

**RSPO PRINCIPLE AND CRITERIA –
RECERTIFICATION ASSESSMENT (RC_2)
Public Summary Report**

| Sime Darby Plantation Berhad |
|--|
| <p>Client company Address: Level 3A, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7 47301 Ara Damansara Selangor, Malaysia</p> |
| <p>Certification Unit: Strategic Operating Unit (SOU 8) East Palm Oil Mill</p> <p>Location of Certification Unit: East Palm Oil Mill Lot 2664 Jalan Pulau Carey, 42960 Carey Island Selangor, Malaysia</p> |

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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 Operation Unit – SOU 8 East Palm Oil Mill | | |
| Address | Lot 2664 Jalan Pulau Carey, 42960 Carey Island, Selangor, Malaysia | | |
| Contact Name | Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mr Azlan bin Md Kambali (East POM) | | |
| Website | www.simedarbyplantation.com | E-mail | Kks.east@simedarbyplantation.com |
| Telephone | +603-3122 4001 | Facsimile | +603-7848 4356 (Head Office) +603-3122 4005 (Mill) |

| 2. Certification Information | | | |
|-------------------------------|---|------------------------------------|------------|
| Certificate Number | RSPO 543543 | Date of First Certification | 19/05/2010 |
| | | Certificate Start Date | 19/05/2020 |
| | | Certificate Expiry Date | 18/05/2025 |
| Scope of Certification | Palm Oil and Palm Kernel Production | | |
| Applicable Standards | Malaysian National Interpretation 2019 for RSPO P&C 2018 with Identity Preserved supply chain Module. | | |

| 3. Other Certifications | | | |
|---------------------------|--|-------------------------------|--------------------|
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date |
| MSPO 687976 | MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4 | BSI Services Malaysia Sdn Bhd | 09/01/2023 |
| MSPO 682045 | MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3 | BSI Services Malaysia Sdn Bhd | 09/01/2023 |
| MSPO 714129 | MSPO Supply Chain Certification Standard | BSI Services Malaysia Sdn Bhd | 22/07/2024 |

| 4. Location(s) of Mill & Supply Bases | | | |
|---------------------------------------|---|-----------------|----------------|
| Name (Mill / Supply Base) | Location [Map Reference #] | GPS Coordinates | |
| | | Latitude | Longitude |
| East Palm Oil Mill | SOU 8 Management Unit (East Palm Oil Mill) Lot 2664 Jalan Pulau Carey, Carey Island, 42960 Selangor, Malaysia | 2°53'2.58"N | 101°26'11.65"E |
| East Estate | East Estate, 42960 Carey Island, Selangor, Malaysia. | 2°54'01.7"N | 101°23'53.7"E |
| Dusun Durian Estate | Ladang Dusun Durian 42700 Banting, Selangor, Malaysia | 2°48'02.3"N | 101° 27'43.0"E |
| Sepang Estate | Ladang Sepang 43900 Sepang, Selangor, Malaysia | 2°42'11.6"N | 101°44'37.60"E |

| 5. Description of Supply Base | | | | | |
|-------------------------------|--|-------------|-----------------------------------|--------------------|--------------|
| Estate | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
| East Estate | 4,994.79 | 12.15 | 627.51 | 5,634.45 | 88.65 |
| Dusun Durian Estate | 1,961.14 | 1.43 | 129.71 | 2,092.28 | 93.73 |
| Sepang Estate | 2,706.54 | 2.40 | 467.27 | 3,176.21 | 85.00 |
| Total | 9,662.47 | 15.98 | 1,224.49 | 10,902.94 | 88.62 |

Note:

*Dusun Durian Estate – Increase by 107.68 Ha in Infrastructure & other due to nursery 29.83 ha was not reported in last report Nursery was established since 1996 as per SAP data but missed to be reported in last year assessment. It is within the certified area in the estate therefore it doesn't required NPP.

*East Estate – Reduction in total planted by 0.36 ha – taken to build surau

| 6. Plantings & Cycle | | | | | | | |
|----------------------|-------------|----------|----------|---------|---------|------------------|------------------|
| Estate | Age (Years) | | | | | Mature** (ha) | Immature (ha) |
| | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 | | |
| East Estate | 619.40 | 1,238.11 | 2,766.01 | 371.27 | 0 | 4,375.39 | 619.40 |
| Dusun Durian Estate | 71.09 | 829.53 | 1,000.48 | 60.04 | 0 | 1,890.05 | 71.09 |
| Sepang Estate | 484.37 | 683.92 | 1,317.87 | 220.38 | 0 | 2,222.17 | 484.37 |
| Total (ha) | 1,174.86 | 2,751.56 | 5,084.36 | 651.69 | 0 | 8,487.61 | 1,174.86 |

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| 7. Certified Tonnage of FFB (Own Certified Scope) | | | | |
|--|---|--|---|--|
| Estate | Tonnage / year | | | |
| | Estimated (May 2019-April 2020) (mt) | Actual (Jan 2019-Jan 2020) (mt) | | Forecast (May 2020-April 2021) (mt) |
| | | <i>Previous license period (Jan 2019 – Apr 2019)</i> | <i>Current license period (May 2019-Jan 2020)</i> | |
| East Estate | 58,124.740 | 7,621.00 | 30,420.52 | 52,103.00 |
| Dusun Durian Estate | 59,250.500 | 17,955.15 | 36,137.08 | 55,175.00 |
| Sepang Estate | 60,541.530 | 19,939.12 | 32,983.23 | 65,340.24 |
| Total | 177,916.77 | 145,056.10 | | 172,618.24 |

| 8. Certified Tonnage of FFB (from other certified unit(s)) if applicable * | | | | |
|---|--|--|--|---|
| Estate | Tonnage / year | | | |
| | Estimated (May 2019-April 2020) | Actual (Jan 2019-Jan 2020) | | Forecast (May 2020-April 2021) |
| | | <i>Previous license period (Jan 2019 – Apr 2019)</i> | <i>Previous license period (Jan 2019 – Apr 2019)</i> | |
| | NA | | | NA |
| West Estate | | 139.46 | 4,128.92 | |
| Total | | 4,268.38 | | |

| 9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable | | | | |
|---|--|--|--|---|
| Independent FFB Supplier | Tonnage / year | | | |
| | Estimated (May 2019-April 2020) | Actual (Jan 2019-Jan 2020) | | Forecast (May 2020-April 2021) |
| | | <i>Previous license period (Jan 2019 – Apr 2019)</i> | <i>Previous license period (Jan 2019 – Apr 2019)</i> | |
| - | - | - | - | - |
| Total | | | | |

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| 10. Certified Tonnage | | | | |
|--|--|---|---|---|
| Mill Capacity: 30 MT/hr SCC Model: IP | Estimated (May 2019-April 2020) (mt) | Actual (Jan 2019-Jan 2020) (mt) | | Forecast (May 2020-April 2021) (mt) |
| | FFB | FFB | | FFB |
| | 177,916.77 | <i>Previous license period</i> (Jan 2019 – Apr 2019) | <i>Previous license period</i> (May 2019-Jan 2020) | 172,681.24 |
| | | 45,654.91 | 103,669.58 | |
| | CPO (OER: 21.50%) | CPO (OER: 22.34%) | | CPO (OER: 22.22%) |
| | 38,252.11 | 33,357.02 | | 38,369.77 |
| | PK (KER: 5.1%) | PK (KER: 4.93%) | | PK (KER: 5.10%) |
| | 9,073.76 | 7,365.22 | | 8,806.74 |

| 11. Actual Sold Volume (CPO) (Jan 2019-Jan 2020) | | | | | |
|--|----------------|-------------------------|-----|--------------|-----------|
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | RSB | | |
| CPO (MT) | 14,754.45 | - | - | 18,201.14 | 32,955.59 |

| 12. Actual Sold Volume (PK) (Jan 2019-Jan 2020) | | | | | |
|---|----------------|-------------------------|-----|--------------|----------|
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | RSB | | |
| PK (MT) | 2,600.00 | - | - | 4,706.97 | 7,306.97 |

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
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Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
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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 recertification assessment was conducted from **10/02/2020 – 14/02/2020**. 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 Critical NC close out off-site assessment was conducted on **12/05/2020**. The reason why it is conducted off-site is because of the compliance to Movement Control Order by Malaysia Prime Minister started from 18/03/2020 – 28/04/2020. The audit programmes are included in Section 2.3.

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. Malaysia National Interpretation 2019 for RSPO P&C 2018 with supply chain Module Identity Preserved 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.

- 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

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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. The comments made by external stakeholders were also taken into account in the assessment where the stakeholder notification was made on 27/12/2019, through BSI website as per following link: https://www.bsigroup.com/globalassets/localfiles/en-my/rspo/Public%20Notification/2019/rspo-public-notification_sou-8-east-pom_english.pdf

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 (RC2) | Year 2 (ASA2_1) | Year 3 (ASA2_2) | Year 4 (ASA2_3) | Year 5 (ASA2_4) |
| East Palm Oil Mill | √ | √ | √ | √ | √ |
| Dusun Durian Estate | √ | √ | √ | √ | √ |
| Sepang Estate | √ | √ | √ | √ | √ |
| East Estate | √ | √ | √ | √ | √ |

Tentative Date of Next Visit: February 1, 2021 - February 5, 2021

Total No. of Mandays: 13 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> |
|---------------------|---|--|
| Elzy Ovktafia (EOC) | Team Leader | <p>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) 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.</p> |
| Vijay Kanna (VK) | Team Member | <p>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 and mill/estate best practises. He is fluent in Bahasa Malaysia and English languages.</p> |
| Amir Bahari (AB) | Team Member | <p>He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 306 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered environmental issues, HCV/HCS and worker consultation. He is fluent in both verbal/written in Bahasa Malaysia and English.</p> |

Accompanying Persons: -

| No. | Name | Role |
|-----|------|------|
| | | |
| | | |
| | | |

2.3 Assessment Plan

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

| Date | Time | Subjects | EO | VK | AB |
|-----------------------|-----------|--|----|----|----|
| Sunday 09/02/2020 | PM | Audit Team travelling to Banting and check in hotel. | √ | √ | √ |
| Monday, 10/02/2020 | 0800-0830 | Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader • Confirmation of assessment scope and finalize audit plan (including stakeholder’s consultation) • Verification on previous audit findings | √ | √ | √ |
| | 0830-1200 | Sime Darby-East 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. | √ | √ | √ |
| | 1200-1300 | Lunch | √ | √ | √ |
| | 1300-1630 | Sime Darby-East Palm Oil Mill: Visit to laboratory, weighbridge and palm product storage area. Document Review: Principle 1. Behave ethically and transparently, Principle 2. Operate legally and respect rights, Principle 3. Optimise productivity, efficiency, positive impacts and resilience, Principle 4. Respect community and human rights and deliver benefits, Principle 5. Support smallholder inclusion, Principle 6. Respect workers’ rights conditions and Principle 7. Protect, conserve and enhance ecosystems and the environment. | √ | √ | √ |
| | 1630-1700 | Interim Closing Briefing | √ | √ | √ |

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| Date | Time | Subjects | EO | VK | AB |
|-------------------------|-----------|---|----|----|----|
| Tuesday, 11/02/2020 | 0800-1200 | Dusun Durian 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. | √ | √ | √ |
| | 1000-1200 | Meeting with stakeholders – DOSH, DOE, Forestry, Wildlife, Land Office, Labour Office, Neighbouring Estates, Community, Contractors, Suppliers, etc. | √ | - | - |
| | 1200-1300 | Lunch | √ | √ | √ |
| | 1300-1630 | Dusun Durian Estate: Document Review: Principle 1. Behave ethically and transparently, Principle 2. Operate legally and respect rights, Principle 3. Optimise productivity, efficiency, positive impacts and resilience, Principle 4. Respect community and human rights and deliver benefits, Principle 5. Support smallholder inclusion, Principle 6. Respect workers’ rights conditions and Principle 7. Protect, conserve and enhance ecosystems and the environment. | √ | √ | √ |
| | 1630-1700 | Interim Closing Briefing | √ | √ | √ |
| Wednesday 12/02/2020 | 0830-1200 | Sepang 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. | √ | √ | √ |
| | 1200-1300 | Lunch | √ | √ | √ |
| | 1300-1630 | Sepang Estate: Document Review: Principle 1. Behave ethically and transparently, Principle 2. Operate legally and respect rights, Principle 3. Optimise productivity, efficiency, positive impacts and resilience, Principle 4. Respect community and human rights and deliver benefits, Principle 5. Support smallholder inclusion, Principle 6. Respect workers’ rights conditions and Principle 7. Protect, conserve and enhance ecosystems and the environment. | √ | √ | √ |
| | 1630-1700 | Interim Closing Briefing | √ | √ | √ |

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| Date | Time | Subjects | EO | VK | AB |
|------------------------|-----------|---|----|----|----|
| Thursday 13/02/2020 | 0830-1200 | East 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. | √ | √ | √ |
| | 1200-1300 | Lunch | √ | √ | √ |
| | 1300-1630 | East Estate: Document Review: Principle 1. Behave ethically and transparently, Principle 2. Operate legally and respect rights, Principle 3. Optimise productivity, efficiency, positive impacts and resilience, Principle 4. Respect community and human rights and deliver benefits, Principle 5. Support smallholder inclusion, Principle 6. Respect workers' rights conditions and Principle 7. Protect, conserve and enhance ecosystems and the environment. | √ | √ | √ |
| | 1630-1700 | Audit team discussion & findings preparations. Closing Meeting <ul style="list-style-type: none"> • Presentation of report by BSI Lead Auditor – briefing & discussion of findings • Acceptance & acknowledgement by Sime Darby-East Palm Oil Mill & Estates. | √ | √ | √ |
| Friday 14/02/2020 | 0800-1300 | Sime Darby-East Palm Oil Mill: Incoming of FFB and outgoing of CSPO & CSPK – weighbridge, ramp, storage area, loading bays, etc. Documentation review: RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records. | √ | - | - |
| | 1300-1400 | Lunch | √ | - | - |
| | 1400-1630 | Continue the Supply Chain Audit | √ | - | - |
| | 1630-1700 | Closing for RSPO SCC Audit | √ | - | - |

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Assessment Plan for RSPO – Offsite NCR Closure Visit for Sime Darby- East Palm Oil Mill and its supply base

| Date | Time | Subjects | EO |
|-----------------------|-----------|--|----|
| Monday 11/05/2020 | 1400-1430 | Proposed preparatory/test call between BSI and East POM team. | ✓ |
| Tuesday 12/05/2020 | 1500-1515 | ICT/Webex Start Up | ✓ |
| | 1515-1530 | Soft opening / Introduction | ✓ |
| | 1530-1700 | <ul style="list-style-type: none"> • Offsite verification at East POM (Webex/Skype/Whatsapp video call). • Interview workers. • Documentation verification. | ✓ |
| | 1700-1730 | Report preparation and finalization of findings. | ✓ |
| | 1730-1800 | Closing Meeting | ✓ |

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Sime Darby-East Palm Oil Mill’s Multiple Management Units / Time Bound Plan
- RSPO P&C 2018 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- Malaysia National Interpretation 2019 for RSPO P&C 2018 with supply chain Module Identity Preserved.

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? | <p>Yes. SDP TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p> <p>http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</p> | Complied |
| Have all the estates and mills certified within five years after obtaining RSPO membership? | <p>Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1st Oct 2018, the mill has completed the selling off transaction.</p> <p>In Indonesia, PT Mitral Austral Sejahtera was sold and currently SDP have no control in the management.</p> | Complied |
| Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-years from the date of acquisition. | No. There is no new acquisitions as at latest TBP 2020. | Complied |

| | | |
|---|---|-----------------|
| <p>Certification plan for the new acquisition shall be available.</p> | | |
| <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.</p> <p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification.</p> <p>PT Mitral Austral Sejahtera: The properties was sold and currently SDP have no control in the management. The property was disposed on 25 June 2019 and an official letter on disposal of PT Mas was sent to RSPO Secretariat on 27 June 2019. Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019. Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP.</p> <p>Malaysia - Pekaka Mill is being mothballed (at the time of SDP Annual Report 2018) and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang. Bintang Oil Mill: SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, 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 1st Oct 2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public notification letter: https://www.rspo.org/certification/public-announcement</p> <p>For Liberia operations: As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p> | <p>Complied</p> |

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| | http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations ACOP 2018 has been cross-referenced as below: https://www.rspo.org/members/29/Sime-Darby-Plantation-Berhad | |
| Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised | No lapses. | Complied |
| 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 | No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above. | Complied |
| Un-Certified Units or Holdings | | |
| 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. | HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011). | Complied |
| Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure. | No new plantings. As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations | Complied |
| 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 Liabilities shall be verified and reported. | No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above. | Complied |
| Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3. | No stakeholder comments or complaints received. | Complied |
| Any Legal non-compliance is being addressed through measures consistent with the | None noted. No stakeholder comments or complaints received. | Complied |

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| requirements of RSPO P&C criteria 2.1 | | |
| Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available. | Yes. The sustainability unit has conducted the internal audit for 9 units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1 st 2010. Other than that, land conflicts and land disputes also being audited and approved by Head of Sustainability-Indonesia (Alagendran Maniam) on 22/05/2019. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance. | Complied |
| Have there been any stakeholder (including NGO) consultation conducted? | None noted. No stakeholder comments or complaints received. | 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 as there is no smallholder scheme under East Certification Unit. | NA |

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 Recertification Assessment there were Two (2) Critical & Four (4) Non-Critical nonconformities raised. The Sime Darby-East POM 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 # | 1883198-202002-M1 | Clause & Category (Critical/Non-critical) | 2.1.1 Critical |
| Date Issued | 14/02/2020 | Due Date | 14/05/2020 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 12/05/2020 |
| Statement of Nonconformity: | Some of the legal requirements is not fully demonstrated. | | |
| Requirement Reference: | The unit of certification complies with applicable legal requirements. | | |
| Objective Evidence: | <p>In East POM sighted that punch card of female weighbridge clerk (Gunasunthari) on Aug 2019, Dec 2019 and Jan 2020, she worked after 10 pm and East POM is not having the JTK permit for female nightshift as below:</p> <ol style="list-style-type: none"> 1. 1 Aug 2019: 23.31 pm 2. 2 Aug 2019: 23.35 pm 3. 13 Aug 2019 23.31 pm 4. 22 Aug 2019: 23.40 pm 5. 19 Dec 2019: 23.30 pm 6. 21 Dec 2019: 23.28 pm 7. 11 Jan 2020: 23.39 pm 8. 28 Jan 2020: 23.34 pm <p>In East POM, the JTK Permit for salary deduction for Temple fund is not available. Sighted the pay slip for Gunasunthari on Jan 2020, the deduction of RM5 was made although in the internal audit report dated 15/11/2019 mentioned that the mill will stop deduct the Temple fund until the JTK Permit is obtained.</p> <p>In East Estate, the JTK Permit for salary deduction for Temple fund is not available. Sighted the pay slip for Dilip Bhagat on Aug 2019, the deduction of RM 10 was made under Temple Fund No 3 although the meeting between management and the Temple Committee has been conducted on 25/04/2019 to discuss on the stop Temple fund in salary deduction.</p> <p>Sepang Estate has not established the SW e-swiss. This is not comply with the requirement under EQA 1974 (Scheduled Wastes) Regulations 2005 (Regulation 3, notification of the generation of scheduled waste No 1 every waste generator shall, within 30 days from the date of generation of scheduled wastes notify the Director General of the new categorized and quantities of scheduled waste which are generated).</p> | | |
| Corrections: | <p>East POM:</p> <ol style="list-style-type: none"> i) Mill management has apply permit on "Night Work Restrictions For Women Workers" from JTK on 5th February 2020 and the management has decided to immediately change the 2nd shift hour from 3.30pm - 11.30pm to 2.00pm - 10.00pm to comply with applicable legal requirement. | | |

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| | <p>ii) Mill management has stop the temple fund deduction recurring in the system and reimbursement of temple fund to the affected employee has been made in February 2020 payroll.</p> <p>East Estate: Estate management has ceased the deduction for temple fund effective November 2019 and informed the temple committee on the cessation via letter dated 5th November 2019.</p> <p>Sepang Estate: The estate management will take immediate action to update the date and details of scheduled waste generation for 2019 and notify the Director General of the new categorized and quantities of scheduled waste.</p> |
| <p>Root Cause Analysis:</p> | <p>Lack of mechanism and inadequate monitoring of the system to ensure compliance to legal labour requirement due to lack of communication and awareness on legal requirement.</p> |
| <p>Corrective Actions:</p> | <p>East POM:</p> <ul style="list-style-type: none"> i) 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 ii) To ensure no more recurring in temple fund deduction, training on payroll system and verification procedure to estate personal and person In-charge to ensure no hiccup in the data entry process. <p>East Estate: The mechanism is already in place as the key person (Lucy Liew Sankaran) has undergone a training on 12th September 2019 on Understanding MAPA/NUPW Collective Agreement and monitor yearly during internal audit.</p> <p>Sepang Estate:</p> <ul style="list-style-type: none"> iii) The estate management will assigned the person in charge (MA/Store Clerk) to monitor and updating regularly all the requirement under EQA 1974 (Scheduled Wastes) Regulations 2005. Specific training will be given to all the upkeep supervisor and the action plan to rectify the off spec will be conducted. iv) To include the highlighted issue and discussion in the quarterly management/OSH meeting agenda |
| <p>Assessment Conclusion:</p> | <p>East POM: Sighted the Application form for Night Work Restrictions For Women Workers dated 05/02/2020 by Sime Darby Plantation-East POM. As this is involving the government authority for approval, it will take some time and beyond the management’s control. In the meantime, East POM has stop the night shift after 10 pm for female workers. This is cross-referenced with the Punch card and pay slip for Gunasunthari a/l Perumal on February 2020 which not working more than 10 pm and Attendance records for weighbridge clerk working in 2 shifts for</p> |

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| | <p>February 2020. Management also has conducted the morning briefing to all employee and recorded at 13/02/2020 for shift A & B in East POM and Legal Labour Training for payroll system & employee overtime on 18/04/2020 at East Oil Mill.</p> <p>East Estate: Estate management has ceased the deduction for temple fund effective November 2019 and informed the temple committee on the cessation via letter dated 5th November 2019. Verified the Letter to Temple Chairman from East Estate Senior Manager on 5th November 2019 titled "Cessation of Monthly Temple Deduction". The pay slip for Dilip Bhagat on Jan, Feb & March 2020 were having no salary deduction for temple fund. As a continuous improvement, Lucy Liew Sankaran was sent for MAPA in house training on understanding of MAPA Collective Agreements at Training Room CER Office Selangor on 12th September 2019. The certificate of attendance from MAPA is reviewed.</p> <p>Sepang Estate: Sepang Estate has updated the Inventory of scheduled wastes Fifth Schedule (Regulation 11) dated 31/03/2020 for Sepang Estate. Sighted the appointment letter e-swiss (schedule waste inventory system) representative for Sepang Estate dated 01/01/2020 to Senior Assistant Manager (Mohd Shahbudding Bin Mohd Fadzli) and Store Clerk (Nurhuda Binti Alam). Other than that, E-Swiss Inventory of Scheduled Waste Training on 29/02/2020 has been conducted and attended by 4 people at Sepang Estate. Verified the training records and photos. Sepang Estate has conducted the OSH meeting and sighted the minutes of meeting dated 09/01/2020, mentioning on e-swiss update by chairman under clause 2.3.</p> <p>Based on the verification evidences, implemented action taken can be seen and found to be effective to eliminate the root cause. Thus, the Critical NC was closed off-site on 12/05/2020 due to Movement Control Order start from 18 March 2020-09 June 2020 by the Malaysian Government. The reviewed on the documentation and interview session held with the relevant workers during off-site Critical NC Audit. Continuous implementation will be further verified in the next surveillance assessment.</p> |
|--|--|

| Non-conformity | | | |
|------------------------------------|---|--|----------------|
| NCR Ref # | 1883198-202002-M2 | Clause & Category (Critical/Non-critical) | 7.2.6 Critical |
| Date Issued | 14/02/2020 | Due Date | 14/05/2020 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 12/05/2020 |
| Statement of Nonconformity: | The Sampled Chemical Sprayers were not trained on the required SOPs. | | |
| Requirement Reference: | 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 | | |

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| | show evidence of regular updates on the knowledge about the activity they carry out. |
| Objective Evidence: | <p>The CHRA dated 22.10.2020 indicates that 'the safe use and handling of chemicals require all employees to be trained in the safe handling procedures'. Retraining of all employees should be carried out at least once in 2 years or each time worker is assigned to new work or new task involving new chemical. All training program shall be documented and kept for inspection.</p> <p>The sampled sprayers, Minto (GSP Lechumey), Md. Akhtar Molla (GSP Lechumey), Kogilavani a/p Muniandy (7219), and Nirmala Devi a/p Muniandy (7226) had no records of training attendance available for inspection and verification.</p> |
| Corrections: | Training for all the sprayers has been conducted on 12 th February 2020. The training will be extended to all field staff to ensure the requirement of CHRA is being communicated to all level of employee for the particular task |
| Root Cause Analysis: | Monitoring system to ensure the competency of worker to do the job is lacking due to communication breakdown. |
| Corrective Actions: | To maintain the list of sprayers and to ensure all the listed sprayers have undergo a proper SOP training |
| Assessment Conclusion: | <p>The Spraying Training has been conducted to Sprayer on 12/02/2020 for Dusun Durian Estate. Also, the Refreshment Training was conducted too on circle spraying and safety aspect (PPE) at Dusun Durian Estate on 25/04/2020.</p> <p>Dusun Durian Estate has maintain the list of sprayer as per attendance list of Refreshment Training on circle spraying and safety aspect (PPE) at Dusun Durian Estate on 25/04/2020. Auditor also manage to interview 4 sprayers through Webex Video Call on 12/05/2020 at 3.00 pm to confirm on the training conducted and their awareness on the spraying technique. It was found that the sprayers were aware on the safe use and handling of chemicals for sprayers.</p> <p>Based on the verification evidences, implemented action taken can be seen and found to be effective to eliminate the root cause. Thus, the Critical NC was closed off-site on 12/05/2020 due to Movement Control Order start from 18 March 2020-09 June 2020 by the Malaysian Government. The reviewed on the documentation and interview session held with the relevant workers during off-site Critical NC Audit. Continuous implementation will be further verified in the next surveillance assessment.</p> |

| Non-conformity | | | |
|------------------------------------|---|--|------------------------------|
| NCR Ref # | 1883198-202002-N1 | Clause & Category (Critical/Non-critical) | 2.2.2 Non-Critical |
| Date Issued | 14/02/2020 | Due Date | Open |
| Closed (Yes / No) | No | Date of nonconformity Closure | Next surveillance assessment |
| Statement of Nonconformity: | The contractor cannot demonstrate that they meeting applicable requirement. | | |

