterion 4.5.3: Waste management and disposal								
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	TDM Sg Tong Mill had identified all wastes and sources of pollution. The Waste Management Action Plan 2022 were established to mitigate and control the identified wastes and source of pollution. The common significant environmental receptors for the estates and mill operations among others as summarized below:						Complied
			Receptor	Sources				
		1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)-GHG				
		2	Water	Cleaning water/run-off/process station waters, sterilizer condensate/clarification waste) & boiler quenching water and blow down				

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		3	<table border="1" style="width: 100%;"> <tr> <td style="width: 15%;">Land</td> <td>Scheduled waste, domestic waste and industrial/process waste</td> </tr> </table> <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2022 reviewed annually. The waste generated from the mill operations as shown below:</p> <table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 5%;"></th> <th style="width: 20%;">Type of waste</th> <th style="width: 75%;">Details</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td style="text-align: center;">2</td> <td>Domestic waste</td> <td>rubbish from the mill/estate complex and employees' quarters</td> </tr> <tr> <td style="text-align: center;">3</td> <td>Industrial waste</td> <td>Fiber, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td style="text-align: center;">4</td> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table> <p>The pollution identified from the mill/estate activities:</p> <table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 5%;"></th> <th style="width: 20%;">Type of waste</th> <th style="width: 75%;">Details</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Black smoke</td> <td>Emission from Boilers/ vehicles/ engines</td> </tr> <tr> <td style="text-align: center;">2</td> <td>Odor & gases</td> <td>Activities from the effluent treatment</td> </tr> <tr> <td style="text-align: center;">3</td> <td>Leakage of lubricant</td> <td>Storage & vehicle maintenance</td> </tr> </tbody> </table>	Land	Scheduled waste, domestic waste and industrial/process waste		Type of waste	Details	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	2	Domestic waste	rubbish from the mill/estate complex and employees' quarters	3	Industrial waste	Fiber, palm kernel shell, boiler ash, scrap iron	4	Sewage	Sewage from housing/office complex		Type of waste	Details	1	Black smoke	Emission from Boilers/ vehicles/ engines	2	Odor & gases	Activities from the effluent treatment	3	Leakage of lubricant	Storage & vehicle maintenance	
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4.5.3.2	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p>	<p>TDM Sg Tong Mill had identified all wastes and sources of pollution. The Waste Management Action Plan 2022 were established to mitigate and control the identified wastes and source of pollution. The common significant environmental receptors for the estates and mill operations among others as summarized below:</p>		Complied																													

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Criterion / Indicator		Assessment Findings		Compliance								
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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>TDM Sg Tong POM had established SOP for chemical handling dated Nov 2022. The SOP of handling of chemicals is available in the following document among others:</p> <p>a) Manual Kilang Sawit</p> <ul style="list-style-type: none"> - Prosedur Kerja Selamat <p>b) Manual Sustainability</p> <ul style="list-style-type: none"> - Prosedur Kerja Selamat - Prosedur Penyimpanan / Penggunaan Racun - Prosedur Buangan Terjadual <p>The scheduled waste is disposed to Pentas Flora (Kelantan) Sdn Bhd registered with DOE. DOE letter of authorization Pentas Flora (Kelantan) Sdn Bhd for SW collection ref no 00473 validity dated 30/01/2023. Details of scheduled waste dispatched as recorded below. The duration of storage is in line with the date of generation.</p> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>SW409</th> <th>SW 305</th> <th>SW410</th> <th>SW410</th> <th>SW322</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>11/12/22</td> <td>-</td> <td>0.3000</td> <td>0.0335</td> <td>-</td> <td>0.0005</td> </tr> <tr> <td>2</td> <td>30/11/22</td> <td>0.0350</td> <td>0.2110</td> <td>0.0270</td> <td>0.1910</td> <td>0.0031</td> </tr> <tr> <td>3</td> <td>17/05/22</td> <td>0.1198</td> <td>0.1560</td> <td>0.1390</td> <td>0.0391</td> <td>-</td> </tr> <tr> <td>4</td> <td>18/01/22</td> <td>-</td> <td>0.2750</td> <td>0.1435</td> <td>0.0175</td> <td>-</td> </tr> </tbody> </table>						Date	SW409	SW 305	SW410	SW410	SW322	1	11/12/22	-	0.3000	0.0335	-	0.0005	2	30/11/22	0.0350	0.2110	0.0270	0.1910	0.0031	3	17/05/22	0.1198	0.1560	0.1390	0.0391	-	4	18/01/22	-	0.2750	0.1435	0.0175	-	Complied
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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 for the mill and housing complex are disposed at Majlis Daerah Setiu landfill collected 2-3/x week via contract services of MDS. Sighted and verified payment for services made on 15/11/2022/23 invoice no PY22000568.</p>					Complied																																			

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Criterion 4.5.4: Reduction of pollution and emission including greenhouse gas																														
<p>4.5.4.1</p>	<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 polluting activities are identified and documented in the Environmental Aspect & Impact Identification. From the EAI, it will be evaluated for the impact and any impact will be included in the management plan. The evaluation is documented in the Environmental Impact Evaluation. All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2022 reviewed annually.</p> <p>The waste generated from the mill/ estates operations as shown below:</p> <table border="1" data-bbox="1088 815 1865 1082"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td>2</td> <td>Domestic waste</td> <td>rubbish from the mill/estate complex and employees' quarters</td> </tr> <tr> <td>3</td> <td>Industrial waste</td> <td>Fiber, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td>4</td> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table> <p>The pollution identified from the mill operations/ activities:</p> <table border="1" data-bbox="1088 1171 1865 1342"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Black smoke</td> <td>Emission from Boilers/ vehicles/ engines</td> </tr> <tr> <td>2</td> <td>Odor & gases</td> <td>Activities from the effluent treatment</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>Storage & vehicle maintenance</td> </tr> </tbody> </table>		Type of waste	Details	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	2	Domestic waste	rubbish from the mill/estate complex and employees' quarters	3	Industrial waste	Fiber, palm kernel shell, boiler ash, scrap iron	4	Sewage	Sewage from housing/office complex		Type of waste	Details	1	Black smoke	Emission from Boilers/ vehicles/ engines	2	Odor & gases	Activities from the effluent treatment	3	Leakage of lubricant	Storage & vehicle maintenance	<p>Complied</p>
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Criterion / Indicator		Assessment Findings			Compliance	
		The mill also monitored and maintained records on Palm GHG. Inclusive in the report are the plantation/ field emission data from field emission and sinks (tCO ₂ e/t FFB) and mill emission from mill emission and credits (tCO ₂ e/t FFB).				
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	The action plan to reduce the pollution is tabled below.			Complied	
			Environmental Issues	Management/Action Plan		PIC
		1	Boiler - Black smoke	To monitor the condition of dust cyclone every 3 months To carry out boiler furnace cleaning every week		AMM
		2	Effluent - Odor & gases	To maintain proper feeding into digestion process of effluent to prevent severe and unpleasant odour		AMM
		3	Vehicles/ Lorries- Leakage of lubricant/ diesel	Ensure maintenance schedule to be strictly followed To place all lubricant oil drum on metal trays. Vehicles awaiting entry into the mill to be switched off		AMM
		4	Domestic waste - odor and environmental pollution	Only organic waste to be disposed. NO burning and NIL disposal of empty chemicals containers into landfill.	AMM	

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		All efforts and action plan for the identified pollutants and emission above at current is adequate to comply with the requirement. All identified issues have significant impacts to the environment.																																														
4.5.4.3	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p>- Major compliance -</p>	<p>Palm oil mill effluent (POME) is treated to ensure compliance with the DOE standards. Interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements.</p> <p>a) No overflow was observed, and flow meter reading was recorded daily. Submission to DOE is made through Borang Penyata Suku Tahunan.</p> <p>b) The results from final discharge were compliance within the DOE parameter limit.</p> <p>Sg Tong Mill DOE license no 004090 was for water discharge application requirement of which is BOD less than 100 mg/l.</p> <table border="1"> <thead> <tr> <th></th> <th>Std</th> <th>13/7/22</th> <th>10/8/22</th> <th>19/9/22</th> </tr> </thead> <tbody> <tr> <td>1 PH</td> <td>5.-9.</td> <td>8.20</td> <td>7.60</td> <td>8.70</td> </tr> <tr> <td>2 BOD</td> <td>100</td> <td>7.00</td> <td>13.00</td> <td>19.00</td> </tr> <tr> <td>3 COD</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>4 Total solids</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>5 S Solids</td> <td>-</td> <td>23.00</td> <td>17.00</td> <td>36.00</td> </tr> <tr> <td>6 Oil & grease</td> <td>-</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>7 A Nitrogen</td> <td>-</td> <td>1.01</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>8 Total N</td> <td>-</td> <td>2.74</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table>		Std	13/7/22	10/8/22	19/9/22	1 PH	5.-9.	8.20	7.60	8.70	2 BOD	100	7.00	13.00	19.00	3 COD	-	-	-	-	4 Total solids	-	-	-	-	5 S Solids	-	23.00	17.00	36.00	6 Oil & grease	-	0.00	0.00	0.00	7 A Nitrogen	-	1.01	0.00	0.00	8 Total N	-	2.74	0.00	0.00	Complied
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Criterion / Indicator	Assessment Findings	Compliance																									
<p>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:</p> <ul style="list-style-type: none"> a) Assessment of water usage and sources. b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill’s current activities. c) Ways to optimize water and nutrient usage and reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.). <p>- Major compliance -</p>	<p>The mill water management plan has been established and reviewed in 10/02/2022. Among others the plan therein emphasized:</p> <ol style="list-style-type: none"> 1. Rainwater harvesting for cleaning purposes 2. Water from the reservoir/ catchment for the mill operations 3. Continual training workers on water efficiency consumption 4. Desilting of water reservoir to retain the reservoir optimal capacity. <table border="1" data-bbox="1099 738 1868 1391"> <thead> <tr> <th></th> <th>Source</th> <th>Activity</th> <th>Threat</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reservoir / pond/ SATU</td> <td>Chemical mixing</td> <td>Pollution Draught Wastage</td> <td>Enforcement of buffer zone as non-spraying activities.</td> </tr> <tr> <td>2</td> <td>Rain</td> <td>General Upkeep</td> <td>Pollution Draught Wastage</td> <td>Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.</td> </tr> <tr> <td>3</td> <td></td> <td>Line site</td> <td>Pollution Draught Wastage</td> <td>Every house is on direct SATU. To schedule water supply to avoid wastage. Awareness on water usage efficiency. Outsource from neighboring estates.</td> </tr> <tr> <td>4</td> <td></td> <td></td> <td>Water pollution</td> <td>Prohibit workers from activities at water source Monitor condition of septic tank</td> </tr> </tbody> </table>		Source	Activity	Threat	Action Plan	1	Reservoir / pond/ SATU	Chemical mixing	Pollution Draught Wastage	Enforcement of buffer zone as non-spraying activities.	2	Rain	General Upkeep	Pollution Draught Wastage	Follow WI & SOP to avoid water pollution. Follow SW SOP to avoid pollution caused from SW.	3		Line site	Pollution Draught Wastage	Every house is on direct SATU. To schedule water supply to avoid wastage. Awareness on water usage efficiency. Outsource from neighboring estates.	4			Water pollution	Prohibit workers from activities at water source Monitor condition of septic tank	<p>Complied</p>
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		<p>The mill processing water are obtained from catchment source from the nearby river adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording (water usage per mt in 2022 of fresh fruit bunches (FFB) below; Base line is 3.5 ratio.</p> <table border="1"> <thead> <tr> <th>No</th> <th>2022</th> <th>Water m3</th> <th>FFB /mt</th> <th>Water /FFB</th> </tr> </thead> <tbody> <tr><td>1</td><td>Jan</td><td>32190</td><td>10643</td><td>3.02</td></tr> <tr><td>2</td><td>Feb</td><td>26720</td><td>7152</td><td>3.74</td></tr> <tr><td>3</td><td>Mac</td><td>35890</td><td>9868</td><td>3.64</td></tr> <tr><td>4</td><td>Apr</td><td>28080</td><td>8026</td><td>3.50</td></tr> <tr><td>5</td><td>May</td><td>30250</td><td>11862</td><td>2.55</td></tr> <tr><td>6</td><td>June</td><td>27450</td><td>10772</td><td>2.55</td></tr> <tr><td>7</td><td>July</td><td>32860</td><td>12820</td><td>2.56</td></tr> <tr><td>8</td><td>Aug</td><td>44830</td><td>21025</td><td>2.13</td></tr> <tr><td>9</td><td>Sept</td><td>45220</td><td>17744</td><td>2.55</td></tr> <tr><td>10</td><td>Oct</td><td>43640</td><td>15945</td><td>2.74</td></tr> <tr><td>11</td><td>Nov</td><td>41390</td><td>14008</td><td>2.95</td></tr> <tr><td>12</td><td>Dec</td><td>-</td><td>-</td><td>-</td></tr> <tr><td></td><td>Total</td><td>388520</td><td>139864</td><td>2.78</td></tr> </tbody> </table> <p>There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/ discharging for maintenance etc. Prevention is made especially during the manuring activities. TDM reviewed the environmental</p>					No	2022	Water m3	FFB /mt	Water /FFB	1	Jan	32190	10643	3.02	2	Feb	26720	7152	3.74	3	Mac	35890	9868	3.64	4	Apr	28080	8026	3.50	5	May	30250	11862	2.55	6	June	27450	10772	2.55	7	July	32860	12820	2.56	8	Aug	44830	21025	2.13	9	Sept	45220	17744	2.55	10	Oct	43640	15945	2.74	11	Nov	41390	14008	2.95	12	Dec	-	-	-		Total	388520	139864	2.78	
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Criterion / Indicator		Assessment Findings				Compliance																																																																				
		<p>performances during the monthly EPMC Environmental Performance Monitoring Committee and the quarterly ESH meetings. The following minutes of meeting EPMC was sighted and verified.</p> <table border="1"> <thead> <tr> <th></th> <th>ST POM</th> <th></th> <th>ST POM</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>21/09/2022</td> <td>3</td> <td>22/03/2022</td> </tr> <tr> <td>2</td> <td>22/06/2022</td> <td>4</td> <td>12/12/2021</td> </tr> </tbody> </table> <p>Sighted minutes of meeting Sungai Tong POM 21/09/2022 and 22/03/2022 among others discussing the following:</p> <ul style="list-style-type: none"> a) Effluent treatment and performance b) Scheduled wastes and others waste management c) Clean air monitoring d) Environmental Programs. <p>The mill made an monthly water samples at 2 points in the river nearby i.e hulu & hilir Sg Nerus source for the mill water consumption. Analysis made by Makmal Analisa ERA Lab (KT) Sdn Bhd.</p> <table border="1"> <thead> <tr> <th></th> <th></th> <th></th> <th colspan="2">25/10/22</th> <th colspan="2">Sample F</th> </tr> <tr> <th></th> <th>Parameter</th> <th>unit</th> <th>Hulu</th> <th>Hilir</th> <th>Hulu</th> <th>Hilir</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>PH</td> <td>-</td> <td>6.5</td> <td>6.5</td> <td>6.6</td> <td>6.5</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>mg/L</td> <td>5</td> <td>3</td> <td>5</td> <td>3</td> </tr> <tr> <td>3</td> <td>COD</td> <td>mg/L</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>4</td> <td>T Solids</td> <td>mg/L</td> <td>159</td> <td>138</td> <td>159</td> <td>138</td> </tr> <tr> <td>5</td> <td>S Solids</td> <td>mg/L</td> <td>38</td> <td>19</td> <td>38</td> <td>19</td> </tr> <tr> <td>6</td> <td>O & G</td> <td>mg/L</td> <td>ND</td> <td>ND</td> <td>ND</td> <td>ND</td> </tr> </tbody> </table>					ST POM		ST POM	1	21/09/2022	3	22/03/2022	2	22/06/2022	4	12/12/2021				25/10/22		Sample F			Parameter	unit	Hulu	Hilir	Hulu	Hilir	1	PH	-	6.5	6.5	6.6	6.5	2	BOD	mg/L	5	3	5	3	3	COD	mg/L	-	-	-	-	4	T Solids	mg/L	159	138	159	138	5	S Solids	mg/L	38	19	38	19	6	O & G	mg/L	ND	ND	ND	ND	
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Criterion / Indicator		Assessment Findings					Compliance			
		7	A Nitrogen	mg/L	ND	ND	ND	ND		
		8	T Nitrogen	mg/L	1.60	2.00	1.60	2.00		
		The results for both river shows the river water was conform to NWQS Class II. Sampling sites were visited and verified.								
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 -	Sg Tong Palm Oil Mill DOE license no 004090 was for water discharge requirement of which is BOD less than 100 mg/l. The following initiative by the mill is currently being practiced ensuring the quality of the effluent complies with DOE requirement and for enhancement to the environmental issues.							Complied	
		Details								
		1	Annual Desluding RM140K - 3 ponds /year							
		2	Biogas Plant - commissioned in April 2022							
		3	Continuous monitoring of effluent parameters							
4.6 Principle 6: Best Practices										
Criterion 4.6.1: Mill Management										
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	Sighted documented Standard Operating Procedure & Operation Manual with last revision in November 2012. Among activities covered under Main Section: <ul style="list-style-type: none"> • Reception Station • Sterilization Station • Overhead Crane Station • Threshing Station • Pressing station • Clarification Station 							Complied	

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Depericarping Station • Kernel Recovery Station • Boiler Station • Power Generation Station • Water Treatment Plant and other 14s. 	
4.6.1.2	<p>All palm oil mills shall implement best practices.</p> <p>- Major compliance -</p>	<p>In order to maintain best practices, a Mill Advisory (Hj. Mat Nor Abdullah) has conducted a visit as report of Sustainability Performance Report for Sg. Tong POM between 13-13/06 & 14/08 2022. With objective to look into, review and assess palm oil mill compliance with milling rules, regulations and assess their sustainability plant performance status by using Sustainability Business Excellence Model (SusBEM) 2.0. and Sustainability Performance Rating (SPR) approach.</p>	Complied
Criterion 4.6.2: Economic and financial viability plan			
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>Documented business or management were established as following samples: All estates audited, business or management plan was documented as Budget (Business Plan) 2021 – 2027; which includes the estimate for FFB Processed, CPO and Kernel produced, General Charges, Mill maintenance, Process Shift Labor, General Services and Capital Budget to demonstrate attention to economic and financial viability through long-term management planning.</p>	Complied
Criterion 4.6.3: Transparent and fair price dealing			

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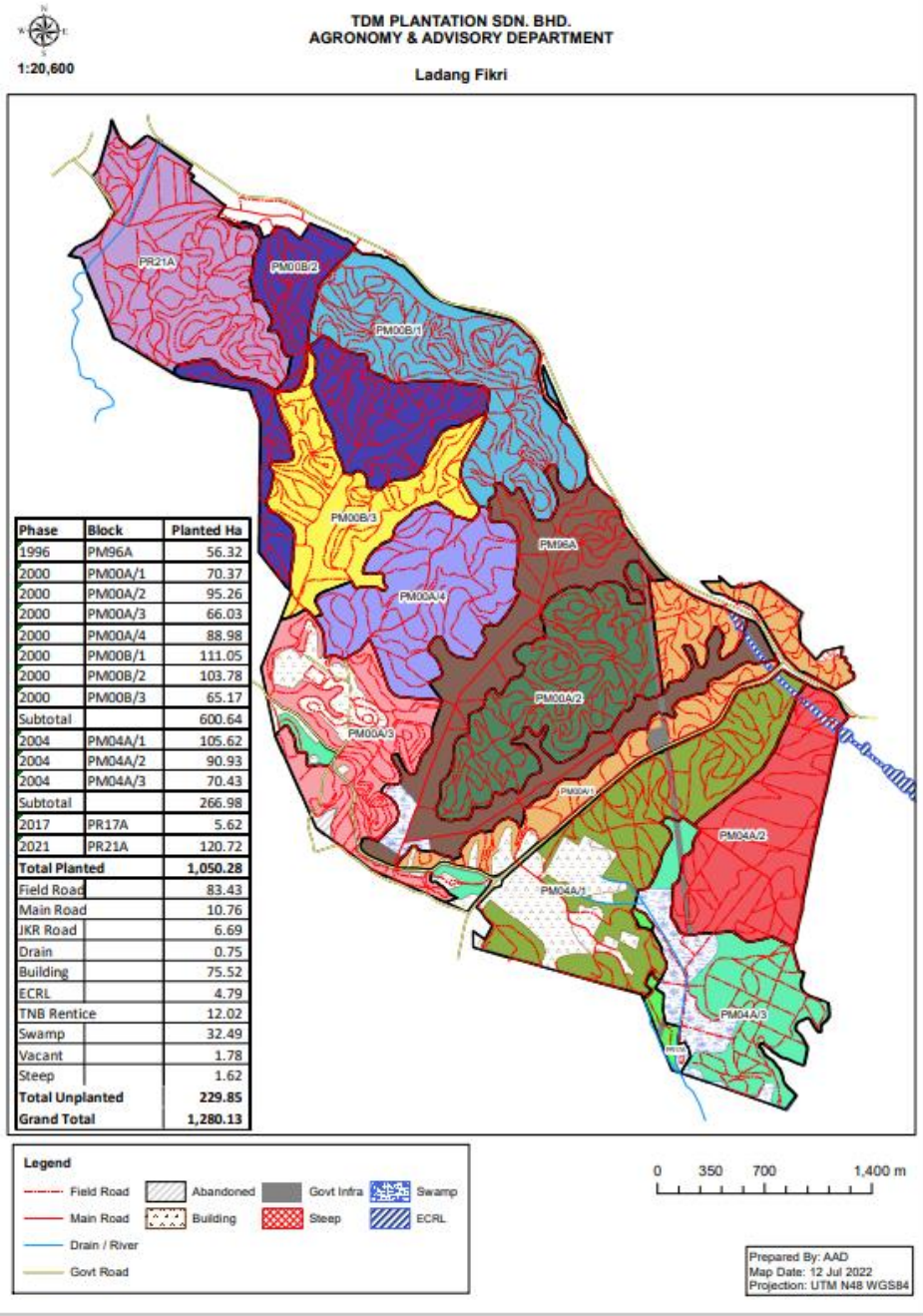
Criterion / Indicator		Assessment Findings	Compliance
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	Sighted information abstract from COP Committee HQ of TDM Plantation Sdn Bhd of Pricing Mechanism of Daily FFB. Exemplified for date of 21/12/2022: OER (AS at 20/12/2022): 18.00% KER (As at 20/12/2022): 4.34% PC (Flat rate): RM 58.00 CPO Transport: RM 45 PK Transport: RM 27 CPO Price (20/12/2022): RM 3,916.00 PK Price (20/12/2022): RM 2,025.00 FFB Price: RM 718.57 Driver Incentive: RM 50.00 Gross FFB Price: RM 668.57 Nett FFB Price: 663.57 FFB Price Offer Before Deduction: RM 660.00	Complied
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	Based on Invoice (I-2211010) dated 13/11/2022 with term 230 days issued by Kluang Practical Engineering Sdn Bhd. for Price sump of RM 9,450.00. Payment proceeds after Work Verification by Mill Manager as work completed and correct on 17/10/2022 and noted as to proceed payment.	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.	A meeting with Stakeholder included Contractor on 16/11/2022 at Akedemi TDM at 3.00pm. Representative from Mill (Norwati bt Mamat) briefed on RSPO/MSPO certification and principles, Policies	Complied

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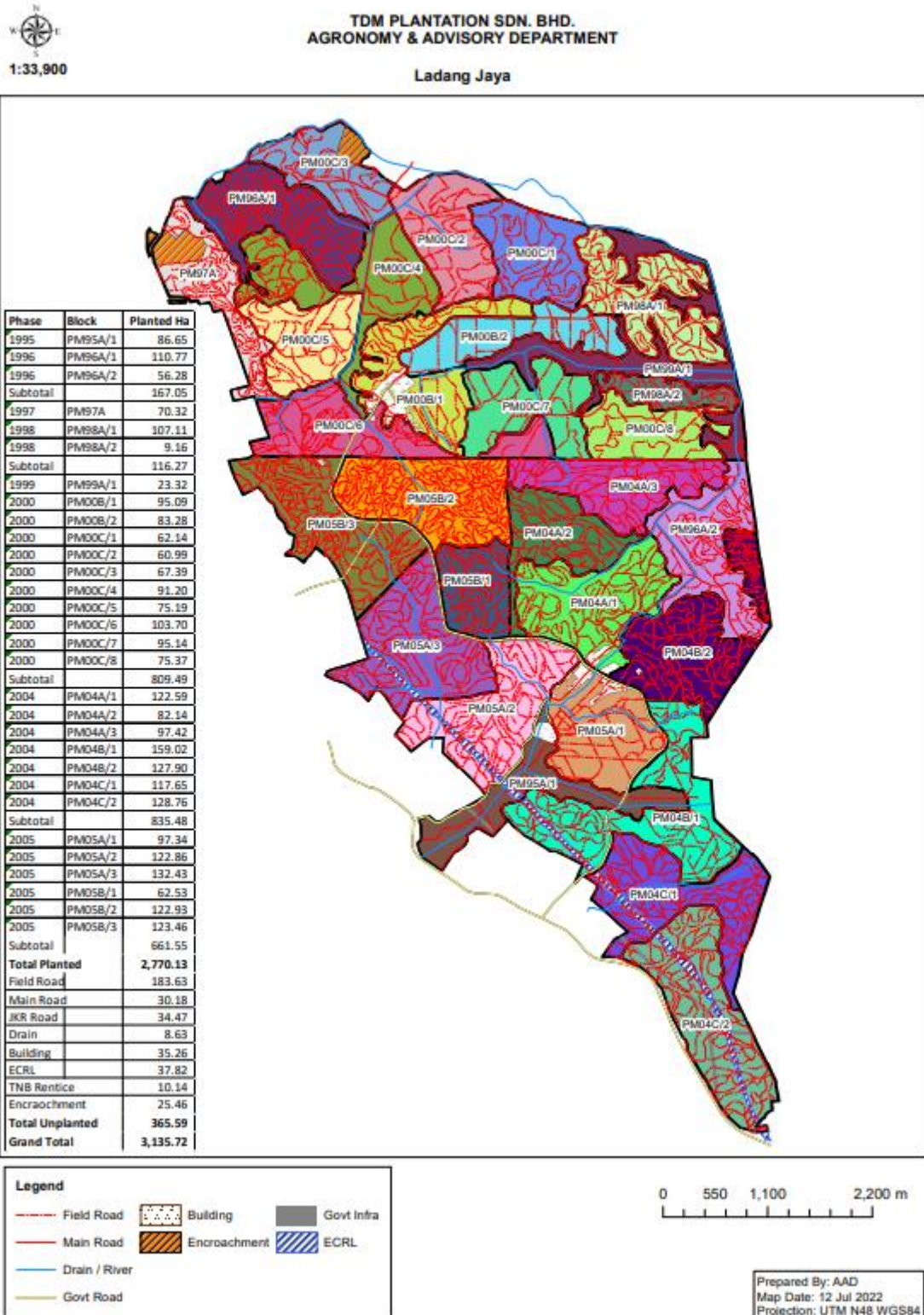
Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	of TDM, Complaint and Grievances Procedure, Emergency Response and Preparedness Procedure.	
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	Sampled contract work to Supply labor and mobile crane to dismantle, repair and modify to suit new replacement wear part EFB Conveyor No. 3 Platform. Work Order No. 242/2022 issued on 06/10/2022 to Kluang Practical Engineering Sdn Bhd. Price Lump sum RM 9,600.00 for period of 06/10/2022 to 20/10/2022. Signed agreed by representative of the contractor with official company stamp.	Complied
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	The requirement of accepting MSPO accredited auditors to audit against the contractors was mentioned in the work order and addendum in jobs specifications. Briefing to 3 contractor was conducted on 16/11/2022	Complied

Appendix C: Location and Field Map

Fikri Estate



Jaya Estate

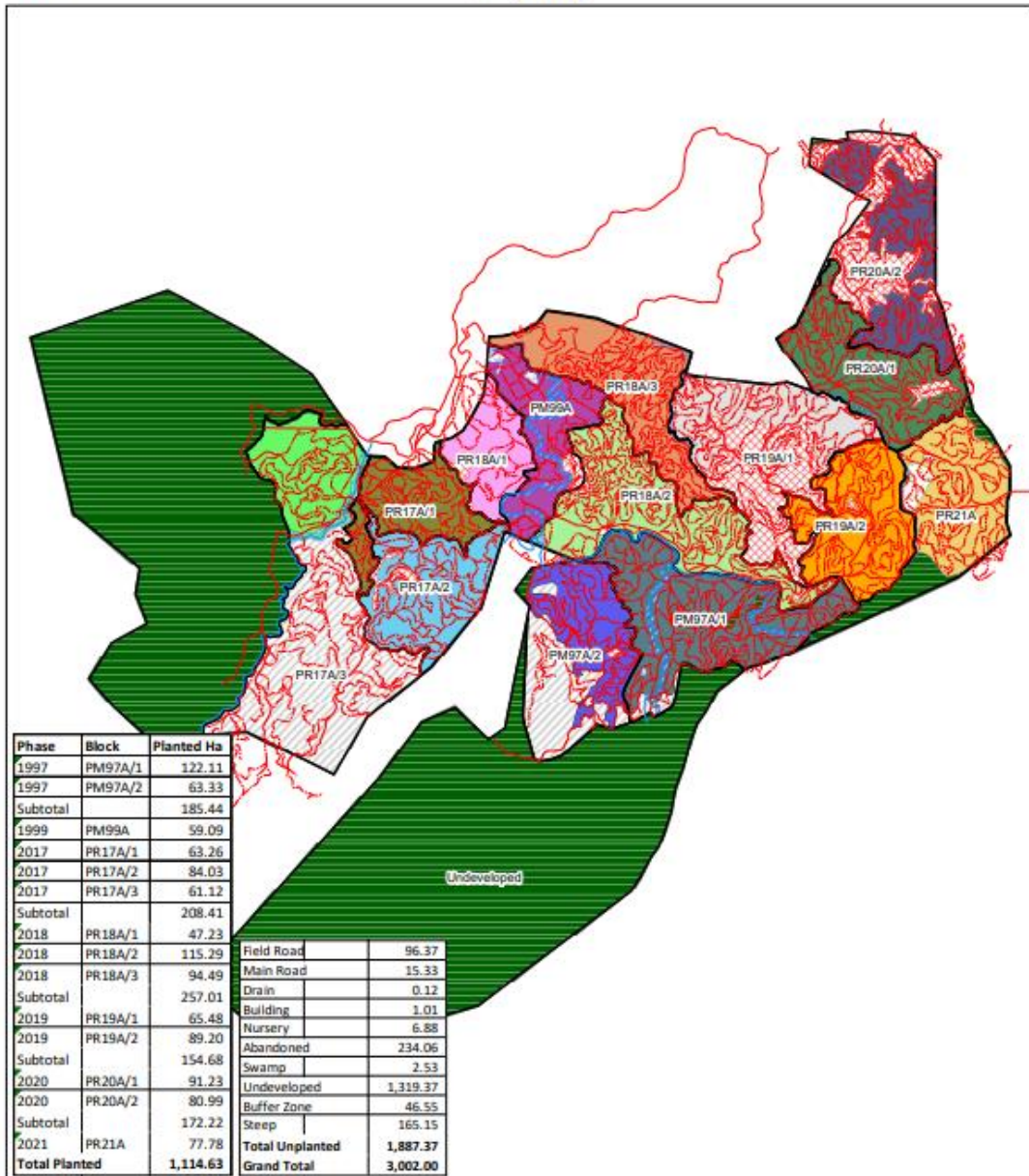


Pelung Estate



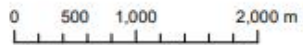
TDM PLANTATION SDN. BHD.
AGRONOMY & ADVISORY DEPARTMENT

Ladang Pelung



Legend

Field Road	Abandoned	Building	Steep
Main Road	Buffer Zone	Nursery / Orchard	Swamp
Drain / River	Undeveloped		
Govt Road			



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

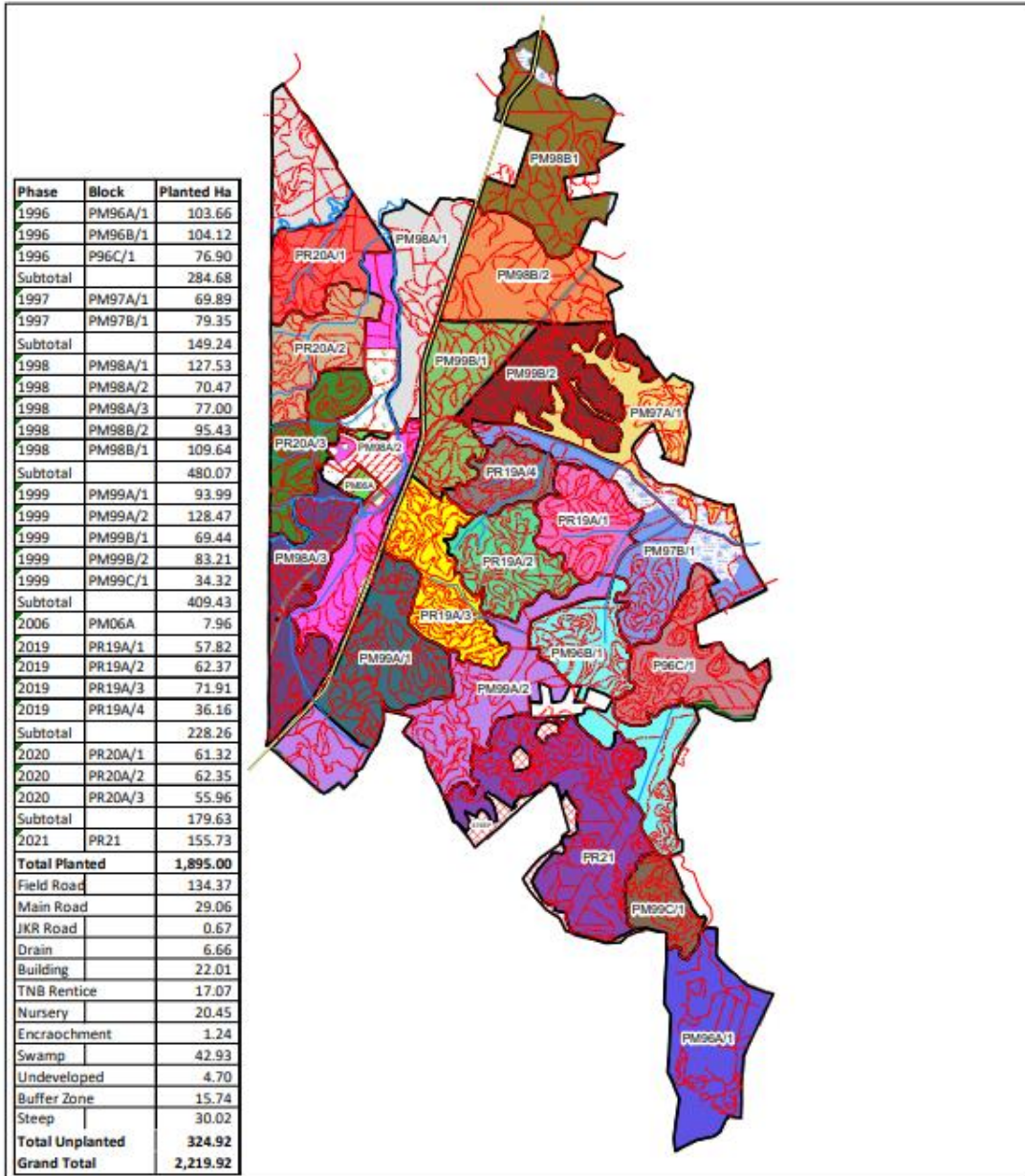
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Tayor Estate



TDM PLANTATION SDN. BHD.
AGRONOMY & ADVISORY DEPARTMENT

Ladang Tayor



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



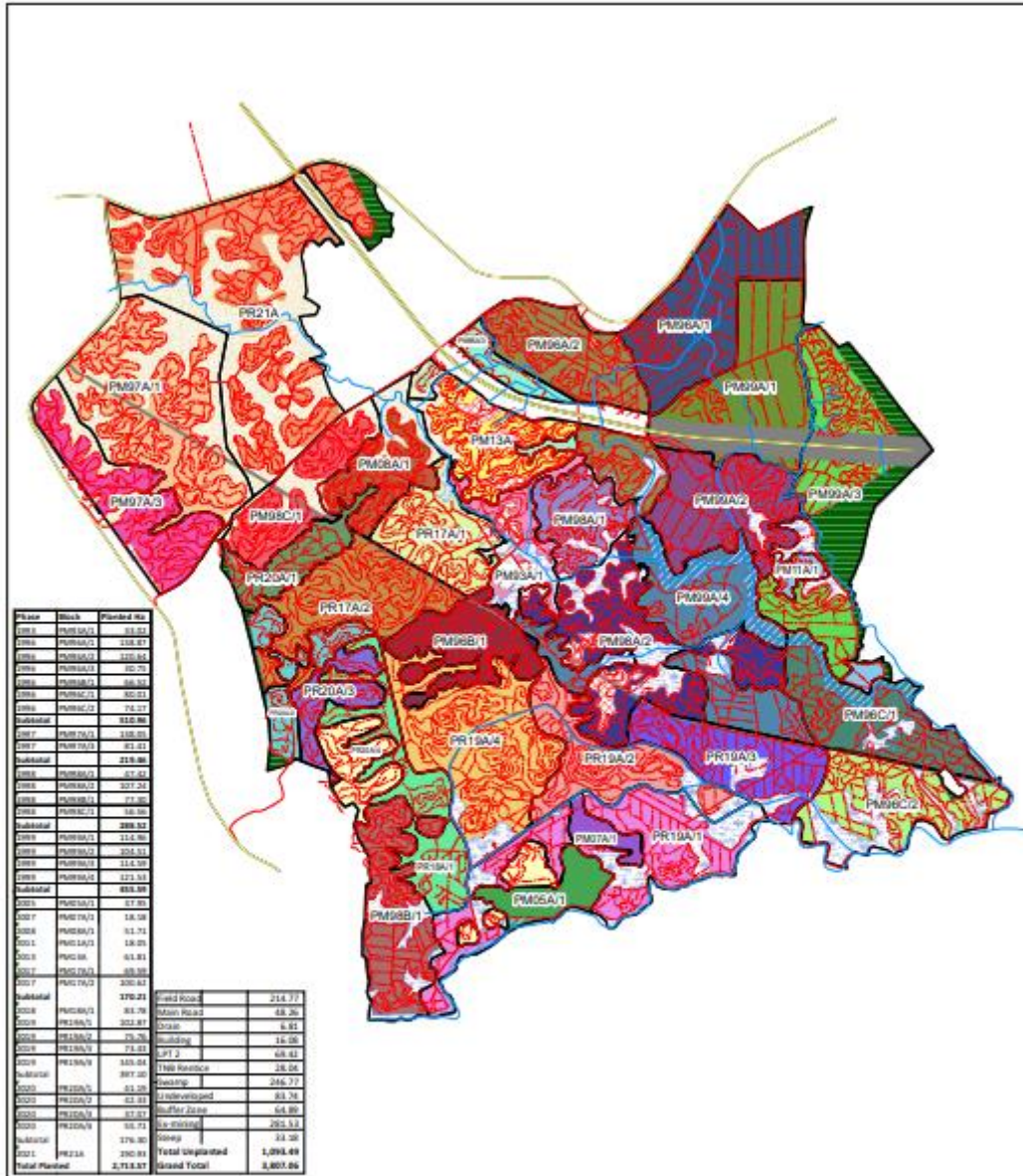
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Map Date: 12 Jul 2022
Projection: UTM N48 WGS84

Pinang Emas Estate



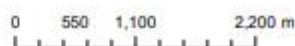
TDM PLANTATION SDN. BHD.
AGRONOMY & ADVISORY DEPARTMENT

Ladang Pinang Emas



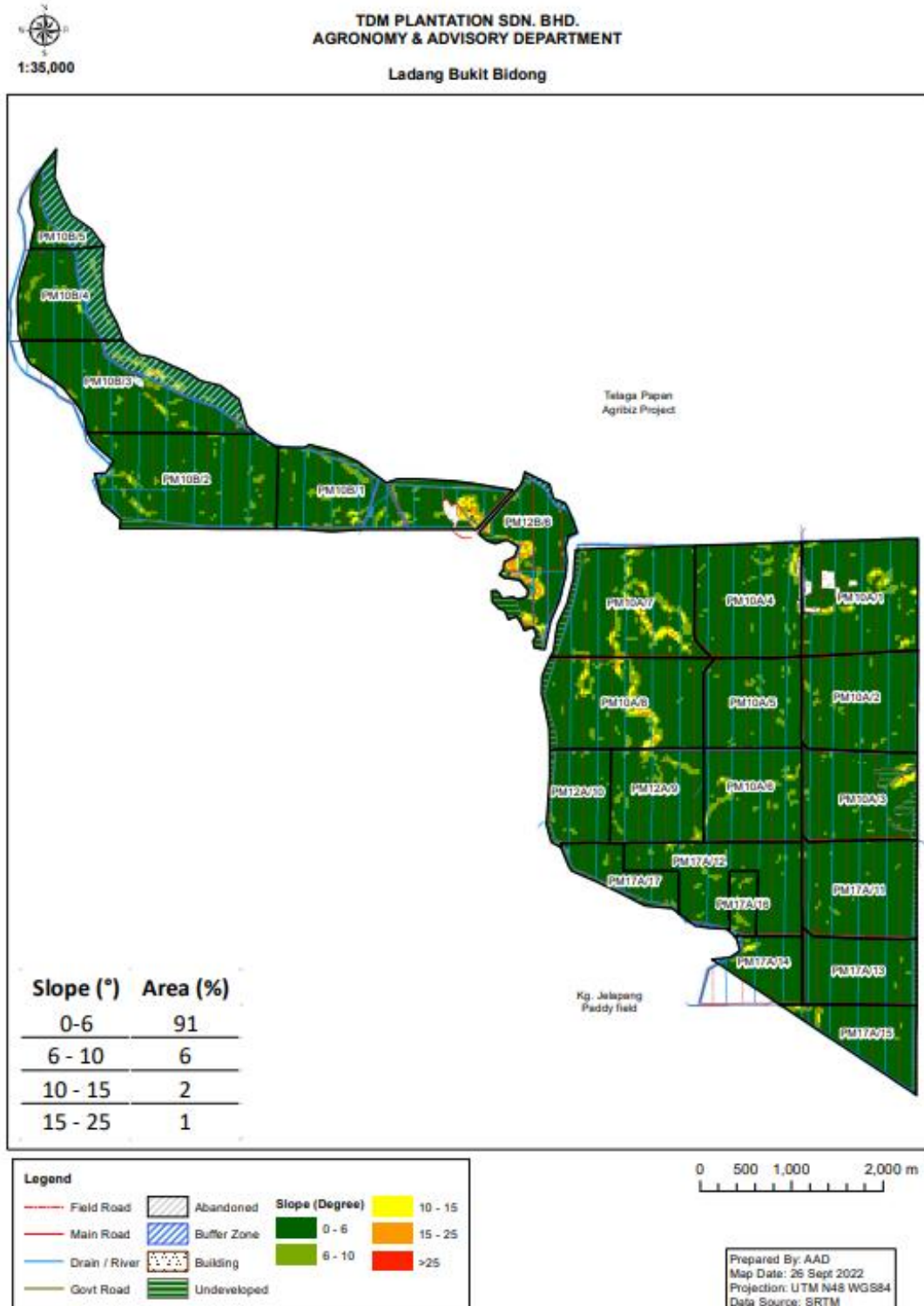
Legend

- Field Road
- Main Road
- Drain / River
- Govt Road
- Buffer Zone
- Building
- Ex-mining
- Govt Infra
- Swamp
- Undeveloped
- Steep

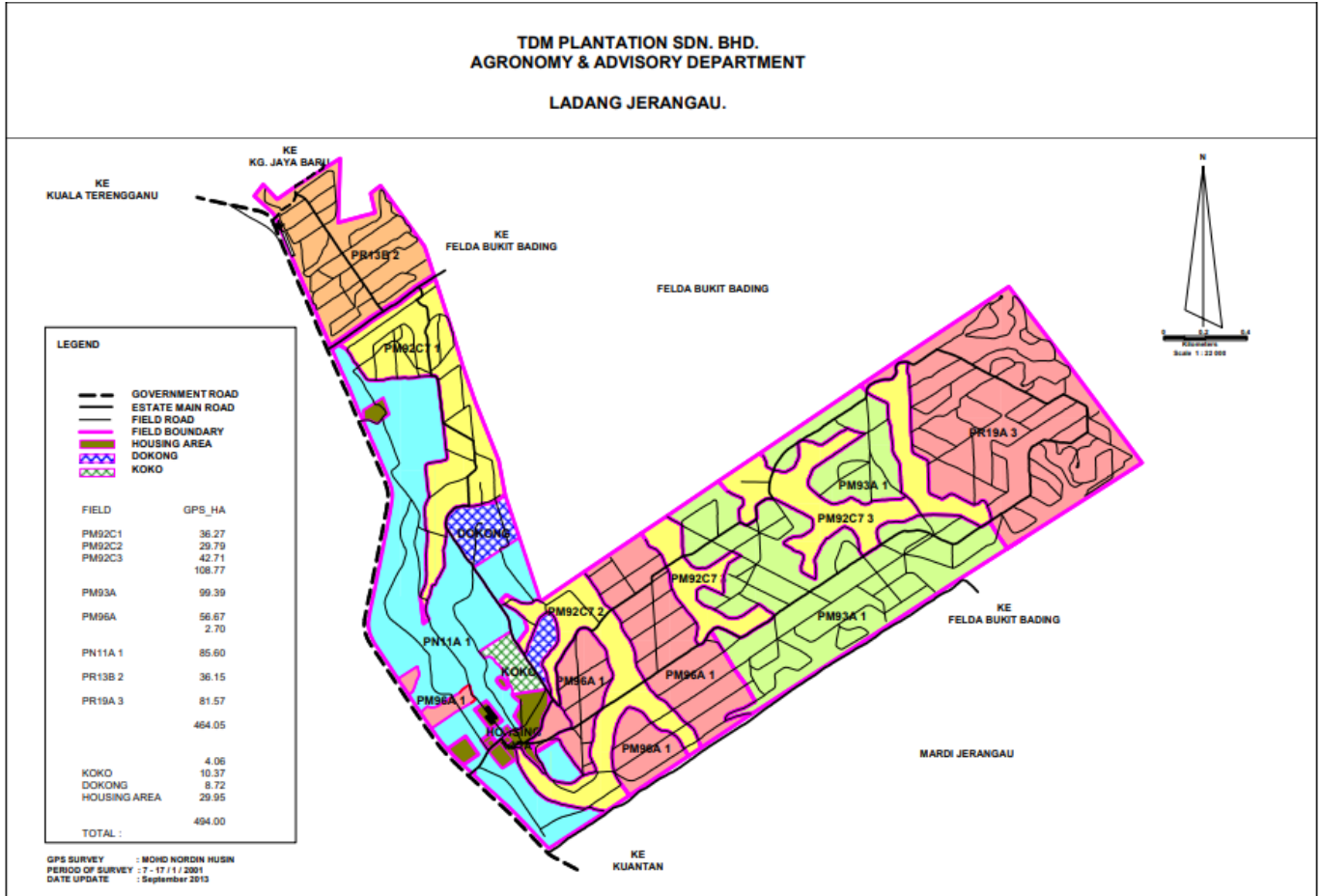


Prepared By: AAD
Map Date: 12 Jul 2022
Projection: UTM N48 WGS84

Bukit Bidong Estate



Jerangau Estate



Appendix D: List of Abbreviations

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MSPO	Malaysian Sustainable Palm Oil
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RTE	Rare, Threatened or Endangered species
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure