

**RSPO PRINCIPLE AND CRITERIA –
4th ANNUAL SURVEILLANCE ASSESSMENT (ASA1_4)
Public Summary Report**

Sime Darby Plantation Berhad
Client company Address: Level 3A, Main Block, Plantation Tower No 2, Jalan PJU 1A/7, Ara Damansara 47301 Petaling Jaya Selangor, Malaysia
Certification Unit: Bukit Kerayong Palm Oil Mill and Supply Base Location of Certification Unit: Bukit Kerayong Road 42200 Kapar Klang, Selangor, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	06/09/2004
Parent Company Name	Sime Darby Plantation Berhad		
Address	Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia		
Subsidiary (Certification Unit Name)	Strategic Operating Unit (SOU 7) – Bukit Kerayong Palm Oil Mill		
Address	Bukit Kerayong Road 42200 Kapar, Klang, Selangor, Malaysia		
Contact Name	Mdm. Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mr. Senthilkumaran Gopal (Mill Manager)		
Website	www.simedarbyplantation.com	E-mail	Kks.bk.kerayong@sime-darbyplantation.com
Telephone	+603-89478888 (HQ) +607-787 5100 (Mill)	Facsimile	03-78484356 (HQ)

2. Certification Information			
Certificate Number	RSPO 550181	Date of First Certification	15/04/2011
		Certificate Start Date	15/04/2016
		Certificate Expiry Date	14/04/2021
Scope of Certification	Production of Certified Sustainability Crude Palm Oil and Palm Kernel		
Applicable Standards	RSPO Principal & Criterial Malaysia National Interpretation 2019 with Identity Preserved Supply Chain Module		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 690368	MS 2530-3:2013 (MSPO Part 3) – General principles for oil palm plantations and organised smallholders	BSI Services Malaysia Sdn Bhd	13/03/2023
MSPO 682049	MS 2530-4:2013 (MSPO Part 4) – General principles for palm oil mills	BSI Services Malaysia Sdn Bhd	13/03/2023
MSPO 714128	MSPO Supply Chain Certification Standard	BSI Services Malaysia Sdn Bhd	31/07/2024

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4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Bukit Kerayong Palm Oil Mill	Jln Bukit Kerayong 42000 Kapar, Klang, Selangor, Malaysia	3° 11' 12.7" N	101° 22' 29.6" E
Bukit Kerayong Estate	Jalan Bukit Kerayong, 42200 Kapar, Klang, Selangor, Malaysia	3° 10' 31.3" N	101° 21' 00.5" E
Bukit Cheraka Estate	Jalan Jeram, 45809 Jeram, Selangor, Malaysia	3° 13' 38.6" N	101° 22' 01.7" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Cheraka Estate	3,388.70	55.52	203.40	3,647.62	92.90%
Bukit Kerayong Estate	2,797.76	3.00	211.30	3,012.06	92.88%
Total	6,186.46	58.52	414.70	6,659.68	92.89%

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bukit Cheraka Estate	520.54	1,057.14	1,762.15	48.87	0	2,868.16	520.54
Bukit Kerayong Estate	495.81	2115.4	186.55	0	0	2,301.95	495.81
Total (ha)	1,016.35	3,172.54	1,948.7	48.87	0	5,170.11	1,016.35

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (Apr 19 – Apr 20)	Actual (Jan – Dec 19)	Forecast (May 20 - Apr 21)
Bukit Cheraka Estate	60,229.01	66,113.76	64,735.17
Bukit Kerayong Estate	71,145.50	68,635.26	67,600.00
Volume Extension	28,080.21	n/a	n/a
Total	159,454.72	134,749.02	132,335.17

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (Apr 19– Apr 20)	Actual (Jan – Dec 19)	Forecast (May 20 – Apr 21)
Dusun Durian Estate	N/A	104.75	N/A
Total	N/A	104.75	N/A

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (Apr 19 – Apr 20)	Actual (Jan – Dec 19)	Forecast (May 20 – Apr 21)
Nil	N/A	N/A	N/A
Total	N/A	N/A	N/A

10. Certified Tonnage			
Mill Capacity: 30 MT/hr SCC Model: IP	Estimated (Apr 19 – Apr 20)	Actual (Jan – Dec 19)	Forecast (May 20 – Apr 21)
	FFB	FFB	FFB
	159,454.72	134,853.77	132,335.17
	CPO (OER: 21.32 %)	CPO (OER: 21.07 %)	CPO (OER: 20.00 %)
	34,000.49	28,418.57	26,467.03
	PK (KER: 5.46 %)	PK (KER: 5.12 %)	PK (KER: 4.89 %)
8,702.51	6,899.15	6,471.19	

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	15,735.68	-	-	9,287.95	25,023.63

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	1,982.27	-	-	4,094.56	6,076.83

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	N/A	N/A
IS-CSPKO	N/A	N/A
IS-CSPKE	N/A	N/A

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
 (ASI Accreditation Number: ASI-ACC-067)
 Suite 29.01 Level 29, The Gardens North Tower,
 Mid Valley City, Lingkaran Syed Putra,
 59200 Kuala Lumpur, Malaysia.
 Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
 Representative: Nicholas Cheong (Nicholas.Cheong#@bsigroup.com)
 Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK’s National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site annual surveillance assessment was conducted from 20-23 Jan 2020. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out through verification of CAP was conducted on off-site 10 Apr 2020. The verification was conducted off-site since the evidence was able to be submitted electronically to confirm the effectiveness of the CAP taken.

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. RSPO Principles & Criteria Malaysia National Interpretation 2019 and RSPO Supply Chain Certification Standard 2017 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 approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

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- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO 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 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

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

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification 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 / Supply Base)	Year 1 (RC)	Year 2 (ASA1_1)	Year 3 (ASA1_2)	Year 4 (ASA1_3)	Year 5 (ASA1_4)
Bukit Kerayong Palm Oil Mill	✓	✓	✓	✓	✓
Bukit Cheraka Estate	✓	✓	✓	✓	✓
Bukit Kerayong Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: January 11, 2021 - January 14, 2021

Total No. of Mandays: 10 mandays

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Hafriazhar Mohd Mokhtar	Team Leader	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands, Gabon, Nigeria and Pakistan. During assessment, he covered the Economic management plan, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV, and RSPO supply chain requirements. He is fluent in Bahasa Malaysia and English languages.
Elzy Ovktafia	Team Member	She graduated from Universiti Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters and currently in the midst of completing the AISP level (professional certificate and recognition from the Incorporated Society of Planters). She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Audit for Social Compliance Programme (URSA, ETI, etc) for 2 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for almost 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During this assessment, she assessed on the aspects of legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English.
Vijay Kanna Pakirisamy	Team Member	He holds a bachelor’s degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010. He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad. Throughout his 10 year tenure in the oil palm industry, he has been part of the operations team that implements standards within the estate such as RSPO, MSPO, ISCC and FINWATCH. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, endorsed RSPO P&C Lead Auditor Course in October 2019 and endorsed MSPO Lead Auditor Course in November 2019. During this assessment, he assessed on the aspects of Occupational, Health & Safety

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		and estate best practises. He is fluent in Bahasa Malaysia and English languages.
Muhammad Fadzli Masran	Team Member	Fadzli graduated in Bachelor of Forestry Science at University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers’ welfare, workers’ occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO9001 and ISO14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. Fluent in Bahasa Malaysia and English Language. During assessment, he covered the RSPO supply chain requirements.

Accompanying Persons:

No.	Name	Role
Nil	N/A	N/A

2.3 Assessment Plan

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

Date	Time	Subjects	HMM	EOC	VKP	MFM
Monday, 20/1/2020 Bukit Kerayong Estate	0830 – 0900	Opening Meeting at Bukit Kerayong Palm Oil Mill: <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 	✓	✓	✓	✓
	0900 - 1230	Bukit Kerayong Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill & etc.	✓	✓	✓	-
	1230 – 1330	Lunch break	✓	✓	✓	-

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Date	Time	Subjects	HMM	EOC	VKP	MFM
	1330 - 1630	Bukit Kerayong Estate: Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓	-
	1630 - 1700	Interim briefing	✓	✓	✓	-
Tuesday 21/1/2020 Bukit Cherakah Estate	0830 - 1230	Bukit Cherakah Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill & etc.	✓	✓	✓	-
	1230 - 1330	Lunch break	✓	✓	✓	-
	1330 - 1630	Bukit Cherakah Estate: Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓	-
	1630 - 1700	Interim briefing	✓	✓	✓	-
Wednesday 22/1/2020 Bukit Kerayong Palm Oil Mill	0830 - 1230	Bukit Kerayong Palm Oil Mill: Inspection of FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	✓	✓	✓	-
	1030 - 1230	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	✓	-	-
	1230 - 1330	Lunch break	✓	✓	✓	-

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Date	Time	Subjects	HMM	EOC	VKP	MFM
	1330 - 1630	Bukit Kerayong Palm Oil Mill: Lab, weighbridge and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation	✓	✓	✓	-
	1630 - 1700	Interim briefing	✓	✓	✓	-
Thursday, 23/1/2020	0830 – 1230	Supply chain audit for Bukit Kerayong Palm Oil Mill: <ul style="list-style-type: none"> • General COC for supply chain • RSPO rules communication and claim 	✓	-	-	✓
Bukit Kerayong Palm Oil Mill	1230 – 1330	Closing meeting	✓	-	-	✓

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Sime Darby Plantation Berhad Multiple Management Units / Time Bound Plan
- RSPO P&C 2018 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C Malaysia National Interpretation 2019

3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	Yes. Please refer to appendix B for details on the mills and estates of Sime Darby Plantations Berhad Group.	Complied
Have all the estates and mills certified within five years after obtaining RSPO membership?	<p>No, Target to receive certification for two management units [SDP Liberia and PT Mitra Austral Sejahtera (PT MAS)] shifted to end 2020:</p> <ul style="list-style-type: none"> - SDP Liberia operation has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was put on-hold due to security & safety issue. After due consideration on the current engagement with the House of Representative in Liberia, the time bound plan of RSPO Certification for SDP Liberia is set to 2019/2020 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process. The progress of the above is under management monitoring for readiness towards certification. - SDP has also been addressing the legacy social issues at PT MAS and regularly updating the progress status to resolve this case to RSPO and other relevant stakeholders. 	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	Yes, two newly acquired management units under Markham Farming Company Limited are targeted for certification by end 2020.	Complied

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<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Yes, changes due to issue in Liberia concession and two newly acquired management units under Markham Farming Company Limited that were targeted for certification by end 2020. This was consistent with RSPO Annual Communications of Progress 2019 reporting.</p>	<p>Complied</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>No, there has not been any isolated lapses.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>No, there is no fundamental failure.</p>	<p>Complied</p>
<p>Un-Certified Units or Holdings</p>		
<p>No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. </p>	<p>Replacement took place in newly acquired units in Papua New Guinea, Markham Farms. The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore the Remediation and Compensation Procedure will be required to be fulfilled in order to achieve certification. The Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEJIA and LUCA are being undertaken in order to submit the mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration.</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>As above, the Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEJIA and LUCA are being undertaken in order to submit the mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration.</p>	<p>Complied</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6. The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the</p>	<p>Based on RSPO RACP tracker, a total of 17 Management Units with potential liability, 15 LUCA submitted, 14 Concept Note approved and 14 Compensation Plan submitted.</p>	<p>Complied</p>

Liabilities shall be verified and reported.		
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labour dispute reported in the uncertified units.	Complied
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance reported in the uncertified units.	Complied
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes. As part of the RSPO P&C compliance, internal audit has been conducted at the uncertified units. Report of improvement was provided for site's further improvement.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes. Stakeholders including NGO were consulted in the uncertified units.	Complied

3.3 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable	N/A

3.4 Details of findings

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

During the Annual Surveillance Assessment 1-4 2020, there were two (2) Critical (Major) and five (5) Minor nonconformities raised. The SOU Bukit Kerayong Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

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Non-conformity			
NCR Ref #	1874552-202001-M1	Clause & Category (Major / Minor)	RSPO P&C MYNI 2019 Indicator 6.2.3 (Critical/Major)
Date Issued	23/1/2020	Due Date	21/4/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	10/4/2020
Statement of Nonconformity:	The legal labour requirements was not fully demonstrated.		
Requirement Reference:	There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.		
Objective Evidence:	<p>1. In Bukit Kerayong Estate, sighted on estate daily attendance report and pay slip for Muhammad Shahir Bin Ismail (Employee ID: 0000155534) that he worked on his rest day on 13 & 20 Oct 2019 but being paid with normal rate.</p> <p>2. In Bukit Kerayong POM, found that Latchumy (Employee ID: 00006767) and Kavitha (Employee ID: 000006776) has worked at night shift after 10 pm without having the Permit for Female Nightshift by Labour Department as below:</p> <p>Kavitha:</p> <ol style="list-style-type: none"> 1. 2/08/2019: 1526-2301 2. 3/08/2019: 1513-2256 3. 8/08/2019: 1533-2300 4. 13/08/2019: 1502-2306 5. 16/08/2019: 1500-2300 6. 24/08/2019: 0804-2300 7. 30/08/2019: 0756-2306 8. 7/10/2019: 1509-2300 9. 9/10/2019: 1511—2300 10. 10/10/2019: 1510-2258 11. 21/10/2019: 1511-2306 12. 18/12/2019: 1458-2304 <p>Latchumy:</p> <ol style="list-style-type: none"> 1. 6/8/2019: 1453-2303 2. 7/8/2019: 1512-2308 3. 9/8/2019: 1506-2300 4. 17/8/201: 1454-2218 5. 19/8/2019: 1445-2259 6. 20/8/2019: 1450-2231 7. 21/8/2019: 1453-2256 8. 22/8/2019: 1452-2308 		

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	<p>9. 23/8/2019: 1449-2319</p> <p>10. 26/8/2019: 1454-2250</p> <p>11. 2/10/2019: 1457-2230</p> <p>12. 3/10/2019: 1457-2305</p> <p>13. 5/10/2019: 1652-2300</p> <p>14. 12/10/2019: 1803-2306</p>
Corrections:	<p>Estate management together with PIC has checked back the data in the system with the AP schedule. The amount of salary underpaid has been verified and paid to the affected employees on 22nd January 2010.</p> <p>Mill management has apply permit on "Sekatan Kerja Malam Bagi Pekerja-Pekerja Wanita" from JTK on 19th February 2020 and until then Mill management will impose time limitation to received FFB from supplying estate which is not later than 9pm</p>
Root Cause Analysis:	Lack of mechanism to ensure compliance to legal labour requirement
Corrective Actions:	<p>Training on payroll system and verification procedure to estate personal and person In-charge to ensure no hiccup in the data entry process.</p> <p>SQM with the assistance of regional HR will organise a training on labour legal compliance for mill and estate personnel tentatively in May/June 2020</p>
Assessment Conclusion:	<p>Major NC close out verification:</p> <p>Corrective action plan taken was verified as per evidence submitted as following:</p> <ul style="list-style-type: none"> - Cash payment voucher # CV01/2020-18 dated 22/1/2020 - Application of permit accepted by JTK Pelabuhan Klang dated 19/2/2020 - Training records dated 22/1/2020 - Training plan for May/June 2020 <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 10/4/2020. Continuous implementation will be further verified in the next audit.</p>

Non-conformity			
NCR Ref #	1874552-202001-M2	Clause & Category (Major / Minor)	RSPO P&C MYNI 2019 Indicator 3.6.1 (Critical/Major)
Date Issued	23/1/2020	Due Date	21/4/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	10/4/2020
Statement of Nonconformity:	HIRARC for ramp lever operator was not assessed		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		

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Objective Evidence:	Sampled the HIRARC at the BKEPOM for the Ramp workstation (SOP No.: BKOM/07/09-16; SOP Title: BKOM-OO-RAMP; Review Date: 3/1/2019), the HIRARC did not identify the hazards of the lever operator below the ramp. During the site visit at the mill it was sighted the lever operator working on the raised platform while sitting on a high chair. The possible hazards include slip and fall due to slippery surface, falling from height, etc.
Corrections:	Mill management will conduct and review the HIRARC assessment for their operation including ramp lever operator schedule in April/May 2020
Root Cause Analysis:	HIRARC assessment mechanism at BKOM is inadequate as the assessment is not been conducted thoroughly.
Corrective Actions:	SQM will conduct refresher training on HIRARC procedure for operation personal and to ensure the HIRARC assessment covers all operation and its' activities.
Assessment Conclusion:	Major NC close out verification: Corrective action plan taken was verified as per evidence submitted as following: - HIRARC form ref. # BKOM-00/RAMP review dated 2/3/2020 - Training records dated 22/1/2020 - Training plan for May/June 2020 Evidence shown the CAP was found to be effective thus the major NC was closed on 10/4/2020. Continuous implementation will be further verified in the next audit.

Non-conformity			
NCR Ref #	1874552-202001-N1	Clause & Category (Major / Minor)	RSPO P&C MYNI 2019 Indicator 4.2.3 (Minor)
Date Issued	23/1/2020	Due Date	22/1/2021
Closed (Yes / No)	No	Date of nonconformity Closure	N/A
Statement of Nonconformity:	No evidence that the unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders		
Requirement Reference:	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.		
Objective Evidence:	<p>Any repairs required by Internal Stakeholders need to fill-up the House Repair Requisition Form.</p> <p>Sample taken on House No WQ-47; Mr Kumaren dated 25th June 2019 on leaking washing basin, damage of concrete drain and faulty lamp.</p> <p>Faulty lamp being repaired by the Mill Charge-man. However, other repairs which incurred higher cost a quotation is required as the work will be outsourcing.</p> <p>Sample taken on the quotation being obtained from contractor, Biglenz Tech Services on 4th November 2019 and work has been approved on 12th November 2019 through Doc No 4300487407. Seen, the invoice under No 0000030 being submitted on 18th November 2019.</p>		

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	No evidence, all the repairs being resolved in an effective, timely and appropriate manner, which is accepted by all parties as per Plantation Quality Management System, Level 2, Standard Operation Manual Sub –Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1 Year 2008, Issue No 1 dated 1st Nov 2008 under Clause 6.3.
Corrections:	To brief workers on current financial situation that will affect the effectiveness and timeline for housing repair. Management will propose any defect will resolve within 6 month.
Root Cause Analysis:	A mechanism to monitor grievances is not in place
Corrective Actions:	To have a guideline on the complaint procedure to and communicate to all employees
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.

Non-conformity			
NCR Ref #	1874552-202001-N2	Clause & Category (Major / Minor)	RSPO P&C MYNI 2019 Indicator 2.2.2 (Minor)
Date Issued	23/1/2020	Due Date	22/1/2021
Closed (Yes / No)	No	Date of nonconformity Closure	N/A
Statement of Nonconformity:	The sampled contractor for Bukit Kerayong POM is not fully meet the applicable requirements related to Employment Act 1955		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
Objective Evidence:	<p>In Bukit Kerayong POM, Lotus Two Enterprise has signed the Vendor Integrity Pledge (as due diligence) on 22/01/2020 and declaration to follow RSPO/ISCC/MSPO on 10/12/2019.</p> <p>However found non-compliance as below:</p> <ol style="list-style-type: none"> 1. There is one worker named Mehdi Hassan with working permit for Toranor Sdn Bhd as Construction Worker temporarily work at Lotus Two Enterprise letter dated 17/07/2019. 2. Pay slips for Romel, Hasan Sheikh and Mehdi Hassan for January 2020, Dec 2019 and Nov 2019 has no SOCSO contribution. LotusTwo Enterprise has continue the FWCS subscription from 01 May 2019- 01 May 2020. 3. The duration of contract is 8 years as stated in the employment contract. 		
Corrections:	- To request temporary work permission letter from Torrano Sdn Bhd to Lotus Two		

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	<ul style="list-style-type: none"> - To register Romel and Hasan Sheikh for SOCSO with immediate effect - To amend the duration of the contract to 3 years
Root Cause Analysis:	Lack of mechanism to monitor the contractor’s operation including their compliance to legal requirement
Corrective Actions:	Briefing to contractor is schedule in June/July on applicable legal requirement and monitoring of contractor will be conducted during internal audit which is schedule in December 2020.
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.

Non-conformity			
NCR Ref #	1874552-202001-N3	Clause & Category (Major / Minor)	RSPO P&C MYNI 2019 Indicator 7.12.7 (Minor)
Date Issued	23/1/2020	Due Date	22/1/2021
Closed (Yes / No)	No	Date of nonconformity Closure	N/A
Statement of Nonconformity:	Outcomes of this monitoring are not fed back into the management plan for the new planting area of Ex-Quarry which found with slopes more than 25 degree not been control its erosion		
Requirement Reference:	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.		
Objective Evidence:	<p>Based on the Internal Social & Environment Impact Assessment (SEIA) Report (RSPO – New Planting Procedure) SOU 7 Bukit Cheraka Estate; Prepared by: GSQM Department, Sime Darby Plantation Berhad November 2018 – summary of project area:</p> <p>Current field: P01 Nature of Area: Ex-quarry Year of conversion: 2019 Area: 0.8 Ha</p> <p>Under EIA Matrix & Findings – 3.4 Soil erosion and sedimentation of silt:</p> <ul style="list-style-type: none"> - Prohibited activities of oil palm plantation development or clearing - any oil palm plantation development activities or land activities are not allowed on a slope of 25 degree or more - Boundary slope of 25 degree or more shall be measured prior to the development of oil palm plantation activities or clearing activities initiated in the project and must achieve a measurement accuracy of class 3 standard 		

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	<ul style="list-style-type: none"> - Measurement plan for slope of 25 degree or more with a minimum scale of 1: 25,000 shall be monitored along with latitude and longitude readings before any oil palm plantation development activities or land clearing activities commence - Boundary slope of 25 degree or more that have been measured, shall be marked on field with red paint and signage installed in conspicuous locations by oil palm plantation development activities initiated in the project
Corrections:	<ul style="list-style-type: none"> - Proper signages were installed in the area and estate management planned to barricade the area should the cost is permissible. - Legume cover crops such as Pueraria Javanica, Calopogonium Mucunoides and Mucuna Bracteata were establish in the area and to cover the slope area to promote root growth holding the soil together. - Announcement on the area and safety precaution to be taken while conducting operation around the area have been given to the workers during muster briefing. - Briefing on safety issue and environmental issue related to the area were given to the backhoe driver (contractor).
Root Cause Analysis:	Lack of mechanism to monitor slope area
Corrective Actions:	<ul style="list-style-type: none"> - To cease all work at the slope area which will increase the risks on that area. - SQM will organize a training on biodiversity and HCV monitoring for SOU Bk Kerayong schedule in June/July 2020
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.

Non-conformity			
NCR Ref #	1874552-202001-N4	Clause & Category (Major / Minor)	RSPO P&C MYNI 2019 Indicator 3.3.2 (Minor)
Date Issued	23/1/2020	Due Date	22/1/2021
Closed (Yes / No)	No	Date of nonconformity Closure	N/A
Statement of Nonconformity:	Procedures were not fully implemented in accordance with the MQMS		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<p>The Mill Quality Management System under the Occupational Safety Health Manual, Chapter 9 (Chemical Safety Management) states under No. 6.0 Procedures for Handling, iii. Ensure that containers is properly labelled, not damaged and no spillage during handling.</p> <p>During the site visit at the mill it was sighted 3 unlabelled containers stored with diesel and 3 unlabelled containers stored with lubricant.</p>		
Corrections:	To put labelling on temporary container use to store diesel and lubricant at the workshop		

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Root Cause Analysis:	Inadequate training mechanism on company's procedure
Corrective Actions:	To conduct refresher training on chemical handling and OSH manual to all employee involve with chemical.
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.