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| 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: | The Vendor Integrity Pledge has been signed by contractor as due diligence as well as the declaration to follow RSPO/ISCC/MSPO. However, in Sepang Estate, found that contractor workers for Amachi Enterprise (Sekaran a/l Audayer and Ganisen a/l Perumal Ravandar) has been paid RM5 for overtime rate in Jan 2020, Dec 2019 and Aug 2019 pay slip while the employment contract was signed on 01/03/2019 mentioned that the overtime rate is RM7.94/hour. |
| Corrections: | The management has advised the contractor to reimburse the amount underpay to its' worker as per rate agreed in the contract and provide the payment voucher as evidence of payment. Additionally, the contractor has been advised to adhere to the term and condition stated in the contract signed between them and its' worker |
| Root Cause Analysis: | Monitoring for contractor's worker for legal requirement is inadequate as the monitoring is only been conducted on annual basis i.e. during internal audit and lacking of enforcement for the contractor to comply to what they have agreed in the contract. |
| Corrective Actions: | <p>The SDP in the midst to develop the Contractor Worker Management Procedure. Based on the Minimum Wages Order (Amendment) 2018:</p> <ul style="list-style-type: none"> • OU Management to ensure all contracts follow the Minimum Wages order 2018 by MAPA Circular No.44/2018 contain full terms and conditions which include but not limited to the following: • With regards to employees who are not paid basic wages but are paid wages based only on piece-rated system, tonnage system, task system, trip or commission system, the rate of monthly wages payable to such employee should not less than RM1,100.00 • The minimum wages of individual employees covered Articles of the Agreement who turn up for work on all days on which work is offered by management and who complete the full duties allotted shall not be less than RM1,100.00 per month in respect of monthly rated employees and RM42.31 per day worked in respect of daily rated employees • OU Management to obtain and maintain the workers contractor monthly pay slip by photocopy of the following documents from contractors: <ol style="list-style-type: none"> 1. Monthly pay slip for each individual workers 2. To be specify in their pay slip on basic rate and overtime rate as per agreement • OU Management to conduct periodic spot check to ensure all contract workers has been paid as per agreement |
| Assessment Conclusion: | Corrective actions plan has been reviewed and deemed to be satisfactory to address the Non-critical non-conformity. Evidence CAP will be verified during next assessment. |

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| Non-conformity | | | |
|------------------------------------|--|--|------------------------------|
| NCR Ref # | 1883198-202002-N2 | Clause & Category (Critical/Non-critical) | 4.2.3 Non-Critical |
| Date Issued | 14/02/2020 | Due Date | Open |
| Closed (Yes / No) | No | Date of nonconformity Closure | Next surveillance assessment |
| Statement of Nonconformity: | No evidence complaint and grievances being resolved in an effective, timely, appropriate manner and accepted by all parties. | | |
| 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>In East POM, any repairs required by Internal Stakeholders need to fill-up the House Repair Requisition Form.</p> <p>Sample taken on below: East POM</p> <ol style="list-style-type: none"> 1) Broken pipe at house no A3 from Thiagarajan on 14/01/2020. 2) Broken toilet door at house no 48 from K. Muthuvarmaini on 11/01/2020. 3) Door lock and cement broken at house no 24 from V.Kumanesan on 07/10/19. 4) Low water pressure at house no A8 from Suhairy Nizam on 21/12/2019. <p>It is not comply with the SOM Sub-Section 5.5 Management Responsibility, Appendix 5.5.3.2 Procedure for External Communication 6.3 Time frame for External Communication:</p> <ol style="list-style-type: none"> a) Within 2 weeks of the date of receipt for communication requiring direct feedback. b) Within one week of the completion of the investigation, for communication requiring investigation. | | |
| Corrections: | Communicated to the respective worker on the situation that defer the repairing process. | | |
| Root Cause Analysis: | Lacking in the implementation of the system/procedure and budget constraint. | | |
| Corrective Actions: | SQM will conduct a refresher training to the management on complaint handling procedure and other related training. | | |
| Assessment Conclusion: | Corrective actions plan has been reviewed and deemed to be satisfactory to address the Non-critical non-conformity. Evidence CAP will be verified during next assessment. | | |

| Non-conformity | | | |
|------------------|-------------------|--|--------------------|
| NCR Ref # | 1883198-202002-N3 | Clause & Category (Critical/Non-critical) | 7.3.2 Non-Critical |

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|------------------------------------|--|--------------------------------------|------------------------------|
| Date Issued | 14/02/2020 | Due Date | Open |
| Closed (Yes / No) | No | Date of nonconformity Closure | Next surveillance assessment |
| Statement of Nonconformity: | Domestic wastes were not disposed properly at the designated area. | | |
| Requirement Reference: | Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. | | |
| Objective Evidence: | East Estate – during the line site visit East Estate housing area block A domestic waste was thrown in field no P96P. | | |
| Corrections: | Estate management is in progress to clean up the area and cover the area with boiler ash from mill. | | |
| Root Cause Analysis: | The management has overlooked the illegal dumping activities in the area as they are focusing more on the worker housing compound. | | |
| Corrective Actions: | Estate management together with mill management will erect a signage of “Prohibition of Waste Disposal in this Area” and brief the workers on the correct way to dispose their domestic waste. | | |
| Assessment Conclusion: | Corrective actions plan has been reviewed and deemed to be satisfactory to address the Non-critical non-conformity. Evidence CAP will be verified during next assessment. | | |

| Non-conformity | | | |
|------------------------------------|--|--|------------------------------|
| NCR Ref # | 1883198-202002-N4 | Clause & Category (Critical/Non-critical) | 3.3.2 Non-Critical |
| Date Issued | 14/02/2020 | Due Date | Open |
| Closed (Yes / No) | No | Date of nonconformity Closure | Next surveillance assessment |
| Statement of Nonconformity: | The mechanism to check on implementation of certain procedures have been ineffective. | | |
| Requirement Reference: | A mechanism to check consistent implementation of procedures is in place. | | |
| Objective Evidence: | <p>1. EAST POM - Audiometric test was conducted on an annual basis. Latest test was done on 07th – 25th May 2019. A total of 37 workers were sent for the test with 7 workers found to be with STS including 2 with hearing impairment. The workers with STS were required to repeat audiometric test within 3 months from the last report. The GSQM Department have highlighted that the audiometric re-test results were not available during the internal audit conducted by the department on 15th November 2019. However, until the audit, the mentioned workers have yet to be sent for retest. Thus, the mechanism to ensure implementation of procedures, the internal audit, is not effective.</p> <p>Stated amongst the recommendations in the CHRA (22nd October 2015) for Health Surveillance Programs, it is stated “If any employee is exposed or likely</p> | | |

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| | <p>to be exposed to chemicals hazardous health listed in Schedule II, the health surveillance required as per USECHH Regulations 2000 shall include medical surveillance conducted by an Occupational health Doctor (OHD) at intervals of not more than twelve months or at such shorter intervals as determined by the OH.</p> <p>2. It was sighted that the Medical Surveillance at Dusun Durian Estate was not done for the whole of 2019. The latest Medical Surveillance was conducted on 23rd January 2020. Prior to that the Medical Surveillance was done on 26th November 2018 which is more than 12 months interval.</p> |
| Corrections: | <p>Audiometric test for all the workers have been conducted on 2/3/2020.</p> <p>To ensure medical surveillance and other requirements in CHRA are well monitored by the team comprising of MA and office staff.</p> |
| Root Cause Analysis: | <p>Inefficient tracking system to monitor compliance of CHRA requirement as currently only one member is assign for the task</p> |
| Corrective Actions: | <p>To assigned another person to back-up the task of monitoring the requirement in CHRA should the primary person in-charge is not available.</p> |
| Assessment Conclusion: | <p>Corrective actions plan has been reviewed and deemed to be satisfactory to address the Non-critical non-conformity. Evidence CAP will be verified during next assessment.</p> |

| Opportunity for Improvements | |
|------------------------------|-------------|
| OFI # | Description |
| OFI 1 | - |

| Positive Findings | |
|-------------------|---------------------------------------|
| PF # | Description |
| PF 1 | Good cooperation from the management. |

3.4.1 Status of Nonconformities Previously Identified and Observations

| Non-conformity | | | |
|------------------------------------|---|--|------------------------------|
| NCR Ref # | 1733498-201901-M1 | Clause & Category (Major / Minor) | RSPO SCCS Module D 5.1 Major |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 15/04/2019 |
| Statement of Nonconformity: | Record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK was not consistently monitored on a real-time basis | | |

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| Requirement Reference: | 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. IP Mill must report on real time basis. |
| Objective Evidence: | Real time monitoring was not effectively demonstrated based on quarterly records and balance from February 2018 to December 2018, it was found that: i) February 2018 : delivery of RSPO PK more that stock (7.56 mt) ii) June 2018 : delivery of RSPO PK more than stock (819.83 mt) iii) December 2018 : delivery of RSPO PK more than stock (454.47 mt) |
| Correction | Mill will assigned the executive to monitor the CSPO and CSPK records. Beside, Mill management will be provided with username and password for self-monitoring in real-time basis of any transaction. |
| Root Cause Analysis: | Due to the executive transfer, there is no designated person in charge to monitor the CSPO and CSPK. |
| Corrective Actions: | The new person in charge has been assigned by the mill. The new PIC will use the new monitoring template. In the revised monitoring template, PIC will make a reconciliation between CPO & PK dispatch and CPO & PK announced in RS PO IT Platform. |
| Assessment Conclusion: | Major NC close out verification: The following evidence was verified on-site: - Appointment letter dated 01/02/2019 where an executive has been appointed to monitor the CSPO and CSPK records. - Revised template CSPO & CSPK monitoring sheet (balance sheet), Based on the sheet, the deliveries were made from positive stock. - Daily production summary report as at 14/04/2019 showing that the CSPO and CSPK productions were recorded in real-time basis. Based on the evidence, the implementation of corrective action was found to be effective. Thus, the NCR is closed on 15/04/2019. <u>Recertification Audit Verification:</u> No reoccurrence issue and the Major NC is remained closed. Real time monitoring was effectively demonstrated based on quarterly records and balance from Jan 2019 to Jan 2020 and explained in the supply chain declaration (Appendix E). |

| Non-conformity | | | |
|------------------------------------|---|--|-----------------------------------|
| NCR Ref # | 1733498-201901-M2 | Clause & Category (Major / Minor) | RSPO SCCS General COC 5.7.2 Major |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 15/04/2019 |
| Statement of Nonconformity: | Shipping announcement for the volumes of products that are in the yield scheme (CPO and PK) was not promptly registered in the RSPO IT Platform. | | |
| Requirement Reference: | The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, | | |

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| | 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. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------------|---|---------------------|----------------------------|-----------------------------|----------------------------|-----------------------------|----------|--------|--------|---|---|----------|---|--------|---|---|----------|---|-----|-----|------|----------|---|---|---|---|----------|------|--------|-----|---|----------|---|------|------|---|----------|---|-------|---|---|-----------|-----|--------|---|-----|----------|---|-------|-----|------|----------|---|-----|-----|------|----------|------|---|-----|---|-------|---------|---------|------|------|
| Objective Evidence: | <p>Based on downloaded transaction license ID: CB 70765, palm trace transaction recorded for CPO is 7440.18 mt. No reconciliation of certified CPO compared to NC product for the period of February 2018 to December 2018. Based on quarterly records and balance from February 2018 to December 2018, the following were recorded:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>RSPO Delivery (PK)</th> <th>RSPO Delivery (CPO)</th> <th>Confirmed Transaction (PK)</th> <th>Confirmed Transaction (CPO)</th> </tr> </thead> <tbody> <tr> <td>Feb 2018</td> <td>518.29</td> <td>394.66</td> <td>0</td> <td>0</td> </tr> <tr> <td>Mar 2018</td> <td>0</td> <td>194.24</td> <td>0</td> <td>0</td> </tr> <tr> <td>Apr 2018</td> <td>0</td> <td>250</td> <td>450</td> <td>1200</td> </tr> <tr> <td>May 2018</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Jun 2018</td> <td>1300</td> <td>249.06</td> <td>100</td> <td>0</td> </tr> <tr> <td>Jul 2018</td> <td>0</td> <td>72.2</td> <td>1300</td> <td>0</td> </tr> <tr> <td>Aug 2018</td> <td>0</td> <td>32.19</td> <td>0</td> <td>0</td> </tr> <tr> <td>Sept 2018</td> <td>600</td> <td>282.12</td> <td>0</td> <td>796</td> </tr> <tr> <td>Oct 2018</td> <td>0</td> <td>40.14</td> <td>600</td> <td>1700</td> </tr> <tr> <td>Nov 2018</td> <td>0</td> <td>286</td> <td>500</td> <td>2000</td> </tr> <tr> <td>Dec 2018</td> <td>1100</td> <td>0</td> <td>600</td> <td>0</td> </tr> <tr> <td>Total</td> <td>3518.29</td> <td>1800.61</td> <td>3550</td> <td>5696</td> </tr> </tbody> </table> <p>CPO - RSPO delivery: 1,800.61 mt (balance sheet) vs 5,696 mt (palm trace), NC CPO sold: 28,120.57 mt (balance sheet). No evidence provided for commodity downgrade from IP to NC CPO.</p> | Month | RSPO Delivery (PK) | RSPO Delivery (CPO) | Confirmed Transaction (PK) | Confirmed Transaction (CPO) | Feb 2018 | 518.29 | 394.66 | 0 | 0 | Mar 2018 | 0 | 194.24 | 0 | 0 | Apr 2018 | 0 | 250 | 450 | 1200 | May 2018 | 0 | 0 | 0 | 0 | Jun 2018 | 1300 | 249.06 | 100 | 0 | Jul 2018 | 0 | 72.2 | 1300 | 0 | Aug 2018 | 0 | 32.19 | 0 | 0 | Sept 2018 | 600 | 282.12 | 0 | 796 | Oct 2018 | 0 | 40.14 | 600 | 1700 | Nov 2018 | 0 | 286 | 500 | 2000 | Dec 2018 | 1100 | 0 | 600 | 0 | Total | 3518.29 | 1800.61 | 3550 | 5696 |
| Month | RSPO Delivery (PK) | RSPO Delivery (CPO) | Confirmed Transaction (PK) | Confirmed Transaction (CPO) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb 2018 | 518.29 | 394.66 | 0 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mar 2018 | 0 | 194.24 | 0 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apr 2018 | 0 | 250 | 450 | 1200 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May 2018 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jun 2018 | 1300 | 249.06 | 100 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jul 2018 | 0 | 72.2 | 1300 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug 2018 | 0 | 32.19 | 0 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sept 2018 | 600 | 282.12 | 0 | 796 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct 2018 | 0 | 40.14 | 600 | 1700 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nov 2018 | 0 | 286 | 500 | 2000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dec 2018 | 1100 | 0 | 600 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 3518.29 | 1800.61 | 3550 | 5696 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Correction | Mill management will be provided with username and password for self-monitoring in real-time basis of any transaction. The monitoring is not limited to the certified product only, the downgrade product is also available. In the revised monitoring template, PIC will make a reconciliation between CPO & PK despatch and CPO & PK announced in RSPO IT platform. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Root Cause Analysis: | CPO/PK contracts from mills to refineries/KCP are allocated as RSPO IP/MB on a provisional basis. The final sales of products and its RSPO status shall be confirmed later by the refineries/KCP, refineries/KCP will then select the relevant contracts matching the RSPO sales, and only selected contracts will be announced in PalmTrace. This is applicable for contracts from mills to Sime Darby refineries/KCP but not for third party customers. There is no monitoring on the downgrade product. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Corrective Actions: | Monitoring of RSPO certified CPO and PK will be done in a revised template based on the actual announcement in RSPO PalmTrace system with the necessary reconciliation and in accordance to the SOP. The downgrade product will be determine in the new format. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| Assessment Conclusion: | <p>Major NC close out verification: The following evidence was verified on-site:</p> <ul style="list-style-type: none"> - PalmTrace announcement in excel sheet for both CSPO and CSPK. - Revised template CSPO & CSPK monitoring sheet (balance sheet), showing the volume announce in the PalmTrace by month and sales as conventional. <p>Based on the verification of the documents, it was found that the volume announced in the PalmTrace was tally with the records in the balance sheet. Thus, the NCR is closed on 15/04/2019.</p> <p><u>Recertification Audit Verification:</u> No reoccurrence issue and the Major NC is remained closed. Based on downloaded palm trace transaction recorded for CPO is 14,754.45 mt and PK is 2600 mt. Based on quarterly records and balance from Jan 2019-Jan 2020, the following were recorded in Supply Chain declaration.</p> |
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| Non-conformity | | | |
|------------------------------------|--|--|-------------------------------|
| NCR Ref # | 1733498-201901-M3 | Clause & Category (Major / Minor) | RSPO SCCS Module D: 2.2 Major |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 15/04/2019 |
| Statement of Nonconformity: | Registration and reporting requirements in RSPO IT platform was not effectively demonstrated. | | |
| Requirement Reference: | The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform). | | |

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| <p>Objective Evidence:</p> | <p>Based on downloaded transaction license ID: CB 70765, palm trace transaction recorded for CPO is 7440.18 mt. No reconciliation of certified CPO compared to NC product for the period of February 2018 to December 2018. Based on quarterly records and balance from February 2018 to December 2018, the following were recorded:</p> <table border="1" data-bbox="507 539 1468 1240"> <thead> <tr> <th>Month</th> <th>RSPO Delivery (PK)</th> <th>RSPO Delivery (CPO)</th> <th>Confirmed Transaction (PK)</th> <th>Confirmed Transaction (CPO)</th> </tr> </thead> <tbody> <tr> <td>Feb 2018</td> <td>518.29</td> <td>394.66</td> <td>0</td> <td>0</td> </tr> <tr> <td>Mar 2018</td> <td>0</td> <td>194.24</td> <td>0</td> <td>0</td> </tr> <tr> <td>Apr 2018</td> <td>0</td> <td>250</td> <td>450</td> <td>1200</td> </tr> <tr> <td>May 2018</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Jun 2018</td> <td>1300</td> <td>249.06</td> <td>100</td> <td>0</td> </tr> <tr> <td>Jul 2018</td> <td>0</td> <td>72.2</td> <td>1300</td> <td>0</td> </tr> <tr> <td>Aug 2018</td> <td>0</td> <td>32.19</td> <td>0</td> <td>0</td> </tr> <tr> <td>Sept 2018</td> <td>600</td> <td>282.12</td> <td>0</td> <td>796</td> </tr> <tr> <td>Oct 2018</td> <td>0</td> <td>40.14</td> <td>600</td> <td>1700</td> </tr> <tr> <td>Nov 2018</td> <td>0</td> <td>286</td> <td>500</td> <td>2000</td> </tr> <tr> <td>Dec 2018</td> <td>1100</td> <td>0</td> <td>600</td> <td>0</td> </tr> <tr> <td>Total</td> <td>3518.29</td> <td>1800.61</td> <td>3550</td> <td>5696</td> </tr> </tbody> </table> <p>CPO - RSPO delivery: 1,800.61 mt (balance sheet) vs 5,696 mt (palm trace), NC CPO sold: 28,120.57 mt (balance sheet). No evidence provided for commodity downgrade from IP to NC CPO.</p> | Month | RSPO Delivery (PK) | RSPO Delivery (CPO) | Confirmed Transaction (PK) | Confirmed Transaction (CPO) | Feb 2018 | 518.29 | 394.66 | 0 | 0 | Mar 2018 | 0 | 194.24 | 0 | 0 | Apr 2018 | 0 | 250 | 450 | 1200 | May 2018 | 0 | 0 | 0 | 0 | Jun 2018 | 1300 | 249.06 | 100 | 0 | Jul 2018 | 0 | 72.2 | 1300 | 0 | Aug 2018 | 0 | 32.19 | 0 | 0 | Sept 2018 | 600 | 282.12 | 0 | 796 | Oct 2018 | 0 | 40.14 | 600 | 1700 | Nov 2018 | 0 | 286 | 500 | 2000 | Dec 2018 | 1100 | 0 | 600 | 0 | Total | 3518.29 | 1800.61 | 3550 | 5696 |
|------------------------------------|---|---------------------|----------------------------|-----------------------------|----------------------------|-----------------------------|----------|--------|--------|---|---|----------|---|--------|---|---|----------|---|-----|-----|------|----------|---|---|---|---|----------|------|--------|-----|---|----------|---|------|------|---|----------|---|-------|---|---|-----------|-----|--------|---|-----|----------|---|-------|-----|------|----------|---|-----|-----|------|----------|------|---|-----|---|-------|---------|---------|------|------|
| Month | RSPO Delivery (PK) | RSPO Delivery (CPO) | Confirmed Transaction (PK) | Confirmed Transaction (CPO) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb 2018 | 518.29 | 394.66 | 0 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mar 2018 | 0 | 194.24 | 0 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apr 2018 | 0 | 250 | 450 | 1200 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May 2018 | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jun 2018 | 1300 | 249.06 | 100 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jul 2018 | 0 | 72.2 | 1300 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug 2018 | 0 | 32.19 | 0 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sept 2018 | 600 | 282.12 | 0 | 796 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct 2018 | 0 | 40.14 | 600 | 1700 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nov 2018 | 0 | 286 | 500 | 2000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dec 2018 | 1100 | 0 | 600 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 3518.29 | 1800.61 | 3550 | 5696 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Correction</p> | <p>Mill management will be provided with username and password for self-monitoring in real-time basis of any transaction. The monitoring is not limited to the certified product only, the downgrade product is also available. In the revised monitoring template, PIC will make a reconciliation between CPO & PK despatch and CPO & PK announced in RSPO IT platform.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Root Cause Analysis:</p> | <p>CPO/PK contracts from mills to refineries/KCP are allocated as RSPO IP/MB on a provisional basis. The final sales of products and its RSPO status shall be confirmed later by the refineries/KCP, refineries/KCP will then select the relevant contracts matching the RSPO sales, and only selected contracts will be announced in PalmTrace. This is applicable for contracts from mills to Sime Darby refineries/KCP but not for third party customers. There is no monitoring on the downgrade product.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Corrective Actions:</p> | <p>Monitoring of RSPO certified CPO and PK will be done in a revised template based on the actual announcement in RSPO PalmTrace system with the necessary reconciliation and in accordance to the SOP. The downgrade product will be determine in the new format.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| Assessment Conclusion: | <p>Major NC close out verification: The following evidence was verified on-site:</p> <ul style="list-style-type: none"> - PalmTrace announcement in excel sheet for both CSPO and CSPK. - Revised template CSPO & CSPK monitoring sheet (a.k.a balance sheet), showing the volume announce in the PalmTrace by month and sales as conventional. <p>Based on the verification of the documents, it was found that the volume announced in the PalmTrace was tally with the records in the balance sheet. Thus, the NCR is closed on 15/04/2019.</p> <p><u>Recertification Audit Verification:</u> No reoccurrence issue and the Major NC is remained closed. 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 East Palm Oil Mill is under Sime Darby Plantation Berhad with RSPO Membership # 1-0008-04-000-00. RSPO Palmtrace Member ID: RSPO_PO1000000097 (East Oil Mill) which license expires on 18/05/2020.</p> |
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| Non-conformity | | | |
|------------------------------------|--|--|-----------------------|
| NCR Ref # | 1733498-201901-M4 | Clause & Category (Major / Minor) | Indicator 6.5.1 Major |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 15/04/2019 |
| Statement of Nonconformity: | The pay and conditions were not implemented according to legal requirements. | | |
| Requirement Reference: | Documentation of pay and conditions shall be available. | | |

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| <p>Objective Evidence:</p> | <p>Dusun Durian Estate:</p> <ul style="list-style-type: none"> • Interviewed with the contractors’ workers found that they were paid RM 37/ day and with overtime rate is RM 5/ hour. They were not paid double if work on rest day, Sunday. • Interviewed with the contractor confirmed that the workers’ daily rate is RM 37 with RM 5/ hour for overtime. If workers worked on rest day, their daily rate also RM 37 only. • Reviewed on the payslips from October 2018 to December 2018 found that the basic rate is RM 37/ day and the overtime rate is RM 5/ hour. • Reviewed on the Memorandum of agreement between contractor and the management, under Clause 4.1 (vi), stated “The Contractor shall ensure that all the said workers enjoy the monetary benefits entitled to them under Malaysian laws, which inter alia shall include paid leave and paid medical leave.” The daily rate of wages to be complied with Minimum Wage Order 2016 is RM 38.46 and the overtime rate should be RM 7.21/ hour. Therefore, the contractors have yet to comply with the requirements and did not pay the wages accordingly. Total 52 workers' payslips were reviewed for October 2018 to December 2018. Besides, sampled 4 workers for Contractor Sri have yet to receive payslip verified through interviewed with the workers and representative of contractor as below: <ul style="list-style-type: none"> a. Permit No.: PE 0457969 b. Permit No.: PE 1093605 c. Permit No.: PD 4968693 d. Permit No.: PE 0437428 |
| <p>Correction</p> | <p>Estate management will conduct the meeting and legal training to the related contractor. The enforcement for compliance will be carry out immediately and the contractor shall to responsible to ensure all the requirement is complied.</p> <p>To immediately conduct a briefing session with contactors on relevant requirement specifically on labour and immigration as stated in the contract agreement, to rectify the issues stated above.</p> |
| <p>Root Cause Analysis:</p> | <p>The contractor does not understand to fulfill the legal requirements even though the terms of the agreement have stated. Estate Management also only monitor the presence of documents but have no monitoring of compliance with applicable laws.</p> |
| <p>Corrective Actions:</p> | <p>As a practice before, estate will obtain copy for the all documents and will be assign the person in charge to monitor the compliance with the legal requirement. Internal Audit to monitor the compliance of contractors’ engaged on the relevant requirement stated in the contract agreement.</p> |
| <p>Assessment Conclusion:</p> | <p>On-site verification: The following evidence was verified on-site: - The new wage rate (RM42.31/day) cannot be implemented yet by the contractors because it needs to revise the rate in contract agreement between SDPB and the contractors. At the point of on-site verification, the new tendering dated 13/03/2019 and submitted to Zone Office (Carey Island) on 15/05/2019 but still pending for approval from GM. It is expected to be approved by 15/04/2019 and retendering will be made within 2 weeks thereafter. Therefore, the contractors had no source of finance to meet the minimum wage. - Minutes of meeting dated 02/02/2019</p> |

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| | <ul style="list-style-type: none"> - Pay slips for the month of March 2019 for the contractors' (Sritheran, GSP Lechumy) workers showing the rest days and overtime were paid accordingly. These also have been crossed checked with daily check-roll. - PIC to monitor compliance with the legal requirement (En. Rosnizam –AM) recorded the monitoring results in pays lips vs contract attendance book (check-roll) - Internal audit is planned to be conducted in Dec 2019, combined with MSPO. Internal Audit Schedule is available. <p>Based on the evidence, the implementation of corrective action was found to be effective. Thus, the NCR is closed on 15/04/2019.</p> <p><u>Recertification Audit Verification:</u> In Sepang Estate, found that contractor workers for Amachi Enterprise (Sekaran a/l Audayer and Ganisen a/l Perumal Ravandar) has been paid RM5 for overtime rate in Jan 2020, Dec 2019 and Aug 2019 pay slip while the employment contract was signed on 01/03/2019 mentioned that the overtime rate is RM7.94/hour. Hence, during recertification audit (MYNI 2019), an NC was raised under 2.2.2 for this issue.</p> |
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| Non-conformity | | | |
|------------------------------------|--|--|-----------------------|
| NCR Ref # | 1733498-201901-M5 | Clause & Category (Major / Minor) | Indicator 6.5.2 Major |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 15/04/2019 |
| Statement of Nonconformity: | Employment contract detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) was not implemented adequately. | | |
| Requirement Reference: | Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. | | |

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| <p>Objective Evidence:</p> | <p>Dusun Durian Estate: Reviewed on the employment contract for the contractors' workers (GSP) found that the terms and conditions stated in the contract were not outlined as per the Employment Act 1955. For eg:</p> <ul style="list-style-type: none"> i. Clause 2 – The wages will be paid by daily rate (RM 38/ day) and overtime will be paid RM 6/ hour. No allowance will be paid. ii. Clause 4 – No paid annual leave will be given to the workers. All the leaves taken will not be paid. iii. Sick leave and public holiday entitlement. iv. Time of payment of wages. v. Total working hours in a week. <p>Besides, sampled 4 workers for Contractor Sri have yet to sign and receive employment contract verified through interviewed with the workers and representative of contractor as below:</p> <ul style="list-style-type: none"> i. Permit No.: PE 0457969 ii. Permit No.: PE 1093605 c. Permit No.: PD 4968693 iii. Permit No.: PE 0437428 <p>East Estate and Sepang Estate: Document reviewed the employment contracts for the contractors' workers found that the contract was too simplified as it only mentioned working hours is 8 hours and 6 days per week with overtime whenever necessary. Wage was mentioned in the contract too. However, terms and conditions stipulated in the Employment Act 1955 has yet to be included in the contract such as rate of overtime, annual leave entitlement, sick leave, time of payment of wages, notice of termination and rate for work on rest days and public holiday.</p> |
| <p>Correction</p> | <p>The immediate action will be taken by the estate management. SQM will conduct training and workshop on developing the employment contract for the related contractor. The workshop will be held in March 2019.</p> |
| <p>Root Cause Analysis:</p> | <p>The appointment letter issued by the contractor. However, the entire clause in the contract is not in accordance with the provisions of the legal requirement. This is because the contractor did not realize the necessity of following such a clause provided in the Employment Act 1955.</p> |
| <p>Corrective Actions:</p> | <p>SQM will conduct the document verification and training for the contractor. Besides, the document will be review during the internal audit and monitored by the assigned person in charge.</p> |
| <p>Assessment Conclusion:</p> | <p>Major NC close out verification: The following evidence was verified on-site:</p> <ul style="list-style-type: none"> - Contractors' newly revised employment contract where all the missing conditions highlighted in this NCR have been included. Nonetheless, the legal minimum wage will only take effective once the new tender with the revised rates is awarded. - List of Contract Workers Monitoring, showing that the legal requirements applicable to the workers are being monitored. Latest record is for the month of March 2019, monitored by Mr. Rosnizam - Training records of contractors on developing employment contract to their workers dated 17/4/2019. The training was conducted 2 days after the on-site visit. |

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| | <p>Based on the evidence, the implementation of corrective action was found to be effective. Thus, the NCR is closed on 17/4/2019.- PIC to monitor compliance with the legal requirement (En. Rosnizam –AM) recorded the monitoring results in pays lips vs contract attendance book (check-roll)</p> <p>Internal audit is planned to be conducted in Dec 2019, combined with MSPO. Internal Audit Schedule is available.</p> <p>Based on the evidence, the implementation of corrective action was found to be effective. Thus, the NCR is closed on 15/04/2019.</p> <p><u>Recertification Audit Verification:</u> Sighted Alimuddin, Kamal, Siraj Sikdar, Munian on 01/07/2019 employment contract having the necessary requirement such as leave, basic pay. No reoccurrence issue and the Major NC is remained closed.</p> |
|--|---|

| Non-conformity | | | |
|------------------------------------|---|--|-----------------------|
| NCR Ref # | 1733498-201901-N1 | Clause & Category (Major / Minor) | Indicator 5.1.3 Minor |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 12/05/2020 |
| Statement of Nonconformity: | Monitoring protocol implemented was not effective to mitigate negative environmental impacts. | | |
| Requirement Reference: | This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. | | |
| Objective Evidence: | <p>Based on pollution prevention plan, FY2018/2019 dated 18/7/18, control measure has been identified for waste water discharge from cleaning/processing however the water analysis results (mill’s parameter drain) does not conform with Class IIA/IIB of NWQS for natural waterways.</p> <p>Refer to COA:</p> <ol style="list-style-type: none"> 1) IE1231/2018 dated 29/10/18, pH COD DO exceed the limit 2) IE521/2018 dated 4/5/18, pH, BOD, SS, DO exceed the limit 3) IE816/2018 dated 24/7/18, pH, COD, DO exceed the limit | | |
| Correction | The mill management will take immediate action to resend water sample to the R&D lab, If the result still off spec the site investigation will be conducted. | | |
| Root Cause Analysis: | Lack of mechanism to monitor water sampling analysis result. | | |
| Corrective Actions: | <ul style="list-style-type: none"> - The mill management will assigned the person in charge to monitor all the water sample result. The specific training will be given and the action plan to rectify the off spec will be conducted. - To include water analysis result discussion in the management/OSH meeting agenda. | | |
| Assessment Conclusion: | <p><u>Recertification Audit Verification:</u> Training has been provided by Sustainability Team dated 18/01/2019 titled Environment (PPP), Schedule Waste (SW) and High Conservation Value (HCV) Training attended by 24 attendees including executive of Dusun Durian Estate,</p> | | |

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| | <p>Staff & MA of Dusun Durian Estate, Representative of RSQM, East Estate, East Oil Mill, West Estate and Sepang Estate. The details include the action plan required in detection of any off-spec samples. The mill conducts water analysis for tracking of any negative impact to the environment. Results for samples analyzed on 31/1/19 was sighted and verified. Samples were taken at points marked TG1,TG2,TG3, River pt A, river pt B and river pt C. Results for the BOD & pH conform to the limits. Details as per 7.8.2</p> <p>Discussion of issues if any are provided in the OSH meeting. Details of OSH meeting as per 6.7.1. Hence minor NC is closed.</p> |
|--|--|

| Non-conformity | | | |
|------------------------------------|---|--|-----------------------|
| NCR Ref # | 1733498-201901-N2 | Clause & Category (Major / Minor) | Indicator 5.2.3 Minor |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 12/05/2020 |
| Statement of Nonconformity: | Status of HCV and RTE species (birds, mammals and reptiles) was not clearly documented and reported. | | |
| Requirement Reference: | Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. | | |
| Objective Evidence: | East Estate Referring management plan for period of 2018 to 2019, there is no specific monitoring plan for wildlife (birds, mammals and reptiles) under IUCN conservation status and WCA 2010 (act 716) documented. Based monthly monitoring of present and potential HCV areas (October, November and December 2018), observation reported during patrol/sighting was not clear. | | |
| Correction | The wildlife monitoring will be cover during the patrolling and observation. To develop new template to cover wildlife | | |
| Root Cause Analysis: | The monitoring is only covered on the HCV area and was not including the monitoring for the wildlife. | | |
| Corrective Actions: | SQM will conduct HCV monitoring training to the related person in charge. | | |
| Assessment Conclusion: | <p><u>Recertification Audit Verification:</u> Training has been provided by Sustainability Team dated 18/01/2019 titled Environment (PPP), Schedule Waste (SW) and High Conservation Value (HCV) Training attended by 24 attendees including executive of Dusun Durian Estate, Staff & MA of Dusun Durian Estate, Representative of RSQM, East Estate, East Oil Mill, West Estate and Sepang Estate. The monitoring of the monthly is made through the patrolling of AP and also the supervisory team. Results / outcome are recorded in a book. The monitoring includes the sighting of presence of wildlife within the estates complexes. Record of monitoring for the month of Dec 2019 and Jan 2020 was sighted and verified to include the observation of HCV and wildlife. Details as per 7.12.1</p> <p>At current through the HCV assessment report, there is no RTE species or HCV present or are affected by the plantation or the mill operations. The action plan was reviewed in Jan 2020. Hence minor NC is closed.</p> | | |

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| Non-conformity | | | | | | | | | | | | | | | | | | |
|------------------------------------|--|--|---------------------------------|--------------|-------|---------------------------|---------------------------------|-------|-----------|-----|-------|--------------|-----|-----|--------|--------------|-----|-----|
| NCR Ref # | 1733498-201901-N3 | Clause & Category (Major / Minor) | Indicator 2.1.3 Minor | | | | | | | | | | | | | | | |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 12/05/2020 | | | | | | | | | | | | | | | |
| Statement of Nonconformity: | Mechanism for ensuring compliance was not implemented adequately. | | | | | | | | | | | | | | | | | |
| Requirement Reference: | A mechanism for ensuring compliance shall be implemented. | | | | | | | | | | | | | | | | | |
| Objective Evidence: | <p>Dusun Durian Estate:</p> <p>Sampled the contractors' workers' passport and permit found that the permit was under process of application and some with permits but the details of employer and sector to work stated in the permit was not reflect the actual situation as below:</p> <ol style="list-style-type: none"> Passport No.: BM0567433, Tax Invoice MyEG# IMM/PT1483697622743 dated 06/01/2017 (GSP). Passport No.: BQ0984719, Tax Invoice MyEG# IMM/PT1483695711335 dated 06/01/2017 (GSP). Passport No.: BR0834202, Tax Invoice MyEG# IMM/PT1483697390327 dated 06/01/2017 (GSP). Passport No.: BW0465299, Tax Invoice MyEG# IMM/KD1521614201805 dated 21/03/2018 (GSP). Permit No.: PD 6323405 valid until 3/09/2018 for Construction Coordinator with Magnatron Bina Sdn Bhd; Tax Invoice MyEG# IMM/PT1483698998341 dated 06/12/2017 (GSP). Permit No.: PE 1093605 valid until 31/05/2019 for Construction Worker with Jasa Baik Estate (SRI). Permit No.: PE 4968693 valid until 08/12/2019 for Plaster Specialist with Jinggak Jaya Construction Sdn Bhd (SRI). <p>East POM:</p> <p>Based on the permit obtained from JTK with Ref. No.: BHG.PU/9/134 JLD 9(11) dated 27/03/2017 that the limit for overtime is 130 hours per month.</p> <p>However, reviewed on the punch card and daily input Form for the sampled workers found that the total overtime has exceeded the allowable limit.</p> <table border="1" data-bbox="507 1774 1465 2007"> <thead> <tr> <th>Employee No.</th> <th>Month</th> <th>Total Hours in Punch Card</th> <th>Total Hours in Daily Input Form</th> </tr> </thead> <tbody> <tr> <td rowspan="2">52594</td> <td>June 2018</td> <td>140</td> <td>133.5</td> </tr> <tr> <td>October 2018</td> <td>140</td> <td>135</td> </tr> <tr> <td>122373</td> <td>October 2018</td> <td>142</td> <td>132</td> </tr> </tbody> </table> | | | Employee No. | Month | Total Hours in Punch Card | Total Hours in Daily Input Form | 52594 | June 2018 | 140 | 133.5 | October 2018 | 140 | 135 | 122373 | October 2018 | 142 | 132 |
| Employee No. | Month | Total Hours in Punch Card | Total Hours in Daily Input Form | | | | | | | | | | | | | | | |
| 52594 | June 2018 | 140 | 133.5 | | | | | | | | | | | | | | | |
| | October 2018 | 140 | 135 | | | | | | | | | | | | | | | |
| 122373 | October 2018 | 142 | 132 | | | | | | | | | | | | | | | |

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| | <p>Sepang Estate: Sampled permits for the contractors’ workers found that the details of employer and sector to work stated in the permit was not reflect the actual situation as below:</p> <ul style="list-style-type: none"> a. Permit No.: PE 1955468 valid until 14/05/2019 for Construction Workers with Carma Utama Services & Trading. b. Permit No.: PE 1579665 valid until 16/04/2019 for Construction Workers with Carma Utama Services & Trading. c. Permit No.: PE 2033176 valid until 04/11/2019 for Construction Workers with Chunyu Construction Sdn Bhd. d. Permit No.: PE 0913486 valid until 26/05/2019 for Plantation Workers with SV Hardjob Enterprise. b. e. Permit No.: PE 1297791 valid until 25/08/2019 for Plantation Workers with Agro Deban Enterprise. |
| <p>Correction</p> | <p>DDE: Estate management will follow up the status of the renewal from the contractor.</p> <p>East POM: To limit and monitor individual overtime for workers via mid-month chekroll updating.</p> <p>SPE: Towards to the compliance, estate management has advise contractor to terminate workers who has permit in others sector.</p> |
| <p>Root Cause Analysis:</p> | <p>Dusun Durian Estate: Checking & communication between estate management & contractor were not regularly & toughly done, thus lead to issues in permit status & standard of immigration document to ensure all document are valid & legal.</p> <p>East POM: Due to certain cases where foreign workers took long break and local workers having discipline issue, replacement from existing available is inevitable as to ensure continuity of processing. Thus will resulted to significant increase on overtime for those replacement workers.</p> <p>Sepang Estate: Inadequate monitoring the details of sector to work stated in the permit of contractors’ workers.</p> |
| <p>Corrective Actions:</p> | <p>DDE: Estate management will improve and tightly monitor on any follow up matters especially for renewal permit. Estate will obtain the established list of the permit for the ease monitoring. The specific training will be conducted to the related contractor.</p> <p>Internal Audit to monitor the compliance of contractors’ engaged on the relevant requirement stated in the contract agreement.</p> <p>East POM:</p> |

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| | <p>Replacement for workers taking long break will only be offer for existing workers who having less overtime. A request will be issue to JTK for extension of overtime limit from current approval limit.</p> <p>SPE:</p> <p>The SDP in the midst develop the Contractor Worker Management Procedure. Based on the drafted procedure:</p> <p>OU Management to ensure all contracts/ purchase orders contain full terms and conditions which include but not limited to the following:</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> A. Identity Card (IC) for Malaysian B. Passport and valid work permit for non-Malaysian <p>OU Management to conduct periodic spot check to ensure that only workers registered with the OU Management are within the premises.</p> |
| <p>Assessment Conclusion:</p> | <p><u>Recertification Audit Verification:</u></p> <p>Dusun Durian Estate:</p> <ol style="list-style-type: none"> a. Passport No.: BM0567433, Tax Invoice MyEG# IMM/PT1483697622743 dated 06/01/2017 (GSP) -New expiry date: 24/10/2020 (Permit No: PE78847861). b. Passport No.: BQ0984719, Tax Invoice MyEG# IMM/PT1483695711335 dated 06/01/2017 (GSP) -New expiry date: 18/02/2021 (Permit No: PE9971337) c. Passport No.: BR0834202, Tax Invoice MyEG# IMM/PT1483697390327 dated 06/01/2017 (GSP) -No longer working. d. Passport No.: BW0465299, Tax Invoice MyEG# IMM/KD1521614201805 dated 21/03/2018 (GSP) -New expiry date: 24/10/2020 (Permit No: PE78740098). e. Permit No.: PD 6323405 valid until 03/09/2018 for Construction Coordinator with Magnatron Bina Sdn Bhd; Tax Invoice MyEG# IMM/PT1483698998341 dated 06/12/2017 (GSP) -No longer working. f. Permit No.: PE 1093605 valid until 31/05/2019 for Construction Worker with Jasa Baik Estate (SRI) -No longer working. g. Permit No.: PE 4968693 valid until 08/12/2019 for Plaster Specialist with Jingga Jaya Construction Sdn Bhd (SRI) -No longer working. <p>Sepang Estate: The contractor "Ammachi Enterprise" has terminates the 5 worker's contract which their work permit is invalid. Verified the termination letter from Ammachi to the workers.</p> <p>East POM: there is no overtime more than 130 hours/month as sighted in sampled in clause 6.2.3 in this report. Hence minor NC is closed.</p> |

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| Non-conformity | | | |
|------------------------------------|---|--|-----------------------|
| NCR Ref # | 1733498-201901-N4 | Clause & Category (Major / Minor) | Indicator 4.7.3 Minor |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 12/05/2020 |
| Statement of Nonconformity: | Awareness on importance of PPE to cover potential hazard is it effectively communicated with the harvester. | | |
| Requirement Reference: | 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: | Dusun Durian Estate Noted during site visit and interview session with the harvester, the harvesters didn't wear the PPE (safety helmet) provided by the estate. Pictorial Safety Standard, Section 7.1 Harvesting – Personal Protective Equipment stated Safety Helmet as one of the PPE that must be used by the harvester during working. | | |
| Correction | The field staff will conduct spot check during the morning muster. the SIME card (unsafe act) will be issue to the workers who violate the instructions. | | |
| Root Cause Analysis: | Lack of awareness by the harvester to wear complete PPE all the time especially during working hour. | | |
| Corrective Actions: | a) Management to conduct refreshment training/ briefing how important of wearing the PPE. b) Management will issues the SIME Card to worker does not follow the safety procedure. | | |
| Assessment Conclusion: | <u>Recertification Audit Verification:</u> During the recertification, audit it was noted that there were no recurrence of the similar issue. The management conduct regular morning briefing to create awareness amongst the workers and staffs on the importance of PPE usage. During the interview with the sprayers in Dusun Durian Estate, it was noted that the sampled workers were aware on the importance of PPE usage. It was sighted that all the workers were well equipped with appropriate PPEs. Hence minor NC is closed. | | |

| Opportunity for Improvement | |
|-----------------------------|---|
| OFI# | Description |
| OFI 1 | 1733498-201901-I1 RSPO SCCS : General COC : 5.3.2 CAP process is documented under internal audit procedure, SD/SDP/PSQM/IAP rev:2 dated 01/11/2017. The timeline for CAP submission and closure has yet to be followed, within 14 days from closing meeting and closure within 60 days for evidence verification by lead auditor. This CAP process has yet to be consistently followed for improvement. |

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|--------------|--|
| | <p><u>Recertification Audit Verification:</u> Stated in the SOP for Sustainability Supply Chain & Traceability (Version 2; Issue Date April 2019); 18.0 Internal Audit; 18.1 Annual internal audit shall be conducted in accordance to internal audit procedure (SD/SDP/PSQM/IAP) to determine whether the Mill conforms to the requirements in the RSPO SCCS as well as effectively implements and maintains the standard requirements.</p> <p>The internal audit was last conducted on 19th June 2019 by the Plantation Sustainability & Quality Management Department (PSQM), Ara Damansara. There were no non-conformities raised during the mentioned internal audit.</p> |
| OFI 2 | <p>1733498-201901-I2 RSPO SCCS : Module D : 4.2 92.80 % of volume allocated @ certificate volume has been used for the period of February to December 2018. Threshold limit has yet to be set to ensure no overproduction and prompt notification to CB for volume extension.</p> <p><u>Recertification Audit Verification:</u> In the period of recertification audit, the threshold limit has been set based on the 12 months forecast volume. There is no overproduction of CPO and PK in during the recertification audit. Hence, the OFI is closed.</p> |

3.4.2 Summary of the Nonconformities and Status

| CAR Ref. | Category (Major / Minor) | P&C Indicator | Issued Date | Status & Date (Closure) |
|-------------------|--------------------------|---------------|-------------|--------------------------|
| 1149356M1 | Major | 2.1.1 | 27/02/2015 | Closed out on 08/04/2015 |
| 1149356M2 | Major | 5.3.3 | 27/02/2015 | Closed out on 08/04/2015 |
| 1298818N1 | Minor | 6.5.3 | 24/02/2016 | Closed out on 24/02/2017 |
| 1298818N2 | Minor | 5.6.3 | 24/02/2016 | Closed out on 24/02/2017 |
| 1444834-201702-M1 | Major | 4.7.2 | 23/02/2017 | Closed out on 17/03/2017 |
| 1444834-201702-M2 | Major | 2.1.1 | 23/02/2017 | Closed out on 17/03/2017 |
| 1444834-201702-N1 | Minor | 5.2.3 | 23/02/2017 | Closed out on 23/02/2018 |
| 1444834-201702-N2 | Minor | 4.7.3 | 23/02/2017 | Closed out on 23/02/2018 |
| 1596927-201802-M1 | Major | SCCS 5.3.2 | 23/02/2018 | Closed out on 24/04/2018 |
| 1596927-201802-M2 | Major | SCCS 5.4.1 | 23/02/2018 | Closed out on 24/04/2018 |
| 1596927-201802-M3 | Major | SCCS 5.13.1 | 23/02/2018 | Closed out on 24/04/2018 |
| 1596927-201802-M4 | Major | SCCS 5.13.2 | 23/02/2018 | Closed out on 24/04/2018 |
| 1596927-201802-M5 | Major | SCCS 5.13.3 | 23/02/2018 | Closed out on 24/04/2018 |
| 1596927-201802-M6 | Major | 2.1.1 | 23/02/2018 | Closed out on 24/04/2018 |
| 1596927-201802-M7 | Major | SCCS D4.2 | 23/02/2018 | Closed out on 24/04/2018 |
| 1596927-201802-N1 | Minor | 5.3.3 | 23/02/2018 | Closed out on 01/02/2019 |

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|-------------------|--------------|----------------------|------------|--------------------------|
| 1596927-201802-N2 | Minor | 6.9.3 | 23/02/2018 | Closed out on 01/02/2019 |
| 1733498-201901-M1 | Major | SCCS D 5.1 | 01/02/2019 | Closed out on 15/04/2019 |
| 1733498-201901-M2 | Major | General COC 5.7.2 | 01/02/2019 | Closed out on 15/04/2019 |
| 1733498-201901-M3 | Major | SCCS D 2.2 | 01/02/2019 | Closed out on 15/04/2019 |
| 1733498-201901-M4 | Major | 6.5.1 | 01/02/2019 | Closed out on 15/04/2019 |
| 1733498-201901-M5 | Major | 6.5.2 | 01/02/2019 | Closed out on 15/04/2019 |
| 1733498-201901-N1 | Minor | 5.1.3 | 01/02/2019 | Closed out on 14/02/2020 |
| 1733498-201901-N2 | Minor | 5.2.3 | 01/02/2019 | Closed out on 14/02/2020 |
| 1733498-201901-N3 | Minor | 2.1.3 | 01/02/2019 | Closed out on 14/02/2020 |
| 1733498-201901-N4 | Minor | 4.7.3 | 01/02/2019 | Closed out on 14/02/2020 |
| 1883198-202002-M1 | Critical | 2.1.1 | 14/02/2020 | Closed out on 12/05/2020 |
| 1883198-202002-M2 | Critical | 7.2.6 | 14/02/2020 | Closed out on 12/05/2020 |
| 1883198-202002-N1 | Non-critical | 2.2.2 | 14/02/2020 | Open |
| 1883198-202002-N2 | Non-critical | 4.2.3 | 14/02/2020 | Open |
| 1883198-202002-N3 | Non-critical | 7.3.2 | 14/02/2020 | Open |
| 1733498-201901-N4 | Non-critical | 3.3.2 | 14/02/2020 | 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 Sime Darby-East POM 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 | |
|---|---|
| Internal Stakeholders Gender Committee Representatives Foreign & local workers NUPW Representatives | Union/Contractors FFB Transporter GSP Letchumy Sritheran Enterprise |
| Government Departments Pejabat Daerah Tanah Sepang SK Seri Lanang | NGO/Communities/Neighbourhood villages Kampung Sri Cheeding |

| No | Stakeholders comment |
|----|--|
| 1 | Feedbacks: <u>Pejabat Daerah Tanah Sepang</u> The officer has shared the information on the encroachment of Persatuan Kubur Cina to Sime Darby's land and it was solved among themselves. |
| | Management Responses: The management has forwarded the issue to the Land Department and it is already being solved. |
| | Audit Team Findings: Sighted the correspondence between Persatuan Kubur Cina & Land Department of Sime Darby. No other issue. |
| 2 | Feedbacks: <u>Kampung Sri Cheeding</u> There is a land belonged to Sime Darby but being used as squatters. The area is near to Bukit Perah and Perkampungan Orang Asli. There are request to have a contribution of Balai Raya and cages of wild dogs. |
| | Management Responses: The area is now sold to the property company, Srimas and estate will inform the head of villager to contact them for any request. |
| | Audit Team Findings: No other issue. |
| 3 | Feedbacks: <u>SK Seri Lanang</u> The school management would like to extend their appreciation to the Sime Darby's management for their contribution and supports. |
| | Management Responses: Noted on the information. |
| | Audit Team Findings: No other issue. |
| 4 | Feedbacks: <u>Gender Committee Representatives</u> No sexual harassment cases reported so far. Meeting and activities were conducted actively year round. No domestic violence cases too. New mother needs has been discussed in the gender committee meeting and implemented. |
| | Management Responses: Noted on the information. |
| | Audit Team Findings: No other issue. |
| 5 | Feedbacks: <u>Contractors (FFB Transporter, GSP Letchumy, Sritheran Enterprise)</u> Agreement, COBC and Vendor Integrity Pledge within contractor and management is available and signed. They also have been briefed on RSPO/MSPO/ISCC from Sime Darby Management. They has provides the employment contract and pay slips for their workers for management records. No other complaint received from their workers so far. |



| | |
|----------|---|
| | Management Responses: Noted on the information. |
| | Audit Team Findings: No other issue. |
| 6 | <p>Feedbacks: <u>Workers & NUPW Representatives</u></p> <p>Company have no objection for workers to join any trade union and to take leave/time off for join their meeting. The selection of the representative was made by the election and management didn't involve at all. In Dusun Durian Estate, the worker's representative has suggested the PPE stock to be ordered more in future especially for gloves. In East POM, the mill worker who has worked more than 10 years informed that they has not received the ex gratia (bonus) if finish contract which previous worker received.</p> <p>Management Responses: Noted on the information and Dusun Durian management will make sure the PPE balance is available. For East POM, the management informed that the Ex-Gratia has been changed to Retention Bonus payment and it has been briefed to worker previously.</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 |
| Dusun Durian Estate (Golden Hope Plantation Berhad) | Until 2008 | 5634.45 | Yes | No | Yes, ownership changed due to company merging as Sime Darby |
| Sepang Estate (Golden Hope Plantation Berhad) | Until 2008 | 2092.28 | Yes | No | Yes, ownership changed due to company merging as Sime Darby |
| East Estate (Golden Hope Plantation Berhad) | Until 2008 | 3176.21 | Yes | No | Yes, ownership changed due to company merging as Sime Darby |

| Previous land owner / user comment | |
|------------------------------------|---------------------------------|
| 1. | Feedbacks: NA |
| | Management Responses: NA |
| | Audit Team Findings: NA |

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 Elzy Ovktafia as Audit Team Leader, Amir Bahari and Vijay Kanna.

| 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 Sime Darby-East POM Certification Unit has complied with the RSP0 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 Sime Darby-East POM Certification Unit is continued.</p> | |
| Report prepared by | Acceptance of Assessment Conclusion |
| Name: Elzy Ovktafia | Name: Sairani Ariffin |
| Company Name: BSI Services (Malaysia) Sdn Bhd | Company Name: Sime Darby Plantations Berhad – East POM |
| Title: Client Manager | Title: Senior Manager |
| Signature:  | Signature: <p><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></p>  <p>SIME DARBY PLANTATION BHD EAST ESTATE SAIRANI ARIFFIN SR MANAGER</p> |
| Date: 12/05/2020 | Date: 16/05/2020 |

Appendix A: Summary of Findings

| Criterion / Indicator | Assessment Findings | Compliance | |
|---|--|---|------------|
| <p>Principle 1: Behave ethically and transparently</p> | | | |
| <p>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> | | | |
| <p>1.1.1</p> | <p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> | <p>Documents required for all unit of certification available in East 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 | <p>Yes</p> |
| <p>1.1.2</p> | <p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> | <p>SOU 8 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 8 conducted on 07/11/2019 at Conference Room, KKS East.</p> | <p>Yes</p> |

| | | | |
|-------|--|--|-----|
| 1.1.3 | (C) Records of requests for information and responses are maintained. | <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 stakeholders as follows:</p> <p>East Estate:</p> <ol style="list-style-type: none"> 1. Request to use hall for Ponggal on 25/01/2020 from Ahli Majlis Pengerusi MPP Zon 17 2. SJK(T) Pulau Carey request on permit for contractor to work on 14-26/01/2020. <p>Dusun Durian Estate:</p> <ol style="list-style-type: none"> 1. Request for grass cutting at SJK(T) Sungai Sedu field on 03/02/2020. 2. Request for bushes clearance near Sekolah Agama Menengah Unwanus Saadah 01/10/2019. <p>Sepang Estate:</p> <ol style="list-style-type: none"> 1. Approval to use the estate for Merentas Desa at SJK(T) Sepang on 08-09/01/2020. 2. Majlis Sambutan Awal Muharam – Surau Main Division, Ladang Sepang on 01/09/2019. <p>East POM:</p> <ol style="list-style-type: none"> 1. Request to use the unutilized chairs at Mill Canteen from Kernel Plant Operator to Mill Manager on 22/01/2020. 2. Request to come work early (6.30 am) on 18th Dec 2019 from worker to Mil Manager. 3. Request to install the signboard 'Do not litter' and the awareness campaign from Chairman of Kampung Orang Asli Bumbun | Yes |
| 1.1.4 | (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and | 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). | Yes |

| | | | |
|--------------|--|--|------------|
| | <p>explained to all relevant stakeholders by a nominated management official.</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.</p> <p>This has been communicated to workers and stakeholders through:</p> <ol style="list-style-type: none"> 1. Stakeholder meeting on 07/11/2019 at Conference Room, KKS East, on 13/11/2019 at Meeting Room, Dusun Durian Estate, 07/11/2019 at Meeting Room, Sepang Estate and on 14/11/2019 at Meeting Room East Estate. 2. The policies were communicated through the muster briefing to 63 workers on 07/01/20 by Assistant Engineer at East POM, on 23/01/2020 by Assistant Manager at Dusun Durian Estate, 17/01/2020 at Sepang Estate and 12/02/2020 at East Estate. <p>The person in charge for communication and consultation is Mohd Farhamin bin Ismail on 01/01/2019 (East POM), Muhammad Saufiy bin Ayub on 07/01/2020 (Dusun Durian Estate), Sallahuddin Bin Kassim on 01/07/2018 (Sepang Estate) and 01/01/2019 (East Estate).</p> | |
| <p>1.1.5</p> | <p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> | <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. East POM: Community Head, Kampung Manickavasagam, Pulau Carey. 2. Dusun Durian Estate: Contractor for lent labor grasscutting (G.S.P Letchumy Sdn Bhd, Mr Gocindasamy a/l Ramapillay, Banting, Selangor). 3. Sepang Estate: Balai Bomba Dan Penyelamat Sepang (603-31421333). 4. East Estate: Balai Polis Teluk Panglima Garang (Is Zahan on 603-31227222). | <p>Yes</p> |

| 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>Sime Darby Plantation Berhad has implemented Code of Business Conduct (COBC) where the company implemented the attitude of fair, integrity and ethics during any business process. The company is strictly prohibited to have any bribery related and/or receiving any form of gifts in the business processes.</p> <p>EAST POM</p> <p>The policy is displayed at the Office Display Board for public viewing. The policy has been briefed to all the workers on 07/01/2020 during the morning muster.</p> <p>DUSUN DURIAN ESTATE</p> <p>The policy is displayed at the Office Display Board for public viewing. The policy has been briefed to all the workers on 23/01/2020 during the morning muster at Sg. Buaya Division.</p> <p>SEPANG ESTATE</p> <p>The policy is displayed at the notice board at the office for general viewing. The policy has also been broadcasted to all workers for understanding on 17/01/2020.</p> <p>EAST ESTATE</p> <p>The policy is displayed at the notice board at the office, muster ground, housing quarters notice board and workshop for general viewing. The policy of COBC was briefed during the morning muster to all worker on 14/11/2019.</p> | Yes |
| 1.2.2 | A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. | <p>Sime Darby Plantation has issued a 'Vendor Integrity Pledge' that is to be signed by all contractors, suppliers and vendors. The Pledge states that the undersigned has read, understood and will comply to:</p> <ol style="list-style-type: none"> 1. The Vendor Code of Business Conduct. (includes Ethics and Management Practises) | Yes |

| | | <p>2. All applicable laws and regulations relating to anti-bribery, fraud and corruption.</p> <p>Among the sighted pledged documents are:</p> <ol style="list-style-type: none"> 1. Elektrik Setuah (Contractor) – Dusun Durian Est 2. Sritheran A/L Renganathan (Contractor) – Dusun Durian Est 3. G.S.P LECHUMY SDN BHD (Contractor) – Dusun Durian Est 4. Homeston Engineering Supplies (Supplier) – Sepang Est. 5. S. Thayalan Enterprise (Contractor) – Sepang Est. 6. TK DAS Enterprise (Contractor) – East Estate 7. Becon Enterprise Sdn Bhd (Supplier) – East Estate | | | | | | | | | | | | | | | | |
|--|--|--|--|---|-----------------|---------------------------|--|--|---|--------------------------------|------------|---|---------------------------------------|-----------------------|---|-------------------------------------|------------|------------|
| <p>Principle 2: Operate legally and respect rights</p> | | | | | | | | | | | | | | | | | | |
| <p>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> | | | | | | | | | | | | | | | | | | |
| <p>2.1.1</p> | <p>(C) The unit of certification complies with applicable legal requirements.</p> | <p>East Palm Oil Mill continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and GSQM sustainability team. The Mill and the 3 estates had obtained and renewed license and permits as required by the law. The licenses/permit viewed among others were:</p> <table border="1" data-bbox="1048 1114 1886 1374"> <thead> <tr> <th></th> <th>License / Permit / Regulatory Requirement</th> <th>Validity Period</th> </tr> </thead> <tbody> <tr> <td colspan="3" style="text-align: center;">East Palm Oil Mill</td> </tr> <tr> <td style="text-align: center;">1</td> <td>MPOB License no 53323-800-4000</td> <td style="text-align: center;">30/09/2020</td> </tr> <tr> <td style="text-align: center;">2</td> <td>DOE – Compliance Scheduled Ref 005838</td> <td style="text-align: center;">01/10/2019-30/09/2020</td> </tr> <tr> <td style="text-align: center;">3</td> <td>BOMBA – no 305798– fire certificate</td> <td style="text-align: center;">28/02/2019</td> </tr> </tbody> </table> | | License / Permit / Regulatory Requirement | Validity Period | East Palm Oil Mill | | | 1 | MPOB License no 53323-800-4000 | 30/09/2020 | 2 | DOE – Compliance Scheduled Ref 005838 | 01/10/2019-30/09/2020 | 3 | BOMBA – no 305798– fire certificate | 28/02/2019 | <p>Yes</p> |
| | License / Permit / Regulatory Requirement | Validity Period | | | | | | | | | | | | | | | | |
| East Palm Oil Mill | | | | | | | | | | | | | | | | | | |
| 1 | MPOB License no 53323-800-4000 | 30/09/2020 | | | | | | | | | | | | | | | | |
| 2 | DOE – Compliance Scheduled Ref 005838 | 01/10/2019-30/09/2020 | | | | | | | | | | | | | | | | |
| 3 | BOMBA – no 305798– fire certificate | 28/02/2019 | | | | | | | | | | | | | | | | |

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|--|--|----|---|------------|--|
| | | 4 | KPDNKK – 15500 diesoline | 07/02/2020 | |
| | | 5 | Work on overtime –JTK 3 -3 years approval | 31/05/2021 | |
| | | 6 | Sterilizer no 1 PM 1069 | 03/07/2020 | |
| | | 7 | Sterilizer no 2 PMT 1531 | 03/07/2020 | |
| | | 8 | Sterilizer no 3 PMT 1070 | 03/07/2020 | |
| | | 9 | Boiler no 3 PMD 80297 | 11/12/2020 | |
| | | 10 | Crane no 4 PMA 28305 | 03/07/2020 | |
| | | 11 | Air Compressor PMT 3467 | 03/07/2020 | |
| | | 12 | Air Receiver Tank PMT 81790 | 11/12/2020 | |
| | | 13 | Air receiver Tank PMT 81806 | 11/12/2020 | |
| | | 14 | Metrology Corp. w/bridge 1 ref B1528721 | 04/03/2020 | |
| | | 15 | Metrology Corp. w/bridge 1 ref B1528720 | 04/03/2020 | |
| | | 16 | Energy Commission ref 2019/02642 | 10/10/2020 | |
| | | | | | |
| | | | Dusun Durian Estate | | |
| | | 1 | Permit <i>Control Item</i> KPDNKK No 1375 | 14/12/2020 | |
| | | 2 | Air Compressor PMT 28377 | 16/04/2020 | |
| | | 3 | Air Compressor PMT 28376 | 16/04/2020 | |
| | | 4 | MPOB – FFB Production – 563441011000 | 31/07/2020 | |
| | | 5 | MPOB – FFB Production – 528976002000 | 30/04/2020 | |
| | | | | | |
| | | | East Estate | | |

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|--|--|--|--|------------|--|--|
| | | 1 | Permit for <i>Control Item</i> KPDNKK No 2820 | 11/12/2020 | | |
| | | 2 | Air Compressor PMT 39183 | 11/12/2020 | | |
| | | 3 | Air Compressor PMT 4385 | 11/12/2020 | | |
| | | 4 | MPOB – FFB Production – 531308002000 | 31/07/2020 | | |
| | | 5 | Pesticides Act ref 00-10GL | 07/02/2020 | | |
| | | | | | | |
| | | | <i>Sepang Estate</i> | | | |
| | | 1 | Permit for <i>Control Item</i> KPDNKK No 00102 | 04/02/2020 | | |
| | | 2 | Air Compressor PMT 81283 | 18/07/2020 | | |
| | | 3 | Air Compressor PMT 364469 | 18/07/2020 | | |
| | | 4 | MPOB – FFB Production – 53326700-2000 | 30/09/2020 | | |
| | | 5 | MPOB – FFB Production – 53379800-2000 | 31/10/2020 | | |
| | | 6 | Labour Department – Wages deduction | 10/09/2019 | | |
| | | 7 | DOE – SW Buyer approval ref 003172 | 15/10/2019 | | |
| | | 8 | Pesticides Act - Acephate | 05/02/2020 | | |
| | | <p>Note: East POM under MPOB license issued on 16/07/2019 the approved FFB processed/annum is maximum 180,000 mt and the actual FFB processed in 01/10/2018 – 30/09/2019 was 136,123.25 mt compliance to the regulations. The mill was designed at 30 mt/hr.</p> <p>Fire certificate application was sighted via email effective 16/5/2019. The Mill is still waiting for approval from BOMBA. BOMBA has yet to update the BLESS system.</p> | | | | |

| | | | |
|-------|--|---|-----|
| | | <p>Labour Department Permit: Application for Overtime Works Under Section 60A(4)(a) Labour Act 1955 on 31 May 2019 (130 hours).</p> <p>Labour Department Permit: Application for Salary Deduction Under Section 24 Labour Act 1955 for electricity bill deduction on 06/07/2017.</p> <p>Labour Department Permit: Application for Salary Deduction Under Section 24 Labour Act 1955 for Mosque Donation for Muslims (RM5.00/month) dated 06/08/2018.</p> <p>DOE – SW Buyer approval ref 003172 date of approval is 15/10/2019</p> | |
| 2.1.2 | <p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and regulations.</p> | <p>The Certification Unit continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them.</p> <p>a) Each estate and mill had its own Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the person in-charge and approved by the respective managers.</p> <p>b) The GSQM Department is responsible to track changes and the information was disseminated to all its plantations and Mill department. Among the applicable legal and included in the legal register are Pesticides Act 1974 and Regulations, Environmental Quality Act 1974 and Regulations, Factories and Machinery Act 1967 and Regulations, Occupational Safety and Health 01/7/2019. Act 1994, Employment Act 1955, Aboriginal Peoples Act 1954, Industrial Relations Act 1967, Children and Young Persons (Employment) Act 1966, MPOB Regulations (Licensing) 2005.</p> <p>c) The latest legal register update by GSQM was related to</p> <ul style="list-style-type: none"> - Min wages order 2020 rev 15/01/2020 - Workers Min Std Housing Amenities (Amendment) Act 2019 revised on 24/01/2020. | Yes |

| | | <p>d) The mill reviewed the LORR dated 08/01/2020 to include OSH (Noise Exposure) Regulations 2019 effective 01/06/2019.</p> <p>e) The estates reviewed LORR effective to include Pesticides (Amendment of first Schedule Order 2019 enforced effective 01/06/2019.</p> <table border="1" data-bbox="1048 539 1597 769"> <thead> <tr> <th>No</th> <th>OU</th> <th>LORR Rev date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>East POM</td> <td>08/01/2020</td> </tr> <tr> <td>2</td> <td>East Estate</td> <td>08/01/2020</td> </tr> <tr> <td>3</td> <td>D Durian</td> <td>24/01/2020</td> </tr> <tr> <td>4</td> <td>Sepang</td> <td>03/02/2020</td> </tr> </tbody> </table> | No | OU | LORR Rev date | 1 | East POM | 08/01/2020 | 2 | East Estate | 08/01/2020 | 3 | D Durian | 24/01/2020 | 4 | Sepang | 03/02/2020 | | | | | | | | | | | | | | | | |
|-------|--|---|------------------|--------|---------------|--------------|----------|------------|------|-------------|------------|-------------|----------|------------|------|-----------|------------|----------|-------|------------------|---|--------|-------|---------------|---|--------|-------|------------------|---|--------|------|-----------|-----|
| No | OU | LORR Rev date | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | East POM | 08/01/2020 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | East Estate | 08/01/2020 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | D Durian | 24/01/2020 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Sepang | 03/02/2020 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2.1.3 | <p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> | <p>The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 3 estates, during the field inspection confirmed that they were clearly marked and maintained. All the physical markers/Boundary stones along the legal boundaries between was visibly available.</p> <table border="1" data-bbox="1048 986 1715 1359"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Boundary</th> <th>Neighbouring</th> </tr> </thead> <tbody> <tr> <td rowspan="2">1</td> <td rowspan="2">East</td> <td>P17A</td> <td>West Estate</td> </tr> <tr> <td>P13A</td> <td>West Estate</td> </tr> <tr> <td>2</td> <td>D Durian</td> <td>P04B</td> <td>Sg Langat</td> </tr> <tr> <td>3</td> <td>D Durian</td> <td>P06K1</td> <td>Kg Kancong Darat</td> </tr> <tr> <td>4</td> <td>Sepang</td> <td>P05C1</td> <td>Kg Baru India</td> </tr> <tr> <td>5</td> <td>Sepang</td> <td>P05C1</td> <td>Kubor 1 Malaysia</td> </tr> <tr> <td>6</td> <td>Sepang</td> <td>P15B</td> <td>Kg Batu 2</td> </tr> </tbody> </table> | No | Estate | Boundary | Neighbouring | 1 | East | P17A | West Estate | P13A | West Estate | 2 | D Durian | P04B | Sg Langat | 3 | D Durian | P06K1 | Kg Kancong Darat | 4 | Sepang | P05C1 | Kg Baru India | 5 | Sepang | P05C1 | Kubor 1 Malaysia | 6 | Sepang | P15B | Kg Batu 2 | Yes |
| No | Estate | Boundary | Neighbouring | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | East | P17A | West Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | P13A | West Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | D Durian | P04B | Sg Langat | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | D Durian | P06K1 | Kg Kancong Darat | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Sepang | P05C1 | Kg Baru India | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Sepang | P05C1 | Kubor 1 Malaysia | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | Sepang | P15B | Kg Batu 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|--|---|---|-----------------|
| Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements. | | | |
| 2.2.1 | A list of contracted parties is maintained. | The list of contracted parties was available in the stakeholder list updated as at Jan 2020 in each unit. | Yes |
| 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. | In Dusun Durian Estate, Sritheran A/L Renganathan (Labour Supply Contractor) and in East Estate, Tiong Ying Enterprise Sdn Bhd has signed the Vendor Integrity Pledge (as due diligence) on 01/01/2020 and declaration to follow RSPO/ISCC/MSPO on 10/10/2018. Non-conformance: In Sepang Estate, the Vendor Integrity Pledge has been signed by contractor as due diligence as well as the declaration to follow RSPO/ISCC/MSPO. However, in Sepang Estate, found that contractor workers for Amachi Enterprise (Sekaran a/l Audayer and Ganisen a/l Perumal Ravandar) has been paid RM5 for overtime rate in Jan 2020, Dec 2019 and Aug 2019 pay slip while the employment contract was signed on 01/03/2019 mentioned that the overtime rate is RM7.94/hour. | Non-conformance |
| 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. | The contract signed with contractors is sighted. For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC dated 07 Feb 2020, Human Rights Charter-protecting the rights of children. | Yes |
| 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 | The mill received only crop from the SDP estates, mainly from the Sepang, East and Dusun Durian Estates, other if any are from diversion from the sister mill as results of breakdown or annual maintenance. | Yes |

| | | | |
|---|---|--|-----|
| | <ul style="list-style-type: none"> One or more supporting documents for claims Valid MPOB license | <p>All the estates from the same SOU 8 possessed the following information sighted and verified during the audit</p> <p>a) All FFB from the SDP estates supported by the delivery documents.</p> <p>b) Valid land title with ownership status (refer indicator 4.4.1)</p> <p>c) Valid MPOB licence (refer criteria indicator 2.1.1)</p> <p>All delivery documents were verified with volumes of FFBs received by the mill.</p> | |
| 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. | No smallholders' crop received or processed in East Palm Oil Mill. | Yes |
| <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 | <p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> | <p>EAST POM</p> <p>The mill has established a forecast business plan for five financial years from FY 2020 until 2024 categorized as the 'MPLAN_2020' as a projection for the mill to run the operations. The Plan is reviewed on an annual 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>Estates</p> <p>The Estates visited have established and implemented its commitment to long-term sustainability and improvements through the MPLAN_2020 (Ex-estate Cost, 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> | Yes |

| <p>3.1.2</p> | <p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> | <p>The business units have established a long-range replanting programme until FY 2024. Replanting planned for the palm older than 25 years, non-performance fields (yield) and Ganoderma infected palm. The total Ha for the projected replanting of the 3 estates are as follows :</p> <table border="1" data-bbox="1048 507 1899 850"> <thead> <tr> <th>YEAR</th> <th>East Estate</th> <th>Dusun Durian Estate</th> <th>Sepang Estate</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>110.47</td> <td>323.29</td> <td>0</td> </tr> <tr> <td>2021</td> <td>250.03</td> <td>234.16</td> <td>125.88</td> </tr> <tr> <td>2022</td> <td>227.67</td> <td>164.38</td> <td>117.29</td> </tr> <tr> <td>2023</td> <td>224.07</td> <td>198.49</td> <td>189.26</td> </tr> <tr> <td>2024</td> <td>101.93</td> <td>219.41</td> <td>102.01</td> </tr> </tbody> </table> | YEAR | East Estate | Dusun Durian Estate | Sepang Estate | 2020 | 110.47 | 323.29 | 0 | 2021 | 250.03 | 234.16 | 125.88 | 2022 | 227.67 | 164.38 | 117.29 | 2023 | 224.07 | 198.49 | 189.26 | 2024 | 101.93 | 219.41 | 102.01 | <p>Yes</p> |
|--------------|--|--|---------------|-------------|---------------------|---------------|------|--------|--------|---|------|--------|--------|--------|------|--------|--------|--------|------|--------|--------|--------|------|--------|--------|--------|------------|
| YEAR | East Estate | Dusun Durian Estate | Sepang Estate | | | | | | | | | | | | | | | | | | | | | | | | |
| 2020 | 110.47 | 323.29 | 0 | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021 | 250.03 | 234.16 | 125.88 | | | | | | | | | | | | | | | | | | | | | | | | |
| 2022 | 227.67 | 164.38 | 117.29 | | | | | | | | | | | | | | | | | | | | | | | | |
| 2023 | 224.07 | 198.49 | 189.26 | | | | | | | | | | | | | | | | | | | | | | | | |
| 2024 | 101.93 | 219.41 | 102.01 | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>3.1.3</p> | <p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.</p> | <p>EAST POM</p> <p>The management review was conducted on 17th December 2019 attended by 8 members. The meeting was chaired by the Chairman Mr. Azlan Md Kambali.</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>Yes</p> | | | | | | | | | | | | | | | | | | | | | | | | |

| | | <p>Among the Findings and Corrective Action Plan that were sighted are as below :-</p> <table border="1"> <thead> <tr> <th data-bbox="1048 435 1357 485">Findings</th> <th data-bbox="1357 435 1906 485">Action Plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="1048 485 1357 663">Audiometric re-test results not available</td> <td data-bbox="1357 485 1906 663">All 7 workers required for re-test to be sent to VMO (Dr. Hartati Clinic) for retest for audiometric and medical surveillance. VMO will issue report from the test once 7 workers done the test.</td> </tr> <tr> <td data-bbox="1048 663 1357 810">LORR is not updated</td> <td data-bbox="1357 663 1906 810">Pn. Raanon has emailed the updated list of LORR. Mill Management has gone through the list and confirmed that all requirement is in order.</td> </tr> <tr> <td data-bbox="1048 810 1357 922">All employee exposed to excessive noise are adequately trained.</td> <td data-bbox="1357 810 1906 922">Hearing Conservation Training will be conducted by region SQM.</td> </tr> </tbody> </table> <p>Dusun Durian Estate The management review was conducted on 05th February 2020 attended by 8 members. The meeting was chaired by the Chairman Mr. Amirudin Said.</p> <p>Sepang Estate The management review was conducted on 14th January 2020 attended by 14 members. The meeting was chaired by the Chairman Mr. Kamarul Bahrin Noor Bin Sha'arani. The minutes of meeting indicated the management has reviewed the system audits and assess the effectiveness and opportunities for improvements.</p> <p>East Estate The management review was conducted on 26th November 2019 attended by 14 members. The meeting was chaired by the Chairman Mr.</p> | Findings | Action Plan | Audiometric re-test results not available | All 7 workers required for re-test to be sent to VMO (Dr. Hartati Clinic) for retest for audiometric and medical surveillance. VMO will issue report from the test once 7 workers done the test. | LORR is not updated | Pn. Raanon has emailed the updated list of LORR. Mill Management has gone through the list and confirmed that all requirement is in order. | All employee exposed to excessive noise are adequately trained. | Hearing Conservation Training will be conducted by region SQM. | |
|---|--|--|----------|-------------|---|--|---------------------|--|---|--|--|
| Findings | Action Plan | | | | | | | | | | |
| Audiometric re-test results not available | All 7 workers required for re-test to be sent to VMO (Dr. Hartati Clinic) for retest for audiometric and medical surveillance. VMO will issue report from the test once 7 workers done the test. | | | | | | | | | | |
| LORR is not updated | Pn. Raanon has emailed the updated list of LORR. Mill Management has gone through the list and confirmed that all requirement is in order. | | | | | | | | | | |
| All employee exposed to excessive noise are adequately trained. | Hearing Conservation Training will be conducted by region SQM. | | | | | | | | | | |

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| | | Kamarul Bahrin Noor Bin Sha'arani. The minutes of meeting indicated the management has reviewed the MSPO & RSPO internal audit report dated 12 th Nov 2019 and assessed the effectiveness and opportunities for improvements. | |
| 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. | | | |
| 3.2.1 | (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>The Mill has established continual improvement plans documented in the <i>Rise Focused Accountability Dashboard</i> and <i>Kaizen Charter</i>. Sighted the sampled implementation of the improvement plan FY 2020 as follows:</p> <ul style="list-style-type: none"> - To hire new experienced workers for maintenance / workshop team. - To hire / allocate sufficient workers. - To collect water condensate, rain water and improve maintenance to stop all leakage and overflow. - To eliminate TNB consumption for Kernel plant by using electricity from steam turbine and to reduce TNB electricity bill. <p>Dusun Durian Estate</p> <p>The estate have stated their intentions towards continuous improvement through the following action;</p> <ul style="list-style-type: none"> - An education and awareness programme shall be carried out to train the SOU biodiversity, flora/fauna and about biodiversity management. - To develop beneficial plant nursery comprised of <i>Turnera subulata</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, <i>Euphorbia heterophylla</i>, <i>Crotalaria zanzibarica</i> & <i>Asytasia gangetica</i>. <p>Sepang Estate</p> <ul style="list-style-type: none"> - To identify unsafe acts to minimize near misses/ accidents occurrence. | Yes |

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| | | <ul style="list-style-type: none"> - Sport activities to promote recreation activities for good health life. Estate management will provide sport facilities/ sport tools. - Talk by Kementerian Pembangunan Wanita dan Masyarakat for Gender Committee for their benefits and to highlight related issues. | |
| 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. | The RSPO metrics template has not been issued by RSPO for reporting. | Yes |
| 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>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 01/11/2008) 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 02/1/2008 and Agricultural reference Manual) covers land preparation, planting material, upkeep, harvesting, transport etc. Noted updated procedure under SOP for water analysis and RSPO SCCS procedure:</p> <ul style="list-style-type: none"> • SPMS, Appendix 7: SOP for water quality monitoring, issue 2, dated 01/06/2016. • SOP for sampling guideline; Water and Wastewater Sampling Guideline, issue 1, dated 01/06/2016. • RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15, version 2, issue 2, dated October 2016. | Yes |
| 3.3.2 | A mechanism to check consistent implementation of procedures is in place. | Plantation Advisory Department, Performance Monitoring Unit, Quality Management Unit (PSQM) inspect and report to ensure compliance | Non-conformance |

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| | | <p>against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements.</p> <p>East POM</p> <p>Audiometric test was conducted on an annual basis. Latest test was done on 07th – 25th May 2019. A total of 37 workers were sent for the test with 7 workers found to be with STS including 2 with hearing impairment. The workers with STS were required to repeat audiometric test within 3 months from the last report. The GSQM Department have highlighted that the audiometric re-test results were not available during the internal audit conducted by the department on 15th November 2019. However, until the audit, the mentioned workers have yet to be sent for retest. Thus, the mechanism to ensure implementation of procedures, the internal audit, is not effective.</p> <p>Dusun Durian Estate</p> <p>The internal audit was conducted by SQM Malaysia, Central East RSQM on 13th November 2019 to check on compliance to the standard operating procedures and legal aspects.</p> <p>Stated among the recommendations in the CHRA (dated 22nd October 2015) for Health Surveillance Programs, it is stated "If any employee is exposed or likely to be exposed to chemicals hazardous health listed in Schedule II, the health surveillance required as per USECHH Regulations 2000 shall include medical surveillance conducted by an Occupational Health Doctor (OHD) at intervals of not more than twelve months or at such shorter intervals as determined by the OH.</p> <p>It was sighted that the Medical Surveillance at Dusun Durian Estate was not done for the whole of 2019. The latest Medical Surveillance was conducted on 23rd January 2020. Prior to that the Medical Surveillance was done on 26th November 2018 which is more than 12 months interval.</p> <p>Sepang Estate</p> | |
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| | | <p>The internal audit was conducted by SQM Malaysia, Central East RSQM on 14th November 2019 to check on compliance to the standard operating procedures and legal aspects.</p> <p>East Estate</p> <p>The internal audit was conducted by SQM Malaysia, Central East RSQM on 12th November 2019 to check on compliance to the standard operating procedures and legal aspects.</p> | |
| 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. The mill Advisor and Plantation Advisor (PA) are accountable to monitor the estates compliance towards the SOP, Budget and Productivity.</p> <p>EAST POM</p> <p>Mill Advisor visit was conducted twice a year. Latest visit was conducted on 24-25th 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> <p>Dusun Durian Estate</p> <p>The Plantation Advisor visited the estate on 20th - 22nd December 2018. The PA advised the estate on crop recovery, Average Bunch Weights, etc.</p> <p>Sepang Estate</p> <p>The Plantation Advisor visited the estate on 8th – 11th January 2019. The PA advised the estate on pruning, circle raking, crop quality and crop recovery.</p> <p>East Estate</p> | Yes |

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| | | <p>The Plantation Advisor visited the estate on 20th and 22nd December 2018. The PA advised the estate on crop recovery, Average Bunch Weights, Loose Fruit Collections, etc.</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> | | | |
| <p>3.4.1</p> | <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>In Sepang Estate, SEIA has been conducted on 19th Sept 2018, in Dusun Durian Estate and East Estate on 27th – 28th April 2016 by internal GSQM team. The area assessed were converted from ex palm oil mill areas to oil palm in Nov 2018 and Jul 2019 for 7.49 Ha (Sepang Estate), kitchen vegetables (P15A-4.09 Ha) and coconut (P14C-8.76 Ha) (East Estate) and coconut (P14D-14.49 Ha) in Dusun Durian Estate. The activities involved discussion with the estate management, sighting the documentation, observation on sites and surrounding, and interview with stakeholders adjacent to the conversion areas. The assessment covered the aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control. Interviews were conducted with stakeholders to obtain feedback on the impact of replanting activities on their daily lives.</p> <p>The SEIA has been conducted in accordance to requirement of the RSPO NPP (NPP 2015) under scenario new plantings within an RSPO-certified management unit, which came into effect on 2016.</p> <p>Example as below: Sepang Estate (Sepang Palm Oil Mill was closed down in 2013 and crops have since been diverted to West POM. With the closing of this mill, most of the workers opted for retrenchment, while 8 workers agreed to be transferred to other OUs. These workers were absorbed by Sepang Estate.</p> | <p>Yes</p> |

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| | | <p>5 out of 8 of them were interviewed during this assessment. The estate has previously converted the mill staff quarters area into an oil palm field in 2015 (1.39 Ha).</p> <p>1. Interview with the ex-mill workers now working in the estate revealed that drains at the housing complex are broken heavily clogged (raised under OFI). Estate management to repair the drains and clean them periodically to prevent clogging and stagnant water issues.</p> <p>2.A collection drain in field P95A1 (bordering and flowing into the ex-mill area) was observed to be dirty and stagnant. Estate management is to clean up the collection drains prior to replanting.</p> <p>East Estate & Dusun Durian Estate:</p> <p>1. Construction of roads. Drainage system shall be provided to drain the water out of the structure of the road and diverted to vegetated areas. East and Dusun Durian Estate construct silt pit and maintain drain.</p> <p>2. Economic livelihood: Workers are grateful on the programme to improve livelihood. Debris from old tree planting and POME smell reduced once planting activities started. The issues will be dissolved after the palm trees mature.</p> | |
| 3.4.2 | 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>SEIA management plan has been developed with the consultation with stakeholders as below:</p> <p>Example as below:</p> <p>Sepang Estate (Sepang Palm Oil Mill was closed down in 2013 and crops have since been diverted to West POM. With the closing of this mill, most of the workers opted for retrenchment, while 8 workers agreed to be transferred to other OUs. There workers were absorbed by Sepang Estate. 5 out of 8 of them were interviewed during this assessment. The estate has previously converted the mill staff quarters area into an oil palm field in 2015.).</p> | Yes |

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| | | <p>1. Interview with the ex-mill workers now working in the estate revealed that drains at the housing complex are broken heavily clogged (raised under OFI). Action: Estate management to repair the drains and clean them periodically to prevent clogging and stagnant water issues.</p> <p>2.A collection drain in field P95A1 (bordering and flowing into the ex-mill area) was observed to be dirty and stagnant. Action: Estate management is to clean up the collection drains prior to replanting.</p> <p>East Estate & Dusun Durian Estate:</p> <p>1. Construction of roads. Drainage system shall be provided to drain the water out of the structure of the road and diverted to vegetated areas. Action: East and Dusun Durian Estate construct silt pit and maintain drain.</p> <p>2. Economic livelihood: Workers are grateful on the programme to improve livelihood. Debris from old tree planting and POME smell reduced once planting activities started. The issues will be dissolved after the palm trees mature.</p> <p>In yearly basis, the Social Management Plan for period 2020-2021 available for East Certification Unit. It mention the objectives, category, action, frequency, person in charge and monitoring period.</p> <p>Example seen as below:</p> <ol style="list-style-type: none"> 1. To ensure compliance to SOP and legal requirement regarding social (appointment of person in charge/committee to handle social matters, communication on policies/SOP on social to relevant stakeholders, monitoring of pay and agreement of workers and contractor's workers and to maintain housing and facilities provided to workers). 2. To contribute to local communities development (corporate social responsibility to surrounding communities/workers). | |
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| <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 Social Action Plan available for each units and the input were gathered from the meeting minutes (Gender Committee, NUPW, Safety Meeting, Complaint & Request from internal & external stakeholders and muster briefing).</p> <p>Sampled sighted for Social Action Plan 2020 as below:</p> <p><u>Dusun Durian Estate</u></p> <ol style="list-style-type: none"> 1. Working condition: to increase school bus subsidies for children of workers from RM12/person to Rm20/person. Action plan: to confirm and rectify with En Syazwan, MAPA/NUPW Staff on bus subsidies matter in the collective agreement. PIC: Chief Clerk, completion date: March 2020. 2. Issues related with Stakeholders: Representative from SJKT, Sungai Sedu requested for grass cutting at school football field. Action plan: To provide rotorslasher for grass cutting work at the football field. PIC: Asst. Manager in-charge, completion date: Feb 2020. <p><u>Sepang Estate:</u></p> <ol style="list-style-type: none"> 1. Mr Hashim requested estate to provide the tractor for branches cutting in the roadside of the village. Action plan: Estate has informed that any kind of assistance within estate’s control can be requested in black and white form. But so far, no letter of request is received. PIC: Mr Shahbudin/Mr Ashar. 2. Mrs Ranjamal voice out her concerns on the bad drainage in hpusing area need repair. Action plan: the repairs work is in phases. Drainage must be kept clean and cooperation from the workers to keep the housing area clean is required. Status: the repairs work has completed. Workers are advised to report any issue in housing area for management action. PIC: Mr Shahbudin/Sallahudin. | <p>Yes</p> |
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| | | <p><u>East Estate:</u></p> <ol style="list-style-type: none"> Workers quarters: Complaint on using water pump at Local resident causing other house receive less water. Action: To carry out inspection at the workers quarters by Executive, Medical Assistant and Security. Progress: On-going. Issues related with Stakeholders: Representative from SJK Timur requested for grass cutting at school football field. Action plan: Management agreed to carry out the grass cutting work when they required. PIC: En. Azahari. Progress: On-going. <p><u>East POM:</u></p> <ol style="list-style-type: none"> Orang Asli requesting signboard for 'Do not litter" and awareness campaign. Action plan: Mr Munusamy requested to write a letter to install the signboard. PIC: Irwan (Asst. Engineer). Progress: On-going. Mr Munusamy asking why the villager's cattles are not allowed to enter the Sime Darby estates. Action Plan: HQ instruction to prohibits the outside cattle since they destroy the immature palm oil. Only Sime Darby internal worker's cattle are allowed to be inside the estate. PIC: Azni (AAO). Status: Closed. | |
| 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. | <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>As a Group, there is Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2nd December 2019.</p> | Yes |

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| 3.5.2 | Employment procedures are implemented and records are maintained. | <p>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 liaison and recruitment, documentation and processing, workforce management centre (WMC) Sua Betong, Careline and estate.</p> <p>Seen the training certificates for the workers who has attended the induction training as below:</p> <p>East POM: Bukxxx (Passport no: AT945xxx), Anxxx (Passport no: AT651xxx)</p> <p>Dusun Durian Estate: Kaxxx (Passport No: M937xxx) and Saxx (Passport No: 09274xxx).</p> <p>Sepang Estate: Raxx (Passport No: N 713xxxx), Paixxx (Passport No: B411xxxx).</p> <p>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 (Vixxxxx A/P Chxxxxx, Guxxxxxx and Hoxxxx) at East POM, (Zuxxxxx) at Dusun Durian Estate.</p> | Yes |
| 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 risks 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>East POM</p> <p>Issues on health and safety have been assessed and documented in the HIRARC report. The assessment was done based on risk the assessment criteria. The HIRARC covers a mill main processing and support operation i.e . Kernel Station, Workshop, FFB Ramp, Press, etc. The latest review of the HIRARC is dated 25.05.2019.</p> | Yes |

| | | <p>Sighted the HIRARC for the sampled accident case 25.09.2019 that occurred in 2019 where a female lab personal had a hand cut by broken glass fragments while the personal was washing the flask. The personal was found to not be wearing the appropriate PPE (nitrile gloves). The HIRARC was reviewed to include training on SOP for washing glassware in the lab. Sighted the SOP (Doc. No. SDP/GSQM/LPC/02) dated 01.07.2018; Safety In the Laboratory; 2.1 Cleansing Glassware. Training was conducted on 26.06.2019.</p> <p>The CHRA has been conducted and explained to the Safety Committee of East POM on 23rd January 2020 by HJ. SHAARI CHIN (HQ/09/ASS/00/124). Among the recommendations are:</p> <table border="1" data-bbox="1048 730 1906 1029"> <thead> <tr> <th>WORK AREAS</th> <th>RECOMMENDATIONS</th> </tr> </thead> <tbody> <tr> <td>Laboratory</td> <td>To ensure hardcopy of SDS available and at conspicuous area for reference at site.</td> </tr> <tr> <td>Boiler Station</td> <td>To review standard operation procedure to include all PPE required and prevention steps.</td> </tr> <tr> <td>Effluent Treatment Plant</td> <td>To wear long sleeve shirt or long glove and Nitrile Glove.</td> </tr> </tbody> </table> <p>DUSUN DURIAN ESTATE</p> <p>Issues on health and safety risks have been assessed and documented in the HIRARC reports. The assessment was done based on risk the assessment criteria. The HIRARC covers all estate main operations including Gardening, Harvesting, Felling & Chipping, Cutting Bunch Stalk, etc. The latest review of the HIRARC is dated 13.01.2020 for "Machine Operator Kubota" which was reviewed due to an accident that occurred on 11.01.2020 from the related operation.</p> | WORK AREAS | RECOMMENDATIONS | Laboratory | To ensure hardcopy of SDS available and at conspicuous area for reference at site. | Boiler Station | To review standard operation procedure to include all PPE required and prevention steps. | Effluent Treatment Plant | To wear long sleeve shirt or long glove and Nitrile Glove. | |
|--------------------------|--|---|------------|-----------------|------------|--|----------------|--|--------------------------|--|--|
| WORK AREAS | RECOMMENDATIONS | | | | | | | | | | |
| Laboratory | To ensure hardcopy of SDS available and at conspicuous area for reference at site. | | | | | | | | | | |
| Boiler Station | To review standard operation procedure to include all PPE required and prevention steps. | | | | | | | | | | |
| Effluent Treatment Plant | To wear long sleeve shirt or long glove and Nitrile Glove. | | | | | | | | | | |

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| | | <p>The CHRA has been conducted and explained to the Safety Committee of Dusun Durian Est on 22nd October 2015 by NIOSH Malaysia.</p> <p>SEPANG ESTATE</p> <p>Issues on health and safety risks have been assessed and documented in the HIRARC reports. The assessment was done based on risk the assessment criteria. The HIRARC covers all estate main operations including, Travelling using Motorcycle, De-creeping, FFB Collection etc. The latest review of the HIRARC is dated 18.01.2020 for 'Cutting FFB and Fronds' which was reviewed due to an accident that occurred on 15.01.2020 from the related operation.</p> <p>The CHRA has been conducted and explained to the Safety Committee of Sepang Est on 04nd November 2015 by NIOSH Malaysia.</p> <p>EAST ESTATE</p> <p>Issues on health and safety risks have been assessed and documented in the HIRARC reports. The assessment was done based on risk the assessment criteria. The HIRARC covers all estate main operations including, Frond Stacking, Loose Fruit Collection, Harvester,, Supervision etc. The latest review of the HIRARC is dated 09.10.2019 for 'Supervision' which was reviewed due to an accident that occurred on 09.10.2019 from the related operation.</p> <p>The CHRA has been conducted and explained to the Safety Committee of East Est on 13th July 2015 by Daud Adam (JKKP HIE 127/171-2(353), NIOSH Malaysia.</p> | |
| 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 are conducted by East POM and Estates in each of their operations. It was sighted during the site visits and documents reviews that the sampled training and checklist were in place. | Yes |
| <p>Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p> | | | |

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| <p>3.7.1</p> | <p>(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.</p> | <p>EAST POM A training plan is available and documented in the <i>SOU 8 ;East Oil Mill; Training Plan Financial Year 2020</i>. The trainings is divided to 3 sub categories namely Safety, Environment and QMS. Among the details of training are First Aid Training, Chemical Spillage Training, Hearing Conservation training, Fire Fighting, etc.</p> <p>DUSUN DURIAN ESTATE A training plan is implemented in the 'Training Requirements For Operating Units (Estates)'. Among the trainings that are planned out are Accident Investigation Techniques, First Aid Training, Fire Fighting, Harvesting Induction Training, Personal Hygiene and Health, etc.</p> <p>SEPANG ESTATE A training plan is available in the Environment, Safety & Health Program 2020. The Program includes Health and Hygiene Monitoring Program, Fire Drill An Fire Fighting Training, Chemical Safety Training,etc.</p> <p>EAST ESTATE A training plan is available in the Safety & Health Management Program 2020. The Program includes Health and Hygiene Monitoring Program, Safety Inspections, Vehicle & Machinery Safety Management, etc.</p> | <p>Yes</p> |
|--------------|--|--|------------|

| 3.7.2 | Records of training are maintained. | <p>All workers involved in operations are provided with adequate training in safe working practices as preplanned in the training program. Sighted the training record as follows:</p> <p>EAST POM</p> <table border="1" data-bbox="1048 555 1886 805"> <thead> <tr> <th>TRAINING</th> <th>DATE</th> </tr> </thead> <tbody> <tr> <td>Introduction to GMP</td> <td>14.01.2020</td> </tr> <tr> <td>Noise Conservation Training</td> <td>10.01.2020</td> </tr> <tr> <td>5S Training</td> <td>20.12.2019</td> </tr> <tr> <td>Fire Drill</td> <td>13.12.2019</td> </tr> </tbody> </table> <p>DUSUN DURIAN ESTATE</p> <table border="1" data-bbox="1048 895 1886 1129"> <thead> <tr> <th>TRAINING</th> <th>DATE</th> </tr> </thead> <tbody> <tr> <td>Health & Hygiene Program (Influenza Awareness & Mental Health at Workplace)</td> <td>28.01.2020</td> </tr> <tr> <td>Tractor Handling Training & Safety Procedure</td> <td>21.08.2019</td> </tr> <tr> <td>Bagworm Census Training</td> <td>01.06.2019</td> </tr> </tbody> </table> <p>SEPANG ESTATE</p> <table border="1" data-bbox="1048 1219 1886 1366"> <thead> <tr> <th>TRAINING</th> <th>DATE</th> </tr> </thead> <tbody> <tr> <td>Bagworm Census Training</td> <td>20.08.2019</td> </tr> <tr> <td>Manuring Training</td> <td>12.06.2019</td> </tr> </tbody> </table> | TRAINING | DATE | Introduction to GMP | 14.01.2020 | Noise Conservation Training | 10.01.2020 | 5S Training | 20.12.2019 | Fire Drill | 13.12.2019 | TRAINING | DATE | Health & Hygiene Program (Influenza Awareness & Mental Health at Workplace) | 28.01.2020 | Tractor Handling Training & Safety Procedure | 21.08.2019 | Bagworm Census Training | 01.06.2019 | TRAINING | DATE | Bagworm Census Training | 20.08.2019 | Manuring Training | 12.06.2019 | Yes |
|---|-------------------------------------|---|----------|------|---------------------|------------|-----------------------------|------------|-------------|------------|------------|------------|----------|------|---|------------|--|------------|-------------------------|------------|----------|------|-------------------------|------------|-------------------|------------|-----|
| TRAINING | DATE | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Introduction to GMP | 14.01.2020 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Noise Conservation Training | 10.01.2020 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5S Training | 20.12.2019 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Fire Drill | 13.12.2019 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TRAINING | DATE | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Health & Hygiene Program (Influenza Awareness & Mental Health at Workplace) | 28.01.2020 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Tractor Handling Training & Safety Procedure | 21.08.2019 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Bagworm Census Training | 01.06.2019 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TRAINING | DATE | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Bagworm Census Training | 20.08.2019 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Manuring Training | 12.06.2019 | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | <table border="1"> <tr> <td>Trunk Injection Training</td> <td>08.05.2019</td> </tr> <tr> <td>Spraying Techniques Training</td> <td>12.02.2019</td> </tr> <tr> <td>Training On Best Agronomic and IPM Practices in the Oil Palm Nursery</td> <td>21.02.2019</td> </tr> </table> <p>EAST ESTATE</p> <table border="1"> <thead> <tr> <th>TRAINING</th> <th>DATE</th> </tr> </thead> <tbody> <tr> <td>New Policy Briefing</td> <td>12.02.2020</td> </tr> <tr> <td>Circle Spraying Training</td> <td>18.11.2019</td> </tr> <tr> <td>P&D Spraying Training</td> <td>12.11.2019</td> </tr> <tr> <td>Fertilizer Application Training</td> <td>18.01.2019</td> </tr> <tr> <td>First Aid, CPR & Choking Training</td> <td>06.01.2020</td> </tr> <tr> <td>Safety Training (Contractors)</td> <td>29.03.2019</td> </tr> </tbody> </table> | Trunk Injection Training | 08.05.2019 | Spraying Techniques Training | 12.02.2019 | Training On Best Agronomic and IPM Practices in the Oil Palm Nursery | 21.02.2019 | TRAINING | DATE | New Policy Briefing | 12.02.2020 | Circle Spraying Training | 18.11.2019 | P&D Spraying Training | 12.11.2019 | Fertilizer Application Training | 18.01.2019 | First Aid, CPR & Choking Training | 06.01.2020 | Safety Training (Contractors) | 29.03.2019 | |
|--|--|--|--------------------------|------------|------------------------------|------------|--|------------|----------|------|---------------------|------------|--------------------------|------------|-----------------------|------------|---------------------------------|------------|-----------------------------------|------------|-------------------------------|------------|--|
| Trunk Injection Training | 08.05.2019 | | | | | | | | | | | | | | | | | | | | | | |
| Spraying Techniques Training | 12.02.2019 | | | | | | | | | | | | | | | | | | | | | | |
| Training On Best Agronomic and IPM Practices in the Oil Palm Nursery | 21.02.2019 | | | | | | | | | | | | | | | | | | | | | | |
| TRAINING | DATE | | | | | | | | | | | | | | | | | | | | | | |
| New Policy Briefing | 12.02.2020 | | | | | | | | | | | | | | | | | | | | | | |
| Circle Spraying Training | 18.11.2019 | | | | | | | | | | | | | | | | | | | | | | |
| P&D Spraying Training | 12.11.2019 | | | | | | | | | | | | | | | | | | | | | | |
| Fertilizer Application Training | 18.01.2019 | | | | | | | | | | | | | | | | | | | | | | |
| First Aid, CPR & Choking Training | 06.01.2020 | | | | | | | | | | | | | | | | | | | | | | |
| Safety Training (Contractors) | 29.03.2019 | | | | | | | | | | | | | | | | | | | | | | |
| 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. | RSPO Supply Chain Training was conducted 17 July 2019 by Nadiah Mohamed Nazri (GSQM) for the East POM management personals. Training was sighted for the PIC, Azni Rohaidah Bt. A. Rahman. | Yes | | | | | | | | | | | | | | | | | | | | |
| Definition | | | | | | | | | | | | | | | | | | | | | | | |
| Identity Preserved Mill D.1 | 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. | East palm oil mill received only certified FFB from supply base or crop diversion from other Sime Darby's certified unit. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified | Yes | | | | | | | | | | | | | | | | | | | | |

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| | 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 sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable. | FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products. | |
| 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 identity preserved module is used. | NA |
| 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 the RSPO supply chain managing organisation (RSPO IT platform).</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 East Palm Oil Mill is under Sime Darby Plantation Berhad with RSPO Membership # 1-0008-04-000-00. RSPO PalmTrace Member ID: RSPO_PO1000000097 (East Oil Mill) which license expires on 18/05/2020.</p> | Yes |
| 5.3 Documented procedures | | | |

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| <p>5.3.1 D.3 E.3</p> | <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>SOP for Sustainable Supply Chain and Traceability, Issue No:5, Dated April 2019: which covers control of documents and records, delivery of FFB from the estate, receiving FFB at the mill, process monitoring, CPO and PK dispatch, non-conforming material/product, product claims, production volume, conversion factor, internal audit, outsourced contractor, training, reclassification of mill’s supply chain model, complaints and management review.</p> | <p>Yes</p> |
| <p>5.3.2 Internal Audit</p> | | | |
| <p>5.3.2</p> | <p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <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>Stated in the SOP for Sustainability Supply Chain & Traceability (Version 2; Issue Date April 2019); 18.0 Internal Audit; 18.1 <i>Annual internal audit shall be conducted in accordance to internal audit procedure (SD/SDP/PSQM/IAP) to determine whether the Mill conforms to the requirements in the RSPO SCCS as well as effectively implements and maintains the standard requirements.</i></p> <p>The internal audit was last conducted on 19th June 2019 by the Plantation Sustainability & Quality Management Department (PSQM), Ara</p> | <p>Yes</p> |

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| | <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>Damansara. There were no non-conformities raised during the mentioned internal audit.</p> <p>The management review was conducted on 17th December 2019 attended by 8 members. The meeting was chaired by the Chairman Mr. Azlan Md Kambali. As there were no non-conformities raised on RSPO SCCS during the internal audit therefore the internal audit was only reviewed for other issues.</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>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified. Records verified by internal and external audit.</p> <p>The accompanying documents of incoming FFB from own estate are estate's weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate's ticket number were recorded in the mill's ticket number. For the review period of Jan 2019 to Jan 2020, there are diversion crop received from other Sime Darby's certified estates.</p> <p>Sample of weighbridge tickets checked:</p> <ol style="list-style-type: none"> 1. Supplier: East Estate Ticket: 181652 Product: 0002-Loose Fruit Vehicle No: BLJ3530 Nett weight: 5,460 kg Field: 07B3A & P00B FFB consignment note no: 406922 RSPO Certificate No: RSPO 54343 | <p>Yes</p> |

| | | | |
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| | | <p>2. Supplier: Dusun Durian Estate Ticket: 181506 Product: 0002-FFB Crop Vehicle No: BDF2151DS Nett weight: 8,060 kg Field: 04B1 FFB despatch note no: 62261 RSPO Certificate No: RSPO 54343</p> <p>The facility is aware of this procedure. There was no projected overproduction for the period under review from Jan 2019 to Jan 2020. 24.94% of CPO and 23.14% of PK from the volume allocated has been used for the period of Jan 2019 to Jan 2020 as at audit on 14/02/2020. Addressed in the SOP clause 11.0 Non-conforming Products and/or Documents. Based on the procedure, where there is contamination of RSPO/MSPO certified material during receiving, processing, storage and dispatch, the mill shall downgrade the materials in such order: IP to MB to conventional.</p> <p>Material received with insufficient information for verification, or any error in incoming documents, shall be treated as non-conforming documents. The documents shall be investigated, verified and corrected in order to allow processing of material. Release of such material for processing release shall be authorized by the Mill Manager or Assistant Engineer.</p> | |
| 5.5 Outsourcing Activities | | | |
| 5.5.1 | In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. | East POM only outsources the transportation services of CPO. JASA BUMI LOGISTICS SDN BHD is assigned to transport the CPO. Sighted in the | Yes |

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| | <p>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>Contract Agreement on Transportation of Crude Palm Oil (CPO) for Sime Darby Plantation Berhad’s Peninsular Malaysia Oil Mills, between Sime Darby Plantation Berhad and Jasa Bumi Logistic Sdn Bhd, stated that the outsourced contractor abides to the RSPO Supply Chain Certification Standard (Anexure 5).</p> <p>No bulking facilities outsourced by the mill for PK Products as the transport services was assigned by the buyer.</p> | |
| 5.5.2 | <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,</p> | <p>The site has included outsourcing agreement within the scope of its RSPO SCCS as follows:</p> <p>a) Stated in the Agreement with the outsource transportation service, <i>Annexure 5; 2. Outsourcing Activities; Part a) The site has legal ownership of all input material to be included in outsourced process.</i></p> <p>b) Stated in the Agreement with the outsource transportation service, <i>Annexure 5; 2. Outsourcing Activities; Part 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.</i></p> <p>c) Stated in the Agreement with the outsource transportation service, <i>Annexure 5; 2. Outsourcing Activities; Part c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</i></p> <p>d) Stated in the Agreement with the outsource transportation service, <i>Annexure 5; 2. Outsourcing Activities; Part b) The onus is on the site</i></p> | Yes |

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| | systems, and any and all information, when this is announced in advance. | <i>to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</i> | |
| 5.5.3 | 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. | Only one contractor is engaged for outsourcing activities by the mill. The name and contact details is clearly stated in the 'Agreement on Transportation of Crude Palm Oil (CPO) for Sime Darby Plantation Berhad's Peninsular Malaysia Oil Mills, between Sime Darby Plantation Berhad and Jasa Bumi Logistic Sdn Bhd' | Yes |
| 5.5.4 | The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products. | No new contractor has been engaged by the site for the processing or physical handling of RSPO certified oil palm products. | Yes |
| 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. | All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date and accessible. Both soft and hard copy records were kept for procedure, sales documentation, training, etc. by the authorized personnel in computer system and archive room. | Yes |
| 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 spelt out in its supply chain procedure, Clause 5.4, all traceability records are to be maintained minimum of three years. | Yes |
| 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 (input) and claimed (output) over a period of twelve (12) months. | Not applicable. The product of the facility is containing 100% palm oil. | Yes |

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| 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. | Real time monitoring was effectively demonstrated based on quarterly records and balance from Jan 2019 to Jan 2020 and explained in the supply chain declaration (Appendix E). | Yes |
| 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> | East POM is using the real time basis/continuous accounting system therefore this requirement is not applicable. | NA |
| 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. Last year's average from Jan 2019-Jan 2020 were 21.97% (OER) & 4.5392% (KER). | Yes |
| 5.10.2 | Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate. | The facility is using the actual extraction rate and therefore updating of rates is not necessary. | Yes |
| 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. | During this assessment it was confirmed that East palm oil mill received only certified FFB from supply base or crop diversion from other Sime Darby's certified unit. This ensures that there is no possibility of mixing during processing. | Yes |

| 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, shipping documents and specification documentation). <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>East POM ensured the required information is available in document form. Sampled of CPO contract: S/C-PSD/2002/CPOO0128 (RSPO CPO-IP) dated 28/01/2020, quantity 500 mt (delivery month – February 2020).</p> <ul style="list-style-type: none"> • The name and address of the buyer; XXX • The name and address of the seller: KKS East, Carey Island, Selangor • The loading or shipment/ delivery date; e.g. 10/02/2020 • 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); <p>Crude Palm Oil (CPO) RSPO IP</p> <ul style="list-style-type: none"> • The quantity of the products delivered; e.g. 32,080 kg • Any related transport documentation; e.g. 179 – Jasa Bumi Logistics Sdn Bhd • Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 54354 (SC Model: IP). • A unique identification number: palm trace no: available in a few forms e.g. DN no., seal no., etc. | Yes |
| 5.7 Registration of Transactions | | | |
| 5.7.1 | <p>Supply chain actors who:</p> <ul style="list-style-type: none"> • Are mills, traders, crushers and refineries; and | <p>The registration of Palm Trace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the Palm Trace.</p> | Yes |

| | <ul style="list-style-type: none"> 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>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 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> | <p>Based on downloaded palm trace transaction recorded for CPO is 14,754.45 mt and PK is 2,600 mt. Based on quarterly records and balance from Jan 2019-Jan 2020, the following were recorded in Supply Chain declaration.</p> <table border="1" data-bbox="1048 678 1899 1390"> <thead> <tr> <th>Month</th> <th>RSPO Delivery (PK)</th> <th>RSPO Delivery (CPO)</th> <th>Confirmed Transaction (PK)</th> <th>Confirmed Transaction (CPO)</th> </tr> </thead> <tbody> <tr> <td>Jan 2019</td> <td>0</td> <td>2329.10</td> <td rowspan="12">2,600</td> <td rowspan="12">14,754.45</td> </tr> <tr> <td>Feb 2019</td> <td>400</td> <td>179.52</td> </tr> <tr> <td>Mar 2019</td> <td>0</td> <td>0</td> </tr> <tr> <td>Apr 2019</td> <td>0</td> <td>950.46</td> </tr> <tr> <td>May 2019</td> <td>500</td> <td>2569.09</td> </tr> <tr> <td>Jun 2019</td> <td>0</td> <td>2352.21</td> </tr> <tr> <td>Jul 2019</td> <td>0</td> <td>55.76</td> </tr> <tr> <td>Aug 2019</td> <td>400</td> <td>96.49</td> </tr> <tr> <td>Sept 2019</td> <td>790</td> <td>1827.62</td> </tr> <tr> <td>Oct 2019</td> <td>0</td> <td>2683.13</td> </tr> <tr> <td>Nov 2019</td> <td>550</td> <td>1865.91</td> </tr> <tr> <td>Dec 2019</td> <td>0</td> <td>245.16</td> </tr> </tbody> </table> | Month | RSPO Delivery (PK) | RSPO Delivery (CPO) | Confirmed Transaction (PK) | Confirmed Transaction (CPO) | Jan 2019 | 0 | 2329.10 | 2,600 | 14,754.45 | Feb 2019 | 400 | 179.52 | Mar 2019 | 0 | 0 | Apr 2019 | 0 | 950.46 | May 2019 | 500 | 2569.09 | Jun 2019 | 0 | 2352.21 | Jul 2019 | 0 | 55.76 | Aug 2019 | 400 | 96.49 | Sept 2019 | 790 | 1827.62 | Oct 2019 | 0 | 2683.13 | Nov 2019 | 550 | 1865.91 | Dec 2019 | 0 | 245.16 | <p>Yes</p> |
| Month | RSPO Delivery (PK) | RSPO Delivery (CPO) | Confirmed Transaction (PK) | Confirmed Transaction (CPO) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan 2019 | 0 | 2329.10 | 2,600 | 14,754.45 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb 2019 | 400 | 179.52 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mar 2019 | 0 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apr 2019 | 0 | 950.46 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May 2019 | 500 | 2569.09 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jun 2019 | 0 | 2352.21 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jul 2019 | 0 | 55.76 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug 2019 | 400 | 96.49 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sept 2019 | 790 | 1827.62 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct 2019 | 0 | 2683.13 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nov 2019 | 550 | 1865.91 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dec 2019 | 0 | 245.16 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|---|---|---|------|-----------|--|-----|--|
| | | Jan 2020 | 0 | 0 | | | |
| | | Total | 2640 | 15,154.45 | | | |
| 5.11 Claims | | | | | | | |
| 5.11.1 | 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. | RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims. | | | | Yes | |
| General corporate communications | | | | | | | |
| 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 East POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc). | | | | Yes | |
| 4.2 | In corporate communications a member is allowed to: 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. 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. | Not applicable as no off-product claim made by East POM as to date. | | | | Yes | |
| 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 East POM as to date. | | | | Yes | |

| | | | |
|--|---|--|-----|
| 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 East POM as to date. | Yes |
| 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. | Not applicable as no off-product claim made by East POM as to date. | Yes |
| 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. | Yes |
| 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 (Crude Palm Oil RSPO IP) and RSPO certificate number. | Yes |
| 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 or wholesaler, with specific evidence either through on-pack claims or documentation. | East POM is not under distributor or wholesaler category. Thus, this requirement is not applicable. | Yes |

| | | | |
|---|---|---|-----|
| | b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. | | |
| 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> | East 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. | Yes |
| Business to consumer communication | | | |
| 6.1 | 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. | No business to consumer communication on product specific claim made East POM and only producing crude and unfinished product. This is not applicable for POM. | Yes |
| 6.2 | 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. | No business to consumer communication on product specific claim made East POM and only producing crude and unfinished product. This is not applicable for POM. | Yes |
| 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 East POM and only producing crude and unfinished product. This is not applicable for POM. | Yes |
| 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 East POM and only producing crude and unfinished product. This is not applicable for POM. | Yes |

| | | | |
|-----|--|--|-----|
| 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 East POM and only producing crude and unfinished product. This is not applicable for POM. | Yes |
| 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 East POM and only producing crude and unfinished product. This is not applicable for POM. | Yes |
| 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 East POM and only producing crude and unfinished product. This is not applicable for POM. | Yes |
| 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 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 . | No business to consumer communication on product specific claim made East POM and only producing crude and unfinished product. This is not applicable for POM. | Yes |

MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES

Certified oil palm content (IP)

| | | | |
|-------------------------------------|--|---|-----|
| | For IP, 95% or above of the oil palm content must be RSPO IP-certified. | Oil palm content is 100% CPO and claim as RSPO IP-certified. | Yes |
| | For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP. | No SG claim made. | Yes |
| | 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. | Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified. | Yes |
| Labelling and trademark (IP) | | | |
| | Members are allowed to use the RSPO label in one of the following ways: 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. | East POM is not use RSPO label in its product (CPO & PK). This is confirmed due site visit observation and interview with the mill workers. | Yes |
| Messaging (IP) | | | |
| | Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements: | East POM is not use RSPO label in its product (CPO & PK). This is confirmed due site visit observation and interview with the mill workers. | Yes |

| | | | |
|--|---|--|-----|
| | <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 • 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. | | |
| MODULE C – PARTIAL PRODUCT CLAIMS | | | |
| | <p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p> <ul style="list-style-type: none"> • The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO. • At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB. | East POM is producing RSPO IP product and no MB claim made as to date. | Yes |

| | | | |
|--|--|---|------------|
| | <ul style="list-style-type: none"> • The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume. • The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'. • The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim. | | |
| <p>MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES</p> | | | |
| | <p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p> <p>75% IP + 20% SG => 95% SG claim is made 65% SG + 30% MB => 95% MB claim is made 55% MB + 40% B&C => 95% partial product claim can be made 45% SG + 55% B&C < 50% B&C claim can be made</p> <p>Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made:</p> <p>95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made</p> | <p>East POM is producing RSPO IP product and no MB claim made as to date.</p> | <p>Yes</p> |
| <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> | | | |

| | | | |
|--|--|--|-----|
| Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders. | | | |
| 4.1.1 | (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. | SDPSB has implemented 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. They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights. The policy was communicated through the muster briefing to 63 workers on 07/01/20 by Assistant Engineer at East POM, on 23/01/2020 by Assistant Manager at Dusun Durian Estate, 17/01/2020 at Sepang Estate and 12/02/2020 at East Estate. During the housing inspection, an interview session was conducted and it was found that the workers were aware on the policy communicated during muster briefing and placed publicly in the notice board at housing area and office. It is also been explained during the induction course for the newly arrived workers. | Yes |
| 4.1.2 | The unit of certification does not instigate violence or use any form of harassment in their operations. | SDPSB has implemented Group Sustainability and Quality Policy Statement dated 02 Dec 2019 where the management is committed to contributing to a better society: 1. Respecting, upholding & no-exploitation of fundamental human rights. 2. Providing safe and healthy workplaces, and protecting workers’ welfare. 3. Engaging and empowering communities. This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers. | Yes |
| 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 | 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). | Yes |

| | | | |
|-------|---|---|-----------------|
| | spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. | 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 | |
| 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 63 workers on 07/01/20 by Assistant Engineer at East POM, on 23/01/2020 by Assistant Manager at Dusun Durian Estate, 17/01/2020 at Sepang Estate and 12/02/2020 at East Estate. During the housing inspection, an interview session was conducted and it was found that the workers were aware on the policy communicated during muster briefing and placed publicly in the notice board at housing area and office. It is also been explained during the induction course for the newly arrived workers. | Non-conformance |
| 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. | There is no grievance from external party received so far and for internal party, it was mainly for the housing repairs and request. This is further confirmed through the external stakeholder invitation through e-mail sent by BSI team for recertification audit and internal/stakeholder consultation conducted during the audit day. The same procedure for external communication is used for internal grievance as per the Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (subsection 5.5, Appendix 5.5.3.2). In the SOP has mentioned its scope: The procedure is specific to communications with respect to QSHE performance at the Mill. It applies to all employees the mill and Sime Darby Berhad irrespective of level and all levels of external interested parties. | Non-conformance |

| | | | |
|--|--|--|--|
| | | <p>SOM Sub-Section 5.5 Management Responsibility, Appendix 5.5.3.2 Procedure for External Communication 6.3 Time frame for External Communication:</p> <p>a. Within 2 weeks of the date of receipt for communication requiring direct feedback.</p> <p>b. Within one week of the completion of the investigation, for communication requiring investigation.</p> <p>Sighted the Housing Repair Books and External Complaint Book have the agreed resolution within timeframe. Sampled:</p> <p>However in East POM, any repairs required by Internal Stakeholders need to fill-up the House Repair Requisition Form.</p> <p>Sample taken on below:</p> <p>East POM</p> <ol style="list-style-type: none"> 1. Broken pipe at house no A3 from Thiagarajan on 14/01/2020. 2. Broken toilet door at house no 48 from K. Muthuvarmaini on 11/01/2020. 3. Door lock and cement broken at house no 24 from V.Kumanesan on 07/10/19. 4. Low water pressure at house no A8 from Suhairy Nizam on 21/12/2019. <p>It is not comply with the SOM Sub-Section 5.5 Management Responsibility, Appendix 5.5.3.2 Procedure for External Communication 6.3 Time frame for External Communication:</p> <p>a. Within 2 weeks of the date of receipt for communication requiring direct feedback.</p> | |
|--|--|--|--|

| | | | |
|---|---|--|-----|
| | | <p>b. Within one week of the completion of the investigation, for communication requiring investigation.</p> <p>Sepang Estate:</p> <ol style="list-style-type: none"> 1. 3 lamps not function at Rafi Mondal's house on 08/02/2020. 2. Toilet not function at Indra, Janaka & Jaya's house on 05/02/2020. <p>East Estate:</p> <ol style="list-style-type: none"> 1. House no 55 Division B for Safudin & Agus Karyadi on wiring problem dated 17/09/2019. 2. House no 94 for Jalal on wiring problem dated on 13/12/2019. | |
| 4.2.4 | 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. | 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. | Yes |
| Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities. | | | |
| 4.3.1 | Contributions to community development that are based on the results of consultation with local communities are demonstrated. | <p>East POM certification unit have made contribution to the internal and external stakeholders. For example, the management has contributed and supported the activities such as request as below:</p> <p>East POM:</p> <ol style="list-style-type: none"> 1. Contribution from East Mill (replica of aeroplane, helicopter and cannon from used item in Mill to SJK(T) East, Pulau Carey on 21/08/2019. 2. Christmas potluck 2019 on 09 January 2020 at KKS East. | Yes |

| | | | |
|---|--|---|------------|
| | | <ol style="list-style-type: none"> 3. Friendly football match between East Oil Mill and West Oil Mill executive, staff and workers on 15/12/2019. 4. Deepavali potluck on 21/11/2019. <p>Dusun Durian Estate:</p> <ol style="list-style-type: none"> 1. Providing the grass cutting at SJK(T) Sungai Sedu on 24/02/2020. 2. Contribution of manpower and agriculture tractor for celebrating Iftar Ramadan to Majlis Pengurusan Komuniti Kampung (MPKK) on 17 May 2019. 3. Gotong-Royong at SAM Unwanus Saadah on 28/09/2019. <p>Sepang Estate:</p> <ol style="list-style-type: none"> 1. Jemputan Berbuka Puasa Bersama YB Hanipah Bin Maidin, Ahli Dewan Parlimen Timbalan Menteri Dalam Negeri Undang-Undang on 14/05/2019. 2. Majlis Sambutan Hari Raya Aidilfitri on 03/07/2019. 3. Donation to Tabika Perpaduan Sg. Linau (RM300) on 04/11/2019. 4. Donation for Graduation Day Year 2019 (RM500) on 05/11/2019. <p>East Estate:</p> <ol style="list-style-type: none"> 1. Request to use the unutilized chairs at Mill Canteen from Kernel Plant Operator to Mill Manager on 22/01/2020. 2. Donation to SK Telok Panglima Garang (RM 1000) for Kejohanan Sukan Tahunan Sekolah on 23/01/2020. | |
| <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>SOU 8 estates were able to demonstrate the evidence of legal ownership if its lands through possession of land titles. The estates have 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</p> | <p>Yes</p> |

headquarter. Evidence of legal ownership of the land including history of land tenure was verified during this audit. The land titles sighted among others as shown below:

| No | OU | Historical information |
|----|-----------------|---|
| 1 | East Mill | Commissioned in Sept 1983 under HMPB later named as GHPB. In 2008 ownership under SDPB following a merger exercise |
| 2 | D Durian Estate | Established in 1903 registered under d Durian Plantation Ltd. In 2008 ownership under SDPB following a merger exercise |
| 3 | East Estate | Founded by Edward Valentine Carey in 1906. Sold to Jugra Land later to H&C/HMPB. Merger in 2008 to become SDPB |
| 4 | Sepang Estate | Formerly known as The London Asiatic Rubber & Produce Company Ltd established in 1952 and later converted to HMPB and SDP following a merger in 2008. |

| No | Estate | No hak milik | No Lot /PT | Ha |
|----|--------------|--------------|------------|-----------|
| 1 | East | 0334108 | 958 | 5366 |
| | | 046219 | 2601 | 2009.4791 |
| | | 44294 | 02697 | 175.330 |
| | | 0334133 | 18141 | 371.900 |
| 2 | Dusun Durian | 30755 | 000001 | 47.6016 |
| | | 27439 | 01300 | 40.6203 |
| | | 52810 | 001697 | 366.4423 |

| | | | | | | | |
|-------|---|--|--------|---------|--------|----------|-----|
| | | | | 48428 | 001718 | 807.3213 | |
| | | | | 122253 | 03713 | 201.300 | |
| | | | | 27493 | 01462 | 56.3965 | |
| | | | | 48789 | 00704 | 80.810 | |
| | | 3 | Sepang | 01135 | 00016 | 2.9946 | |
| | | | | 0048737 | 00048 | 202.4437 | |
| | | | | 0047885 | 000268 | 45.0971 | |
| | | | | 0053307 | 001074 | 86.3497 | |
| | | | | 0080527 | 005755 | 69.4700 | |
| | | | | 080609 | 005756 | 190.6000 | |
| | | | | 80611 | 005758 | 1841.883 | |
| | | | | 001143 | 00027 | 76.4349 | |
| 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.</p> <p>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> <p>At Sepang Estate, there is encroachment from Tanah Perkuburan Orang Cina Sepang to Sime Darby's land on 04/04/2019 and sighted the correspondences. The management of Tanah Perkuburan Orang Cina Sepang has requested Sime Darby's discretion to give the encroached land to them and the management will show their appreciation through the newspaper. The decision is still in progress by the top management during the audit day. This is not involving FPIC process due to the encroachment and compensation is not caused by Sime Darby but external party.</p> | | | | | Yes |

| | | | |
|--------------|---|--|------------|
| | <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.</p> <p>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> <p>At Sepang Estate, there is encroachment from Tanah Perkuburan Orang Cina Sepang to Sime Darby's land on 04/04/2019 and sighted the correspondences. The management of Tanah Perkuburan Orang Cina Sepang has requested Sime Darby's discretion to give the encroached land to them and the management will show their appreciation through the newspaper. The decision is still in progress by the top management during the audit day. This is not involving FPIC process due to the encroachment and compensation is not caused by Sime Darby but external party.</p> | |
| | <p>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.</p> | <p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>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> <p>At Sepang Estate, there is encroachment from Tanah Perkuburan Orang Cina Sepang to Sime Darby's land on 04/04/2019 and sighted the correspondences. The management of Tanah Perkuburan Orang Cina Sepang has requested Sime Darby's discretion to give the encroached land to them and the management will show their appreciation through the newspaper. The decision is still in progress by the top management during the audit day. This is not involving FPIC process due to the encroachment and compensation is not caused by Sime Darby but external party.</p> | |
| <p>4.4.3</p> | <p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties</p> | <p>The estates maintained the following maps and documents for proof of recognised legal rights. Documents were sighted and verified. A scale of map at 1:10000 to 1: 15000 is established. Maps were prepared in Jan</p> | <p>Yes</p> |

| | <p>(including neighbouring communities where applicable, and relevant authorities).</p> | <p>2015 by R&D -Plantations Research and Advisory Dept with data source GPS Surveyed @Jan 2015 & SEMUA @2015</p> <table border="1" data-bbox="1048 435 1762 807"> <thead> <tr> <th>No</th> <th>Items</th> <th>East</th> <th>D. Durian</th> <th>Sepang</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>GPS survey</td> <td>/</td> <td>/</td> <td>/</td> </tr> <tr> <td>2</td> <td>Soil series</td> <td>/</td> <td>/</td> <td>/</td> </tr> <tr> <td>3</td> <td>Topography</td> <td>/</td> <td>/</td> <td>/</td> </tr> <tr> <td>4</td> <td>Water ways model</td> <td>/</td> <td>/</td> <td>/</td> </tr> <tr> <td>5</td> <td>Field boundary</td> <td>/</td> <td>/</td> <td>/</td> </tr> <tr> <td>6</td> <td>Boundary stone</td> <td>/</td> <td>/</td> <td>/</td> </tr> <tr> <td>7</td> <td>Hydrology Map</td> <td>/</td> <td>/</td> <td>/</td> </tr> </tbody> </table> <p>Legend: / - available.</p> <p>All the related documentation regarding the land acquisition was kept in Sime Darby HQ Office and was verified by the auditor. There were no issues regarding land with villagers, local community and neighbouring estate. Hence, there was no need for the establishment of map showing the legal, customary, or user right of other users as required by this indicator.</p> | No | Items | East | D. Durian | Sepang | 1 | GPS survey | / | / | / | 2 | Soil series | / | / | / | 3 | Topography | / | / | / | 4 | Water ways model | / | / | / | 5 | Field boundary | / | / | / | 6 | Boundary stone | / | / | / | 7 | Hydrology Map | / | / | / | |
|--------------|--|---|------------|--------|------|-----------|--------|---|------------|---|---|---|---|-------------|---|---|---|---|------------|---|---|---|---|------------------|---|---|---|---|----------------|---|---|---|---|----------------|---|---|---|---|---------------|---|---|---|--|
| No | Items | East | D. Durian | Sepang | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | GPS survey | / | / | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Soil series | / | / | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Topography | / | / | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Water ways model | / | / | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Field boundary | / | / | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | Boundary stone | / | / | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | Hydrology Map | / | / | / | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>4.4.4</p> | <p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> | <p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>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> <p>At Sepang Estate, there is encroachment from Tanah Perkuburan Orang Cina Sepang to Sime Darby's land on 04/04/2019 and sighted the correspondences. The management of Tanah Perkuburan Orang Cina</p> | <p>Yes</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>Sepang has requested Sime Darby's discretion to give the encroached land to them and the management will show their appreciation through the newspaper. The decision is still in progress by the top management during the audit day. This is not involving FPIC process due to the encroachment and compensation is not caused by Sime Darby but external party.</p> | |
| 4.4.5 | <p>(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.</p> | <p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>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> <p>At Sepang Estate, there is encroachment from Tanah Perkuburan Orang Cina Sepang to Sime Darby's land on 04/04/2019 and sighted the correspondences. The management of Tanah Perkuburan Orang Cina Sepang has requested Sime Darby's discretion to give the encroached land to them and the management will show their appreciation through the newspaper. The decision is still in progress by the top management during the audit day. This is not involving FPIC process due to the encroachment and compensation is not caused by Sime Darby but external party.</p> | Yes |
| 4.4.6 | <p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> | <p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>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> <p>At Sepang Estate, there is encroachment from Tanah Perkuburan Orang Cina Sepang to Sime Darby's land on 04/04/2019 and sighted the correspondences. The management of Tanah Perkuburan Orang Cina Sepang has requested Sime Darby's discretion to give the encroached land to them and the management will show their appreciation through the newspaper. The decision is still in progress by the top management during</p> | Yes |

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| | | the audit day. This is not involving FPIC process due to the encroachment and compensation is not caused by Sime Darby but external party. | |
| Criteria 4.5: 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. | No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. | Yes |
| 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. | No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. | Yes |
| 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. | No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. | Yes |
| 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. | No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. | Yes |

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| 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. | No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. | Yes |
| 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 anew concession or land title to the operator. | No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. | Yes |
| 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. | No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. | Yes |
| 4.5.8 | (C) Newlands are not acquired in areas inhabited by communities in voluntary isolation. | No new plantings are established on local peoples' land. This was verified through stakeholders' consultation. | Yes |
| Criteria 4.6: 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. | SDPSB has established Flowchart and Procedures on Handling Land Disputes dated 01/11/2008. Compensation procedure has been clearly stated in the procedure as well. There was no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders. | Yes |
| 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. | SDPSB has established Flowchart and Procedures on Handling Land Disputes dated 01/11/2008. Compensation procedure has been clearly stated in the procedure as well. There was no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders. | Yes |

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| 4.6.3 | Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings. | SDPSB has established Flowchart and Procedures on Handling Land Disputes dated 01/11/2008. Compensation procedure has been clearly stated in the procedure as well. There was no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders. | Yes |
| 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. | SDPSB has established Flowchart and Procedures on Handling Land Disputes dated 01/11/2008. Compensation procedure has been clearly stated in the procedure as well. There was no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders. | Yes |
| 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 established Flowchart and Procedures on Handling Land Disputes dated 01/11/2008. Compensation procedure has been clearly stated in the procedure as well. There was no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders. | Yes |
| 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 established Flowchart and Procedures on Handling Land Disputes dated 01/11/2008. Compensation procedure has been clearly stated in the procedure as well. There was no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders. | Yes |
| 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 established Flowchart and Procedures on Handling Land Disputes dated 01/11/2008. Compensation procedure has been clearly stated in the procedure as well. There was no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders. | Yes |

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| 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 established Flowchart and Procedures on Handling Land Disputes dated 01/11/2008. Compensation procedure has been clearly stated in the procedure as well. There was no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders. | Yes |
| 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. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. | SDPSB has established Flowchart and Procedures on Handling Land Disputes dated 01/11/2008. Compensation procedure has been clearly stated in the procedure as well. There was no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders. | Yes |
| 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 established Flowchart and Procedures on Handling Land Disputes dated 01/11/2008. Compensation procedure has been clearly stated in the procedure as well. There was no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders. | Yes |
| 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 established Flowchart and Procedures on Handling Land Disputes dated 01/11/2008. Compensation procedure has been clearly stated in the procedure as well. There was no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders. | Yes |
| Principle 5: Support smallholder inclusion | | | |
| Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships. | | | |

| Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses. | | | |
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| 5.1.1 | Current and previous period prices paid for FFB are publicly available and accessible by smallholders. | There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable. | NA |
| 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). | There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable. | NA |
| 5.1.3 | (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented. | There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable. | NA |
| 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. | There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable. | NA |
| 5.1.5 | Contracts are fair, legal and transparent and have an agreed timeframe. | There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable. | NA |
| 5.1.6 | (C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. | There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable. | NA |
| 5.1.7 | Weighing equipment is verified by an independent third party on a regular basis (this can be government). | There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable. | NA |
| 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. | There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable. | NA |

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| 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. | There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable. | NA |
| 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. | There is no smallholders scheme or supplier to East POM. However, Central East Region Team has provide the Integrated Pest Management Training to Smallholders in Carey Island on 28/08/2019 attended by 7 smallholders from Kampung Sg Rambai, 1 smallholder from Kampung Sg Bumbun, 7 smallholders from Kampung Kepau Laut, 1 smallholder from Kg. Sg. Kurau and 11 attendees from internal workers. | Yes |
| 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). | There is no smallholders scheme or supplier to East POM. However, Central East Region Team has provide the Integrated Pest Management Training to Smallholders in Carey Island on 28/08/2019 attended by 7 smallholders from Kampung Sg Rambai, 1 smallholder from Kampung Sg Bumbun, 7 smallholders from Kampung Kepau Laut, 1 smallholder from Kg. Sg. Kurau and 11 attendees from internal workers. | Yes |
| 5.2.3 | Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. | There is no smallholders scheme or supplier to East POM. However, Central East Region Team has provide the Integrated Pest Management Training to Smallholders in Carey Island on 28/08/2019 attended by 7 smallholders from Kampung Sg Rambai, 1 smallholder from Kampung Sg Bumbun, 7 smallholders from Kampung Kepau Laut, 1 smallholder from Kg. Sg. Kurau and 11 attendees from internal workers. | Yes |
| 5.2.4 | (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. | There is no smallholders scheme or supplier to East POM. However, Central East Region Team has provide the Integrated Pest Management Training to Smallholders in Carey Island on 28/08/2019 attended by 7 smallholders from Kampung Sg Rambai, 1 smallholder from Kampung Sg Bumbun, 7 smallholders from Kampung Kepau Laut, 1 smallholder from Kg. Sg. Kurau and 11 attendees from internal workers. | Yes |

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| 5.2.5 | The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. | There is no smallholders scheme or supplier to East POM. However, Central East Region Team has provide the Integrated Pest Management Training to Smallholders in Carey Island on 28/08/2019 attended by 7 smallholders from Kampung Sg Rambai, 1 smallholder from Kampung Sg Bumbun, 7 smallholders from Kampung Kepau Laut, 1 smallholder from Kg. Sg. Kurau and 11 attendees from internal workers. | Yes |
| <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 | <p>(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> | <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 63 workers on 07/01/2020 by Assistant Engineer at East POM, on 23/01/2020 by Assistant Manager at Dusun Durian Estate, 17/01/2020 at Sepang Estate and 12/02/2020 at East Estate.</p> <p>During the housing inspection, an interview session was conducted and it was found that the workers were aware on the policy communicated during muster briefing and placed publicly in the notice board at housing area and office. It is also been explained during the induction course for the newly arrived workers.</p> | Yes |
| 6.1.2 | <p>(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> | <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 supplier (connect to national water and</p> | Yes |

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| | | <p>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> <p>For foreign workers, 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 Amozza Travels for India (INR 50,000) for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent. Other than that, there is no recruitment fees charge to workers. This is further verified through the interview session with foreign workers during housing inspection conducted.</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>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. 2) Bin Attendant, Welder, General Workers/ Requirements: Malaysian, age 20-45 years old, good working records, possess B2, D & F driving license and have a good communication. | Yes |

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| 6.1.4 | 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>There is no pregnancy test conducted in East POM. Confirmed through the interview session to workers and Gender Committee Minute of Meeting.</p> <p>During the housing inspection, an interview session was conducted and it was found that the workers were aware on the policy communicated during muster briefing and placed publicly in the notice board at housing area and office. It is also been explained during the induction course for the newly arrived workers.</p> | Yes |
| 6.1.5 | (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>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).</p> <p>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. Meetings were conducted quarterly according to the handbook. Gender Committee were established by the mill and estates management. The last meeting was conducted on 17/01/2020, 23/12/2020, 26/06/2019 and 14/03/2019 at East POM, 17/01/2020, 22/10/2019, 26/07/2019, 29/04/2019 and 24/01/2019 at Dusun Durian Estate, 04/02/2020, 12/11/2019, 19/09/2019, 20/06/2019 and 19/03/2019 at Sepang Estate and 04/12/2019, 09/08/2019, 18/04/2019 and 18/01/2019 at East Estate. The activities such as bowling, visit old folks home and Health Awareness etc. sighted.</p> <p>No sexual harassment case been report and confirmed through interviewed with the chairman and female workers.</p> | Yes |

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| 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. | Yes |
| 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). | | | |
| 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>East POM:</p> <ol style="list-style-type: none"> 1. Employee Id: 132xxx 2. Employee Id: 127xxx 3. Employee Id: 852xx 4. Employee Id: 525xx 5. Employee Id: 134xxx 6. Employee Id: 146xxx 7. Employee Id: 773xx <p>Dusun Durian Estate:</p> <ol style="list-style-type: none"> 1. Employee Id: 137xxx 2. Employee Id: 137xxx 3. Employee Id: 1191xxx 4. Employee Id: 108xxx 5. Contract Worker (Sritheran): Mxxxx 6. Contract Worker (Sritheran): Hexxx | Yes |

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| | | <p>Sepang Estate:</p> <ol style="list-style-type: none"> 1. Employee Id: 581xx 2. Employee Id: 139xxx 3. Employee Id: 124xxx 4. Employee Id: 900xx 5. Contract Worker: Sexxxxx (Amachi Enterprise) 6. Contract Worker: Ganxxxx (Amachi Enterprise). <p>East Estate:</p> <ol style="list-style-type: none"> 1. Employee Id: 560xx 2. Employee Id: 102xxx 3. Employee Id: 141xxx 4. Employee Id: 634xx 5. Contractor Worker: Balxxxxx (Tiong Ying Enterprise Sdn Bhd) 6. Contractor Worker: Kuxxx (Tiong Ying Enterprise Sdn Bhd) <p>It was explained to the workers by the senior worker from the same country and the assistance during arrival through the induction training. Sighted the certificates of attendance from MAPA & MPOA titled "Foreign Worker Induction Course" and record of induction training to foreign workers on 20/12/2019 attended by 7 workers, 2 assistants at Dusun Durian Estate, on 09/06/2019 at Sepang Estate and on 13/12/2019 attended by 5 new workers at East Estate.</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> | |
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| 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 work performed. This includes a form of record for work done by family members.</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> | Yes |
| 6.2.3 | <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 20019 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>East POM:</p> <ul style="list-style-type: none"> 8. Employee Id: 132xxx 9. Employee Id: 127xxx 10. Employee Id: 852xx 11. Employee Id: 525xx 12. Employee Id: 134xxx 13. Employee Id: 146xxx 14. Employee Id: 773xx <p>Dusun Durian Estate:</p> <ul style="list-style-type: none"> 7. Employee Id: 137xxx 8. Employee Id: 137xxx 9. Employee Id: 1191xxx 10. Employee Id: 108xxx | Non-conformance |

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| | | <p>11. Contract Worker (Sritheran): Mxxxx 12. Contract Worker (Sritheran): Hexxx</p> <p>Sepang Estate:</p> <p>7. Employee Id: 581xx 8. Employee Id: 139xxx 9. Employee Id: 124xxx 10. Employee Id: 900xx 11. Contract Worker: Sexxxxx (Amachi Enterprise) 12. Contract Worker: Ganxxxx (Amachi Enterprise).</p> <p>East Estate:</p> <p>7. Employee Id: 560xx 8. Employee Id: 102xxx 9. Employee Id: 141xxx 10. Employee Id: 634xx 11. Contractor Worker: Balxxxxx (Tiong Ying Enterprise Sdn Bhd) 12. Contractor Worker: Kuxxx (Tiong Ying Enterprise Sdn Bhd)</p> <p>However, in East POM sighted that punch card of female weighbridge clerk (Gunasunthari) on Aug 2019, Dec 2019 and Jan 2020, she worked after 10 pm and East POM is not having the JTK permit for female nightshift as below:</p> <p>1. 1 Aug 2019: 23.31 pm 2. 2 Aug 2019: 23.35 pm 3. 13 Aug 2019 23.31 pm</p> | |
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| | | <p>4. 22 Aug 2019: 23.40 pm 5. 19 Dec 2019: 23.30 pm 6. 21 Dec 2019: 23.28 pm 7. 11 Jan 2020: 23.39 pm 8. 28 Jan 2020: 23.34 pm</p> <p>In East POM, the JTK Permit for salary deduction for Temple fund is not available. Sighted the pay slip for Gunasunthari on Jan 2020, the deduction of RM 5 was made although in the internal audit report dated 15/11/2019 mentioned that the mill will stop deduct the Temple fund until the JTK Permit is obtained.</p> <p>In East Estate, the JTK Permit for salary deduction for Temple fund is not available. Sighted the pay slip for Dhillip Bhagat on Aug 2019, the deduction of RM 10 was made under Temple Fund No 3 although the meeting between management and the Temple Committee has been conducted on 25/04/2019 to discuss on the stop Temple fund in salary deduction.</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 provided with subsidize rate as per employment contract.</p> <p>Seen the Dusun Durian Estate-Budget 2020–Admin staff Office-housing repairs, sanitation, garden upkeep, etc and CAPEX from all operating units.</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</p> | Yes |

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| | | people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilizes). Seen the record for weekly linesite inspection done for Dusun Durian Estate (Puan Fazidatul Atikah – MA), Sepang Estate (Encik Raja Muhd Yusri – MA), East Estate (Encik Aslam Bin Baharuddin & Mohd Sabri bin Sulaiman) available during the audit. | |
| 6.2.5 | The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. | The housing area were located in Carey Island (East POM & East Estate), Banting (Dusun Durian Estate) and Sepang town (Sepang Estate) where the accessibility to the grocery and shops is available in housing area or they can go to the nearest town in Banting or Sepang | Yes |
| 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. | Sime Darby Plantation Berhad-East POM as provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. It includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. The payslip sighted in clause 6.2.1 showed that the salary received complied with the minimum wage order 2018 and the decent living wage set up by the group. Note: Until housing basket can be determine (work in progress-data type need to pulled from various departments and further segregated), in the interim SDP will refer to CA amount of RM125. | Yes |
| 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 East POM and supply bases. All employees are permanent employee (for locals) and contracted employee (for foreign workers). All permanent and full time employment or contract workers used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2. | Yes |
| <p>Criteria 6.3: 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.</p> | | | |

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| 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.</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.</p> <p>Sighted the letter from NUPW to Mill Manager for time off to Mr T Shanmugam and Mr M Meganathan from 12-13 Dec 2019 for Area Meeting at East POM and Biennial General Meeting on 23/09/2019. In the letter, sighted that the Mill Manager has approved the time-off requested. It was further confirmed with the NUPW representative interviewed during the stakeholder meeting on the audit day.</p> <p>In East Estate, sighted the letter from NUPW to notify the union worker for join the annual general meeting on 26/04/2019 at Berjaya Waterfront Hotel, JB.</p> | Yes |
| 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. | Minutes of Meeting between management representative and NUPW representative 2019 dated 07/11/2019 involved the representative from employer and employee available in East POM, 29/01/2020 for Dusun Durian Estate, 21/11/2019 at East Estate. | Yes |
| 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>In Sepang Estate, sighted the election of NUPW Committee Members (NUPW/SSB/E:142/19) on 24th Sept 2019 as below:</p> <ol style="list-style-type: none"> 1. Chairman: Mr. Sukan a/l Thirunavukarasu 2. Vice Chairman: Mr. Thanasi a/l Govindasamy 3. Secretary: Mdm Govindamah a/p Subramaniam <p>In East Estate, sighted the election of NUPW Committee Members (NUPW/SSB/E:139A/18) on 12th January 2018 as below:</p> <ol style="list-style-type: none"> 1. Chairman: Mr. Shanmugam a/l Tharman | Yes |

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| | | <p>2. Secretary: Mr. Meganathan a/l Muniyan 3. Committee Member: Mr. Vyravan a/l Palanivel</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> | |
| <p>Criteria 6.4: Children are not employed or exploited.</p> | | | |
| 6.4.1 | <p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> | <p>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.</p> <p>Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC dated 07 Feb 2020, Human Rights Charter-protecting the rights of children.</p> | Yes |
| 6.4.2 | <p>(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.</p> | <p>The age screening procedure is conducted by the assistant operating unit as per SOP Hiring of locals dated 01/11/2019.</p> <p>For foreign workers, the age screening procedure was included in the Workforce Management Unit Liason & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 which stated that procedures recruitment team shall be guided by approved requirement Age which is between 18-45 years old.</p> <p>During the audit, it was confirmed that the workers were above 18 years old through the employee master list, sampled of worker’s passport as in</p> | Yes |

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| | | clause 6.2.1, interview session with the workers at housing area and stakeholder meeting. | |
| 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 East POM certification unit. | Yes |
| 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. | Yes |
| 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). During the housing inspection, an interview session was conducted and it was found that the workers were aware on the policy communicated during muster briefing and placed publicly in the notice board at housing area and office. It is also been explained during the induction course for the newly arrived workers. | Yes |
| 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 | Yes |

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| | | conducted during morning muster and the policies was displayed at the notice board outside the office. | |
| 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 are new mothers assessments conducted through Gender Committee Meeting. In East POM certification unit, new mother will be given the time-off for breast milk pumping session if their baby is still breastfeeding (under 2 years old). | Yes |
| 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 17/01/2020, 23/12/2020, 26/06/2019 and 14/03/2019 at East POM, 17/01/2020, 22/10/2019, 26/07/2019, 29/04/2019 and 24/01/2019 at Dusun Durian Estate, 04/02/2020, 12/11/2019, 19/09/2019, 20/06/2019 and 19/03/2019 at Sepang Estate and 04/12/2019, 09/08/2019, 18/04/2019 and 18/01/2019 at East Estate. The activities such as bowling, visit old folks home and Health Awareness etc. sighted. No sexual harassment case been report and confirmed through interviewed with the chairman and female workers. | Yes |
| Criteria 6.6: No forms of forced or trafficked labour are used. | | | |
| 6.6.1 | <p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees Contract substitution Involuntary overtime Lack of freedom of workers to resign | <p>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 Amozza Travels for India (INR 50,000) for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent.</p> <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> | Yes |

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| | <ul style="list-style-type: none"> • Penalty to the workers for termination of employment • Debt bondage • Withholding of wages | <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>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 East POM.</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 abscond, 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. 7. 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. | |
| 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 c. Eradicating any form of exploitation d. Ensuring favorable working conditions | Yes |

| | | <p>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 07/01/2020 by Assistant Engineer at East POM, on 23/01/2020 by Assistant Manager at Dusun Durian Estate, 17/01/2020 at Sepang Estate and 12/02/2020 at East Estate. For e.g.: All the workers have provided with induction training in Sua Betong Estate or based estate during their arrival to Malaysia.</p> <p>During the housing inspection, an interview session was conducted and it was found that the workers were aware on the policy communicated during muster briefing and placed publicly in the notice board at housing area and office. It is also been explained during the induction course for the newly arrived workers.</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> | | | | | | | | | |
| <p>6.7.1</p> | <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>EAST POM</p> <p>The mill has appointed Mr. Azlan Md Kambali as the Chairman of the Safety Committee on the 2nd January 2020 together with Employers and Employee’s representatives 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 mill. The issues discussed include Accident Investigations, Near Misses, Medical reports, Training Reports, Work Site Inspections and arising issues.</p> <table border="1" data-bbox="1048 1214 1906 1343"> <thead> <tr> <th>Meeting</th> <th>Date</th> <th>Issues Raised</th> </tr> </thead> <tbody> <tr> <td>SCM 1/2020</td> <td>15/01/2020</td> <td>- During rain, rainwater is leaking through the front section of Sterilizer.</td> </tr> </tbody> </table> | Meeting | Date | Issues Raised | SCM 1/2020 | 15/01/2020 | - During rain, rainwater is leaking through the front section of Sterilizer. | <p>Yes</p> |
| Meeting | Date | Issues Raised | | | | | | | |
| SCM 1/2020 | 15/01/2020 | - During rain, rainwater is leaking through the front section of Sterilizer. | | | | | | | |

| | | | | <ul style="list-style-type: none"> - No proper scaffolder for working at height. - No platform to change crane wheel block or heightening centre for crane No.2 and No.4 | | | | | | | |
|---|------------|--|------------|--|------|---------------|-------------|------------|--|--|--|
| | | SCM 4/2019 | 13/11/2019 | <ul style="list-style-type: none"> - Drain cover behind steriliser drain has corroded and broken. - No proper scaffolder for working at night. | | | | | | | |
| | | SCM 3/2019 | 17/07/2019 | <ul style="list-style-type: none"> - Basculator Drain not covered. - Traffic flow in front of weighbridge is not safe. | | | | | | | |
| | | SCM 2/2019 | 30/04/2019 | <ul style="list-style-type: none"> - New boiler ash conveyer motor area did not have proper platform with ladder. | | | | | | | |
| <p>DUSUN DURIAN ESTATE</p> <p>The estate has appointed Mr. Amirudin Bin Said as the Chairman of the Safety Committee on the 7th January 2020, by the Chief Executive Officer, together with Employers and Employee’s representatives based on their work units as members of the safety committee.</p> <p>The Occupational Safety & Health Committee 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> | | | | | | | | | | | |
| | | <table border="1"> <thead> <tr> <th>Meeting</th> <th>Date</th> <th>Issues Raised</th> </tr> </thead> <tbody> <tr> <td>OSH CM 1/20</td> <td>23/01/2020</td> <td>--Need to clean the housing area to prevent snakes from entering the house..</td> </tr> </tbody> </table> | | Meeting | Date | Issues Raised | OSH CM 1/20 | 23/01/2020 | --Need to clean the housing area to prevent snakes from entering the house.. | | |
| Meeting | Date | Issues Raised | | | | | | | | | |
| OSH CM 1/20 | 23/01/2020 | --Need to clean the housing area to prevent snakes from entering the house.. | | | | | | | | | |

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| | | <p>JKKP 01/2020</p> | <p>09/01/2020</p> | <ul style="list-style-type: none"> - The problem of Cows wandering in residential areas. - Inform the issues arise in main Division B housing area. No issues. | |
| | | <p>JKKP 04/2019</p> | <p>17/09/2019</p> | <ul style="list-style-type: none"> - Request for lawn cutting behind Sepang B row housing complex. - Request repairs for Dewan Seri Bakti. | |
| | | <p>JKKP 03/2019</p> | <p>25/06/2019</p> | <p>No issues.</p> | |
| | | <p>JKKP 02/2019</p> | <p>04/04/2019</p> | <ul style="list-style-type: none"> - Ask for mosquito spray at housing complex. - Apply additional and replace the dustbins around the housing complex. | |
| | | <p>EAST ESTATE</p> <p>En. Sairani Ariffin was appointed as the Chairman of the Safety Committee on the 1st January 2020, by the Chief Executive Officer, Central east Region, together with Employers and Employee’s representatives based on their work units as members of the safety committee.</p> <p>The Occupational Safety & Health Committee 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> | | | |

| | | Meeting | Date | Issues Raised | |
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| | | JKKP 04.2019 | 14/12/2019 | - Wild Dog Issues - Wearing helmets for motorcycle riders needs to be improved. | |
| | | JKKP 03.2019 | 25/09/2019 | - Increase the level of safety awareness for employees | |
| | | JKKP 02.2019 | 26/06/2019 | - Explain that the Sime Card aims to create a positive attitude in ensuring the safety of all. | |
| | | JKKP 01.2019 | 25/03/2019 | - There are trucks that do not have enough lights and are difficult to see at night. | |
| 6.7.2 | <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>EAST POM Accident & Emergency Procedures, Emergency Contact Numbers, Safe Operating Procedures were available on documents and display at the Mill Office Notice Board. Fire Drill and Safety Briefing was conducted on the 13/12/2019. First Kit Training was provided to the first aiders on the 12-13/12/2018. Emergency Response training was conducted for the on the 18/04/2019. Fire Fighting Training was conducted on 20/07/2019. Records of all accidents were kept and updated on a monthly basis and reported to the Head Quarters. Accident cases were reported through MyKKP to JKPP. Yearly submission of JKPP 8 were submitted to JKPP and documents verified.</p> <p>DUSUN DURIAN ESTATE Accident & Emergency Procedures, Emergency Contact Numbers, Safe Operating Procedures for Accidents, Fire, Flood, Strike, Chemical Spillage,</p> | | | Yes |

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| | | <p>Night Emergency and attack by Wild Animals were documented and available on display and sighted at the Office and Workshop.</p> <p>ERP & Chemical Spillage Training was conducted on the 08/01/2019 with 16 attendees. A Fire Drill, Fire Fighting, First Aid, CPR & Choking Program was conducted on 10/12/2019 by Angkatan Pertahanan Awam Malaysia. Visit to the worksites exhibited the sampled worksites such as Nursey, Workshops and Spraying Operation had first aid kits on site. The First aid kits were regularly monitored and had sufficient supplies.</p> <p>Records of all accidents are all kept and updated on a monthly basis. A total of 5 cases were recorded for the year 2019. JKPP 6 and JKPP 8 were submitted to JKPP accordingly. 1 case has been recorded for the year 2020 to date involving a tractor driver. The JKPP 6 have been submitted to DOSH.</p> <p>SEPANG ESTATE</p> <p>Accident & Emergency Procedures, Emergency Contact Numbers, Safe Operating Procedures for Accidents, Fire, Flood, Strike, Chemical Spillage, Night Emergency and attack by Wild Animals were documented and available on display at the Office and workshop.</p> <p>Records of all accidents were kept and updated in the Incident Detained Report on incident basis and reported to the Head Quarters. Accident cases were reported through MyKKP to JKPP. Yearly submission of JKPP 8 were submitted to JKPP and documents verified dated 07/01/2020. A total of 8 cases was reported for the year 2019.</p> <p>ERP Training was conducted on the 03/07/2019. A Fire Drill and Fire Fighting was conducted on 23/12/2019 by Jabatan Bomba dan Penyelamat Malaysia. . Visit to the worksites exhibited the sampled worksites such as Office, Workshops and Spraying Operation had first aid kits on site. The First aid kits were regularly monitored and had sufficient supplies.</p> | |
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| | | <p>EAST ESTATE</p> <p>Accident & Emergency Procedures, Emergency Contact Numbers, Safe Operating Procedures for Accidents, Fire, Flood, Strike, Chemical Spillage, Night Emergency and attack by Wild Animals were documented and available on display at the Office, Muster Ground and Workshop.</p> <p>ERP, Fire Drill and Fire Fighting was conducted on the 25/11/2019. First Aid training was conducted all first aiders on 06/01/2020. Visit to the worksites exhibited the sampled worksites such as Office, Workshops and Spraying Operation had first aid kits on site. The First aid kits were regularly monitored and had sufficient supplies.</p> <p>Records of all accidents were kept and updated in the Incident Detained Report on an incident basis and reported to the Head Quarters. Accident cases were reported through MyKKP to JKKP. Yearly submission of JKKP 8 were submitted to JKKP and documents verified dated 07/01/2020. A total of 8 accident cases and 2 poisoning cases were reported for the year 2019.</p> | |
| 6.7.3 | <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 absorbed by the management. Interviews conducted during the site visit at the Mill and Estate showed understanding and acknowledgement 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 appropriate PPEs. • The importance of using required PPE at all times during work as stated in the SOP and CHRA. • Proper storage and disposal methods of PPE. <p>Sampled issuance of PPE are as below :-</p> | Yes |

| EAST POM | | |
|----------------------------|------------------------|------------|
| Name | PPE | Date |
| J.Krishnamurthi | Safety Shoes | 22/09/2019 |
| Saripuddin | Safety Shoe | 20/11/2019 |
| Acim | Safety Helmet - Yellow | 07/02/2020 |
| Sri Rama Krishnan | Ear Muff | 20/09/2019 |
| DUSUN DURIAN ESTATE | | |
| NAME | PPE | DATE |
| Sapan | Cotton Glove | 11/02/2020 |
| Haslim | Apron | 24/01/2020 |
| Munir | Nitrile Glove | 06/01/2020 |
| SEPANG ESTATE | | |
| NAME | PPE | DATE |
| Dinesh Ram | Mask 3M | 11/02/2020 |
| Abdullah | Mask 3M | 07/02/2020 |
| V. Pandra | Cotton Gloves | 13/11/2019 |
| East Estate | | |
| NAME | PPE | DATE |

| | | | | | |
|-------|--|---|-------------|------------|-----|
| | | Dina Bandu | Mask, Apron | 12/12/2019 | |
| | | Muneksh | Mask, Apron | 17/12/2019 | |
| | | Vikram | Mask | 02/09/2019 | |
| 6.7.4 | 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>East POM All workers are given medical care as the mill workers obtain medical care from the East Estate Dispensary. 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 was sighted in the mill. Verified payment for the month of January 2020 for 99 workers amounting to RM 4,178.30 (Kod Majikan : B3400039082X).</p> <p>Dusun Durian Estate All workers are given medical care at the Estate Dispensary engaged with a Medical Assistant. All workers are entitled for free medical benefits during their tenure here. 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 was sighted in the estate. Verified payment for the month of January 2020 for 288 workers amounting to RM 6,033.40 (Kod Majikan : B3400001928X)</p> <p>Sepang Estate All workers are given medical care at the Estate Dispensary engaged with a Medical Assistant. All workers are entitled for free medical benefits</p> | | | Yes |

| | | <p>during their tenure here. 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 was sighted in the estate. Verified payment for the month of January 2020 for 73 workers amounting to RM 455.80 and 262 workers amounting to RM 6,001.20 (Kod Majikan : B3400001862B)</p> <p>East Estate</p> <p>All workers are given medical care at the Estate Dispensary engaged with 2 Medical Assistants. All workers are entitled for free medical benefits during their tenure here. 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 was sighted in the estate. Verified payment for the month of December 2019 for 448 workers amounting to RM 15,281.70 (Kod Majikan : B3400017135A)</p> | | | | | | | | | | | | | |
|---------------------|--|---|--------|------|----------------|----------|-------------------|------------------|---------------------|-------------------|-----------------|---------------|--------------------|-----|--|
| 6.7.5 | Occupational injuries are recorded using Lost Time Accident (LTA) metrics. | <p>Records on Lost Time Accident (LTA) metrics have been verified to be satisfactory. Accident records (JKKP 6) were found to be updated and submitted accordingly. All records on Lost Time Accident (LTA) metrics were maintained. The records are as follows :-</p> <table border="1" data-bbox="1048 1171 1895 1367"> <thead> <tr> <th>Estate</th> <th>2019</th> <th>2020 (to date)</th> </tr> </thead> <tbody> <tr> <td>East POM</td> <td>3 Cases (38 days)</td> <td>1 Case (Ongoing)</td> </tr> <tr> <td>Dusun Durian Estate</td> <td>5 Cases (25 days)</td> <td>1 Case (9 Days)</td> </tr> <tr> <td>Sepang Estate</td> <td>8 Cases (290 days)</td> <td>nil</td> </tr> </tbody> </table> | Estate | 2019 | 2020 (to date) | East POM | 3 Cases (38 days) | 1 Case (Ongoing) | Dusun Durian Estate | 5 Cases (25 days) | 1 Case (9 Days) | Sepang Estate | 8 Cases (290 days) | nil | |
| Estate | 2019 | 2020 (to date) | | | | | | | | | | | | | |
| East POM | 3 Cases (38 days) | 1 Case (Ongoing) | | | | | | | | | | | | | |
| Dusun Durian Estate | 5 Cases (25 days) | 1 Case (9 Days) | | | | | | | | | | | | | |
| Sepang Estate | 8 Cases (290 days) | nil | | | | | | | | | | | | | |

| | | | | | |
|---|---|---|--------------------|-----|-----|
| | | East Estate | 10 Cases (85 days) | nil | |
| <p>JKKP 8 Forms have been submitted to JKKP for year ending 2019 respectively.</p> <p>Samples of the HIRARC were checked and it was sighted to have been reviewed after the incidents with appropriate training provided to the related workers as stated in indicator 3.6.1.</p> | | | | | |
| <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>All the 3 West Estate continued to implement Integrated Pest Management (IPM) in all the estates. It continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the Agricultural Reference Manual (ARM) Section 15 - Plant Protection. The IPM program among others;</p> <ul style="list-style-type: none"> a) Includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. b) For bagworm control the program includes the planting of beneficial plants such as <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i> and <i>Turnera subulata</i> c) In order to minimize use of pesticides the estates had planted beneficial plants mainly <i>Tunera subulata</i>, <i>cassia cobanensis</i> and <i>Antigonon leptopus</i> with maps indicating areas planted. <p>All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year. Baiting was continued until bait acceptance fell below 20%.</p> | | | Yes |

| 7.1.2 | 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. | This is not practiced in the 3 estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM. | NA | | | | | | | | | | | | | | | | | | | | |
|--|--|--|---------------|-----------|------------------|---------------|-------------------|------------|----|-------|--------------------|------------|----|--------|-------------------|------------|---------|------|------------------------|--|---------------|---------------|-----|
| 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. | The 3 estates audited had not use any form of fire for the pest control. This is verified through the interviews with the estates' management and the field mandores and workers. Site visit also confirmed such practices were not made in SDP estates. | Yes | | | | | | | | | | | | | | | | | | | | |
| Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment. | | | | | | | | | | | | | | | | | | | | | | | |
| 7.2.1 | (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. | 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 : <table border="1" data-bbox="1048 818 1910 1197"> <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>Impreta 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 | Impreta 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 | Yes |
| Noxious Weeds | Herbicide | Rate (amount/ha) | Dilution rate | | | | | | | | | | | | | | | | | | | | |
| Ischaemum muticum | Glyphosate | 4L | 90 ml | | | | | | | | | | | | | | | | | | | | |
| Impreta 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 | | | | | | | | | | | | | | | | | | | | |

| 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>Records of pesticide used were available in the 'Monitoring Pesticide Usage Per Hectare And Per Ton FFB Production'. Sighted the records as below:</p> <p>Dusun Durian Estate</p> <table border="1" data-bbox="1048 555 1888 655"> <thead> <tr> <th>Month</th> <th>Sept 19</th> <th>Oct 19</th> <th>Nov 19</th> <th>Dec 19</th> <th>Jan 20</th> </tr> </thead> <tbody> <tr> <td>a.i/Ha</td> <td>0.293</td> <td>0.086</td> <td>0.298</td> <td>0.218</td> <td>1.347</td> </tr> </tbody> </table> <p>Sepang Estate</p> <table border="1" data-bbox="1048 746 1888 847"> <thead> <tr> <th>Month</th> <th>Sept 19</th> <th>Oct 19</th> <th>Nov 19</th> <th>Dec 19</th> <th>Jan 20</th> </tr> </thead> <tbody> <tr> <td>a.i/Ha</td> <td>2.025</td> <td>1.054</td> <td>7.682</td> <td>13.943</td> <td>3.493</td> </tr> </tbody> </table> <p>East Estate</p> <table border="1" data-bbox="1048 938 1888 1038"> <thead> <tr> <th>Month</th> <th>Aug 19</th> <th>Sept 19</th> <th>Oct 19</th> <th>Nov 19</th> <th>Dec 19</th> </tr> </thead> <tbody> <tr> <td>a.i/Ha</td> <td>1.77</td> <td>2.38</td> <td>1.47</td> <td>1.21</td> <td>1.99</td> </tr> </tbody> </table> | Month | Sept 19 | Oct 19 | Nov 19 | Dec 19 | Jan 20 | a.i/Ha | 0.293 | 0.086 | 0.298 | 0.218 | 1.347 | Month | Sept 19 | Oct 19 | Nov 19 | Dec 19 | Jan 20 | a.i/Ha | 2.025 | 1.054 | 7.682 | 13.943 | 3.493 | Month | Aug 19 | Sept 19 | Oct 19 | Nov 19 | Dec 19 | a.i/Ha | 1.77 | 2.38 | 1.47 | 1.21 | 1.99 | Yes |
|--------|--|---|--------|---------|--------|--------|--------|--------|--------|-------|-------|-------|-------|-------|-------|---------|--------|--------|--------|--------|--------|-------|-------|-------|--------|-------|-------|--------|---------|--------|--------|--------|--------|------|------|------|------|------|-----|
| Month | Sept 19 | Oct 19 | Nov 19 | Dec 19 | Jan 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| a.i/Ha | 0.293 | 0.086 | 0.298 | 0.218 | 1.347 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Month | Sept 19 | Oct 19 | Nov 19 | Dec 19 | Jan 20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| a.i/Ha | 2.025 | 1.054 | 7.682 | 13.943 | 3.493 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Month | Aug 19 | Sept 19 | Oct 19 | Nov 19 | Dec 19 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| a.i/Ha | 1.77 | 2.38 | 1.47 | 1.21 | 1.99 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.2.3 | <p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> | <p>The estates has implemented a Continuous Improvement Plan 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 strategic areas.</p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.</p> | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | |
|-------|--|---|-----------------|
| 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. | Yes |
| 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> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. | Sighted in the Chemical Registers dated 01/01/2020 showed that only class III & IV chemicals were used at all the estates visited. During the site visit to the chemical store it was justified that there were only class II, III and IV chemicals being used. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead. Monocrotophos was eliminated and in its place, Acephate is used. | Yes |
| 7.2.6 | (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>Dusun Durian Estate</p> <p>Pesticides operators have been given training on the Spraying Techniques and the Safety Aspects as well as the Maintenance of Inter Sprayer conducted by Mycrop Sdn Bhd on 18/01/2019. Sighted other training records as follows:</p> <ul style="list-style-type: none"> • Safety and Chemical Handling – 16/01/2019 • Pesticides Spraying Training Inter 16 & Safety – 07/02/2020. <p>The CHRA dated 22/10/2020 indicates that <i>'the safe use and handling of chemicals require all employees to be trained in the</i></p> | Non-conformance |

| | | | |
|--|--|--|--|
| | | <p><i>safe handling procedures'. Retraining of all employees should be carried out at least once in 2 years or each time worker is assigned to new work or new task involving new chemical. All training program shall be documented and kept for inspection.</i></p> <p>The sampled sprayers, Minto (GSP Lechumey), Md. Akhtar Molla (GSP Lechumey), Kogilavani a/p Muniandy (7219), and Nirmala Devi a/p Muniandy (7226) had no records of training attendance available for inspection. These workers stated during the interview that they have been sprayers for more than 2 years.</p> <p>Sepang Estate Pesticides operators have been given training on the Spraying Techniques and the Safety Aspects as well as the Maintenance of Inter Sprayer conducted by Mycrop Sdn Bhd on 12/02/2019. Sighted other training records as follows:</p> <ul style="list-style-type: none"> • Spraying Techniques Training – 12/02/2019 • Trunk Injection Training – 08/05/2019 • Maintenance of Inter Sprayer conducted by Mycrop Sdn Bhd - 14/12/2018 • Premix & Triple Rinse Training – 16/01/2020 <p>East Estate Pesticides operators have been given training on the Spraying and Chemical Handling conducted on 18/11/2019. Sighted other training records as follows:</p> <ul style="list-style-type: none"> • Triple Rinsing For Premixer – 13/02/2018 • Chemical Spillage Training for Mandore, Sprayer & Store Clerk – | |
|--|--|--|--|

| | | | |
|-------|--|---|-----|
| | | <p>27/02/2018</p> <ul style="list-style-type: none"> P&D Spraying Training – 12/11/2019 | |
| 7.2.7 | (C) Storage of all pesticides is in accordance with recognised best practices. | <p>East Estate, Dusun Durian Estate, Sepang Estate</p> <p>Pesticides were found stored in all 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> <p>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 Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p> | Yes |
| 7.2.8 | All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes. | <p>Dusun Durian Estate</p> <p>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 03/02/2020 of Big Chemical Drums (122 pcs), Rat Bait Boxes (23kgs) and Small Chemical Containers (23kgs).</p> <p>Sepang Estate</p> <p>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 06/09/2019 of Big Chemical Drums (50 pcs), Rat Bait Boxes (50kgs) and Small Chemical Containers (10kgs).</p> <p>East Estate</p> <p>All chemical containers were disposed as schedule waste to licensed waste manager SS Setia Teknologi Enterprise (Registration No: JM0512288-D).</p> | Yes |

| | | | |
|--------|--|--|-----|
| | | The last disposal was dated 03/02/2020 of Big Chemical Drums (480pcs), Rat Bait Boxes (402kgs) and Small Chemical Containers (291kgs). | |
| 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. | Yes |
| 7.2.10 | (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. | <p>East POM</p> <p>Annual medical surveillance was done to check for Hexane & Manganese Level amongst exposed workers. A total of 23 workers were sent for the medical surveillance. The medical surveillance was conducted on 06/09/2019 by Datin Dr. Hajjah Hartati Binti Suhaimi (JKKP NO: HQ/08/DOC/00/709). The results of the medical surveillance indicated that all 23 workers tested were fit to work.</p> <p>Dusun Durian Estate</p> <p>Annual medical surveillance was done for a total of 31 workers to check on the chemical exposure of the chemical handlers as required by the CHRA. FBC, Renal Profile, Lipid Profile, Glucose and Biological Monitoring Test were done for Chemical Handlers to monitor the effects chemical exposure have on the individuals that have undergone the medical surveillance. The medical surveillance was conducted on 23/01/2020 and 04/02/2020 by Dr. Muhamad Naqib Bin Shariff (JKKP NO: HQ/17/DOC/00/00042). The results of the medical surveillance was not yet out during the audit. The previous medical surveillance dated 26th November 2018 for 41 workers indicated all workers were fit to work.</p> <p>Sepang Estate</p> | Yes |

| | | | |
|---|--|---|-----|
| | | <p>Annual medical surveillance was done for a total of 45 workers to check on the chemical exposure of the chemical handlers as required by the CHRA. FBC, Renal Profile, Lipid Profile, Glucose and Biological Monitoring Test were done for Chemical Handlers to monitor the effects chemical exposure have on the individuals that have undergone the medical surveillance. The medical surveillance was conducted on 27/12/2020 by Dr. Kavindran Narain a/l Patmanathan (JKKP NO: HQ/18/DOC/00/00266). The results of the medical surveillance indicated all workers were fit to work.</p> <p>East Estate</p> <p>Annual medical surveillance was done for a total of 75 workers to check on the chemical exposure of the chemical handlers as required by the CHRA. FBC, Renal Profile, Lipid Profile, Glucose and Biological Monitoring Test were done for Chemical Handlers to monitor the effects chemical exposure have on the individuals that have undergone the medical surveillance. The medical surveillance was latest conducted on 15/11/2019 by Datin Dr. Hajjah Hartati Binti Suhaimi (JKKP NO: HQ/08/DOC/00/709). The results of the medical surveillance indicated all workers 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>All estates 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>Interview with female workers during the site visit showed awareness that they are prohibited from chemical related works during pregnancy and breastfeeding.</p> | Yes |
| <p>Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p> | | | |

| <p>7.3.1</p> | <p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> | <p>SOU East Mill and all the three estates had identified all wastes and sources of pollution. The Waste Management Action Plan FY 2019 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1048 539 1906 871"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>Land</td> <td>Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.</td> </tr> </tbody> </table> <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2020. The waste generated from the mill/estates operations as shown below:</p> <table border="1" data-bbox="1048 1026 1906 1289"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td>2</td> <td>Domestic waste</td> <td>rubbish from the mill complex and employees' quarters</td> </tr> <tr> <td>3</td> <td>Industrial waste</td> <td>Fiber, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td>4</td> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table> <p>The pollution identified from the mill activities:</p> | | Receptor | Sources | 1 | Air | Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG | 2 | Water | Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down | 3 | Land | Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste. | | Type of waste | Details | 1 | Scheduled waste | Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries | 2 | Domestic waste | rubbish from the mill complex and employees' quarters | 3 | Industrial waste | Fiber, palm kernel shell, boiler ash, scrap iron | 4 | Sewage | Sewage from housing/office complex | <p>Yes</p> |
|--------------|---|--|--|----------|---------|---|-----|---|---|-------|---|---|------|---|--|---------------|---------|---|-----------------|--|---|----------------|---|---|------------------|--|---|--------|------------------------------------|------------|
| | Receptor | Sources | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Air | Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Water | Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Land | Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste. | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Type of waste | Details | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Scheduled waste | Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Domestic waste | rubbish from the mill complex and employees' quarters | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Industrial waste | Fiber, palm kernel shell, boiler ash, scrap iron | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Sewage | Sewage from housing/office complex | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | Type of waste | Details | |
|-------|--|---|----------------------|--|
| | | 1 | Black smoke | Emission from Boilers |
| | | 2 | Odor & gases | Activities from the effluent treatment |
| | | 3 | Leakage of lubricant | Storage & vehicle maintenance |
| 7.3.2 | Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. | <p>In East POM and the estates in SOU 8, procedure SD/SDP/PSQM (ESH)/203- EN1 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <p>a) Management and disposal of wastewater 2020 has been established compiled by Assistant Engineer.</p> <p>b) Waste Management Plan 2020 has been established prepared by QA and verified by the Assistant Engineer in Jan 2020. The management Plan for 2020 has yet to be finalised the source and disposal method of scheduled waste, domestic waste and industrial waste.</p> <p>c) Based on Environmental Impact Evaluation (file no: SM/5.2/EIE) and Environment Aspect and Impact Identification (file no: SM/5.2/EAI) improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination.</p> <p>d) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.</p> <p>e) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is disposed to the following vendors registered with DOE.</p> | | Non-conformance |

| Estate | Date | SW 322 | SW 410 | SW 409 | SW 306 | SW 305 | SW 404 |
|----------|----------|-----------|-----------|-----------|-----------|-----------|-----------|
| East POM | 24/6/19 | 0.500 | 0.097 | 0.132 | 0.150 | 0.200 | |
| Sepang | 22/11/19 | - | - | - | - | - | 0.006 |
| Sepang | 13/11/19 | - | 0.200 | - | - | - | - |
| D Durian | 5/11/19 | - | 0.145 | - | - | 0.400 | 0.003 |
| East | 17/10/19 | - | - | - | - | 1.254 | - |
| East | 15/10/19 | - | - | - | - | - | 0.006 |

The CU scheduled waste is disposed to the following vendors registered with DOE.

| Estate | Date | SW Buyers/Vendor |
|-------------|------------|------------------------------------|
| East POM | 15/02/2019 | Kualiti Alam Sdn Bhd |
| Sepang | 15/01/2019 | Malik Family ResourcesTech Sdn Bhd |
| | 15/01/2019 | Kualiti Alam Sekitar Sdn Bhd |
| D Durian | 01/05/2016 | Malik Family ResourcesTech Sdn Bhd |
| East Estate | 01/05/2016 | Malik Family ResourcesTech Sdn Bhd |
| East Estate | 15/01/2019 | Kualiti Alam Sekitar Sdn Bhd |

Empty containers were despatched to licensed buyer namely *SS Setia Teknologi Enterprise* registered with DOE dated 24/10/2018 and *Jabatan Pertanian* via letter dated 07/12/2015. Records of despatches sighted as follows;

| | | Estate | Date | Chemical containers | Rat bait boxes | Small chemical containers | |
|---|---|--|------------|---------------------|----------------|---------------------------|-----|
| | | Sepang | 06/09/2019 | 50 pcs | 50 kg | 10 kg | |
| | | D Durian | 03/02/2020 | 122 pcs | 23 kg | 23 kg | |
| | | East | 03/02/2020 | - | 402 kg | - | |
| | | East | 26/04/2019 | 480 pcs | - | 291 kg | |
| 7.3.3 | The unit of certification does not use open fire for waste disposal. | <p>During a line site visit East Estate housing area block A domestic waste was thrown in field no P96P not implementing the disposal to the approved landfill. Hence an NCR is raised.</p> <p>There was no land preparation in SOU 8 Mill and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation b) Carbon Policy <p>SDP has a policy of no open burning. As advocated, the estates practiced Zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p> | | | | | Yes |
| 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. | | | | | Yes |
| 7.4.2 | Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health. | <p>Dusun Durian Estate</p> <p>Internal Agronomist from Sime Darby Research Sdn Bhd last visited estate on 30/05/2019 and inspected the oil palm planting to determine the plant health through leaf sampling. The motive of the inspection is to formulate</p> | | | | | Yes |

| | | | |
|--|--|--|--|
| | | <p>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 (N, P, K, Mg, Ca, B) is provided to the estate. The results of the leaf sampling was available in the Plant Analysis Test Report which was sighted in the estate.</p> <p>The soil sampling was available in the Soil Analysis Test Report and was last done on 13/03/2018 by Sime Darby Research Sdn Bhd. (Test report No. S19/2018) identifying the pH, Org C, Total N, Total P, Avail P, etc.</p> <p>Sepang Estate</p> <p>Internal Agronomist from Sime Darby Research Sdn Bhd last visited estate on 18/07/2019 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 (N, P, K, Mg, Ca, B) is provided to the estate. The results of the leaf sampling was available in the Plant Analysis Test Report which was sighted in the estate.</p> <p>The soil sampling was available in the Soil Analysis Test Report and was last done on 06/09/2018 by Sime Darby Research Sdn Bhd. (Test report No. S59/2018) identifying the pH, Org C, Total N, Total P, Avail P, etc.</p> <p>East Estate</p> <p>Internal Agronomist from Sime Darby Research Sdn Bhd last visited estate on 12 & 17/09/2019 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 (N, P, K, Mg, Ca, B) is provided to</p> | |
|--|--|--|--|

| | | <p>the estate. The results of the leaf sampling was available in the Plant Analysis Test Report which was sighted in the estate.</p> <p>The soil sampling was available in the Soil Analysis Test Report and was last done on 06/09/2018 by Sime Darby Research Sdn Bhd. (Test report No. S56/2018) identifying the pH, Org C, Total N, Total P, Avail P, etc</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>East POM</p> <p>EFB is sent to East Estate and Sepang Estate for mulching purposes. Weighbridge records are kept for monitoring purposes in the mill. POME Farrow irrigation is done at the East Estate and monitored by the East POM. Sampled of the records for EFB and POME sent to East Estate are as below:</p> <table border="1"> <thead> <tr> <th>MONTH</th> <th>EFB</th> <th>POME</th> </tr> </thead> <tbody> <tr> <td>January 2020</td> <td>2,595.17</td> <td>14,767.62</td> </tr> <tr> <td>December 2019</td> <td>1,726.92</td> <td>8,383.17</td> </tr> <tr> <td>November 2019</td> <td>2,273.04</td> <td>7,090.04</td> </tr> </tbody> </table> <p>It was sighted and verified in the estates the EFB application in Field 2009D and 2008C of East Estate. The application records were available in the estate for monitoring purposes.</p> | MONTH | EFB | POME | January 2020 | 2,595.17 | 14,767.62 | December 2019 | 1,726.92 | 8,383.17 | November 2019 | 2,273.04 | 7,090.04 | Yes |
| MONTH | EFB | POME | | | | | | | | | | | | | |
| January 2020 | 2,595.17 | 14,767.62 | | | | | | | | | | | | | |
| December 2019 | 1,726.92 | 8,383.17 | | | | | | | | | | | | | |
| November 2019 | 2,273.04 | 7,090.04 | | | | | | | | | | | | | |
| 7.4.4 | <p>Records of fertiliser inputs are maintained.</p> | <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> | Yes | | | | | | | | | | | | |

| | | <p>Fertilizer Application Records were sighted in all estates and were monitored and updated as and when the application is done. Sampled the last application at Dusun Durian Estate dated 07/02/2020 at Field 02K1, 6.87mt of AC at 2kg per palm applied accordingly. Sample application at Sepang Estate dated 28/12/2019 at Field OP 2012D, 5.38 MT of Rock Phosphate was applied accordingly. Sample application at East Estate dated 31/01/2020 at Field 2002B, 12.22mt of AS was applied.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|--|-------|--------|-----------|------|--------|---|-------|-------|------|------|---|----------|-------|-------|-------|---|--------|-------|---|---|---|------|------|-------|------|---|--------|------|---|---|---|------------|---|---|------|---|--------|---|---|-------|---|-------|---|---|------|---|------------|---|---|------|----|-------|---|---|------|----|----------|---|---|------|----|-------|---|---|------|------------|
| <p>Criteria 7.5: Practices minimise and control erosion and degradation of soils.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>7.5.1</p> | <p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> | <p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. The soil series in the estates were classified as follows:</p> <table border="1" data-bbox="1137 762 1821 1362"> <thead> <tr> <th>No</th> <th>East</th> <th>D. Durian</th> <th>East</th> <th>Sepang</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Briah</td> <td>15.18</td> <td>0.77</td> <td>1.21</td> </tr> <tr> <td>2</td> <td>Selangor</td> <td>47.16</td> <td>13.70</td> <td>15.60</td> </tr> <tr> <td>3</td> <td>Bernam</td> <td>17.26</td> <td>-</td> <td>-</td> </tr> <tr> <td>4</td> <td>Jawa</td> <td>3.35</td> <td>58.17</td> <td>3.85</td> </tr> <tr> <td>5</td> <td>Subang</td> <td>4.21</td> <td>-</td> <td>-</td> </tr> <tr> <td>6</td> <td>Batu Lapan</td> <td>-</td> <td>-</td> <td>5.50</td> </tr> <tr> <td>7</td> <td>Bungor</td> <td>-</td> <td>-</td> <td>28.67</td> </tr> <tr> <td>8</td> <td>Carey</td> <td>-</td> <td>-</td> <td>3.03</td> </tr> <tr> <td>9</td> <td>Gajah Mati</td> <td>-</td> <td>-</td> <td>4.54</td> </tr> <tr> <td>10</td> <td>Kedah</td> <td>-</td> <td>-</td> <td>0.01</td> </tr> <tr> <td>11</td> <td>K Berang</td> <td>-</td> <td>-</td> <td>2.16</td> </tr> <tr> <td>12</td> <td>Linau</td> <td>-</td> <td>-</td> <td>0.69</td> </tr> </tbody> </table> | No | East | D. Durian | East | Sepang | 1 | Briah | 15.18 | 0.77 | 1.21 | 2 | Selangor | 47.16 | 13.70 | 15.60 | 3 | Bernam | 17.26 | - | - | 4 | Jawa | 3.35 | 58.17 | 3.85 | 5 | Subang | 4.21 | - | - | 6 | Batu Lapan | - | - | 5.50 | 7 | Bungor | - | - | 28.67 | 8 | Carey | - | - | 3.03 | 9 | Gajah Mati | - | - | 4.54 | 10 | Kedah | - | - | 0.01 | 11 | K Berang | - | - | 2.16 | 12 | Linau | - | - | 0.69 | <p>Yes</p> |
| No | East | D. Durian | East | Sepang | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Briah | 15.18 | 0.77 | 1.21 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Selangor | 47.16 | 13.70 | 15.60 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Bernam | 17.26 | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Jawa | 3.35 | 58.17 | 3.85 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Subang | 4.21 | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | Batu Lapan | - | - | 5.50 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | Bungor | - | - | 28.67 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | Carey | - | - | 3.03 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | Gajah Mati | - | - | 4.54 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | Kedah | - | - | 0.01 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11 | K Berang | - | - | 2.16 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12 | Linau | - | - | 0.69 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|-------|--|---|--------|-------------|---|---|------|----|----------|---|---|------|----|--------------|---|---|------|----|-----------|---|---|-------|----|------|---|-------|------|----|------|---|---|------|----|----------|---|------|---|----|-------|---|------|---|----|-------|---|------|---|----|---------|---|------|---|----|-------------|---|------|---|----|---------|---|------|---|----|--------------|-------|---|---|----|-------|---|------|---|--|-------|--------|--------|--------|--|
| | | <table border="1"> <tr><td>13</td><td>Local Aluv.</td><td>-</td><td>-</td><td>2.38</td></tr> <tr><td>14</td><td>Munchong</td><td>-</td><td>-</td><td>2.76</td></tr> <tr><td>15</td><td>Organic clay</td><td>-</td><td>-</td><td>8.14</td></tr> <tr><td>16</td><td>Pdg Besar</td><td>-</td><td>-</td><td>13.59</td></tr> <tr><td>17</td><td>Sedu</td><td>-</td><td>10.20</td><td>7.09</td></tr> <tr><td>18</td><td>Tavy</td><td>-</td><td>-</td><td>0.78</td></tr> <tr><td>19</td><td>Tongkang</td><td>-</td><td>5.00</td><td>-</td></tr> <tr><td>20</td><td>jugra</td><td>-</td><td>1.47</td><td>-</td></tr> <tr><td>21</td><td>Teluk</td><td>-</td><td>1.13</td><td>-</td></tr> <tr><td>22</td><td>Tualang</td><td>-</td><td>5.17</td><td>-</td></tr> <tr><td>23</td><td>Parit Botak</td><td>-</td><td>2.04</td><td>-</td></tr> <tr><td>24</td><td>Sabrang</td><td>-</td><td>0.89</td><td>-</td></tr> <tr><td>25</td><td>Unclassified</td><td>12.84</td><td>-</td><td>-</td></tr> <tr><td>26</td><td>Carey</td><td>-</td><td>1.46</td><td>-</td></tr> <tr><td></td><td>TOTAL</td><td>