Non-conformity			
NCR Ref #	1874552-202001-N5	Clause & Category (Major / Minor)	RSPO P&C MYNI 2019 Indicator 6.7.2 (Minor)
Date Issued	23/1/2020	Due Date	22/1/2021
Closed (Yes / No)	No	Date of nonconformity Closure	N/A
Statement of Nonconformity:	First Aid Kits were sighted to contain items without labels and expiry dates.		
Requirement Reference:	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		
Objective Evidence:	During the site visit the first aid kit was sampled at 3 locations, namely the Workshop, Harvesting Gang and Manual Weeding Gang. The first aid kit handled by the harvesting gang was noticed to have insufficient items inside, as the Dettol was not available in the box. The Dettol Container handled by the Manual Weeding Gang had no label and expiry date attached to it. All 3 First Aid Kits were not monitored regularly to monitor the usage and balance of the supplies.		
Corrections:	<ul style="list-style-type: none"> - Review First Aid Kit Training and replenish all the first aid box in the estate - Appoint PIC (Tuan Abdul Aziz – Assistant Manager Bukit Kerayong Estate) to monitor first aid kit – Usage /Balances etc. 		
Root Cause Analysis:	Lack of mechanism to monitor first aid kit supply in the premises		
Corrective Actions:	<ul style="list-style-type: none"> - Create new monitoring record book and keep by PIC. - Review and revised First Aid Kit Contents and distribute to each First Aid Kit Box - To request assist from neighbourhood Medical Assistant (Bukit Cheraka Estate) to do regular check on the usage, first aid kit condition and also to train all the first aid kit representative from each workers gang. 		

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Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.
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Opportunity for Improvements	
OFI #	Description
Nil	N/A

Positive Findings	
PF #	Description
PF 1	Stakeholder interview – mostly positive feedbacks
PF 2	Good continuous improvement program implementation generally for productivity and safety aspects
PF 3	Cleanliness and good maintenance at worker’s housing
PF 4	Good documents retrieval

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1733442-201901-M1	Clause & Category (Major / Minor)	RSPO P&C MYNI 2014 Indicator 4.6.6 (Major)
Closed (Yes / No)	Yes	Date of nonconformity Closure	11/3/2019
Statement of Nonconformity:	The premix chemical was not stored under lock and key.		
Requirement Reference:	Storage of all pesticides shall be according to recognized best practices.		
Objective Evidence:	Bukit Cherakah Estate: During site visit at the chemical premixing area, sighted that the premix chemical were not kept under lock and key. The area can be access by any workers and was not secured.		
Correction/containment	Estate management to install a fencing surround the chemical premix area.		
Cause	The management not aware on the installation of lock area as the establishment premix in big tank proposed earlier is to easier handling and increase the productivity (save time for premixing work).		
Corrective Actions:	The mixer operator is allowed to enter in the premix area during the operation and the keys will be kept by field staff, G. Davan after finish works. For the safety and security, the AP’s is a responsible person to ensure that area in properly order.		

Assessment Conclusion:	<p>ASA 1-4 verification: Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. CAP implementations were effectively evidence. Hence, Major NC remained closed.</p>
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Non-conformity			
NCR Ref #	1733442-201901-N1	Clause & Category (Major / Minor)	RSPO P&C MYNI 2014 Indicator 2.1.3 (Minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	20/1/2020
Statement of Nonconformity:	Mechanism for ensuring compliance was not effectively implemented.		
Requirement Reference:	A mechanism for ensuring compliance shall be implemented.		
Objective Evidence:	<p>i) Diesel permit has expired since 18/12/17. Noted a few application for renewal in 2018 for renewal however rejected. The latest application was done on 18/1/19 via BLESS, reference number BL22018030610.</p> <p>ii) Water Abstraction License under Lembaga Urus Air Selangor has expired on 31/7/18. Stipulated in the permit, renewal of permit should be done 3 month before expiry.</p>		
Correction/containment	Mill management follow up the status of the renewal permit directly to the KPDNKK and LUAS office. The renewal in the midst progress.		
Cause	<p>i) Mill management left out the renewal follow up for diesel permit as it has been rejected from previous application.</p> <p>ii) Mill management left out for water abstraction license renewal -Notification from BLESS system also got problem and pending status in the portal.</p>		
Corrective Actions:	Mill management improved and tightly monitor on any follow up matters especially for renewal license or permit. AAO is a person in charge to monitor and renewal process. The renewal will be carry out within three months early before expiry.		
Assessment Conclusion:	<p>ASA 1-4 verification: Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence sighted as following:</p> <ul style="list-style-type: none"> - Schedule control goods (Diesel) permit ref. # B.PGK.SEL/5782; Serial # P:B000078SA; Storage quantity: 15,000 liters; Validity period: 15/2/2019 – 14/2/2020 - Water Abstraction License; Validity period: 1/8/2019 – 31/7/2020 - Energy commission license # 2019/01120; Serial # 35432; Validity period: 25/05/2019 – 24/05/2020 for 2,640 kW installation capacity <p>CAP implementations were effectively evidence. Hence, Minor NC has been closed on 20/1/2020.</p>		

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Non-conformity			
NCR Ref #	1733442-201901-N2	Clause & Category (Major / Minor)	RSPO P&C MYNI 2014 Indicator 6.12.2 (Minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	20/1/2020
Statement of Nonconformity:	The contractor's worker contract has been substituted from original employer to Lotus Two Enterprise Sdn Bhd.		
Requirement Reference:	Where applicable, it shall be demonstrated that no contract substitution has occurred.		
Objective Evidence:	<p>In BKPOM Worker, sighted that 2 contractor's worker (employee of Lotus Two Enterprise Sdn Bhd) are having the different employer's name as below:</p> <p>1) Nilchan, passport no: BR0129087 valid until 11.03.2019 (Employer: Junjungan Pelangi Sdn Bhd), employed as cleaner.</p> <p>2) Rahman Md Hafizur, passport no: BQ0685859 valid until 25 July 2019 (Employer: Hua Hin Furniture Manufacture Sdn Bhd) employed as factory worker.</p>		
Correction/containment	<p>Mill management will take immediate action as per below :</p> <ul style="list-style-type: none"> - Terminate the existing contract worker who are not belongs to Lotus Two Enterprise Sdn Bhd. 		
Cause	All the documentations for the contractor workers is available and monitored by the Mill Management. However we are misunderstanding on the different employer name in the registered permit.		
Corrective Actions:	<p>The SDP in the midst develop the Contractor Worker Management Procedure. Based on the drafted procedure:</p> <ul style="list-style-type: none"> • OU Management to ensure all contracts/ purchase orders contain full terms and conditions which include but not limited to the following: <ul style="list-style-type: none"> • i. To ensure that the workers that the contractor employs possess valid work permit if the workers employed are not Malaysian citizen. • OU Management to obtain and maintain the photocopy of the following documents from contractors: <ol style="list-style-type: none"> 1. Identity Card (IC) for Malaysian 2. Passport and valid work permit for non-Malaysian • OU Management to conduct periodic spot check to ensure that only workers registered with the OU Management are within the premises. 		
Assessment Conclusion:	<p>ASA 1-4 verification:</p> <p>Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence for labour agent and contractors, Sime Darby has applied its Vendor COBC (30 May 2018), It includes the Fair Business practices-ensuring that we promote fair business practices and compete in an ethical manner, labour & human rights, ethics & management practices. The Vendor Integrity Pledge available and signed by Xin Yong Tractors Earth Works (26th June 2019) and BMSPV Enterprise (26th June 2019) at Bukit Kerayong Estate. In Bukit Cheraka Estate, sighted the sampled of contractors document available for KSG Enterprise Sdn Bhd (08/07/2019) and Yih Construction Sdn Bhd (08/07/2019) while in Bukit Kerayong POM, sighted sample for Lotus Two</p>		

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	Enterprise (22/01/2020). CAP implementations were effectively evidence. Hence, Minor NC has been closed on 20/1/2020.
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Non-conformity			
NCR Ref #	1733442-201901-N3	Clause & Category (Major / Minor)	RSPO P&C MYNI 2014 Indicator 4.7.3 (Minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	20/1/2020
Statement of Nonconformity:	Employee awareness regarding the importance of PPE usage are not effectively demonstrated		
Requirement Reference:	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.		
Objective Evidence:	Bukit Kerayong POM: Sighted during site visit at the boiler, the workers were not wearing proper PPE when supplying the fiber into the boiler. The condition are not conducive as the workers have to inhale the fibre dust throughout the working hours and can cause occupational health disease.		
Correction/containment	Mill management will take immediate action as per below : - Terminate the existing contract worker who are not belongs to Lotus Two Enterprise Sdn Bhd.		
Cause	Mill management left out to identify the actual hazard for fiber fuel dust and the actual control measure at boiler station.		
Corrective Actions:	The HIRARC review team consist all the level PIC in the mill and Manager as a chairman. The review will be carry out on quarterly basis (during OSH meeting). The review will discuss the effectiveness of the recommended control.		
Assessment Conclusion:	ASA 1-4 verification: Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence management has established HIRARC review team. The HIRARC was reviewed at minimum once a year and when necessary as per accident happen. Sampled review was conducted on 11/01/2019 due to accident happen on 04/01/2019. CAP implementations were effectively evidence. Hence, Minor NC has been closed on 20/1/2020.		

Non-conformity			
NCR Ref #	1733442-201901-N4	Clause & Category (Major / Minor)	RSPO P&C MYNI 2014 Indicator 4.7.5 (Minor)

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Closed (Yes / No)	Yes	Date of nonconformity Closure	20/1/2020
Statement of Nonconformity:	Monitoring of the First Aid Box was not effectively implemented.		
Requirement Reference:	Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.		
Objective Evidence:	Bukit Cherakah Estate: Sighted during site visit at the harvesting gang (P09), it was noted that the antiseptic solution don't have any information regarding the expiry date. Sighted during site visit at the workshop and premix area (Bukit Cloh Division), it was noted that the antiseptic solution don't have any information regarding the expiry date and the iodine solution was expired.		
Correction/containment	The estate management will dispose any expired medicine and do a replacement for all items required in the first aid box. The checklist is in accordance Fourth Schedule First Aid Guideline.		
Cause	New Medical Assistant appointed on 2nd January 2019 is in progress clearing all expired medicine as former Hospital Assistant left without replacement since July 2018. The ordering and receiving all clinical item is in progress.		
Corrective Actions:	To enforce the monthly checking by MA		
Assessment Conclusion:	ASA 1-4 verification: Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence where First Kit Training was provided to the first aiders on the 19 November 2019. Visit to the worksites exhibited the worksites such as Stores, Boiler Station areas had first aid kits and first aiders on site. The First aid kits were regularly monitored and had sufficient supplies. Temporary Medical Assistant from Bukit Cheraka assisting while awaiting the new appointment. CAP implementations were effectively evidence. Hence, Minor NC has been closed on 20/1/2020.		

Opportunity for Improvement	
OFI#	Description
OFI 1	-Nil-

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1288557M1	Major	4.7.1	22/1/2016	Closed on 20/3/2016
1288557M2	Major	5.3.3	22/1/2016	Closed on 20/3/2016
1288557M3	Major	5.6.2	22/1/2016	Closed on 20/3/2016
1288557M4	Major	6.5.2	22/1/2016	Closed on 20/3/2016

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1288557M5	Major	4.6.11	22/1/2016	Closed on 20/3/2016
1288557M6	Major	4.1.1	22/1/2016	Closed on 20/3/2016
1288557N1	Minor	5.6.3	22/1/2016	Closed on 19/1/2017
1288557N2	Minor	6.2.3	22/1/2016	Closed on 18/1/2017
1288557N3	Minor	4.7.5	22/1/2016	Closed on 19/1/2017
1426255-201701-M1	Major	6.5.2	19/01/2017	Closed on 14/4/2017
1426255-201701-M2	Major	2.1.1	19/01/2017	Closed on 14/4/2017
1426255-201701-M3	Major	5.3.3	19/01/2017	Closed on 14/4/2017
1426255-201701-N1	Minor	6.9.3	19/01/2017	Closed on 18/01/2018
1426255-201701-N2	Minor	4.6.10	19/01/2017	Closed on 18/01/2018
1581966-201801-M1	Major	4.7.1	18/01/2018	Closed on 18/03/2018
1581966-201801-M2	Major	SCCS 5.3.1	18/01/2018	Closed on 18/03/2018
1581966-201801-M3	Major	SCCS 5.3.2	18/01/2018	Closed on 18/03/2018
1581966-201801-M4	Major	SCCS 5.8.1	18/01/2018	Closed on 18/03/2018
1581966-201801-M5	Major	SCCS 5.8.2	18/01/2018	Closed on 18/03/2018
1581966-201801-M6	Major	SCCS 5.13.1	18/01/2018	Closed on 18/03/2018
1581966-201801-M7	Major	SCCS 5.13.2	18/01/2018	Closed on 18/03/2018
1581966-201801-M8	Major	5.13.3	18/01/2018	Closed on 18/03/2018
1581966-201801-N1	Minor	5.1.2	18/01/2018	Closed on 25/01/2019
1733442-201901-M1	Major	4.6.6	25/01/2019	Closed on 11/03/2019
1733442-201901-N1	Minor	2.1.3	25/01/2019	Closed on 20/01/2020
1733442-201901-N2	Minor	6.12.2	25/01/2019	Closed on 20/01/2020
1733442-201901-N3	Minor	4.7.3	25/01/2019	Closed on 20/01/2020
1733442-201901-N4	Minor	4.7.5	25/01/2019	Closed on 20/01/2020
1874552-202001-M1	Major	6.2.3	24/01/2020	Closed on 10/4/2020
1874552-202001-M2	Major	3.6.1	24/01/2020	Closed on 10/4/2020
1874552-202001-N1	Minor	4.2.3	24/01/2020	Open
1874552-202001- N2	Minor	2.2.2	24/01/2020	Open
1874552-202001- N3	Minor	7.12.7	24/01/2020	Open
1874552-202001- N4	Minor	3.3.2	24/01/2020	Open
1874552-202001- N5	Minor	6.7.2	24/01/2020	Open

3.5 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Bukit Kerayong Palm Oil Mill and Supply Base Certification Unit’s environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO 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 later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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 below.

List of Stakeholders contacted	
<p>Internal Stakeholders</p> <p>General workers Mill operators Harvesters Sprayers Gender committee representative</p>	<p>Local communities/Union/Contractors</p> <p>Masjid Nurul Hidayah representatives Mill vendors (contractors & suppliers) Estate vendors (contractors & suppliers) Estate sundry shop operators NUPW representatives</p>
<p>Government Departments</p> <p>JTK Kuala Selangor SK Bukit Kerayong SJKT Ladang Bukit Kerayong SJKT Ladang Jalan Acob</p>	<p>NGO</p> <p>Nil</p>

IS #	Stakeholders comment
1	<p>Feedbacks: <u>Imam Masjid Nurul Hidayah</u> - There is a good relationship between community and Sime Darby-Bukit Cheraka Estate’s management. No encroachment to villager’s land or wildlife. The neighbourhood of Bukit Cheraka Estate is mainly for housing development. They also involved in the past stakeholder meeting in 2019, which conducted combined with Bukit Kerayong Estate and mill.</p>
	<p>Management Responses: Noted on the information.</p>
	<p>Audit Team Findings: No other issue.</p>

<p>2</p>	<p>Feedbacks: <u>Supplier (Yung Sheng H/W Machinery)</u> The only relationship between Yung Sheng is on the hardware supplier to Bukit Cheraka Estate. The agreement is available and signed between both parties. Payment received within 1 month from the invoicing date. They have been briefed on MSPO/RSPO and company policies requirement in HQ. No other complaint.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No other issue.</p>
<p>3</p>	<p>Feedbacks: <u>NUPW Representative (Bukit Cheraka Estate & Bukit Kerayong Estate)</u> The management has solved all complaints from workers. The method of lodge a complaint is through complaint book, verbal and letter. NUPW plays the big role on the complaint issue. The latest MAPA/NUPW collaborative agreement has been explained to the workers. The selection of the NUPW representatives was made through election of NUPW members. There is one concern which is the locals only can use government hospital/clinic while foreigners will use private hospital/clinic.</p> <p>Management Responses: Noted on the information. The reason why locals need to use government clinic/hospital is because the cost, because government provide subsidize rate to locals while for foreign workers will be charged with expensive rate.</p> <p>Audit Team Findings: No other issue.</p>
<p>4</p>	<p>Feedbacks: <u>Gender Committee Representatives (SOU 7)</u> - No sexual harassment reported so far. Gender committee meeting conducted quarterly and minutes of meeting is established. There is new topic discussed, which is on the new mother's need where the need to breastmilk pump time-off. Activities like Zumba, company trip, cooking, etc.</p> <p>Management Responses: - Noted on the information.</p> <p>Audit Team Findings: - No other issue.</p>
<p>5</p>	<p>Feedbacks: <u>Government Officer SJK(T) Ladang Bukit Kerayong, SJK(T) Ladang Jalan Acob & SK Bukit Kerayong.</u> Sime Darby management gives good support and contribution to the school management such as providing the grasscutting services, road repairs, paint for building, etc.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No other issue.</p>
<p>5</p>	<p>Feedbacks:</p>

	<p><u>Jabatan Tenaga Kerja-Kuala Selangor (Mr. Shafie)</u> The extension of expiry date letter from the approved salary deduction earlier by JTK to all employer is only applicable if the employer has obtain the JTK permit earlier. Lawful deduction can be referred to Section 24 under Employment Act 1955 for reference.</p>
	<p>Management Responses: Noted on the information.</p>
	<p>Audit Team Findings: No other issue.</p>



List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Bukit Cheraka Estate (Guthrie Plantation)	Until 2008	2,104.34	Yes	No	Yes, ownership changed due to company merging as Sime Darby
Bukit Kerayong Estate (Guthrie Plantation)	Until 2008	3,368.50	Yes	No	Yes, ownership changed due to company merging as Sime Darby

Previous land owner / user comment	
Nil	Feedbacks: N/A
	Management Responses: N/A
	Audit Team Findings: N/A

3.6 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 consist of Hafriazhar Mohd. Mokhtar as Audit Team Leader, Elzy Ovktafia, Vijay Kanna and Muhammad Fadzli as Audit Team Members.

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Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Bukit Kerayong Palm Oil Mill and Supply Base has complied with the RSPO P&C MYNI 2019, RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Bukit Kerayong Palm Oil Mill and Supply Base is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Hafriazhar Mohd. Mokhtar	Name: Noor Arizan Ahmad
Company Name: BSI Services Malaysia Sdn. Bhd.	Company Name: Sime Darby Plantation Berhad
Title: Lead Auditor	Title: SOU 7 Chairman
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> Sime Darby Plantation Berhad Bukit Cheraka Estate (647766-V)  NOOR ARIZAN BIN AHMAD Senior Manager
Date: 13/4/2020	Date: 15/4/2020

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
<p>Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
1.1.1	(C) Documents that are specified in the RSPO P&C are made available to the public.	<p>Documents required for all unit of certification available in Bukit Kerayong Certification Unit:</p> <ul style="list-style-type: none"> • Land titles/user rights • Occupational health and safety plans • Plans and impact assessments relating to environmental and social impacts • HCV documentation • Pollution prevention and reduction plans • Details of complaints and grievances • Continuous improvement plans • Public summary of certification assessment report • Human Rights Policy • Summary report of contributions to community development 	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	SOU 7 has conducted meeting with the stakeholder to share any new information on RSPO certification, environmental, social, safety and legal requirement applied to all operating units. All the stakeholders has raised some issue and discussed with the management during the meeting. Sighted the latest minutes meeting for whole SOU 7 conducted on 04/12/2019 at Dewan Komuniti Ladang Bukit Cheraka.	Complied

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<p>1.1.3</p>	<p>(C) Records of requests for information and responses are maintained.</p>	<p>Request by stakeholders conducted through stakeholders meeting, letter and forms. The mill and estates maintain the records of all request and response. Sighted the records of request from the stake holders as follows: Bukit Kerayong Estate:</p> <ol style="list-style-type: none"> 1. Request & response to use field at Jalan Acob on 2019 for Pendidikan Jasmani and Kokurikulum from SJK(T) Ladang Jalan Acob on 08/01/2019. 2. Request & response to open check post and water tank for Thaipusam on 17-21/01/2019. <p>Bukit Cheraka Estate:</p> <ol style="list-style-type: none"> 1. Request & response to take out own cows from estate 24/12/2019. 2. Request & response to take out own FFB using the estate road on 14/01/2020. <p>Bukit Kerayong POM:</p> <ol style="list-style-type: none"> 1. Request & response to take mill waste such as EFB and POME for research purpose from UiTM Shah Alam on 23/10/2019. <p>Request & response for contribution for Majlis Hari Anugerah Kecemerlangan Dan Graduasi Tahun 6 on 22-23/11/2018 from PIBG SK Bukit Kerayong-RM300.</p>	<p>Complied</p>
<p>1.1.4</p>	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. This has been communicated to workers and stakeholders through:</p> <ol style="list-style-type: none"> 1. Stakeholder meeting on 04/12/2019 at Dewan Komuniti Ladang Bukit Cheraka. 2. Muster briefing conducted to workers on 02/01/2019. 	<p>Complied</p>

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		The person in charge for communication and consultation is Muhammad Zubair bin Roslan on 11/03/2019 (Bukit Kerayong Estate) and Khairul Shahrin on 01/02/2019 (Bukit Kerayong POM).	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.	<p>The latest stakeholders list updated as at January 2020. Stakeholder's details available included person in charge, address, e-mail and contact number.</p> <p>Example as below:</p> <ol style="list-style-type: none"> 1. Bukit Kerayong Estate: Contractor (KSG Enterprise Sdn Bhd, Mr Tan Wei Kuan. Simpang Tiga Ijok, Batang Berjuntai, Selangor. 2. Bukit Kerayong POM: Supplying Estate (Ladang Bukit Talang, Mahadzir bin Md Kassim, Kuala Selangor). <p>Bukit Cheraka Estate: Contractor (RCLS Enterprise, Mr Chandran Subramaniam, Kampung Simpang Tiga, Jeram, Selangor)</p>	Complied
Criteria 1.2			
The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	<p>SDPSB has implemented policy on code of ethical conduct and integrity (Code of Business Conduct- COBC) which covered all operations in the plantation operation. Briefing session was given to all workers at visited operating units. For example, briefing of policies were given to the estate workers on 02.01.19 (Bukit Kerayong Estate) and 08.01.19 (Bukit Cheraka Estate) and during induction training prior to work for the new workers.</p> <p>For labour agent and contractors, Sime Darby has applied its Vendor COBC (30 May 2018), It includes the Fair Business practices-ensuring that we promote fair business practices and compete in an ethical manner, labour & human rights, ethics & management practices. The Vendor Integrity Pledge available and signed by Xin Yong Tractors Earth Works (26th June 2019) and BMSPV Enterprise (26th June 2019) at Bukit Kerayong Estate. In Bukit Cheraka Estate, sighted the sampled of contractors document available for KSG Enterprise Sdn Bhd (08/07/2019) and Yih Construction Sdn Bhd (08/07/2019) while in Bukit Kerayong POM, sighted sample for Lotus Two Enterprise (22/01/2020).</p>	Complied

1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	The overall ethical business practice were regularly monitored through the internal audit conducted by the SQM team on 21/10/2019 – 25/10/2019 for SOU 7. Based on the Code of Business Conduct, it explains where to get guidance, raising a concern or reporting a violation. This is been brief to the worker during morning muster and stakeholder meeting.	Complied
<p>Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	(C) The unit of certification complies with applicable legal requirements.	<p>SOU7 had continued to comply with the legal requirements applicable to its operation as identified in the Legal and Other Requirements Register FY 2020 updated on 2/1/2020. Compliance to each applicable law and regulation is monitored by the operating units and PSQM sustainability team. SOU7 had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were:</p> <p><u>Bukit Kerayong POM</u></p> <ul style="list-style-type: none"> - DOE licence # 003124, Licensing period: 1/7/2019 – 30/6/2020; Mill capacity: 30 mt/hr; POME Method of discharge: Land application (BOD3 limit @ 30°C is 5,000 mg/l - DOE licence # 003771, Licensing period: 5/6/2019 – 4/6/2020; Stack # 2 & 33 Particulate Matter (PM) emission limit: 400 mg/m3; Opacity limit: <40% - MPOB license: 562906004000; Sales & transport: PK, CPO, CPO #; Purchase & transport: FFB #; Storage: PK, CPO, SPO #; Milling: FFB #; Validity period 1/8/2019 – 31/07/2020); Max processing capacity: 180,000 mt - Energy commission license # 2019/01120; Serial # 35432; Validity period: 25/05/2019 – 24/05/2020 for 2,640 kW installation capacity - Schedule control goods permit ref. # B.PGK.SEL/5782; Serial # P:B000078SA; Storage quantity: 15,000 liters; Validity period: 15/2/2019 – 14/2/2020 	Complied

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		<ul style="list-style-type: none"> - There are 12 CFs belonged to the mill covering various equipment such as air receivers, steam separators, hoist and crane, sterilisers, multitubular underfired, unfired multitubular etc. DOSH inspection date: 6/1/2020; Approval # SLK23; Receipt # SL/RE/20/28464; (MyKKP system) <p><u>Bukit Kerayong Estate</u></p> <ul style="list-style-type: none"> - MPOB license: 525572002000 (validity period 01/01/2020 – 31/12/2020), Menjual dan Mengalih FFB, holder: Ladang Bukit Kerayong, 3,368.5 Ha - Diesel Permit # B002722, ref. # B.PGK.SEL/0533 (validity 15/2/2020 – 14/2/2021) Quantity: 10,000 litres - Diesel Permit # B002723, ref. # B.PGK.SEL/0533 (validity 15/2/2020 – 14/2/2021) Quantity: 3,000 litres - CF for unfired pressure vessel/air compressor, SL PMT 21471, valid until 6/2/20. <p><u>Bukit Cheraka Estate</u></p> <ol style="list-style-type: none"> 1) MPOB license: 526188002000, <i>Menjual dan Mengalih FFB</i>, 1,604 Ha, licence holder: Ladang Bukit Cheraka (validity period 01/02/2019 – 31/01/2020). 2) MPOB license: 508324102000, <i>Menjual dan Mengalih FFB</i>, 2,028.29 Ha, licence holder: Ladang Bukit Cloh (validity period 01/03/2019 – 29/02/2020). 3) MPOB license: 589377011000, <i>Menghasilkan, Menjual dan Mengalih, and Menyimpan SLGBIJI, SLGTISU</i>, licence holder: Ladang Bukit Cheraka (validity period 01/10/2018 – 30/09/2019). 4) Diesel Permit # B010150, ref B.PGK.SEL/5300 (validity 20/01/2018 – 19/01/2019) Quantity: 10,000 litre. Renewal of license through BLESS, ref# BL22019002330 and approval is still in progress. 5) Diesel Permit # PUTRAJAYA 000701, ref B.PGK.SEL/5300 (validity 31/1/2018 – 30/1/2019) Quantity: 9,100 litre. Renewal of license through BLESS, ref# BL22019002348 and approval is still in progress. 6) DOA Permit to Purchase of Acephate Quantity: 1,000kg, ref#: SEL/2018/ACP/0068(GL), validity period 30/11/2018 – 20/12/2018, supplier: Hextar Chemicals Sdn Bhd. 	
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		<p>7) Permit to purchase and stored Acephate for bagworm treatment. Refer permit no. SEL/2018/ACP/0068(GL). Validity period from 30/11/2018 till 20/12/2018.</p> <p>8) Permit to purchase and stored Acephate for bagworm treatment. Refer permit no. SEL/2018/ACP/0020(GL). Validity period from 26/3/2018 till 15/4/2018.</p>	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and regulations.	<p>SOU7 continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that are applicable to the CU operation [ref.: Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008]. Each office of the operating unit (mill and estates) has its own LORR and were being evaluated individually annually for compliance and it can be accessed by all levels of staff. Latest legal and other requirements register (LORR) dated 23/1/19 was sighted at Bukit Kerayong POM. The latest update has included Factory and Machinery (Steam Boiler and Unfired Pressure Vessel) Regulation 2017 and the new Minimum Wages Order 2018 in the register. Date for next review 15/2/2020.</p> <p>Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group’s Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Information and implementation date of the new Minimum Wages Order 2018 has been communicated by Group HR on 4th January 2019 to all Sime Darby Plantation Berhad SOUs via email/secular. Effective date of implementation was on 1st January 2019.</p>	Complied
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	As per boundary pegs and mapping (GPS Survey Map) of estate as per sample GPS Surveyed Map for Bukit Kerayong Estate and Bukit Cheraka Estate respectively.	Complied

Criteria 2.2

All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.

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2.2.1	A list of contracted parties is maintained.	A list of contracted parties was maintained as per stakeholder list for categories under vendors and contractors. Sample contractors includes the following: - PT. Cipta Rezeki Utama (Recruitment Agency) - Amoza Travels (Recruitment Agency) - Xin Yong Tractors Earth Works (Machinery Works)	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.	Due diligence done through Sime Darby Plantation Online Vendor Registration (OVR) System sample for recruitment agencies as following: - PT. Cipta Rezeki Utama (13395) – for Indonesian Workers - Amoza Travels (13393) - for Indian Workers	Complied
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	As per Sime Darby Plantation Berhad Group Vendor Integrity Pledge for sample contractor Xin Yong Tractors Earth Works.	Complied
Criteria 2.3			
All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	(C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder • One or more supporting documents for claims • Valid MPOB license 	Bukit Kerayong POM processed own cops only and no FFB sourced from third party. All FFB sent to Bukit Kerayong POM are from own supply base among Bukit Kerayong and Bukit Cheraka Estates. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.	Complied

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2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	This indicator is not applicable since FFB is strictly and only sourced from Sime Darby owned estates.	N/A
<p>PROCEDURAL NOTE: For Implementation Procedure for 2.3.2 refer to Annex 4.</p>			
<p>Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.</p>			
<p>Criteria 3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>			
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	<p>BKPOM The mill has established forecast business plan for five financial years from FY 2020 until 2024 categorized as the 'MPLAN_2020' as projection for the mill to run the operation. Plan was review on annually basis. The plan covers the Mill Production (Mill Intake – Oil Palm, Production Crude Palm Oil, Production Palm Kernel, Total Palm Oil Extraction & Total Palm Kernel Extraction), Reception, Fruit Handling, Sterilization, Threshing, Pressing, Clarification, etc.</p> <p>BKE & BCE The Estates visited have established and implemented its commitment to long term sustainability and improvements through the MPLAN Forecast (Ex-estate Cost – Excluding manuring, Admin Paid By HQ and Depreciation). The MPlan Forecast projects the Crop – Oil Palm, CPO, PK, OER, KER, YPH, Direct Cost and Fixed Cost.</p>	Complied
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	The business unit have established a long-range replanting programme until FY 2024. Replanting planned for the palm older than 25 years, non-performance field (yield) and Ganoderma infected palm. The total Ha for the projected replanting of the 2 estates are as follows :-	Complied

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		YEAR	BKE	BCE						
		2020	0	134.4						
		2021	0	192.9						
		2022	89.32	144.06						
		2023	0	136.08						
		2024	0	0						
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	<p>BKPOM The management review was conducted on 6th December 2019 attended by 14 members. The meeting was chaired by the Chairman Mr.Senthilkumaran A/L Gopal</p> <p>Among the matters discussed during the management review are as follows :-</p> <ol style="list-style-type: none"> 1. Results of Internal Audit 2. Customer Feedback 3. Status of preventive and corrective action plans 4. Follow Up actions for management reviews 5. Changes that could affect the management system 6. Recommendations for improvement <p>The minutes of meeting indicated that Internal audit findings were each thoroughly examined and the corrective action plan were discussed.</p> <p>Among the Findings and Corrective Action Plan that were sighted are as below :-</p> <table border="1"> <thead> <tr> <th>FINDINGS</th> <th>ACTION PLAN</th> </tr> </thead> <tbody> <tr> <td>JTK approval letter for workers salary deduction for Surau, Insurance, temple & Water is not available.</td> <td>Mill to stop immediately workers salary deduction for surau, temple and insurance until approval from JTK. Management to inform workers to pay their insurance by themselves to avoid it being lapsed. No approval required for water deduction</td> </tr> </tbody> </table>			FINDINGS	ACTION PLAN	JTK approval letter for workers salary deduction for Surau, Insurance, temple & Water is not available.	Mill to stop immediately workers salary deduction for surau, temple and insurance until approval from JTK. Management to inform workers to pay their insurance by themselves to avoid it being lapsed. No approval required for water deduction		Complied
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		<p>The minutes of meeting indicated that Internal audit findings were each thoroughly examined and the corrective action plan were discussed.</p> <p>Among the Findings and Corrective Action Plan that were sighted are as below :-</p> <table border="1" data-bbox="958 491 1794 852"> <thead> <tr> <th data-bbox="958 491 1375 528">FINDINGS</th> <th data-bbox="1375 491 1794 528">ACTION PLAN</th> </tr> </thead> <tbody> <tr> <td data-bbox="958 528 1375 687">MFS mentioned the Housing complaint Book is available. However, it lacks information i.e. date of complaint, nature of the complaint.</td> <td data-bbox="1375 528 1794 687">A new format for Housing Complaint Book contains sufficient information should be standardized for each Division.</td> </tr> <tr> <td data-bbox="958 687 1375 852">MFS highlighted on the Emergency Response Plan (ERP) for chemical spillage training to the workers was last done on 24th April 2018</td> <td data-bbox="1375 687 1794 852">MFS assigned MA Razman to select date and to conduct training before end of 2019.</td> </tr> </tbody> </table>	FINDINGS	ACTION PLAN	MFS mentioned the Housing complaint Book is available. However, it lacks information i.e. date of complaint, nature of the complaint.	A new format for Housing Complaint Book contains sufficient information should be standardized for each Division.	MFS highlighted on the Emergency Response Plan (ERP) for chemical spillage training to the workers was last done on 24 th April 2018	MFS assigned MA Razman to select date and to conduct training before end of 2019.	
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<p>Criteria 3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>									
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p>	<p>BKPOM The Mill has established continual improvement plan documented in the Social and Environment Action Plan. Sighted the sampled implementation of the improvement plan FY 2020 as follows:</p> <ul style="list-style-type: none"> - To reduce final BOD discharge - No discharge into water channel - No leachate water discharge into monsoon drain. <p>BCE The estate has established continual improvement plan based on projects and documented Kaizen Charter. Sighted the sampled implementation of the CIP FY 2019 as follows:</p> <ul style="list-style-type: none"> • To reduce external transport for newly matured field by using bin system. 	Complied						

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		<ul style="list-style-type: none"> To reduce circle spraying labor cost by piece rate – inter pump <p>The estate also have established continual improvement documented in the <i>APEX SUB-INITIATIVE</i>. Sighted the sampled implementation plan as follows:</p> <ul style="list-style-type: none"> Application of EFB to C4 & C5 soils Establish SOP for water Management during wet season. <p>BKE</p> <p>The action plan for continuous improvement on social and environment impacts are developed based on the highlights identified by the estate.</p> <table border="1" data-bbox="958 671 1794 1117"> <thead> <tr> <th>HIGHLIGHTS</th> <th>ACTION STEPS</th> </tr> </thead> <tbody> <tr> <td>To reduce the usage of chemicals</td> <td>➤ Implementation of Integrated Pest Management Plan</td> </tr> <tr> <td>Conserve Soil Moisture</td> <td> <ul style="list-style-type: none"> ➤ EFB Application in immature area at 200kg per palm ➤ Propagation of Neprolephis on the fields </td> </tr> <tr> <td>Environment</td> <td>➤ Zero Burning</td> </tr> </tbody> </table>	HIGHLIGHTS	ACTION STEPS	To reduce the usage of chemicals	➤ Implementation of Integrated Pest Management Plan	Conserve Soil Moisture	<ul style="list-style-type: none"> ➤ EFB Application in immature area at 200kg per palm ➤ Propagation of Neprolephis on the fields 	Environment	➤ Zero Burning	
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Environment	➤ Zero Burning										

3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	Not Applicable as the template is still being discussed by RSPO.	N/A
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PROCEDURAL NOTE for 3.2.2: THE RSPO metrics template is awaiting decision/ agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.

Criteria 3.3

Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>SOP were available and sighted for the Palm Oil Mill and the Estates.</p> <p>Palm Mill holds two SOPs as a guidance document to operate the mill.</p> <ul style="list-style-type: none"> - Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and - Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. <p>Estates have a separate SOP (Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual) covers land preparation, planting material, upkeep, harvesting, transport etc.</p>	Complied
3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>Plantation Advisory Department, Performance Monitoring Unit, Quality Management Unit (PSQM) inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements.</p> <p>The Mill Quality Management System under the Occupational Safety Health Manual, Chapter 9 (Chemical Safety Management) states under No. 6.0 Procedures for Handling, iii. <i>Ensure that containers is properly labelled, not damaged and no spillage during handling.</i> During the site visit at the mill it was sighted 3 unlabelled containers stored with diesel and 3 unlabelled containers stored with lubricant. Hence, a minor nonconformity has been raised on the matter.</p>	Minor noncompliance
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>Operating units visited maintain all records of monitoring and available for review.</p> <p>BKPOM Mill advisor visit was conducted twice a year. Latest visit was conducted on 12-13 Jun 2019 and 13-14 Nov 2019. The Visit was conducted by Mill Advisor Mr Edwin Ng Weng Keong. The report covers on the OER, KER, oil and kernel losses, mill throughput, FFB processed, plant and machinery upkeep, CPO and kernel quality, cost of production and compliancy to legal and regulation.</p>	Complied

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		<p>BCE Latest Plantation Advisor visit was conducted on 4-6/9/2018. Refer report no. SOU 7/BCE/01/2018. No major issue raised during the visit. The report cover on yield improvement, crop recovery, OER improvement and replant and immature field upkeep.</p> <p>- Performance Monitoring Unit visit on quarterly basis. Latest visit report for December 2018. Refer report dated 3/12/2018. No major issue raised during the visit. The next visit is scheduled on the 10th – 12th February 2020 based on the email by the Plantation Advisory Office dated 16.01.2020.</p>	
<p>Criteria 3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.</p>	<p>Based on interviews conducted, documents reviewed and observations made during field visits, there is no evidence of any new plantings being carried out within the Bukit Kerayong SOU.</p> <p>However each operating unit has its own Social Impact Assessment (SIA) and Environmental Impact Assessment (EIA) reports which are duly documented. The assessments were carried out internally by the Group and Regional Sustainability Team.</p> <p>All the SIAs and EIAs were done in a participatory manner as evidenced by records of meetings and consultations held. The assessments covered social and environmental impacts of all major activities of its operating units on the stakeholders. The stakeholders include workers, local communities, neighbouring plantations suppliers and contractors.</p> <p>There is no smallholder/outgrower scheme within the certification unit. However, issues of concern raised by the stakeholders were recorded in the Social Impact</p>	Complied

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		<p>Assessment & Time Bound Plan Action Plan, and tabulated as per Environmental Aspect Impact (EAI) SOU 7 Bukit Kerayong Estate FY 2019; updated 16/1/2019 covering whole operation of compound, dispensary, general, lubricants, petrol/diesel and scheduled waste stores, workshop, weeding/spraying, FFB transportation, power station, manuring, harvesting and collecting, road maintenance.</p> <p>Specifically in Bukit Cheraka Estate, there was a conversion of own certified area as per Internal Social & Environment Impact Assessment (SEIA) Report; SOU 7 Bukit Cheraka Estate; Conversion of Oil Palm Nursery to Oil Palm Plantation:</p> <table border="1" data-bbox="958 687 1794 852"> <thead> <tr> <th>Current field</th> <th>Nature of Area</th> <th>Year of conversion</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>2019C</td> <td>Ex-Oil Palm Nursery</td> <td>2019</td> <td>10.45</td> </tr> </tbody> </table>	Current field	Nature of Area	Year of conversion	Ha	2019C	Ex-Oil Palm Nursery	2019	10.45	
Current field	Nature of Area	Year of conversion	Ha								
2019C	Ex-Oil Palm Nursery	2019	10.45								
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p>	<p>The Social & Environment Projects Unit, was conducted for Bukit Kerayong POM, Bukit Kerayong Estate & Bukit Cheraka Estate internally by the PSQM Department. The last SIA was conducted in 2nd – 4th November 2015. Key areas identified in the SIA were on good practices/findings, issues, complaints, suggestions by workers and other stakeholders. The SOP for Social Impact Assessment (Doc No: SD/SDP/PSQM/001) dated 12/01/2018 is referred.</p> <p>In Bukit Cheraka Estate, the internal social & environment impact assessment (SEIA) report SOU7 Bukit Cheraka Estate – conversion of oil palm nursery to oil palm plantation prepared by GSQMD, Sime Darby Plantation Berhad.</p> <p>The current Stakeholder’s Meeting conducted on 04/12/2019 with the participation of 31 stakeholders such as local communities, local authorities and contractors in Bukit Kerayong POM and Bukit Kerayong Estate. Attendance list of the stakeholders interviewed and minutes of meeting was sighted.</p>	Complied								

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		<p>For environmental part, EIA is available and been reviewed periodically, latest during the meeting as per records of Minit Mesyuarat Jawatankuasa Kesihatan dan Keselamatan Pekerjaan (JKKP) dan Alam Sekitar; 16/10/2019 for progress and updates of management plan.</p>																																											
<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p>	<p>The recommendation from the SIA report transferred to action plan. The action plan identified the issues & strategies, action plan, responsible person and timeframe for both positive and negative impact. Seen the Social Management Action Plan 2020 for SOU 7 Bukit Kerayong Oil Mill and supply bases.</p> <p>The plan established as Environmental Management Plan; SOU 7; date: 2/1/2020:</p> <table border="1" data-bbox="958 687 1872 1393"> <thead> <tr> <th>Management plan</th> <th>Objective</th> <th>Category</th> <th>Types/location</th> <th>Actions</th> <th>Frequency</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>Environmental risk management</td> <td>To maintain the effectiveness EAI/EIE</td> <td>Administration</td> <td>-</td> <td>To review EAI/EIE for any changes in operation</td> <td>Annually</td> <td>Executive</td> </tr> <tr> <td>Waste management</td> <td>Proper disposal of waste in accordance of SOP and legal requirements</td> <td>-</td> <td>Rubbish (workers housing complex, office, workshop, store, shop</td> <td>As per Waste Mgmt. Plan</td> <td>Annually</td> <td>Executive</td> </tr> <tr> <td>Water management</td> <td>As per Water Mgmt. Plan</td> <td>-</td> <td>As per Water Mgmt. Plan</td> <td>As per Water Mgmt. Plan</td> <td>Annually</td> <td>Executive</td> </tr> <tr> <td>High conservation value area/biodiversity</td> <td>As per HCV assessment</td> <td>-</td> <td>As per HCV/Bio-D Plan</td> <td>As per HCV/Bio-D Plan</td> <td>Annually</td> <td>Executive</td> </tr> <tr> <td>Pollution prevention plan</td> <td>To minimize soil erosion</td> <td>-</td> <td>As per pollution</td> <td>To plant LCC</td> <td>Annually</td> <td>Executive</td> </tr> </tbody> </table>	Management plan	Objective	Category	Types/location	Actions	Frequency	PIC	Environmental risk management	To maintain the effectiveness EAI/EIE	Administration	-	To review EAI/EIE for any changes in operation	Annually	Executive	Waste management	Proper disposal of waste in accordance of SOP and legal requirements	-	Rubbish (workers housing complex, office, workshop, store, shop	As per Waste Mgmt. Plan	Annually	Executive	Water management	As per Water Mgmt. Plan	-	As per Water Mgmt. Plan	As per Water Mgmt. Plan	Annually	Executive	High conservation value area/biodiversity	As per HCV assessment	-	As per HCV/Bio-D Plan	As per HCV/Bio-D Plan	Annually	Executive	Pollution prevention plan	To minimize soil erosion	-	As per pollution	To plant LCC	Annually	Executive	<p>Complied</p>
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			during replanting		prevention Plan				
		Energy management plan	To reduce GHG	-	Mill	Renewable energy generation	Annually	Executive	

Criteria 3.5

A system for managing human resources is in place.

3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination are documented and made available to the workers and their representatives where applicable.	SDPSB has implemented Social Policy, Social & Humanity Management Policy dated January 2015 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age. As a Group, there is Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2 nd December 2019.	Complied
3.5.2	Employment procedures are implemented and records are maintained.	The SOPP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liason and recruitment, documentation and processing, workforce management centre (WMC) Sua Betong, Careline and estate. Seen the training certificates for the workers who has attended the induction training as below: Bukit Cheraka Estate: Ari Prastowo, Sekh Ajat and Biswas Shrimanta. Bukit Kerayong POM: Ganga Bahadur Bishwakarma, Suparman, Mamudal Sepai and Dukhi Chamar. For locals, there is SOP for "Hiring of Local Workers" dated 01/11/2019 started from fill the application form until offer letter. Sighted the job application letter and employment letter for locals (Muhammad Shahir Bin Ismail/Bukit Kerayong Estate).	Complied

Criteria 3.6			
An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	<p>The risk are assessed through the implementation of HIRARC. Sime Darby Plantations have implemented a SOM (HIRARC PROCEDURE 5.4.1a – Issued 25.05.2015) that states the importance of risk assessment through HIRARC.</p> <p>BKPOM Issues on health and safety have been assessed and documented in the HIRARC report. The assessment was done base on risk assessment criteria. The HIRARC covers a mill main processing and support operation i.e boiler station, fruit handling, sterilizer station, threshing station, pressing station, product storage, ETP operation, workshop maintenance, diesel tank, office compound, store and etc.</p> <p>Sampled the HIRARC for the Ramp workstation (SOP No: BKOM 07/09-16); SOP Title: BKOM-OO/RAMP; SOP Review Date: 3.Jan.2019), The HIRARC did not identify the hazards of the lever operator working below the ramp controlling the ramp doors. During the site visit at the mill it was sighted the lever operator working on the raised platform while sitting on a high chair indicating possible risks attached to the job. The possibility hazards include slip and fall due to slippery surface, falling from height, etc. The severity of these occurrence could be classified as high risk. Hence, a major nonconformity has been raised on the matter.</p> <p>The CHRA have been conducted and explained to the Safety Committee of BKPOM Est 29th July 2015 by The Teong Beng (JKKP HIE 127/171-2(166)). Among the recommendations are:</p> <ul style="list-style-type: none"> - All hexane handling task for Soxhlet, Dirt test and DOBI Test must be conducted Fume Cupboard No.1 with the fan switch on. Vacuum pump air outlet must be connected into fume hood with the fume hood fans switch on. 	Major noncompliance

		<p>- Implement and document monthly water replacement program for eye wash bottles.</p> <p>BCE The estate has conducted assessment to identify any issues on health and safety for all activities in the estate operation and documented in the HIRARC reports. The assessment cover activities office, security, weeding, pest and disease, boundary management, census, pruning, manuring, harvesting and supervision. The estate has established HIRARC review team. The HIRARC was reviewed at minimum once a year and when necessary as per accident happen. Sampled review was conducted on 11/01/2019 due to accident happen on 04/01/2019</p> <p>The CHRA have been conducted and explained to the Safety Committee of Bukit Cheraka Est 6th August 2015 by Daud Adam from NIOSH Malaysia (JKKP HIE 127/171-2(353))</p> <p>BKE All work units that have been identified to have potential risks are documented and the sampled areas are as follows. Mitigation plans and control procedures such as PPE, Administrative Control and Trainings were documented.</p> <table border="1" data-bbox="952 1114 1792 1343"> <thead> <tr> <th>Department</th> <th>Hazards</th> </tr> </thead> <tbody> <tr> <td>Pest & Disease – Spraying</td> <td>- Contact with chemicals - Slip,trip or fall</td> </tr> <tr> <td>Road,Bridges and Culverts – Construction of Run-offs</td> <td>- Struck by vehicles - Crush by stone/soil</td> </tr> </tbody> </table>	Department	Hazards	Pest & Disease – Spraying	- Contact with chemicals - Slip,trip or fall	Road,Bridges and Culverts – Construction of Run-offs	- Struck by vehicles - Crush by stone/soil	
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3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	The effectiveness of the HIRARC is monitored and ensured through checklist and trainings that were conducted by BKPOM, BKE and BCE in each of the operations. Site visits around the mill and estate indicated the Control measures of the HIRARC were followed and ensured by the respective management.	Complied								
Criteria 3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.											
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	BKPOM A training programme is available and documented in the Training Plan FY 2020. Among the trainings that were planned are First Aid Training, RSPO/MSPO Training, LOTO induction Training, HIRARC Training, ERP Training, etc. BCE A training program was sighted in the estate under the 'Training Matrix Y2020' and 'Training Plan 2020'. The plan includes the trainings for Harvesting Induction, Chemical & Spraying, Fire Fighting, etc. BKE A training programme is available for 2019 and 2020 stating the planned trainings to be conducted for the years.	Complied								
3.7.2	Records of training are maintained.	All workers involved in operation has been provided with adequate training in safe working practice as per program in the training plan. Sighted the training record as follows: BKPOM <table border="1" data-bbox="958 1198 1794 1380"> <thead> <tr> <th>TRAINING</th> <th>DATE</th> </tr> </thead> <tbody> <tr> <td>Fire drill and Safety Briefing</td> <td>16.12.2019</td> </tr> <tr> <td>Tractor Driver Training</td> <td>11.12.2019 to 12.12.2019</td> </tr> <tr> <td>First Aid Kit Training</td> <td>19.11.2019</td> </tr> </tbody> </table>	TRAINING	DATE	Fire drill and Safety Briefing	16.12.2019	Tractor Driver Training	11.12.2019 to 12.12.2019	First Aid Kit Training	19.11.2019	Complied
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First Aid Kit Training	19.11.2019										

Fire Fighting Training	03.05.2019
Confined Space SOP Training	04.04.2019

BCE

TRAINING	DATE
Taklimat Keselamatan & SOP Scout Harvesting	13.01.2020
Interpump Spraying Training	08.01.2020
Mandore Safety and Emergency Procedure Training	08.11.2019
Harvesting Training for Loose Fruit Collector	09.08.2019
Spraying & Safety Briefing	30.10.2019
Manuring Application & Safety Training	21.10.2019
IPM Training – Bagworm	16.08.2019

BKE

TRAINING	DATE
First Aid Kit And ERP Training	19.11.2019
Sprayers and Chemical Handling Training	18.07.2019

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		Harvesting Training by Palm King	22.04.2019		
		Lubricants Interactive Session With Shell Malaysia	11.11.2019		
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	<p>Relevant personnel to supply chain implementation as defined by the CU are the personnel that involve in supply chain implementation such as Assistant Managers, QA, clerk, lab supervisor & assistant, weighbridge operators. At Bukit Kerayong POM case, 4 personnel were identified.</p> <p>The latest RSPO training was carried out on 17/6/2019 at Sime Darby Plantation Academy by GSQM and during stakeholders meeting as sighted in minutes meeting dated 4/12/2019 attended by other operating unit representative and contractors. Both training was given by GSQM personnel.</p>			Complied
<p>Supply chain requirements for mills.</p> <p>Procedural note:</p> <p>The below numbering is as per the current RSPO SCCS standard and will be renumbered to become 3.8 and onwards following the revision of the RSPO SCCS in 2019. 'D' therefore refers to RSPO SCCS 'Module D – Crude Palm Oil (CPO) mills: Identity Preserved' and 'E' to RSPO SCCS 'Module E – CPO mills: Mass Balance'. Depending on the supply chain model chosen, the corresponding requirements apply as well as all general requirements (those with numbers only).</p> <p>The RSPO SCCS document uses the terms 'site' and 'organisation' to refer to the unit of certification.</p>					
Definition					
Identity Preserved Mill D.1	<p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume</p>	<p>FFB were obtained from all Sime Darby certified estates only. There was no third party's crop nor non-certified FFB received by the mill. This was verified during the stakeholders meeting and site visit at mill.</p>			Complied

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	sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.		
Mass Balance Mill E.1	Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Not applicable as Bukit Kerayong POM applied Identity Preserve (IP) supply chain module.	N/A
Explanation (Volume and product integrity)			
D.2 E.2	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> <p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. RSPO Membership of Bukit Kerayong Palm Oil Mill is under Sime Darby Plantation Berhad with RSPO Membership # 1-0008-04-000-00. RSPO Palmtrace Member ID: RSPO_PO1000000155 (Bukit Kerayong Oil Mill) which license expires on 14/4/2020.</p>	Complied

	the RSPO supply chain managing organisation (RSPO IT platform).		
5.3 Documented procedures			
5.3.1 D.3 E.3	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation’s procedures for the implementation of this standard. • The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 	<p>Procedure for supply chain has been established entitled “Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability” [appendix 15 of the Sustainable Plantation Management System (SPMS)], version 4, dated September 2018. Among the subjects covered in the procedure are:</p> <ol style="list-style-type: none"> a. Responsibilities b. Control of documents & records c. Delivery of FFB from the estate d. Receiving FFB at the mill e. Process monitoring f. CPO and PK dispatch g. Non-conforming products and/or documents h. Product claims i. Outsourced contractor j. Training k. Reclassification of mill’s supply chain model l. Production volume m. Conversion factors n. Internal audit o. Complaints p. Management review 	Complied
5.3.2 Internal Audit			
5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;	Addressed in the SOP for Sustainable Supply Chain and Traceability, clause 17.0. Based on the procedure, the internal audit is to be conducted annually in accordance to Internal Audit Procedure (SD/SDP/PSQM/IAP).	Complied

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	<ul style="list-style-type: none"> • Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. • Effectively implements and maintains the standard requirements within its organisation. <p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</p>	<p>Combined internal audit for supply chain was last conducted on 21-23/10/2019 by 5 internal auditor from Group Sustainability and Quality Management Department (GSQM). There were 1 major non-conformity for RSPO SCCS were raised during the internal audit. The corrective action plan was submitted to the audit team on 4/11/2019.</p> <p>The results of Internal Audit was discussed in the management Review Meeting as sighted un minutes meeting conducted on 6/12/2019 under section 2: Results of Internal Audit Covering RSPO SCCS.</p>	
<p>5.4 Purchasing Goods In</p>			
<p>D.4.1/ D.4.2 E.4.1/E.4.2</p>	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	<p>Similar to last assessment daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit.</p> <p>Bukit Kerayong mill have system to verify at the weighbridge. Information for RSPO certified FFB were recorded in FFB Consignment notes and weighbridge tickets. Records verified during the audit as follow:</p> <p>i. Bukit Kerayong Estate (P08E)</p> <p>Date: 6/1/2020</p> <p>C/N no.: 012472</p> <p>RSPO Cert. no. 550181 (validity 3/11/2018 – 13/3/2023)</p> <p>W. Ticket no.: 144949</p> <p>Net Weight: 10640 kg</p>	<p>Complied</p>

		<p>ii. Bukit Kerayong Estate (P11G and P12B) Date: 6/1/2020 C/N no.: 012394 RSPO Cert. no. 550181 (validity 3/11/2018 – 13/3/2023) W. Ticket no.: 144950 Net Weight: 11510 kg</p> <p>iii. Bukit Cheraka Estate (P14A) Date: 6/1/2020 C/N no.: 116610 RSPO Cert. no. 550181 (validity 3/11/2018 – 13/3/2023) W. Ticket no.: 144945 Net Weight: 12590 kg</p> <p>iv. Bukit Cheraka Estate (P97A, P04C, P10C) Date: 6/1/2020 C/N no.: 116605 RSPO Cert. no. 550181 (validity 3/11/2018 – 13/3/2023) W. Ticket no.: 144938 Net Weight: 9860 kg</p>	
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		<p>Notification to CB on extension of overproduction was done on 15/1/2019</p> <p>There is procedure for handling non-conforming products and/or documents as per SOP for Sustainable Supply Chain and Traceability dated Sept 2018 Version 2, year 2018 issue 4.</p> <ul style="list-style-type: none"> - Where there is contamination of RSPO/MSPO certified material during receiving, processing, storage and dispatch, the mill/estate shall downgrade the materials following the downgrade order: RSPO: IP -> MB -> Non-certified. 	
5.5 Outsourcing Activities			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organisation (not the tank farm manager).</p>	<p>Sime Darby has established Standard Operating procedure for outsourced activities as per Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019, Section 13.0: Outsourced Contractors.</p> <p>In the SOP under section 13.1 stated that CPO Mill cannot outsourced processing activities like refining or crushing.</p> <p>The list of outsourced contractor was sighted, "list of stakeholder as at January 2020" include the transport contractor for CPO and PK, Jasa Korporat Sdn Bhd.</p> <ul style="list-style-type: none"> - Sighted the sampled contracts between The China Engineers (M) Sdn. Bhd. with Jasa Korporat Sdn. Bhd dated 19/7/2017 and extension email for contract extension dated 29/4/2019. 	Complied

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<p>5.5.2</p>	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a) The site has legal ownership of all input material to be included in outsourced processes;</p> <p>b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</p>	<p>Sighted the sampled contracts between The China Engineers (M) Sdn. Bhd. with Jasa Korporat Sdn. Bhd dated 19/7/2017 and email for contract extension dated 29/4/2019.</p> <p>Stated in the contract agreement between The China Engineers (M) Sdn. Bhd. with Jasa Korporat Sdn. Bhd dated 19/7/2017, mentioned the site has legal ownership of all input material to be included in outsourced processes as per Annexure 5, RSPO Supply Chain Certification Standard.</p> <p>The mill ensure that outsourced activities (transportation) is not contaminated with non-certified materials as per agreement. There is no outsourced processes within Bukit Kerayong Palm Oil Mill, hence this requirement is not applicable.</p>	<p>Complied</p>
<p>5.5.3</p>	<p>The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.</p>	<p>The mill ensure that outsourced activities (transportation) is not contaminated with non-certified materials as per agreement. There is no outsourced processes within Bukit Kerayong Palm Oil Mill, hence this requirement is not applicable.</p>	<p>N/A</p>
<p>5.5.4</p>	<p>The site shall at its next audit inform its CB of the names and contact details of any new contractor used</p>	<p>Sime Darby has issued Memorandum to all contractors dated 26/6/2019. In the memorandum stated the contractors have to comply as follows;</p>	<p>Complied</p>

	for the processing or physical handling of RSPO certified oil palm products.	<ul style="list-style-type: none"> a. Comply with local legal requirements b. Attend the RSPO/ISCC/MSPO/SCCS briefing or training organized by the company c. Having signed and enforceable agreement with the company d. Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary e. Having related working permits f. vi. Ensure PPE utilization by contractors' employee while being in the company premise. 	
5.9 Record keeping			
5.9.1	The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	<p>Sime Darby has established Standard Operating Procedure to maintain all records of evidence on the implementation of MSPO SCCS. The SOP was documented in Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records.</p> <p>In the SOP stated that all traceability records should be maintained at minimum period of 3 years.</p>	Complied
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	As stated in SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records all traceability records should be maintained at minimum period of 3 years.	Complied
5.9.3	The organisation shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased	Not applicable. The product of the facility is containing 100% palm oil.	N/A

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	(input) and claimed (output) over a period of twelve (12) months.		
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	All the inventory records are maintained and updated on daily basis and monthly. Daily records are prepared at the entry point at the weighbridge.	Complied
E.5.1	<p>a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.)</p>	All the inventory records are maintained and updated on daily basis and monthly. Daily records are prepared at the entry point at the weighbridge.	Complied
5.10 Conversion Factors			
5.10.1	Where applicable, a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organisations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org).	Conversion factor of CPO and PK production is depending on the actual OER and KER. Average OER and KER for period of Jan – Dec 2019 were 21.09% (OER) & 5.12% (KER).	Complied

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5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	Conversion factor calculated on daily basis and updated for weekly, monthly and annually basis figures.	Complied
Processing D.6	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation.	No non-certified product since Bukit Kerayong POM applied IP module.	Complied
5.6 Sales and goods out			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer;</p> <ul style="list-style-type: none"> • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number. • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, 	<p>All relevant information for RSPO certified products were made available in document form as per sample sales contract agreement as following:</p> <p>Crude Palm Oil (CPO):</p> <ul style="list-style-type: none"> - Buyer: Sime Darby Oils Langat Refinery; Contract # S/C-PSD/1912/CPO1253; Date: 13/12/2019; Commodity: Crude Palm Oil; Quantity: 500.00 mt; Basis: Delivered - Buyer: Sime Darby Oils Langat Refinery; Contract # S/C-PSD/1911/CPO1169; Date: 19/11/2019; Commodity: Crude Palm Oil; Quantity: 500.00 mt; Basis: Delivered <p>Palm Kernel (PK):</p> <ul style="list-style-type: none"> - Buyer: Sime Darby Plantation Berhad - Nuri Edible Oil (NEO); Contract # S/C-PSD/1911/PK1152; Date: 11/1/2019; Product: Palm Kernel; Quantity: 119.17 mt; Basis: Ex-Mill - Buyer: Sime Darby Plantation Berhad - Nuri Edible Oil (NEO); Contract # S/C-PSD/1910/PK0988; Date: 10/2/2019; Product: Palm Kernel; Quantity: 500.00 mt; Basis: Ex-Mill <p>Sample despatches documented as following:</p>	Complied

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	<p>shipping documents and specification documentation).</p> <p>For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments.</p>	<p>Crude Palm Oil (CPO):</p> <ul style="list-style-type: none"> - Weighbridge ticket # 012005; Date: 26/12/2019; Product: 0007 – Crude Palm Oil (CPO) RSPO IP; Contract # S/C-PSD/1912/CPO1253; Net weight: 35,030 kg; Vehicle # BJG4182 - Weighbridge ticket # 011992; Date: 5/12/2019; Product: 0007 – Crude Palm Oil (CPO) RSPO IP; Contract # S/C-PSD/1911/CPO1169; Net weight: 35,260 kg; Vehicle # BJK7370 <p>Palm Kernel (PK):</p> <ul style="list-style-type: none"> - Weighbridge ticket # 11977; Date: 22/11/2019; Product: 0008 – Palm Kernel (PK) RSPO IP; Contract # S/C-PSD/1910/PK0988; Net weight: 29,000 kg; Vehicle # BPA9815 - Weighbridge ticket # 011990; Date: 29/11/2019; Product: 0008 – Palm Kernel (PK) RSPO IP; Contract # S/C-PSD/1911/CPO1152; Net weight: 26,940 kg; Vehicle # BJS3206 	
<p>5.7 Registration of Transactions</p>			
<p>5.7.1</p>	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> • Are mills, traders, crushers and refineries; and • Take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	<p>The actor is a palm oil mill and its products are CPO and PK which are covered under Figure 2 and 3, Annex 1 of the RSPO SCCS Standard. Based on the downloaded transactions register from the certification unit’s Palmtrace, the company was able to demonstrate that it has been registering its transactions in the Palmtrace accordingly.</p>	<p>Complied</p>
<p>5.7.2</p>	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: Shipping Announcement / Announcement: When</p>	<p>Based on the announcement (transaction) summary, all the registrations were found to be in order.</p>	<p>Complied</p>

	<p>RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping Announcement / Announcement is based on members' own standard operating procedures.</p> <p>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</p> <p>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</p> <p>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</p>		
5.11 Claims			
5.11.1	<p>The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied
General corporate communications			

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4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Bukit Kerayong POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.).	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	Not applicable as no off-product claim made by Bukit Kerayong POM as to date.	N/A
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by Bukit Kerayong POM as to date.	N/A
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as no off-product claim made by Bukit Kerayong POM as to date.	N/A

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4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Bukit Kerayong POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.).	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e product/commodity with SCC model (CPO/Palm Kernel RSPO IP) and RSPO certificate number; RSPO 550181.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor	Bukit Kerayong POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	N/A

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	<p>or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>Bukit Kerayong POM is producing crude palm product and does not involved in any labelling of end product and the presence of certified palm oil contained within a product. This requirement is for the next supply chain actor and not applicable for POM.</p>	N/A
Business to consumer communication			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.</p>	<p>No business to consumer communication on product specific claim made Bukit Kerayong POM and only producing crude and unfinished product. This is not applicable for POM.</p>	N/A
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	<p>No business to consumer communication on product specific claim made Bukit Kerayong POM and only producing crude and unfinished product. This is not applicable for POM.</p>	N/A

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6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made Bukit Kerayong POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made Bukit Kerayong POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made Bukit Kerayong POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made Bukit Kerayong POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made Bukit Kerayong POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those	No business to consumer communication on product specific claim made Bukit Kerayong POM and only producing crude and unfinished product. This is not applicable for POM.	N/A

	<p>highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
<p>MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES</p>			
<p>Certified oil palm content (IP)</p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>Bukit Kerayong POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Complied</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>Bukit Kerayong POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>Bukit Kerayong POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Complied</p>
<p>Labelling and trademark (IP)</p>			

	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ol style="list-style-type: none"> a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	<p>Bukit Kerayong POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Complied</p>
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org 	<p>Bukit Kerayong POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 		
<p>Principle 4: Respect community and human rights and deliver benefit Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p>Criteria 4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>SDPSB has the implemented a Sime Darby's Human Rights Charter where they committed to recognizing the role of Human Rights Defenders in accordance to the United Nations declaration on Human Rights Defender.</p> <p>They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights on 02.01.219 attended by 18 workers for Bukit Kerayong Estate and on 08.01.2019 attended by 312 workers for Bukit Cheraka Estate.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p>	<p>SDPSB has implemented Group Sustainability and Quality Policy Statement dated 02 Dec 2019 where the management is committed to contributing to a better society:</p> <ol style="list-style-type: none"> 1. Respecting, upholding & no-exploitation of fundamental human rights. 2. Providing safe and healthy workplaces, and protecting workers' welfare. 3. Engaging and empowering communities. 	Complied

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		This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers.	
Criteria 4.2			
There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	The policy was communicated through the muster briefing to workers on 02/01/2019 to 91 workers by Assistant Manager (Bukit Kerayong Estate), on 08/01/2019 to 312 workers by Assistant Manager (Bukit Cheraka Estate) and on 07/12/2019 to 59 workers by Assistant Engineer.	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	EOC Sighted the Buku Kerosakan Rumah and External Complaint Book have the agreed resolution within timeframe. Sampled: Bukit Cheraka Estate: Tangki Kumbahan Tersumbat at Pulak, Saputra, Tahar, Faizal and Naidu house on 09/01/2020 and solved on 17/01/2020. Both complainant and management acknowledge it. However in Bukit Kerayong POM, any repairs required by Internal Stakeholders need to fill-up the House Repair Requisition Form. Sample taken on House No WQ-47; Mr Kumaren dated 25th June 2019 on leaking washing basin, damage of concrete drain and faulty lamp. Faulty lamp being repaired by the Mill Charge-man. However, other repairs which incurred higher cost a quotation is required as the work will be outsourcing.	Minor noncompliance

		<p>Sample taken on the quotation being obtained from contractor, Biglenz Tech Services on 4th November 2019 and work has been approved on 12th November 2019 through Doc No 4300487407. Seen, the invoice under No 0000030 being submitted on 18th November 2019. No evidence, that Bukit Kerayong POM keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders as per Plantation Quality Management System, Level 2, Standard Operation Manual Sub –Section 5.5 Management Responsibility Appendix 5.5.3.2 Procedure for External communication, version 1 Year 2008, Issue No 1 dated 1st Nov 2008 under Clause 6.3. Hence, a minor nonconformity has been raised on the matter.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p>	<p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow.</p>	Complied
<p>Criteria 4.3 The unit of certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p>	<p>Bukit Kerayong Estate have made contribution to the internal and external stakeholders. For example, the management has contributed and supported the activities such as request as below: Bukit Kerayong Estate:</p> <ol style="list-style-type: none"> 1. Security arrangement for cross country for SJK(T) Ladang Brafferton 14 January 2020. 2. Request to use field in Jalan Acob in 2020 for Pendidikan Jasman to SJK(T) Ladang Jalan Acob on 06/01/2020. 3. Perkhemahan Badan Beruniform 2019 by Ketua Balai Polis on 07/11/2019. <p>Bukit Cheraka Estate:</p>	Complied

		<p>1. Permission to use estate road in Bukit Cheraka Estate and Auxiliary Police in SJK (T) Ladang Bukit Cheraka and 04/01/2020.</p> <p>Bukit Kerayong POM:</p> <p>1. Request to take mill waste such as EFB and POME for research purpose from UiTM Shah Alam on 23/10/2019.</p> <p>Request for contribution for Majlis Hari Anugerah Kecemerlangan Dan Graduasi Tahun 6 on 22-23/11/2018 from PIBG SK Bukit Kerayong-RM300.</p>									
<p>Criteria 4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>											
<p>4.4.1</p>	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p>	<p>SOU7 estates were able to demonstrate the evidence of legal ownership if its lands through possession of land titles. The estates has a list of all its land titles which have the information about names of lease, hectare, terms & conditions, lease period and grant numbers. Copies of the land titles were available at the estate's offices while the original were kept at headquarter.</p> <p>Example of land titles checked:</p> <table border="1" data-bbox="1025 948 1861 1369"> <thead> <tr> <th>Estate</th> <th>Land title</th> <th>Land use type</th> <th>Tenure</th> </tr> </thead> <tbody> <tr> <td>Bukit Cheraka</td> <td>Sample : GRN45562, lot no. 4503, Mukim Jeram, District: Kuala Selangor title area: 343.70 ha Total titles: 28 (1,633.09 ha) Sample : GRN47691, lot no. 4586, Mukim Jeram, District: Kuala</td> <td>Agriculture & not categorized/gazetted</td> <td>Freehold</td> </tr> </tbody> </table>	Estate	Land title	Land use type	Tenure	Bukit Cheraka	Sample : GRN45562, lot no. 4503, Mukim Jeram, District: Kuala Selangor title area: 343.70 ha Total titles: 28 (1,633.09 ha) Sample : GRN47691, lot no. 4586, Mukim Jeram, District: Kuala	Agriculture & not categorized/gazetted	Freehold	<p>Complied</p>
Estate	Land title	Land use type	Tenure								
Bukit Cheraka	Sample : GRN45562, lot no. 4503, Mukim Jeram, District: Kuala Selangor title area: 343.70 ha Total titles: 28 (1,633.09 ha) Sample : GRN47691, lot no. 4586, Mukim Jeram, District: Kuala	Agriculture & not categorized/gazetted	Freehold								

				Selangor title area: 273.7694 ha Total titles: 105 (2,104.34 ha)				
		Bukit Kerayong	Sample : GRN52712, lot no. 2894, Mukim Jeram, District: Kuala Selangor title area: 11.71 ha Total titles: 21 (3,368.5 ha)	Agriculture & not categorized/gazetted	Freehold			
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>a) Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>		Complied				
	<p>b) Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>		Complied				

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	c) Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	N/A
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	N/A
Criteria 4.5			

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No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Bukit Kerayong SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Bukit Kerayong SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Bukit Kerayong SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied

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4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Bukit Kerayong SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Bukit Kerayong SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Bukit Kerayong SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Bukit Kerayong SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.8	(C) Newlands are not acquired in areas inhabited by communities in voluntary isolation.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Bukit Kerayong SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
Criteria 4.6			

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Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Bukit Kerayong SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Bukit Kerayong SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Bukit Kerayong SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the Bukit Kerayong SOU. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
Criteria 4.7			
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			

4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
Criteria 4.8			
The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved.	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Complied

	In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use right, there claims will be settled using the relevant requirements (Indicator 4.4.2, 4.4.3 and 4.4.4)	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in participatory way with involvement of affected parties (including neighbouring communities where applicable)	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
<p>Principle 5: Support smallholder inclusion Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p>Criteria 5.1 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Bukit Kerayong Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders. Nonetheless, current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary By Region (RM/Tonne); January 2020; Central Region; Grade A (OER 20%).	Complied
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders (at least once a year or upon request).	Bukit Kerayong Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders.	N/A

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5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Bukit Kerayong Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders.	N/A
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	Bukit Kerayong Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders.	N/A
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	Bukit Kerayong Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders.	N/A
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Bukit Kerayong Palm Oil Mill processes FFB from own company estates only. No FFB purchased from out-growers or smallholders.	N/A
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Weighbridge was verified as per records of latest calibration sighted by Metrology Corporation Malaysia Sdn. Bhd. calibration Borang D (Timbang dan Sukat) Perakuan Penentuan Timbang Dan Sukat; Akta Timbang Dan Sukat 1972; Perakuan # B 1643196; Weighbridge Serial # 0444 8556LM; Calibration date: 8/8/2019; Weighbridge capacity: 60,000kg; Brand: Mettler Toledo Kingbird	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	Bukit Kerayong POM processed own cops only and no FFB sourced from third party. All FFB sent to Bukit Kerayong POM are from own supply base among Bukit Kerayong and Bukit Cheraka Estates. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.	Complied

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		As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.	
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	Bukit Kerayong POM processed own cops only and no FFB sourced from third party. All FFB sent to Bukit Kerayong POM are from own supply base among Bukit Kerayong and Bukit Cheraka Estates. Nonetheless, they have the Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2) for grievance handling.	Complied
Criteria 5.2			
The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	Bukit Kerayong POM processed own cops only and no FFB sourced from third party. All FFB sent to Bukit Kerayong POM are from own supply base among Bukit Kerayong and Bukit Cheraka Estates. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers. As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.	Complied
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder or RSIS).	Bukit Kerayong POM processed own cops only and no FFB sourced from third party. All FFB sent to Bukit Kerayong POM are from own supply base among Bukit Kerayong and Bukit Cheraka Estates. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from	Complied

		<p>identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p>	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	<p>Bukit Kerayong POM processed own cops only and no FFB sourced from third party. All FFB sent to Bukit Kerayong POM are from own supply base among Bukit Kerayong and Bukit Cheraka Estates. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p>	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	<p>Bukit Kerayong POM processed own cops only and no FFB sourced from third party. All FFB sent to Bukit Kerayong POM are from own supply base among Bukit Kerayong and Bukit Cheraka Estates. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p>	Complied

5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	<p>Bukit Kerayong POM processed own cops only and no FFB sourced from third party. All FFB sent to Bukit Kerayong POM are from own supply base among Bukit Kerayong and Bukit Cheraka Estates. Nonetheless, Sime Darby Plantation as a group has also developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p>	Complied
<p>Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.</p>			
<p>Criteria 6.1 Any form of discrimination is prohibited.</p>			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	<p>SDPSB has implemented Social Policy, Social & Humanity Management Policy dated January 2015 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.</p> <p>The policy was communicated through the muster briefing to workers on 02/01/2019 to 91 workers by Assistant Manager (Bukit Kerayong Estate), on 08/01/2019 to 312 workers by Assistant Manager (Bukit Cheraka Estate) and on 07/12/2019 to 59 workers by Assistant Engineer.</p>	Complied
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.	<p>EOC</p> <p>Migrant workers are recruited with (2 +1) and 3 years contract. Local workers are on a long-term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, subsidized water and electric</p>	Complied

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		<p>supplier (connect to national water and electricity supply) and medical care (panel clinic) are given to all employees without discrimination.</p> <p>Foreign migrant workers. Refer to Letter of Employment, Employment Contract para" 14 – Annual leave: 14 days for < 5 years and 16 days for > 5 years.</p> <p>Overtime paid as per Employment Act 1995 (EA). Sampled workers are as 6.5.1.</p>	
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p>	<p>EOC</p> <p>There is no any discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting.</p> <p>Sighted the job vacancy advertisement as below:</p> <ol style="list-style-type: none"> 1) Quality Assurance/Production Supervisor. Requirements: minimum 5 years relevant experience in mill operation. Willingness to work on rest day/public holiday and overtime, required language(s): Malay, English and experienced in ESH, SORA and RSPO. <p>Boiler/Engine Driver: Responsible for day to day operations and handling of boiler and its ancillary equipment, ensure boiler and its auxiliary equipment are optimum operating condition, to conduct 1st level of trouble shooting when boiler and its auxiliary equipment breakdown.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>There is no pregnancy test conducted in Bukit Kerayong Estate. Confirmed through the interview session to workers and Gender Committee Minute of Meeting.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p>	<p>The Gender Policy was established since January 2015. The Policy covers the commitment to prevent sexual harassment and all forms of violence against women, workers and community. The signatory of the Policy is by Datuk Franki Anthony Dass, the Managing Director of Sime Darby Plantation. The policy was</p>	Complied

		<p>communicated through the Gender Committee meeting conducted quarterly (combined with all 3 units). SDPSB has implemented Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. It explained the types of gender-based violence & grievance procedures. Meeting was conducted quarterly according to the handbook. A Gender Committee was established by the mill and estates' management. The last meeting was conducted on 16/11/2019, 14/09/2019, 03/07/2019, 04/03/2019 and 17/01/2019 for Bukit Kerayong Estate and 16/01/2020, 14/11/2019, 10/7/2019 and 09/01/2019 for Bukit Cheraka Estate and Bukit Kerayong POM. The activities such as potluck, Zumba and Cameron Highland etc. sighted. No sexual harassment case been report and confirmed through interviewed with the chairman and female workers.</p>	
6.1.6	There is evidence of equal pay for the same work scope.	The equal pay can be seen through the pay slip reviewed for both female and male in clause 6.2.2 and 6.2.3.	Complied
<p>Criteria 6.2 Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.	<p>All the workers are under direct employment and some workshops are under contracts workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary and etc. as per employment contract.</p> <p>Sighted the employment contract for employee as below:</p> <p>Bukit Kerayong Estate:</p> <ol style="list-style-type: none"> 1. BKE Employee ID: 0000132811 2. BKE Employee ID: 0000154986 3. BKE Employee ID: 0000151196 4. BKE Employee ID: 0000155534 	Complied

		<p>5. BKE Employee ID: 0000043744</p> <p>Bukit Cheraka Estate:</p> <ol style="list-style-type: none"> 1. BCE Employee ID: 0000144985 2. BCE Employee ID: 0000058233 3. BCE Employee ID: 0000054302 4. BCE Employee ID: 0000087400 5. BCE Employee ID: 0000003992 <p>Bukit Kerayong POM:</p> <ol style="list-style-type: none"> 1. BKPOM Employee ID: 0000152359 2. BKPOM Employee ID: 0000141120 3. BKPOM Employee ID: 0000154358 4. BKPOM Employee ID: 0000006776 5. BKPOM Employee ID: 0000141124 <p>It is explained to the workers in the workers with the assistance of the senior worker from the same country during arrival through the induction training. Sighted the certificates of attendance from MAPA & MPOA titled "Kursus Induksi Pekerja Asing" and record of induction training to foreign workers on 14/09/2019 attended by 9 worker and 1 translator.</p> <p>MAPA Circular No.12/2019 dated 02/04/2019 effect from 01 January 2019 for 3 years were explained to workers through the NUPW meeting.</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all</p>	<p>All workers have the employment contract stated the regular working hours (8 hours for daily rate) and piece rates by works as per MAPA Circular No.12/2019 dated 02/04/2019 effect from 01 January 2019 for 3 years.</p>	Complied

	<p>work performed. This includes a form of record for work done by family members.</p>		
<p>6.2.3</p>	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p>	<p>The paid salary sighted for Dec, Oct and Aug 2019 for below workers complied with the Minimum Wage Order 2018 (for all workers) and Minimum Wage Order 2019 (for workers in town, if applicable). Sighted the employment contract for employee as below:</p> <p>Bukit Kerayong Estate:</p> <ol style="list-style-type: none"> 1. BKE Employee ID: 0000132811 2. BKE Employee ID: 0000154986 3. BKE Employee ID: 0000151196 4. BKE Employee ID: 0000155534 5. BKE Employee ID: 0000043744 <p>Bukit Cheraka Estate:</p> <ol style="list-style-type: none"> 1. BCE Employee ID: 0000144985 2. BCE Employee ID: 0000058233 3. BCE Employee ID: 0000054302 4. BCE Employee ID: 0000087400 5. BCE Employee ID: 0000003992 <p>Bukit Kerayong POM:</p> <ol style="list-style-type: none"> 1. BKPOM Employee ID: 0000152359 2. BKPOM Employee ID: 0000141120 3. BKPOM Employee ID: 0000154358 4. BKPOM Employee ID: 0000006776 5. BKPOM Employee ID: 0000141124 	<p>Major noncompliance</p>

However, in Bukit Kerayong Estate, sighted on estate daily attendance report and pay slip for Muhammad Shahir Bin Ismail (Employee ID: 0000155534) that he worked on his rest day on 13 & 20 Oct 2019 but being paid with normal rate.

In Bukit Kerayong POM, found that Latchumy (Employee ID: 00006767) and Kavitha (Employee ID: 000006776) has worked at night shift after 10 pm without having the Permit for Female Nightshift by Labour Department as below:

Kavitha:

1. 2/08/2019: 1526-2301
2. 3/08/2019: 1513-2256
3. 8/08/2019: 1533-2300
4. 13/08/2019: 1502-2306
5. 16/08/2019: 1500-2300
6. 24/08/2019: 0804-2300
7. 30/08/2019: 0756-2306
8. 7/10/2019: 1509-2300
9. 9/10/2019: 1511—2300
10. 10/10/2019: 1510-2258
11. 21/10/2019: 1511-2306
12. 18/12/2019: 1458-2304

Latchumy:

1. 6/8/2019: 1453-2303
2. 7/8/2019: 1512-2308
3. 9/8/2019: 1506-2300
4. 17/8/201: 1454-2218
5. 19/8/2019: 1445-2259
6. 20/8/2019: 1450-2231
7. 21/8/2019: 1453-2256
8. 22/8/2019: 1452-2308
9. 23/8/2019: 1449-2319
10. 26/8/2019: 1454-2250

		<p>11. 2/10/2019: 1457-2230 12. 3/10/2019: 1457-2305 13. 5/10/2019: 1652-2300 14. 12/10/2019: 1803-2306</p> <p>Hence, a major nonconformity has been raise on the matter.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years)is allowed to upgrade the infrastructure.</p>	<p>The basic amenities and facilities at the quarters provided by the company to the workers includes electricity, water and domestic waste disposal. Electricity and water were connected with the national infrastructure facilities. The usage of electricity and water is free with subsidize rate as per employment contract. Seen the Bukit Cheraka Estate-CAPEX for Jan to June 2019 –upgrading drainage at 500 meter at RM50/meter for housing drainage at Bukit Cloh division.</p> <p>During the field assessment, it was observed that the housing are in good conditions. For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilizes).</p> <p>Seen the record for weekly linesite inspection done for Bukit Kerayong POM (in charge by Mr Zahariman), Bukit Cheraka Estate (in charge by MA Mohamad Razman Mansor) and Bukit Kerayong Estate (Wan Mohammad bin Wan Hussin) available during the audit.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p>	<p>The housing area were located in Kapar (Bukit Kerayong POM & Bukit Kerayong Estate) and Jeram (Bukit Cheraka Estate) where the accessibility to the grocery and shops is available.</p>	Complied

6.2.6	A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.	As of the date of this audit, the payment of wages is still based on the minimum wages stipulated under the Minimum Wages (Amendment) Order 2018, which is 42.31 per day, or RM1,100 per month or more. Payslips for Feb, April and August 2019 sighted for sampled workers (refer indicator 6.2.1 & 6.2.3) confirmed the payment of the minimum wages. As stipulated under the Minimum Wages and Leave Pay Policies in Malaysia, Sime Darby will conduct a fair and decent wage assessment of its workers based on a credible methodology with the goal of providing workers a fair and decent wage.	Complied
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PROCEDURAL NOTE:

RSPO STANDARD STANDING COMMITTEE

14th of October 2019

STATEMENT FROM THE RSPO STANDARD STANDING COMMITTEE REGARDING THE INDICATOR 6.2.6 ON DECENT LIVING WAGE

With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavor to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist¹

Where a GLWC living wage standard (benchmark), or one that fulfills the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.

In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks¹. These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.

For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage¹.

Once the benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:

- Updated assessment on prevailing wages and in-kind benefits
- There is annual progress on the implementation of living wages
- Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment
- The UoC may choose to implement the living wage payment in specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.

¹ As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam. These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate.

² Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country.

³ RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country.

6.2.7	Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	There are no casual workers hired in Bukit Kerayong POM and supply bases. All employees are permanent employee (for locals) and contracted employee (for foreign workers). All permanent and full time employment used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2.	Complied
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Criteria 6.3

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The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.3.1	(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	<p>The Social Policy established since 2015 covers the commitment of the company towards respecting the rights of all personnel to form and join trade unions of their choice to bargain collectively. It was communicated to the 312 workers on 08 January 2020 at Community Hall, Bukit Cheraka Estate.</p> <p>During the interview with workers, there are no evidence received that there are restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union. It was also confirmed during the stakeholder’s meeting conducted at Bukit Cheraka Estate on 21.01.2020 and Bukit Kerayong Estate on 22.01.2020.</p>	Complied
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	Minit Mesyuarat Antara Pihak Ladang Dan Wakil NUPW 2019 dated 23/12/2019 involved the representative from employer and employee available in Bukit Kerayong Estate, 13/12/2019 in Bukit Cheraka Estate and 19/12/2019 in Bukit Kerayong POM.	Complied
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	<p>For Bukit Cheraka Estate, the union representative is Mohan a/l Veeramalay dated 07/11/2020. In Bukit Kerayong POM, the workers union representative is Kumaran a/l Veramany (chairman), as per letter dated 19.04.2014.</p> <p>Based on the worker’s interview, the selection of NUPW representative made from the election among the NUPW member without management interference. Foreign workers included in the committee formation and appointment letter was sighted.</p>	Complied
Criteria 6.4:			
Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place,	The Social Policy and Social & Humanity Management Policy was established since January 2015. The Policy covers the commitment to not condone forced labour or child labour. The signatory of the Policy is by Datuk Franki Anthony Dass, the Managing Director of Sime Darby Plantation.	Complied

	and included into service contracts and supplier agreements.	Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired. For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC dated 30 May 2018, Human Rights Charter-protecting the rights of children.	
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liason & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).	Complied
6.4.3	(C) Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work.	There is no young worker employed in Bukit Kerayong POM certification unit.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	The unit of certification has communicated the Human Right Charter, Social Policy and Vendor COBC through the stakeholder meeting and muster briefing.	Complied
Criteria 6.5:			
There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	The Gender Policy was established since January 2015. The Policy covers the commitment to prevent sexual harassment and all forms of violence against women, workers and community. The signatory of the Policy is by Datuk Franki Anthony Dass, the Managing Director of Sime Darby Plantation. The policy was communicated through the Gender Committee meeting conducted quarterly (combined with all 3 units).	Complied

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6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	SDPSB has implemented Social Policy, Gender Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Briefing of the policies was conducted during morning muster and the policies was displayed at the notice board outside the office.	Complied
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	There new mothers assessment conducted through Gender Committee Meeting. There is no new mother in Bukit Cheraka Estate. In Bukit Kerayong Estate, new mother will be given the time-off for breast milk pumping session if their baby is still breastfeeding (under 2 years old).	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	Gender committee has been formed in each unit for the medium of sexual harassment grievances by female. The last meeting was conducted on 16/11/2019, 14/09/2019, 03/07/2019, 04/03/2019 and 17/01/2019 for Bukit Kerayong Estate and 16/01/2020, 14/11/2019, 10/7/2019 and 09/01/2019 for Bukit Cheraka Estate and Bukit Kerayong POM. The activities such as potluck, Zumba and Cameron Highland etc. sighted. No sexual harassment case been report and confirmed through interviewed with the chairman and female workers.	Complied
Criteria 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All workers have entered into employment voluntarily and the following are prohibited: <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) 	The recruitment cost were declared by the labour agent from source country for the applicable fees. Sampled for Tenaga Kerja Indonesia (TKI) Kepada Agensi (PL) Dan Sponsor (PL) for Indonesia effective date on 01/06/2017 (IDR 6,150,000) and Amoza Travels for India (INR 50000) for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent.	Complied

	<ul style="list-style-type: none"> • Charging the workers for recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages 	<p>Passport was kept by the management voluntarily. There is agreement letter signed by worker and employer on the safekeeping passport at office. If the workers want to obtain the passport for own usage they can anytime request for it.</p> <p>There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia and India was same with the employment contract signed between worker and estate/mill.</p> <p>Sampled seen as below:</p> <p>Overtime was given voluntarily. Sighted the overtime request form where employer offer work to worker after working hour/rest day/public holiday for Muhammad Reza on 15/03/2019 at Bukit Cheraka Estate.</p> <p>The termination of service clearly stated that the termination of employment if:</p> <ol style="list-style-type: none"> 1. The company is not satisfied with your performance 2. You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term. 3. You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime. 4. You have breached any express or implied terms of your employment. 5. Fail medical examination based on FOMEMA result. 6. Involved in any act that will affect the reputation of the company. <p>No penalty, debt bondage and withholding of wages been imposed to worker if they want to resign. This has been confirmed through the interview and employment contract signed.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.</p>	<p>SDPSB has implemented a Sime Darby's Human Rights Charter on where they committed as below:</p> <ol style="list-style-type: none"> a. Providing equal opportunity b. Respecting freedom of association 	Complied

		<p>c. Eradicating any form of exploitation d. Ensuring favorable working conditions e. Enhancing Safety and Health</p> <p>They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights on 08/01/2020 for Bukit Cheraka Estate and on 02/01/2020 for Bukit Kerayong Estate. For eg: All the workers have provided with induction training in Sua Betong Estate or based estate during their arrival to Malaysia. Seen the training certificates for the workers who has attended the induction training as below:</p> <p>Bukit Cheraka Estate: Ari Prastowo, Sekh Ajat and Biswas Shrimanta.</p>							
<p>Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>									
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>BKEPOM The estate has appointed Tuan Senthilkumaran A/L Gopal as the Chairman of the Safety Committee on the 01st January 2019 to 31st December 2021 together with Employer and Employee representative based on their work units as members of the safety committee.</p> <p>The Occupational Safety & Health Meetings were done on a regular basis (3 months Interval) to address the safety and health issues in the estate. The issues discussed include Accident Investigations, Near Misses, Medical reports, Training Reports, Work Site Inspections and arising issues.</p> <p>Bukit Kerayong Estate</p> <table border="1" data-bbox="958 1252 1794 1351"> <thead> <tr> <th>MEETING</th> <th>DATE</th> <th>ISSUES RAISED</th> </tr> </thead> <tbody> <tr> <td>JKKP BIL 44/2019-4</td> <td>30.10.2019</td> <td>Tiada.</td> </tr> </tbody> </table>	MEETING	DATE	ISSUES RAISED	JKKP BIL 44/2019-4	30.10.2019	Tiada.	Complied
MEETING	DATE	ISSUES RAISED							
JKKP BIL 44/2019-4	30.10.2019	Tiada.							

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<p>JKKP BIL 43/2019-3</p>	<p>31.07.2019</p>	<p>- Kawasan E/Bunch lantai/longkang pecah dan besi kelihatan - Membuat peti cadangan keselamatan.</p>						
	<p>JKKP BIL 42/2019-2</p>	<p>18.04.2019</p> <p>- Emergency eye wash tekanan air tak kuat – diperiksa kebersihan jaring, sekiranya perlu pam akan dipasang - Semua ahli akan diberikan sticker keahlian untuk ditampal pada topi keselamatan dan juga pemberian T-shirt.</p>						
	<p>JKKP BIL 41/2019-1</p>	<p>18.01.2019</p> <p>Saranan dari pengerusi – segala aktiviti dilakukan utamakan keselamatan.</p>						
<p>BCE The estate has appointed Noor Arizan Bin Ahmad as the Chairman of the Safety Committee on the 2nd January 2020 together with Employer and Employee representative based on their work units as members of the safety committee.</p> <p>The Occupational Safety & Health Meetings were done on a regular basis (3 months Interval) to address the safety and health issues in the estate. The issues discussed include Accident Investigations, Near Misses, Medical reports, Training Reports, Work Site Inspections and arising issues.</p> <p>Bukit Kerayong Estate</p> <table border="1"> <thead> <tr> <th>MEETING</th> <th>DATE</th> <th>ISSUES RAISED</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>			MEETING	DATE	ISSUES RAISED			
MEETING	DATE	ISSUES RAISED						

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		JKKP Kali – 1 2020	10.10.2019	<ul style="list-style-type: none"> - Memaklumkan ada segelintir pekerja asing yang menunggang motorsikal ke Pekan Jeram tanpa memakai topi keledar. - Meminta pagar di kawasan linesite Bukit Cloh dibaiki kerana masalah ternakan yang masuk ke dalam linesite. 			
		JKKP Kali - 4 2019	09.10.2019	<ul style="list-style-type: none"> - Memaklumkan sudah ada masalah penyalahgunaan dadah di kalangan pekerja. - Memaklumkan terdapat segelintir pemandu lori yang masih memandu dalam keadaan berbahaya. 			
		JKKP Kali – 3 2019	15.07.2019	<ul style="list-style-type: none"> - Memaklumkan masalah longkang di kawasan perumahan Bukit Cloh yang tersumbat. - Memaklumkan kepada staff dan pekerja supaya berjimat cermat dalam penggunaan elektrik. 			
		JKKP KALI – 2 2019	10.04.2019	<ul style="list-style-type: none"> - Memaklumkan Masalah kekurangan polis bantuan yang bertugas ketika menjalankan rondaan dan pmembuka pagar. - Memaklumkan ketiadaan lampu di jalan 1 dan 3. 			
		<p>BKE The estate has appointed Mohd Muzafar Omar Basiron as the Chairman of the Safety Committee on the 1st January 2020 together with Employer and Employee representative based on their work units as members of the safety committee.</p>					

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The Occupational Safety & Health Meetings were done on a regular basis (3 months Interval) to address the safety and health issues in the estate. The issues discussed include Accident Investigations, Near Misses, Medical reports, Training Reports, Work Site Inspections and arising issues.

Bukit Kerayong Estate

MEETING	DATE	ISSUES RAISED
KALI-1 TAHUN 2019	16 JANUARY 2019	<ul style="list-style-type: none"> - Memaklumkan pihak ladang membersihkan kawasan sempadan secara berkala iaitu 6 bulan. - Meminta pondok-pondok di lading diperbaiki dan dibina bagi kawasan yang belum mempunyai pondok untuk tujuan para pekerja berteduh ketika hujan dan kilat.
KALI-2 TAHUN 2019	25 APRIL 2019	<ul style="list-style-type: none"> - Meminta bekalan air di main division daripada dua kali sehari kepada 24 jam. - Memaklumkan pemeriksaan kawasan rumah staff akan dilakukan pada setiap minggu.
KALI-3 TAHUN 2019	19 JULAI 2019	-Meminta semua mandore mempunyai personal first aid untuk tindakan segera jika berlaku kecederaan ringan di kawasan.
KALI-4 TAHUN 2019	16 OCTOBER 2019	-Memaklumkan pemasangan lampu jalan di Division BK

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			<p>Kerayong telah siap sepenuhnya pada bulan Julai 2019. -Memohon JCB untuk baik pulih jalan di Sg. Kapar Division.</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>BKPOM Accident & Emergency Procedures, Emergency Contact Numbers, Safe Operating Procedures were available on documents and display at the work units such as Boiler Station and Workshop.</p> <p>Fire Drill and Safety Briefing was conducted on the 16th December 2019. First Kit Training was provided to the first aiders on the 19 November 2019. Fire fighting training was conducted for the Emergency Response team on the 3rd May 2019.</p> <p>Visit to the worksites exhibited the worksites such as Stores, Boiler Station areas had first aid kits and first aiders on site. The First aid kits were regularly monitored and had sufficient supplies.</p> <p>Records of all accident were kept and updated on a monthly basis. No accident cases were recorded for the year 2019. JKPP 8 were submitted to JKPP.</p> <p>BCE Accident & Emergency Procedures, Emergency Contact Numbers, Safe Operating Procedures were available on display at the work units such as Chemical Store, Premix Area and Workshop.</p> <p>ERP & Spillage Training was conducted on the 19th December 2019 by the Medical Assistant with 19 attendees. First Aid Training was conducted on the 17th October 2019 and attended by 16 First Aiders. Fire Drill Training was conducted by BOMBA</p>	<p>Minor noncompliance</p>	

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		<p>on the 3rd May 2019. Visit to the worksites exhibited the sampled worksites such as Nursey, Stores, Workshops and Premix area had first aid kits on site. The First aid kits were regularly monitored and had sufficient supplies.</p> <p>Records of all accident are all kept and updated on a monthly basis. A total of 12 cases were recorded for the year 2019. JKPP 6 and JKPP 8 were submitted to JKPP.</p> <p>BKE Accident and emergency procedures were available on site during the visit around the sites. It was noticed at the chemical store the chemical spillage emergency plan was placed for general viewing.</p> <p>During the site visit at the worksites (chemical store, workshop) the assigned operative trained in first aid was present. The operative showed awareness on the first aid equipment. The first aid kit was available at the station and freshly replenished. Regular trainings were conducted for the first aiders with the last sampled training conducted on the 19th November 2019 attended by 21 personals.</p> <p>During the site visit, the first aid kit was sampled at 3 locations, namely the Workshop, Harvesting Gang and Manual Weeding Gang. The first aid kit handled by the harvesting gang was noticed to have insufficient items inside, as the Detol was not available in the box. The Detol Container handled by the Manual Weeding Gang had no label and expiry date attached to it. All 3 First Aid Kits were not monitored regularly to monitor the usage and balance of the supplies.</p> <p>Records of all accidents are recorded and kept in the "<i>Monthly Report Accident/Incident</i>" records and updated to JKPP through the JKPP 6 forms. Yearly reporting to JKPP is done through the JKPP 8 reports.</p> <p>Hence, a minor nonconformity has been raise on the matter.</p>	
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<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>All workers were provided with appropriate PPE where the cost are bared by the management. Interviews conducted during the site visit at the Mill and Estate showed understanding and approval from the workers that:</p> <ul style="list-style-type: none"> • The management bares the cost of all PPEs and the workers are entitled to valid PPE. • The importance of using required PPE at all times during work. • Proper storage and disposal methods of PPE. <p>Sampled issuance of PPE are as below :-</p> <p>Bukit Kerayong POM</p> <table border="1" data-bbox="958 847 1794 1098"> <thead> <tr> <th>Name</th> <th>PPE</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Dhuki Chamar</td> <td>Safety Helmet</td> <td>19.08.2019</td> </tr> <tr> <td>Ganga Bahadur</td> <td>Safety Vest</td> <td>19.07.2019</td> </tr> <tr> <td>Dinesh</td> <td>Safety Rubber Boots</td> <td>03.03.2019</td> </tr> <tr> <td>Kamal BK</td> <td>Safety Vest</td> <td>06.01.2019</td> </tr> </tbody> </table> <p>Bukit Kerayong Estate</p> <table border="1" data-bbox="958 1193 1794 1391"> <thead> <tr> <th>Name</th> <th>PPE</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Ardik Sing</td> <td>Rubber Boots</td> <td>01.01.2020</td> </tr> <tr> <td>Magendran</td> <td>Safety Boots</td> <td>16.01.2020</td> </tr> <tr> <td>Lalitha</td> <td>Dupont Apron</td> <td>13.012020</td> </tr> </tbody> </table>	Name	PPE	Date	Dhuki Chamar	Safety Helmet	19.08.2019	Ganga Bahadur	Safety Vest	19.07.2019	Dinesh	Safety Rubber Boots	03.03.2019	Kamal BK	Safety Vest	06.01.2019	Name	PPE	Date	Ardik Sing	Rubber Boots	01.01.2020	Magendran	Safety Boots	16.01.2020	Lalitha	Dupont Apron	13.012020	<p>Complied</p>
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		<p>Bukit Cheraka Estate</p> <table border="1" data-bbox="958 459 1794 708"> <thead> <tr> <th>Name</th> <th>PPE</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Danesh Kumar</td> <td>Safety Vest</td> <td>30.12.2019</td> </tr> <tr> <td>Tandel Mukeshbai</td> <td>Respirator</td> <td>20.11.2019</td> </tr> <tr> <td>Muthamil Selvee. R</td> <td>Face Mask</td> <td>22.11.2019</td> </tr> <tr> <td>Swarup</td> <td>Face Mask</td> <td>22.10.2019</td> </tr> </tbody> </table> <p>The estates have provided adequate Emergency Shower, Shower Rooms, Changing Area and PPE Storage Area for the workers especially chemical handlers for them to change out of PPE, wash and put on their personal clean clothing.</p>	Name	PPE	Date	Danesh Kumar	Safety Vest	30.12.2019	Tandel Mukeshbai	Respirator	20.11.2019	Muthamil Selvee. R	Face Mask	22.11.2019	Swarup	Face Mask	22.10.2019	
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6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p>	<p>BKPOM</p> <p>All workers are given medical care as the mill workers obtain medical care from the Clinic in Kapar. In the event of major injuries or accidents, the workers will be given appropriate medical care at the hospital under the expenses of the management.</p> <p>All workers are covered under the Social Security Organisation (SOCSO). Sample of SOCSO Contribution via Form 8a were sighted in the estate respectively. Verified payment for the month of December 2019 for 43 workers amounting to RM 2,183.50 (Kod majikan : B3400001852P</p> <p>BCE</p> <p>All workers are given medical care as the estate workers obtain medical care from the Clinic in the estate. In the event of major injuries or accidents, the workers will</p>	Complied															

		<p>be given appropriate medical care at the hospital under the expenses of the management.</p> <p>All workers are covered under the Social Security Organisation (SOCSO). Sample of SOCSO Contribution via Form 8a were sighted in the estate respectively. Verified payment for the month of December 2019 for 313 workers amounting to RM 11,122.00 (Kod majikan : B3400026382Y</p> <p>BKE</p> <p>All workers are entitled for medical care as the estate workers obtain medical care from the Government Clinic in Kapar. In the event of major injuries or accidents, the workers will be given appropriate medical care at the hospital under the expenses of the management.</p> <p>All workers are covered under the Social Security Organisation (SOCSO). Sample of SOCSO Contribution via Form 8a were sighted in the estate respectively. Verified payment for the month of December 2019 amounting to RM 5,429.70 (Kod majikan : B3400001872X)</p>													
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>The Lost Time Accident are recorded and maintained. The records are as follows :-</p> <table border="1" data-bbox="958 1075 1794 1369"> <thead> <tr> <th>MANAGEMENT UNIT</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>BUKIT KERAYONG POM</td> <td>1 CASE (18 DAYS)</td> <td>0 CASE</td> </tr> <tr> <td>BUKIT KERAYONG EST</td> <td>CASSES 23 (35 DAYS)</td> <td>18 CASSES (26 DAYS)</td> </tr> <tr> <td>BUKIT CHERAKAH EST</td> <td>CASSES 20 (836 DAYS)</td> <td>12 CASSES (279 DAYS)</td> </tr> </tbody> </table>	MANAGEMENT UNIT	2018	2019	BUKIT KERAYONG POM	1 CASE (18 DAYS)	0 CASE	BUKIT KERAYONG EST	CASSES 23 (35 DAYS)	18 CASSES (26 DAYS)	BUKIT CHERAKAH EST	CASSES 20 (836 DAYS)	12 CASSES (279 DAYS)	Complied
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<p>Principle 7: Protect, conserve and enhance ecosystem and the environment.</p>			
<p>Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p>	<p><u>Bukit Cheraka Estate</u> The estate have implemented a yearly IPM plan with the objectives as below ;</p> <ul style="list-style-type: none"> ➤ Intensive planting of beneficial plants in immature area ➤ Intensive planting of beneficial plants at area prone to bagworm attacks ➤ IPM bagworm refreshment training ➤ Fixing barn owl boxes - achieve target ratio 1:10 ➤ Fixing of bird perch of replant <p>The progress of the IPM implementation is recorded and monitored in the maps made available in the estate.</p> <p><u>Bukit Kerayong Estate</u> The estate have implemented a yearly IPM plan with the objectives as below :</p> <ul style="list-style-type: none"> ➤ Beneficial establishment to increase the population of natural enemies in order to reduce the chemical usage. ➤ To increase the Tyto Alba population so that estate can reduce the usage of rat baits. ➤ To increase the population of Barn Owl. ➤ Encouragement of biocontrol by use of beneficial plants. 	Complied
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p>	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas.</p>	Complied

7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	There is no use of fire for pest control.	Complied																				
<p>Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>																							
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p>	<p>Sighted in the <i>Sime Darby Agricultural Reference Manual – Oil Palm Planting</i>, the recommended herbicide and the dosage for selective weeding, circle and path spraying. Among the herbicide recommended are as below :</p> <table border="1" data-bbox="958 746 1794 1145"> <thead> <tr> <th>Noxious Weeds</th> <th>Herbicide</th> <th>Rate (amount/ha)</th> <th>Dilution rate</th> </tr> </thead> <tbody> <tr> <td>Ischaemum muticum</td> <td>Glyphosate</td> <td>4L</td> <td>90 ml</td> </tr> <tr> <td>Impretia cylindrica</td> <td>Glyphosate</td> <td>6L</td> <td>135 ml</td> </tr> <tr> <td>Mikania micrantha</td> <td>Fluroxypyr</td> <td>0.375 L</td> <td>9 ml</td> </tr> <tr> <td>Stenochlaena palustris</td> <td>Sodium Chlorate + Metsulfuron - methyl</td> <td>5.5 kg + 75 g</td> <td>125 g + 1.5 g</td> </tr> </tbody> </table>	Noxious Weeds	Herbicide	Rate (amount/ha)	Dilution rate	Ischaemum muticum	Glyphosate	4L	90 ml	Impretia cylindrica	Glyphosate	6L	135 ml	Mikania micrantha	Fluroxypyr	0.375 L	9 ml	Stenochlaena palustris	Sodium Chlorate + Metsulfuron - methyl	5.5 kg + 75 g	125 g + 1.5 g	Complied
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7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p>	<p><u>Bukit Cheraka Estate</u></p> <table border="1" data-bbox="958 1241 1794 1358"> <thead> <tr> <th>Month</th> <th>A.I. / Ha</th> </tr> </thead> <tbody> <tr> <td>Jul 19</td> <td>1.8593</td> </tr> </tbody> </table>	Month	A.I. / Ha	Jul 19	1.8593	Complied																
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Aug 19	1.2117
Sept 19	1.7102
Oct 19	0.5592
Nov 19	1.2557
Dec 19	0.5350

Bukit Kerayong Estate

Glyphosate		Cyper		Kenlon	
Month	A.I. / Ha	Month	A.I. / Ha	Month	A.I. / Ha
Jan 19	0	Jan 19	0.120	Jan 19	0
Feb 19	0	Feb 19	0.179	Feb 19	0.230
Mar 19	0.640	Mar 19	0.120	Mar 19	0.037
Apr 19	0.279	Apr 19	0.050	Apr 19	0.083
May 19	0.515	May 19	0.026	May 19	0.074
Jun 19	0.236	Jun 19	0.096	Jun 19	0.042
Jul 19	0.300	Jul 19	0.169	Jul 19	0.017

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		Aug 19	0.530	Aug 19	0.163	Aug 19	0.008		
		Sept 19	0.470	Sept 19	0.140	Sept 19	0.003		
		Oct 19	0.590	Oct 19	0.148	Oct 19	0		
		Nov 19	0.460	Nov 19	0.159	Nov 19	0		
		Dec 19	0.600	Dec 19	0.239	Dec 19	0		
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	<p>The estates has implemented a Continuous Improvement Plan FY 2019/2020 where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan</p> <p>Sighted during the site visit the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at intended areas.</p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead.</p>						Complied	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	There is no prophylactic use of pesticides in the estates audited.						Complied	
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p>	<p>BCE</p> <p>Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class II, III & IV chemical used at visited estates. Alternative for class IA chemical, Methamidophos was used named Acephate under class III for bagworm infestation.</p> <p>BKE</p> <p>Sighting of the Chemical Register dated 01.01.2020 showed that only class III & IV chemicals were used at the estates visited. During the site visit to the chemical</p>						Complied	

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	<p>a) Judgment of the threat and verify why this is a major threat</p> <p>b) Why there is no other alternative which can be used</p> <p>c) Which process was applied to verify why there is no other less hazardous alternative</p> <p>d) What is the process to limit the negative impacts of the application</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>store it was justified that there were only class III and IV chemicals being used. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead.</p>	
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p>	<p>BCE Pesticides operators have been given training on the safety handling and application of pesticides. The training have been provided by Asst. Manager, Medical Assistant and suppliers of Spraying Equipment/ Pesticides who are knowledgeable on pesticides handling and application. Sighted the training records as follows:</p> <ul style="list-style-type: none"> ➤ Interpump Sprayer Training – 08.01.2020 ➤ Mandore Safety & Emergency Procedures Training - 08.11.2019 ➤ Spraying & Safety Briefing – 30.10.2019 <p>BKE Pesticides operators have been given training on the safety handling and application of pesticides. Sighted the training records as follows :</p> <p>Sprayers and Chemical Handling Training – 18.07.2019</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p>	<p>Pesticides were found stored in the mill and estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations.</p>	Complied

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		<p>a. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazad Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p>	
7.2.8	<p>All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.</p>	<p><u>Bukit Kerayong POM</u> All chemical containers were disposed as schedule waste to licensed waste manager SS Setia Teknologi Enterprise (Registration No : JM0512288-D). The last disposal was dated 26/09/2019. The mill has obtained the approval from Jabatan Alam Sekitar Negeri Selangor to store the schedule waste more than 180 days with conditions stated in the letter, referral number (B) B 31/152/000/067.</p> <p><u>Bukit Cheraka Estate</u> All chemical containers were reused as premix containers to transport diluted chemicals to the fields for application purpose. Otherwise the unused chemical containers are disposed to the licensed waste manager SS SETIA TEKNOLOGI ENTERPRISE (Registration No : JM0512288-D). The last disposal was dated 28.11.2019.</p> <p><u>Bukit Kerayong Estate</u> All chemical containers were reused as premix containers to transport diluted chemicals to the fields for application purpose. Otherwise the unused chemical containers are disposed to the licensed waste manager SS SETIA TEKNOLOGI ENTERPRISE (Registration No : JM0512288-D). The last disposal was dated 14.11.2019.</p>	Complied

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7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	The estates do not conduct aerial spraying.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	<p><u>BKPOM</u> Annual medical surveillance was done for the BKPOM workers. A total of 8 workers were sent for medical surveillance including Kernel Plan Operators, Laboratory Supervisor & Analysis and Worksop attendants. . The medical surveillance was conducted on the 30th and 31st of December 2019 by Dr.Kamalakaran Karanakaran, OH Doctor (DOSH) (HQ/08/DOC/00/329. The results of the medical surveillance was not yet available from the Doctor during the audit.</p> <p>Annual & Baseline Audiometric Testing was conducted for the BCPOM workers. A total of 44 workers were sent for the baseline test. The test was conducted on 11th February 2019 by Procoma Environmental (M) Sdn. Bhd (JKKP H/E 127/12/4-65/17) Report Reference – PRO/FEB/19(BKPOM/60). The results indicated that 2 workers were listed to have hearing impairment. 1 worker was recommended to undergo a retest 3 months later. The particular worker is no more with the mill as he has retired.</p> <p><u>BCE</u> Annual medical surveillance was done for the Bukit Cheraka Estate workers. A total of 123 workers were sent for medical surveillance including chemical exposed workers, workshop fitters, drivers and store keeper. The medical surveillance was conducted on the 15th, 19th 20th and 21st of November 2019 at Klinik Kapar by Dr.Kamalakaran Karanakaran, OH Doctor (DOSH) (HQ/08/DOC/00/329.</p>	Complied

		<p>The results of the medical surveillance indicates all but 4 workers were fit to work. The 4 workers had been found to have low Cholinesterase level and increased Blood manganese level.</p> <p>The management had subsequently removed the 4 workers from chemical exposed works for at least 3 months. The management have committed to reassess the 4 workers's medical condition after 3 months through medical surveillance.</p> <p>BKE Annual medical surveillance was done for the Bukit Kerayong Estate workers. A total of 12 workers were sent for medical surveillance including chemical exposed workers and workshop fitters. The medical surveillance was conducted on the 13th and 19th of November 2019 by Dr.Kamalakaran Karanakaran, OH Doctor (DOSH) (HQ/08/DOC/00/329).</p> <p>The results of the medical surveillance indicates all workers were fit to work.</p>	
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p>	<p>Both estate visited has prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Gender Policy and Occupational Safety and Health Policy signed by the Managing Director on January 2015</p> <p>BCE The estate has prohibited the confirmed pregnant or breast-feeding women to work with chemicals through memo signed by the Estate Manager dated 1/1/2019.</p> <p>BKE The estate has prohibited the confirmed pregnant or breast-feeding women to work with chemicals through memo signed by the Estate Manager dated 1/7/2016.</p>	Complied
<p>Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			

7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented as per Sustainable Plantation Management System Appendix 9 Procedure for Handling of Domestic Waste version 1, year 2008, issue no. 1, dated 1 October 2008.</p> <p>Palm oil mill - Type of waste generated:</p> <ul style="list-style-type: none"> - Scheduled waste (SW305, SW322, SW409 and SW410) domestic waste and recyclable waste. These categories include: effluent, fibre/shell, EFB, boiler clinker, wash water, scrap metal, scheduled waste, boiler blowdown, hydro-cyclone/claybath wash water, methane gas. <p>Estate - Type of waste</p> <ul style="list-style-type: none"> - Scheduled waste – SW102, SW109, SW305, SW306, SW322, SW409, SW410, SW404 – workshop, clinic, SW store, store; - Domestic waste – rubbish & sewage – line-site, office, workshop, store, shop & - Recycle waste – empty container, waste oil - Industrial waste – Scrap iron <p>Records on the usage and disposal were well recorded and documented. Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be maintained accordingly</p>	Complied									
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated as per DOE letter to mill on Permohonan untuk melanjutkan tempoh penstoran buangan terjadual melebihi 180 hari di premis Sime Darby Plantation Bhd Bukit Kerayong, Kapar, Selangor; Letter ref. # (B) B 31/152/000/067 Jld. (9); Date: 28/10/2019; Tempoh kelulusan: 28/10/2019 – 28/10/2020 for type of schedule waste (SW) as following:</p> <table border="1" data-bbox="958 1273 1749 1375"> <thead> <tr> <th>#</th> <th>Waste code</th> <th>Type</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SW 305</td> <td>Lubricant Oil</td> </tr> <tr> <td>2</td> <td>SW 305</td> <td>Waste Mixed Oil</td> </tr> </tbody> </table>	#	Waste code	Type	1	SW 305	Lubricant Oil	2	SW 305	Waste Mixed Oil	Complied
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1	SW 305	Lubricant Oil										
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		<table border="1"> <tr><td>3</td><td>SW 322</td><td>Isopropyl Alcohol</td></tr> <tr><td>4</td><td>SW 409</td><td>Glass Bottle</td></tr> <tr><td>5</td><td>SW 409</td><td>Plastic Bottle</td></tr> <tr><td>6</td><td>SW 409</td><td>Tin/Dum</td></tr> <tr><td>7</td><td>SW 409</td><td>Used Mixed Container</td></tr> <tr><td>8</td><td>SW 410</td><td>Filters</td></tr> <tr><td>9</td><td>SW 110</td><td>Fluorescent Tubes & Bulbs Light</td></tr> </table> <p>Last date of disposal: 11/6/2019 Last date of disposal: 24/9/2019</p>	3	SW 322	Isopropyl Alcohol	4	SW 409	Glass Bottle	5	SW 409	Plastic Bottle	6	SW 409	Tin/Dum	7	SW 409	Used Mixed Container	8	SW 410	Filters	9	SW 110	Fluorescent Tubes & Bulbs Light	
3	SW 322	Isopropyl Alcohol																						
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7	SW 409	Used Mixed Container																						
8	SW 410	Filters																						
9	SW 110	Fluorescent Tubes & Bulbs Light																						
7.3.3	The unit of certification does not use open fire for waste disposal.	Visit to the mill and estate offices as well as housing area shown no open fire been use for waste disposal. Domestic wastes were disposed through municipal waste collector.	Complied																					
Criteria 7.4:																								
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.																								
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield.	Complied																					
7.4.2	Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	<p>Bukit Cheraka Estate</p> <p>Internal Agronomist from Plant Nutrition & Protection, Central East Region last visited estate on July 2019 and inspected the oil palm planting to determine the plant health through leaf sampling. The motive of the inspection is to formulate the year 2020 manuring programme. The leaf sampling is done on a yearly basis to continuously monitor the health of the palms and the summary of leaf nutrient status report is provided to the estate.</p> <p>The soil sampling is done every 5 years to monitor changes in the soil fertility. The sampling was last done on 30.08.2018 by Sime Darby Research Sdn Bhd. (Test report No. S68/2018) identifying the pH, Org C, Total N, Total P, Avail P, etc.</p>	Complied																					

		<p>Bukit Kerayong Estate</p> <p>Internal Agronomist from Plant Nutrition & Protection, Central East Region last visited estate on 10th and 12th July 2019 and inspected the oil palm planting to determine the plant health through leaf sampling. The motive of the inspection is to formulate the year 2020 manuring programme. The leaf sampling is done on a yearly basis to continuously monitor the health of the palms</p> <p>The soil sampling is done every 5 years to monitor changes in the soil fertility. The sampling was last done on 24.04.2018 by Sime Darby Research Sdn Bhd (Test report Number : S33/2018)</p>	
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p>	<p>Bukit Kerayong POM</p> <p>EFB is sent to the BCE and BKE for mulching purposes. Weighbridge records are kept for monitoring purposes in the mill. POME Farrow irrigation is done at the Bukit Kerayong Estate and monitored by the BKPOM</p> <p>Bukit Cheraka Estate obtains the EFB from the BKPOM to be used as a Mulch in the estate to further fertilize the soil. It was sighted in the estate the EFB application in the field 19C and 19B</p> <p>Bukit Kerayong Estate obtains the EFB from the POM to be used as a Mulch in the estate to further fertilize the soil. It was sighted in the estate the EFB application in the field 09D. Sighted the records of EFB application for the field 09D for the month Nov 2019 at 1101.86MT for 35 Ha.</p>	Complied

7.4.4	Records of fertiliser inputs are maintained.	<p>The process of the fertilizer application commences from an agronomist visit for a leaf and soil sampling to determine the level of nutrient and fertility. Thereafter the calculation will be made for an input of fertilizer to maintain/improve the nutrient and fertility at the desired level. The agronomist will develop a yearly recommendation of fertilizer based on the data collected. Estate will use this fertiliser recommendation for the entire requirement in the field identified. Fertilizers are then applied based on the programme generated and records are maintained.</p> <p>Fertilizer Application Records were sighted in both estates and were monitored and updated as and when the application is done.</p>	Complied
<p>Criteria 7.5: Practices minimise and control erosion and degradation of soils.</p>			
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available.	<p>Soil series map available. Refer to soil series map prepared by R&D-TTAS Precision Agriculture Unit (NHM). There are no peat soils or soil categorized as marginal or fragile soil at both estates. Soil series summary as follow:</p> <p>BCE Bernam 27.38%, Bungor 0.24%, Colluvioum 1.56%, Jawa 12.76%, alluvium 3.81%, Mallaca 1.02%, Munchong 0.19%, Organic Clay 5.77%, Sedu 1.62%, Selangor 4.78%, Serdang 1.69%, Tongkang 10.73%, unclassified 27.13%</p> <p>The estate has a terrain map available that indicates the steep terrains demarcated in different color codes.</p> <p>BKE Bernam 28.26%, Briah 38.35%, Jawa 2.45%, Kangkong 2.19%, Sedu 6.94%, Selangor 7.82% Serdang 0.80%, Tongkang 7.57%, Unclassified 5.67%.</p>	Complied

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7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.	The company has established SOP for planting on slopes, documented in Agricultural Reference Manual ver. 1 Section 4 issued on 1/7/2018. Quoted from the Agricultural Reference Manual titled Construction of Terraces, Item no. 8.4 (Areas with greater than 25° slopes should not be planted and best left for biodiversity purposes but access road between the planted areas through unplanted biodiversity area has to be constructed and maintained.	Complied
7.5.3	There is no new planting of oil palm on steep terrain.	Certification Unit and supply base did not carry out any new plantings on steep terrains.	Complied
Criteria 7.6:			
Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	There is no peat soil or soil categorized as marginal or fragile soil at both estates visited.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	There is no peat soil or soil categorized as marginal or fragile soil at both estates visited.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Soil surveys are done and available in a soil map at both estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.	Complied
Criteria 7.7			
No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	There is no peat soil or soil categorized as marginal or fragile soil at both estates visited.	Complied

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7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	There is no peat soil or soil categorized as marginal or fragile soil at both estates visited.	Complied
PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance.			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	There is no peat soil or soil categorized as marginal or fragile soil at both estates visited.	Complied
7.7.4	(C) A documented water and ground cover management programme is in place.	The water and ground cover management programme is documented in the Sime Darby Agricultural Reference Manual (Water Management in Coastal and Peatlands) issued on 01.07.2011.	Complied
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation</p>	There is no peat soil or soil categorized as marginal or fragile soil at both estates visited.	Complied

	period, company could submit other alternate methodologies to be considered by RSPO for recognition.		
7.7.6	(C) All existing plantings on peat are managed according to the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	There is no peat soil or soil categorized as marginal or fragile soil at both estates visited.	Complied
7.7.7	(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.	There is no peat soil or soil categorized as marginal or fragile soil at both estates visited.	Complied
Criteria 7.8			
Practices maintain the quality and availability of surface and groundwater.			
7.8.1	A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Water management plan is in place and implemented as per sighted records of Water Reduction Plan FY 2019/2020 SOU 7 Bukit Kerayong Estate: - Line site water usage - Water leakage - Workshop – rain water harvesting Identification and management of wastewaters: - Chemical mixing area - Sprayer PPE washing area	Complied

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		<ul style="list-style-type: none"> - Workshop - Line site & office - Washrooms <p style="text-align: center;">First Aid Box Monitoring & Replenishment Records Bukit Kerayong Estate; PIC: Abdul Aziz bin Ibrahim; Latest 20/2/2020 for First Aid Box # 6; By Harvesting Mandore</p>													
	<p>b) Workers have adequate access to clean water.</p>	<p>Workers have adequate access to clean water which were supplied through public domain. Furthermore, the estate monitored its discharged water from its plantation activities through water sampling analysis as per records of Pesticide Analysis Test Report; Test report # PL943/2019; Ref. # letter dated 21/10/2019; Date received: 7/11/2019; Date issued: 27/1/2019 - Pesticide in Water Analysis for Sg. Sembilang - Upstream Sg. Sembilang - Downstream, Sungai Sembilang - Midstream</p>													
<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p>	<p>Water courses and wetlands are protected as per documented Guidelines on River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). The widths of the buffer zones are guided by the following measurements:</p> <table border="1" data-bbox="1126 978 1756 1182"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>Monitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/ivers, version 1, year 2008, issue no. 1, dated 1/11/2008.</p>	River width	Buffer zone	> 40 meters	50 meters	20 to 40 meters	40 meters	10 to 20 meters	20 meters	5 to 10 meters	10 meters	< 5 meters	5 meters	<p>Complied</p>
River width	Buffer zone														
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20 to 40 meters	40 meters														
10 to 20 meters	20 meters														
5 to 10 meters	10 meters														
< 5 meters	5 meters														

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		Rainfall was monitored as per sample for Bukit Kerayong Estate for period of Jan – Dec 2019 rainfall: 2,216 ml for 112 days.	
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	<p>Mill effluent is treated to be in compliance with national regulations and monitored adequately as per following samples:</p> <ul style="list-style-type: none"> - Water Analysis Test Report # IE22/2020; Date sampled: 19/12/2019; Date tested: 24/12/2019; Date issued: 7/1/2020; Water sample before (BOD = 50 mg/l) and after (BOD = 48 mg/l) monsoon drain by Sime Darby Research Sdn. Bhd. Lab Services Laboratories R&D Centre – Carey Island; - Effluent Analysis Test Report # EP14/2020; Date sampled: 19/12/2019; Date tested: 20/12/2019; Date issued: 9/1/2020; Anaerobic Pond 2 (Final Discharge) BOD = 520 mg/l - Quarterly return form 3rd Quarter 2019 dated 14/10/2019; File ref. # 31/152/000/067 - Quarterly return form 4th Quarter 2019 dated 15/1/2019; File ref. # 31/152/000/067s - Rainfall (effluent compound): 1,427.15mm; 119 days 	Complied
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>Mill water use per tonne of FFB is monitored and recorded as following:</p> <ul style="list-style-type: none"> - Jan – Dec 2019: Water used = 320,886 mt - FFB processed: 118,065.76 mt FFB - Mill water used/tonne FFB: 2.72 - Electricity used: 1,128,033 kWh ~ 9.55 kWh/Mt FFB processed - Bukit Cheraka water use: 108,732 m3 = 1.67m³/mt FFB 	Complied
<p>Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>			
7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is implemented, monitored and documented.	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Apart from use of grid supply (TNB) for electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler.</p>	Complied

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		<p>The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through steam turbine and coiler where Palm fibre and PK shells were used as renewable energy/fuel on a 70:30 ratio basis respectively. Average of 36.34 kWh/CPO recorded from January to December 2019.</p> <p>Power generation facilities including electrical installation been monitored by competence person as per records of Visiting Electrical Engineer: Ir. Kannan (Kawalan Teknikal Sdn. Bhd.); Date: 4/1/2020; Penjaga Jentera; No. Perakuan: PJ-T-1-B0153-2002; Serial # 00648; Rahim Bin Misro; Category: A0; Date: 12/7/2002; Limitation: Low Voltage System (Tanpa Talian Aerial dan Stesen Janakuasa).</p>	
<p>Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported.</p>	<p>GHG emissions are identified and assessed as per Pollution Prevention Plan FY 2019/2020 – air, noise, water, odour, replanting, rainwater collection and leakage pipeline at line site surrounding. Plans to reduce or minimize emission are implemented, monitored as per sample sighted i.e.:</p> <ul style="list-style-type: none"> - Alam Hijau Integrasi (M) Sdn. Bhd.; Isokinetic Stack & Air Emission Monitoring Report November 2019 for Bukit Kerayong POM Boiler # 2 & Boiler # 3; Report ref. # ALM/SIMEDARBY/1119/5556; Monitoring Date: 21/11/2019; Reporting Date: 10/12/2019. Previous monitoring date: 12/2/2019 (Report ref. # ALM/SIMEDARBY/0219/4616; Reporting date: 28/2/2019) 	Complied
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimize</p>	<p>Records sighted on Carbon Stock Assessment & Projection of Major GHG Emission for New Planting Development Report; SOU 7 Bukit Cheraka Estate; Conversion of Ex-Quarry and Ex-Beneficial Plant Nursery to Oil Palm; August 2019. Proposed new planting:</p>	Complied

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<p>them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p>	Current field	Nature of Area	Year of conversion	Ha	
	P01B	Ex-quarry	2019	0.8	
	P98B	Ex-Nursery beneficial plant	2019	0.26	
	Total			1.06	
	Carbon Stock Value (CSV) before conversion to oil palm:				
	Field	Category	Land area (ha)	Default CSV (tC/ha)	Total CSV
	Ex-quarry	Bare soil	0.8	0	0
	Ex-Nursery beneficial plant	Bare soil	0.04	0	0
		Shrubs	0.22	46	10.12
	Total		1.06		10.12
Carbon Stock Value (CSV) after conversion to oil palm:					
Field	Category	Land area (ha)	Default CSV (tC/ha)	Total CSV	
Multiple	Oil palm	1.06	50	53	
Carbon Stock & LUC Analysis Report; SOU 7 Bukit Cheraka Estate Field P2019C; Prepared by: GSQM Department, Sime Darby Plantation Berhad; August 2019					

		<table border="1"> <tr> <td>Current field</td> <td>Nature of Area</td> <td>Year of conversion</td> <td>Ha</td> </tr> <tr> <td>2019C</td> <td>Oil Palm Nursery</td> <td>2019</td> <td>10.45</td> </tr> </table> <p>Carbon Stock Value (CSV) before conversion to oil palm:</p> <table border="1"> <thead> <tr> <th>Field</th> <th>Category</th> <th>Land area (ha)</th> <th>Default CSV (tC/ha)</th> <th>Total CSV</th> </tr> </thead> <tbody> <tr> <td>P2019C</td> <td>Bare soil</td> <td>10.45</td> <td>26</td> <td>0</td> </tr> </tbody> </table> <p>Carbon Stock Value (CSV) after conversion to oil palm:</p> <table border="1"> <thead> <tr> <th>Field</th> <th>Category</th> <th>Land area (ha)</th> <th>Default CSV (tC/ha)</th> <th>Total CSV</th> </tr> </thead> <tbody> <tr> <td>P2019C</td> <td>Oil palm</td> <td>10.45</td> <td>50</td> <td>522.50</td> </tr> </tbody> </table>	Current field	Nature of Area	Year of conversion	Ha	2019C	Oil Palm Nursery	2019	10.45	Field	Category	Land area (ha)	Default CSV (tC/ha)	Total CSV	P2019C	Bare soil	10.45	26	0	Field	Category	Land area (ha)	Default CSV (tC/ha)	Total CSV	P2019C	Oil palm	10.45	50	522.50	
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7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.</p>	<p>Assessment of all polluting activities was conducted under Environmental Aspect Impact for identifying activities that contributes significant impact to environment. Amongst all, wastewater identified other than effluent were sourced from:</p> <ul style="list-style-type: none"> - Chemical mixing area - Sprayer PPE washing area - Workshop - Line site & office - Washrooms <p>Boiler smoke emission identified as pollutants was monitored using online system (CEMS-DIS) to DOE based on the transmitted data from boiler smoke density</p>	Complied																												

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		indicator and recorder. The emissions of all parameters tested were complied with their respective limits as stipulated in the EQ (Clean Air) Regulations 1978.																	
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.																			
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	New planting that involved conversion of Ex-Quarry (P01B) and Ex-Beneficial Plant Nursery (P98B) to Oil Palm was completed in August 2019 in Bukit Cheraka Estate. Visit conducted to the site confirmed the new planting was not prepared by burning.	Complied																
7.11.2	The unit of certification establishes fire prevention and control measures for the areas under its direct management.	The Fire prevention procedure have been established to ensure no fire breakout happen in estate. Fire drill and fire extinguishing training for emergency team in collaboration with local authority.	Complied																
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	The management already approach the stakeholder during stakeholder consultation meeting regarding to fire prevention and control measure.	Complied																
Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.																			
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protector enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	Records sighted available on Carbon Stock Assessment & Projection of Major GHG Emission for New Planting Development Report; SOU 7 Bukit Cheraka Estate; Conversion of Ex-Quarry and Ex-Beneficial Plant Nursery to Oil Palm; August 2019. Proposed new planting: <table border="1" data-bbox="958 1098 1794 1359"> <thead> <tr> <th>Current field</th> <th>Nature of Area</th> <th>Year of conversion</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>P01B</td> <td>Ex-quarry</td> <td>2019</td> <td>0.8</td> </tr> <tr> <td>P98B</td> <td>Ex-Nursery beneficial plant</td> <td>2019</td> <td>0.26</td> </tr> <tr> <td>Total</td> <td></td> <td></td> <td>1.06</td> </tr> </tbody> </table>	Current field	Nature of Area	Year of conversion	Ha	P01B	Ex-quarry	2019	0.8	P98B	Ex-Nursery beneficial plant	2019	0.26	Total			1.06	Complied
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Field	Category	Land area (ha)	Default CSV (tC/ha)	Total CSV
Multiple	Oil palm	1.06	50	53

Carbon Stock & LUC Analysis Report; SOU 7 Bukit Cheraka Estate Field P2019C; Prepared by: GSQM Department, Sime Darby Plantation Berhad; August 2019

Current field	Nature of Area	Year of conversion	Ha
2019C	Oil Palm Nursery	2019	10.45

Carbon Stock Value (CSV) before conversion to oil palm:

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7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p>	<p>No new land clearing involved within both Bukit Kerayong Estate and Bukit Cheraka Estate except for conversion of existing developed areas.</p> <p>Based on report of Internal Social & Environment Impact Assessment (SEIA) Report (RSPO – New Planting Procedure) SOU 7 Bukit Kerayong Estate (Conversion of Ex-Workers Housing Complex to Oil Palm; Prepared by: GSQM Department, Sime Darby Plantation Berhad November 2018 – summary of project area:</p> <table border="1"> <thead> <tr> <th>Current field</th> <th>Nature of Area</th> <th>Year of conversion</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>P14E (former field P96A)</td> <td>Ex-workers housing complex</td> <td>2018</td> <td>1.64</td> </tr> </tbody> </table> <p>No any HCV clearance in which the existing presence of HCV within Bukit Kerayong estate still remained unchanged from previous visit i.e. 3.00 Ha of pond classified as HCV4.</p> <p>For Bukit Cheraka Estate, report of Internal Social & Environment Impact Assessment (SEIA) Report (RSPO – New Planting Procedure) SOU 7 Bukit Cheraka</p>	Current field	Nature of Area	Year of conversion	Ha	P14E (former field P96A)	Ex-workers housing complex	2018	1.64	Complied												
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P14E (former field P96A)	Ex-workers housing complex	2018	1.64																				

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Estate; Prepared by: GSQM Department, Sime Darby Plantation Berhad November 2018 – summary of project area:

Current field	Nature of Area	Year of conversion	Ha
P01B	Ex-quarry	2019	0.8
P98B	Ex-Nursery beneficial plant	2019	0.26

No any HCV clearance in which the existing presence of HCV within Bukit Cheraka estate still remained unchanged from previous visit. However, due to the P01B (Ex-quarry) area located nearby the HCV 4 i.e. 55.52 ha of slope area >25°, there's additional conservation activities monitoring plan that were required under EIA Matrix & Findings – 3.4 Soil erosion and sedimentation of silt as following:

- Prohibited activities of oil palm plantation development or clearing
- any oil palm plantation development activities or land activities are not allowed on a slope of 25° or more
- Boundary slope of 25° or more shall be measured prior to the development of oil palm plantation activities or clearing activities initiated in the project and must achieve a measurement accuracy of class 3 standard
- Measurement plan for slope of 25° or more with a minimum scale of 1: 25,000 shall be monitored along with latitude and longitude readings before any oil palm plantation development activities or land clearing activities commence
- Boundary slope of 25° or more that have been measured, shall be marked on field with red paint and signage installed in conspicuous locations by oil palm plantation development activities initiated in the project

These existing conservation areas were identified based on Reassessment of Biodiversity conducted in December 2015 by Social & Environment Projects Unit (PSQM). There was an appropriate consultation process for identification,

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		<p>management and monitoring of HCVs. Conservation area maintained involved water-log and steep area where in Bukit Cheraka Estate, slope area of 55.52 ha which is >25° has been maintained as biodiversity area (HCV 4), whereas at Bukit Kerayong Estate, 3.00 Ha of pond was classified as HCV4.</p> <p>Existing HCV Management Plan 2020 SOU 7 Bukit Kerayong implemented as as following:</p> <ul style="list-style-type: none"> - To maintain HCV area: regular check and monitoring & to ensure compliance to SD policy regarding the HCV area - To improve quality of water in HCV pond area: to ensure regular security check to avoid any water pollution - To conduct water sampling process for HCV area <p>Records of implementation available including monitoring as per sample Buku pemantauan HCV; Date: 27/1/2019 & 16/1/2020 by AP.</p>	
	<p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p>	<p>The assessment documented in the records of Environmental Impact Evaluation Form SOU 7 Bukit Kerayong Estate FY 2020; Serial # EIE/2020/01/03/COMP/01; Reg. # EAI/2020/01/02/COM/01.</p>	
<p>PROCEDURAL NOTE for 7.12.2: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p>			
<p>7.12.3</p>	<p><i>Indicator is not applicable in Malaysia context.</i></p>	<p>Not applicable</p>	<p>N/A</p>
<p>7.12.4</p>	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or</p>	<p>Reassessment of Biodiversity has been conducted in December 2015 by Social & Environment Projects Unit (PSQM). There was an appropriate consultation process for identification, management and monitoring of HCVs. Conservation area is</p>	<p>Complied</p>

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	enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).	maintained mainly water-log and steep area. At Bukit Cheraka Estate, slope area of 55.52 ha which is more than 25 degree has been maintained as biodiversity area (HCV 4), whereas at Bukit Kerayong Estate, 3.00 Ha of pond was classified as HCV4.	
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	No HCV set asides with existing rights of local communities have been identified	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	Although there is no RTE species identified at SOU7, there is evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities. Signage as well as routine patrolling activities were carried out as part of the efforts to create awareness among employees about biodiversity. Continuous communication with workers during morning muster and housing meeting was evident to regularly educate workers on the HCV and biodiversity issue.	Complied
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	Based on the Internal Social & Environment Impact Assessment (SEIA) Report (RSPO – New Planting Procedure) SOU 7 Bukit Cheraka Estate; Prepared by: GSQM Department, Sime Darby Plantation Berhad November 2018 – summary of project area:	Minor noncompliance

		<p>Current field: P01 Nature of Area: Ex-quarry Year of conversion: 2019 Area: 0.8 Ha</p> <p>Under EIA Matrix & Findings – 3.4 Soil erosion and sedimentation of silt:</p> <ul style="list-style-type: none"> - Prohibited activities of oil palm plantation development or clearing - any oil palm plantation development activities or land activities are not allowed on a slope of 25 degree or more - Boundary slope of 25 degree or more shall be measured prior to the development of oil palm plantation activities or clearing activities initiated in the project and must achieve a measurement accuracy of class 3 standard - Measurement plan for slope of 25 degree or more with a minimum scale of 1: 25,000 shall be monitored along with latitude and longitude readings before any oil palm plantation development activities or land clearing activities commence - Boundary slope of 25 degree or more that have been measured, shall be marked on field with red paint and signage installed in conspicuous locations by oil palm plantation development activities initiated in the project <p>However, outcomes of this monitoring are not fed back into the management plan for the new planting area of Ex-Quarry which found with slopes more than 25 degree not been control its erosion.</p> <p>Hence, a Minor NC has been raised on the matter.</p>	
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018,	Records available as per criteria 7.10 to 7.12 above.	Complied

	the Remediation and Compensation Procedure (RaCP) applies.		
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Appendix B: Approved Time Bound Plan

Details of Time Bound Plan as submitted by Sime Darby Plantation Berhad (30th June 2019)

Table 1: Initial Timebound Plan and Summary of RSPO Certification Status

Financial year (July – June)	Targeted	Achieved/Status	Attachments
Jun-08	5 SOUs	<p>Achievement of Timebound Plan Sime Darby Plantation has had all its SOUs (Malaysian & Indonesian) completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2011, all Malaysian SOUs have been RSPO certified (with the exception of 2 new oil mills commissioned to replace the current oil mills after the initial timebound plan targets).</p> <p>97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes. Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. A new mill in Liberia is planned to be commissioned.</p> <p>Note: Time-bound plan to achieve 100% RSPO certification has shifted to 2015 .</p>	<p>For details please refer to Attachments: i) SDP - RSPO Certification Status for Malaysia Operations ii) SDP- RSPO Certification Status for Indonesia Operations iii) Updates on PT MAS iii) RSPO SCCS status for Sime Darby Plantation (Downstream Operations)</p>
2008/2009	20 SOUs (from Malaysia and Indonesia)		
2009/2010	20 SOUs (from Malaysia and Indonesia)		
2010/2011 (End Dec 2011)	17 SOUs (from Malaysia and Indonesia)		

Note: SOU - Strategic Operating Units (consisting of one oil mill and supplying estates)

Table 2: Details of RSPO Certification Status as at June 2019

Status	Malaysia	Indonesia	Liberia	Total	Remarks
RSPO Certified	33	23	0	56	<p>Malaysia * Effectively 33 Mills (Excluding Bintang Oil Mill) - Note: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down, and Pekaka POM is being mothballed.</p> <p>*SDP acquired Bintang Palm Oil Mill, Talisman Estate, and Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bk Paloh Estate of SOU 21 Gunung Mas, while Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut. Lian Seng will be incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018, whilst Talisman Estate has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2017. For Bintang Oil Mill, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold as at Dec 2017.</p> <p>Indonesia *Effectively 23 Mills *Note: Angsana Mini POM closed down in 2016. Selabak POM is being mothballed.</p>
Planned for Certification / Undergoing Stage 1 or Stage 2 Assessment/ RSPO EB Review	0	1	1	2	<p>SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.</p> <p>Indonesia PT MAS has undergone RSPO Main assessment and is delayed due to some social disputes. The target date for certification is by 2017 subject to the progress of the matter being resolved.</p>

					<p>Smallholders</p> <p>As at Dec 2017, a total of 28,712 Ha of smallholders have been certified. The entire KKPA (1-5) in Sebamban, KKPA Sg. Cengal, and Plasma TGK and SIA (East and West Plasma) are now RSPO certified with a production capacity of 465,602 mt of FFB. Total scheme smallholders hectares are 51,353 and total communities are 22,613.</p> <p>Certification process for the remaining associated smallholders areas is on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and outgrowers by end 2020.</p> <p>—</p> <p>Liberia</p> <p>Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification Stage 2 Assessment in March/April 2018. RSPO NPP process has been completed in 2011.</p>
Total SOUs	33	24	1	58	<p>Other remarks:</p> <p>In March 2015, Sime Darby Plantation completed the acquisition of New Britain Palm Oil Limited (NBPOL). NBPOL is managed under a separate entity and the reporting of timebound plan will be under NBPOL's management. NBPOL is considered as a different entity/member under the RSPO and NBPOL is 100% RSPO Certified.</p>

SDP - RSPO Certification Status for Malaysia Operations

SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '11	11-Aug-20	SPO 550179	
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	
5a	Sg Samak		3 Mar '11	NA	NA	
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	
8	East	Carey Island, Selangor	19 May '10	18-May-20	SPO 543543	
9	West	Carey Island, Selangor	19 May '10	18-May-20	SPO 543594	
9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	
10	Bukit Puteri	Raub, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020	
11	Kerdau	Temerloh, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019	
12	Jabor	Kuantan, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049	
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-21	CU-RSPO-819163, SGRSPO/PM/MY13/01284, 824 502 16039, SGS-RSPO/PC17-00004, CURSPO-855480	
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-20	SPO 541905	
15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-24	SGS-RSPOPM-MY14/01364, 824 502 16032	Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill with Certificate No: CU- RSPO-819165, certification date: 30 Dec 2011.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '11	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051	
17	Kempas	Jasin, Melaka	20 May '15	19-May-20	RSPO-PC 00101	
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-24	RSPO 600305	Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.

19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	NA	
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-20	RSPO 548299	
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042	
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	SGS-RSPO/PM-00715, 824 502 16040, BVC-RSPO20170623-01	
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	NA	
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-23	RSPO 537872	
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-20	RSPO 001	
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-20	RSPO 002	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-20	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	
32	Rajawali	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819167, RSPO 0020	
33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	
34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-815150, MUTU-RSPO/054	Mill is mothballed, supply base merged into Lavang effective Dec 2017.

Legends:

Certification Withdrawal

SDP- RSPO Certification Status for Indonesia Operations

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	MUTU-RSPO/011, SGS-RSPO/PC17-00005, SGS-RSPO/PC17-00005	
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	2-Jul-23	MUTU-RSPO/027	
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	

5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	3-Aug-22	MUTU-RSPO/014	Recertification of Bebunga POM is in progress.
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	
7	PT BAHARI GEMBIRARIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	28-Nov-22	MUTU-RSPO/019	
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	24-Nov-20	MUTU-RSPO/002	
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	19-Jul-22	MUTU-RSPO/016	Recertification of Pondok Labu POM is in progress.
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	19-Nov-22	MUTU-RSPO/017	Recertification of Rantau Panjang POM is in progress.
12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11	05-Feb-22	MUTU-RSPO/009	
13		BETUNG		1-April-14	31-Mar-24	MUTU-RSPO/035	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	MUTU-RSPO/001	
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	16-Mar-17	MUTU-RSPO/015	Mill is mothballed.
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	28-Nov-22	MUTU-RSPO/020	
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU-RSPO/004	
18	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16	30-Nov-21	MUTU-RSPO/008	
19		MANDAH		1-April-14		31-Mar-24	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU-RSPO/007	
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	28-Dec-22	MUTU-RSPO/018	
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	

23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	2-May-23	MUTU-RSPO/026	
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-24	MUTU-RSPO/044	
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	NA	NA	

Legends

Pending Certification by RSPO	Mill closed down/Mothballed	NA - NOT APPLICABLE
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SDP - RSPO Certification for Time Bound Plan - NBPOL Operations

As at end June 2019

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date
	SOU Name					
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	NA	Guadalcanal Province, Solomon Islands	Certified	18-Mar-11
		Tetere Estate				
		Ngalimbiu Estate				
		Mbalisuna Estate				
		Outgrowers – West Zone				
		Outgrowers – Central Zone				
		Outgrowers – MBA East Zone				
Outgrowers – MBE East Zone						
2	Milne Bay Estates (MBE)	Hagita Oil Mill	NA	Milne Bay Province, Papua New Guinea	Certified	15-Feb-18
		Giligili Estate				
		Waigani Estate				
		Sagarai Estate				
		Padipadi Estate				
		Mariawatte Estate				
		East Gurney Estate				
		West Gurney Estate				
		East Sagarai Estate				
		West Sagarai Estate				
3	Poliamba (POL)	Poliamba Oil Mill	NA	New Ireland Province, Papua New Guinea	Certified	19-Mar-12
		Kara Estate				
		Nalik Estate				
		West Coast Estate				
		Noatsi Estate				
		Madak Estate				
		North Smallholders (613)				
		South Smallholders (863)				
		West Smallholders (309)				
Gusap Mill						
Gusap East (Gusap) Estate						

4	Ramu Agricultural Industries Ltd (RAIL)	Gusap West (Paddock) Estate Surinam Estate Dumpu Estate Ngaru Estate J Estate (Jephcott) Estate	NA	Morobe Province, Papua New Guinea	Certified	5-Aug-10
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill Mamba Oil Mill Embi Estate Ambogo Estate Sangara Estate Sumbiripa Estate Mamba Estate	NA	Oro Bay Province, Papua New Guinea	Certified	1-Feb-13
		Mosa Oil Mill Kumbango Oil Mill Kapiura Mill Numundo Mill Waraston Mill Bebere Estate Kumbango Estate Togulo Estate Dami Estate				
6	West New Britain (WNB)	Waisisi Estate Kautu Estate Karaus Estate Moroa Estate Bilomi Estate Loata Estate Haella Estate Garu Estate Daliavu Estate Sapuri Estate Malilimi Estate Rigula Estate Nomundo Estate Navarai / Karato ME /KDC EU Estate Volupai / Lotomgam / Natupi / Goruru Estate Lolokoru Estate Ove Estate Tamare Estate	NA	Kimbe, West New Britain, Papua New Guinea	Certified	10-Sep-08
7	Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Munum Estate Erap Estate	Sep-20 Sep-20	Markham Farms,	RaCP RaCP	The majority of Markham Farms has already been planted by the former owner without following RSPO NPP. Therefore the Remediation and Compensation Procedure will be required to be fulfilled in order to achieve certification. The Disclosure has been initiated on 18.10.18. Currently HCV/HCS, SEJIA and LUCA are being undertaken in order to submit and mitigation and remediation plan to RSPO. As this process has never been completed through RSPO in less than 2 years, the time frame for the 100% certification of Markham Farms is set to that duration.

Legends
Pending Certification
NA - NOT APPLICABLE

SDP - RSPO Certification for Time Bound Plan - Liberia Operations
As at end June 2019

No	Management Unit SOU Name	Mill and Supply Base	Time Bound Plan	Location	Status	Remarks
1	Sime Darby Plantation (Liberia) Grand Cape Mount	Grand Cape Mount Mill Bomi Estate Lofa Estate Matambo Estate Grand Cape Mount Estate	2019	Grand Cape Mount County	Uncertified	<p>In May – September 2011, SDPL has undergone a series of assessment including Social and Environmental Impact Assessment and High Conservation Value Assessment in conformance with the RSPO New Planting Procedures to begin planting. *Note: RSPO NPP Announcements can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?</p> <p>SDPL has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was only completed conducted and put on-hold due to security & safety issue.</p> <p>After due consideration on the current engagement with the House of Representative in Liberia, SDP management decided to postpone the time bound plan of RSPO Certification to 2019 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process.</p> <p>A letter of Request for Extension of RSPO Certification Time Bound Plan for Sime Darby Plantation dated 22 May was sent to RSPO Secretariat, Head of Certification, and with response to Sime Darby Plantation on 23 May 2019 with no objections on the extension. (Letter and email correspondence as attached)</p>

Legends
Pending Certification
NA - NOT APPLICABLE

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2019 for Bukit Kerayong Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in 2019 for Bukit Kerayong Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.25
PKO	1.25

Extraction	%
OER	21.09
KER	5.12

Production	t/yr
FFB Process	134,749.016
CPO Produced	28,418.57
PKO Produced	6,899.15

Land Use	Ha
OP Planted Area	6,186.46
OP Planted on peat	-
Conservation (forested)	-
Conservation (non-forested)	59.79
Total	6,246.25

Summary of Field Emission and Sink

	Own Crop		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	61,233.22	0.52	-	-	-	-	61,233.22	0.52
CO ₂ Emission from fertilizer	6,015.64	0.05	-	-	-	-	6,015.64	0.05
NO ₂ Emission	4,934.16	0.04	-	-	-	-	4,934.16	0.04
Fuel Consumption	417.42	0.00	-	-	-	-	417.42	0.00
Peat Oxidation	-	-	-	-	-	-	-	-
Sink								
Crop Sequestration	- 58,040.96	- 0.49	-	-	-	-	- 58,040.96	- 0.49
Conservation Sequestration	-	-	-	-	-	-	-	-
Total	14,559.49	0.12	-	-	-	-	14,559.49	0.12

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	23,074.12	0.20
Fuel Consumption	109.13	0.00
Grid Electricity Utilization	757.32	0.01
Credit		
Export of Grid Electricity	-	-
Sales of PKS	-	-
Sales of EFB	-	-
Total	23,940.56	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	-
PK from other source	-
Fuel Consumptions	-
Total Crusher emissions	-

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	-
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	January 2019	12,220.28	-	12,220.28
2	February 2019	12,315.08	-	12,315.08
3	March 2019	13,534.95	-	13,534.95
4	April 2019	12,738.91	-	12,738.91
5	May 2019	11,884.74	-	11,884.74
6	June 2019	10,073.29	-	10,073.29
7	July 2019	11,586.55	-	11,586.55
8	Aug 2019	13,379.15	-	13,379.15
9	Sept 2019	11,366.45	-	11,366.45
10	Oct 2019	11,275.44	-	11,275.44
11	Nov 2019	8,433.63	-	8,433.63
12	Dec 2019	6,045.30	-	6,045.30
Total		134,853.77	-	134,853.77

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	January 2019	2,671.85	609.70
2	February 2019	1,755.54	609.78
3	March 2019	1,410.74	409.63
4	April 2019	2,496.35	409.85
5	May 2019	6,448.23	1,009.01
6	June 2019	1,895.18	410.47
7	July 2019	1,826.41	510.29
8	Aug 2019	2,193.71	791.46
9	Sept 2019	1,693.93	430.70
10	Oct 2019	2,219.81	388.78
11	Nov 2019	2,004.47	913.49
12	Dec 2019	1,802.35	405.99
Total		28,418.57	6,899.15

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		TR-2f69e920-d485		200.00
3	2. Buyer B	TR-401e1968-6fa9, TR-a7d6f938-02ce	353.84	
4	1. Buyer A	TR-f474e166-41e2, TR-f2a4b989-3356, TR-4e3d7107-b32f, TR-04ff1056-3752, TR-016cb840-6753, TR-64da4d47-4a42, TR-8b5ead34-78b9	1,439.44	
5	1. Buyer A	TR-be606a85-e9e9, TR-69a144da-4c41, TR-c17da13a-3b16, TR-d7c47cb4-8f8b, TR-ae208d1-9c89, TR-71d9db23-3f15, TR-f3592626-ad55, TR-31898cdf-ad47, TR-47433df3-a2e4	1,776.00	600.00
	2. Buyer B		3,615.32	
	3. Buyer C	TR-91a3f4ed-2fc5, TR-f5b147fa-f0b8, TR-2e8d4254-5a82, TR-8c2bb058-dd5d, TR-7aaaab61-55a8, TR-e5b62937-08bb, TR-63249930-684d, TR-70bc6911-581b, TR-510016b2-bca3, TR-f0b72db2-1bc9, TR-41940474-dfa7, TR-8351f3c0-3f7c, TR-d8069cba-6223, TR-8d201c46-d9bf, TR-5d4506ff-ae42, TR-3e70e60a-983b, TR-f0dad463-e17c, TR-a73c6413-8401 TR-638fdbd3-4912		
6	2. Buyer B	TR-92c8badb-4b72, TR-621861a6-2f75, TR-cb5b659e-56b9	838.27	
7	1. Buyer A	TR-6e1a1e4d-d9d6, TR-462ad771-da76, TR-fd152050-659a, TR-095f45e0-883c, TR-a1a42cb1-fd5e	139.81	
	2. Buyer B	TR-263cd70f-fb77, TR-76cdf2e0-0c4d	629.69	

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8	1. Buyer A 2. Buyer B	TR-5bf62748-4ca8, TR-06bc7920-64ee, TR-3203228c-31a4 TR-29150462-8223	1,136.80	482.27
9	1. Buyer A	TR-5206167d-dbd3, TR-e53bb9ab-7692, TR-96169fec-83bf, TR-1d5a62d6-8939, TR-2814840f-8e4a, TR-262942b8-4448, TR-aeac7a01-b457, TR-b7aa1675-c828, TR-b47e800b-c734, TR-9c66fc34-0e98, TR-a791e8d0-21de, TR-313021cf-5661, TR-9e911e9e-b619, TR-b0e48050-eb21, TR-b356c95d-5dd4, TR-6d9a6653-2942, TR-5ade6dc1-d179, TR-401c1b7c-4214, TR-6f69522d-0553, TR-3b4ba971-b661	637.02	
10	1. Buyer A	TR-7c62d405-0c9a, TR-8463b2d5-b13c, TR-37bc02fb-9489, TR-e7d305c0-8e63	1,162.90	
11	1. Buyer A 2. Buyer B	TR-53ecdffd6-4b4d, TR-7fd8bcc2-1395, TR-c74bb734-0082 TR-b30c8cf4-78c2	947.56	500.00
12	1. Buyer A	TR-d0e2827b-76cf, TR-b9e90593-4095	745.44	
Total			15,735.68	1,982.27

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)

No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
Nil	n/a	n/a	n/a	n/a

E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)

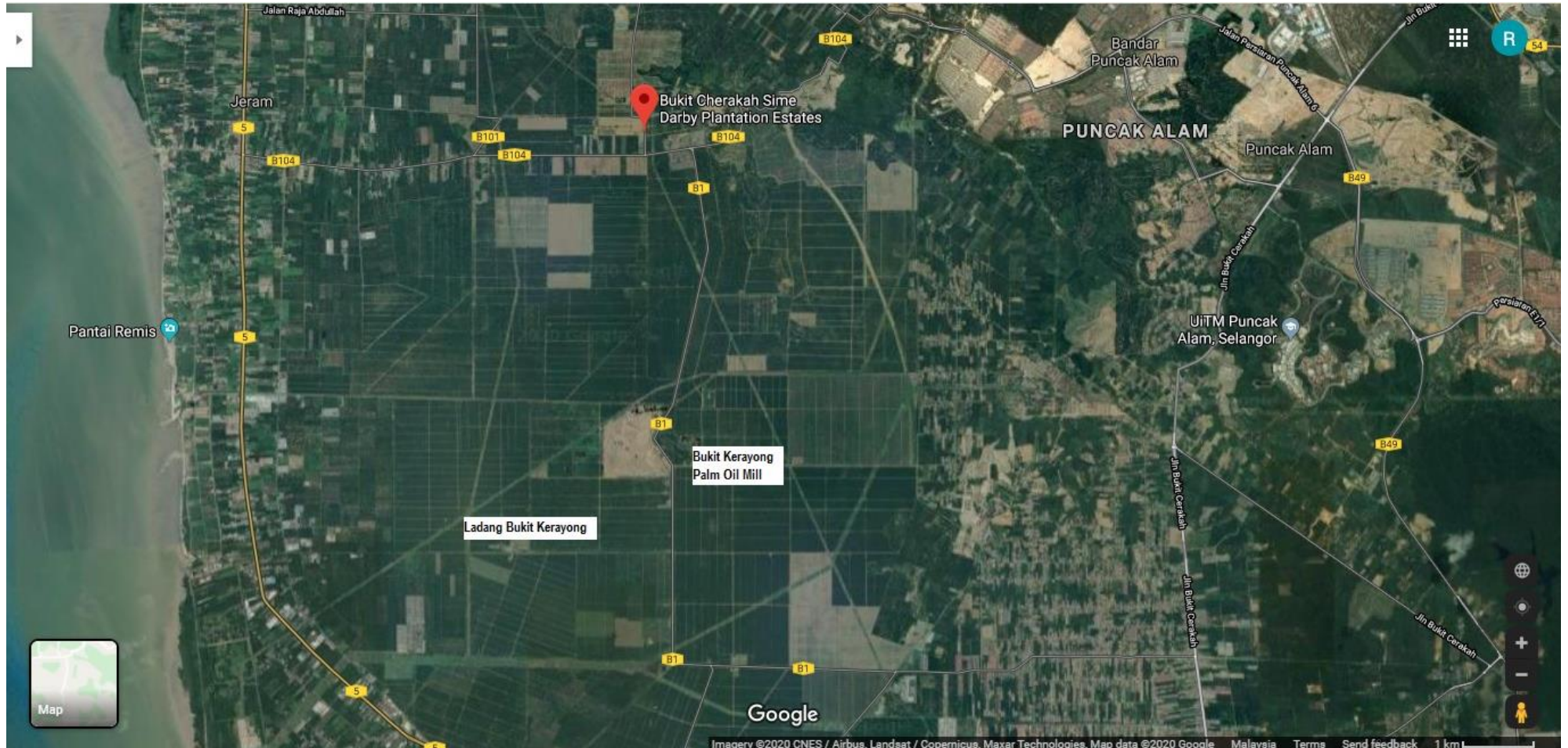
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Buyer A	5,462.91	-

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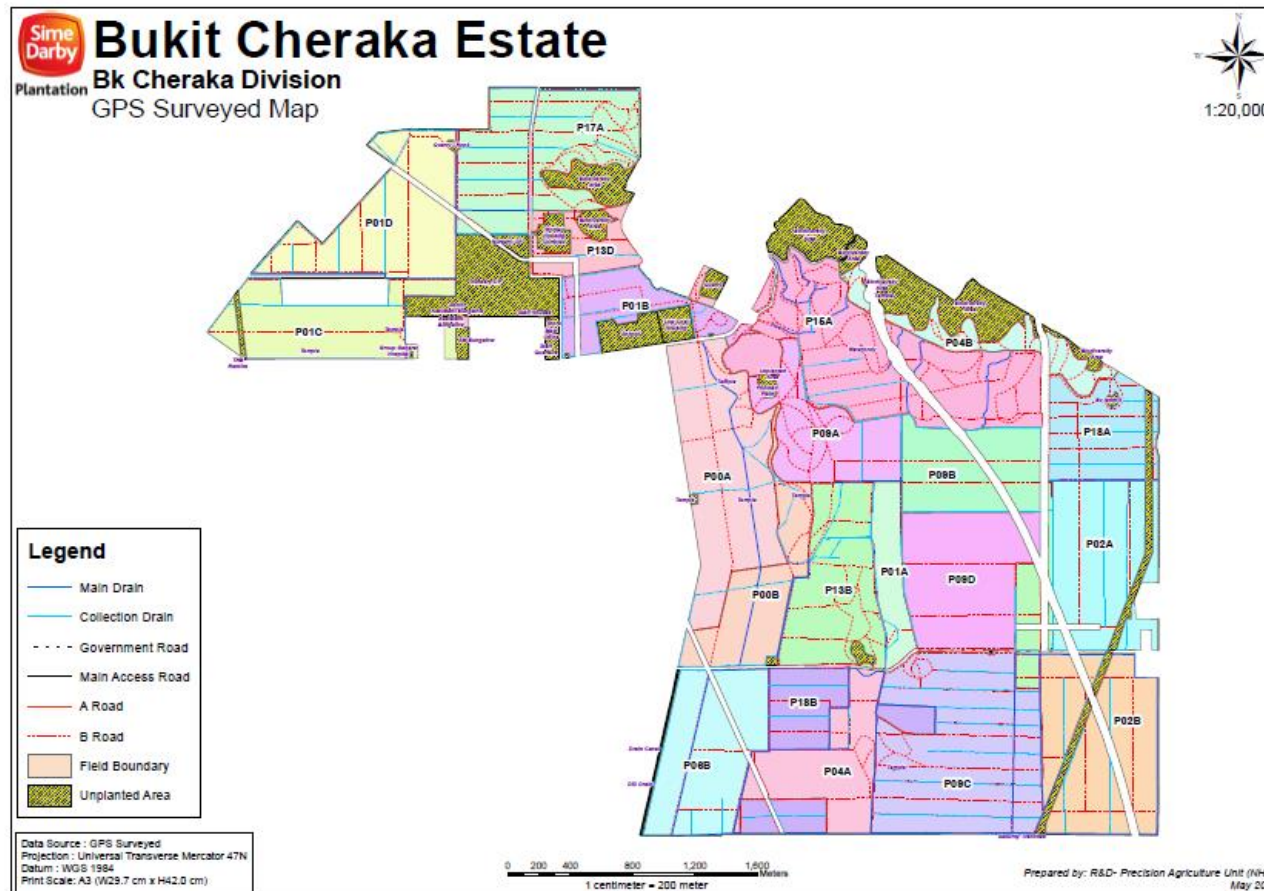
2	Buyer B	1,058.05	-
3	Buyer C	2,766.61	-
4	Buyer DA	0.38	-
5	Buyer E	-	3,695.41
6	Buyer F	-	200
7	Buyer G	-	199.15
TOTAL		9,287.95	4,094.56

F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
Nil	n/a	n/a	n/a

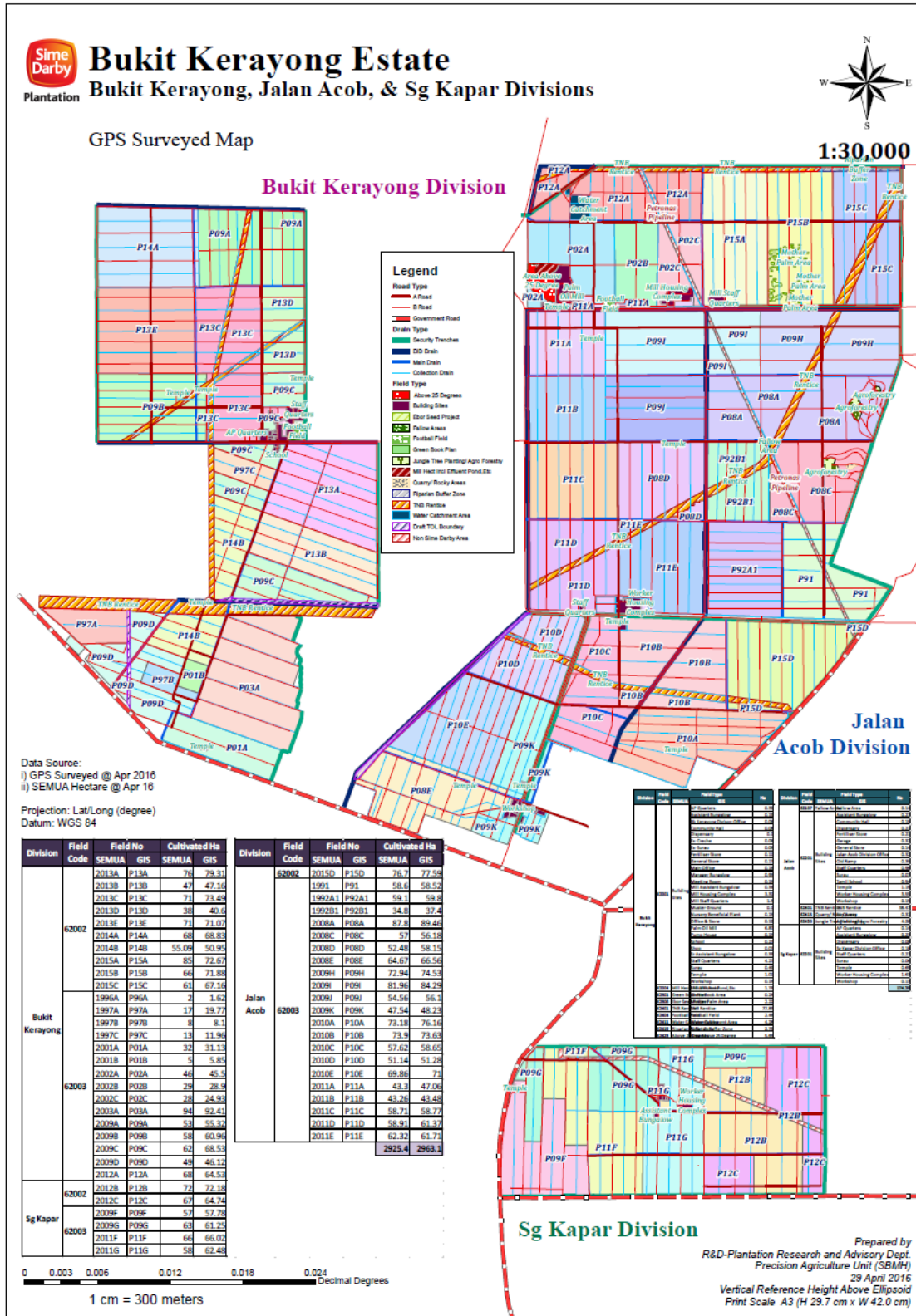
Appendix E: Location Map of Certification Unit and Supply bases



Appendix F: Bukit Cheraka Estate Field Map



Appendix G: Bukit Kerayong Estate Field Map



Appendix H: List of Smallholder Sampled

Not applicable

Appendix I: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel 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
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MB	Mass Balance
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
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure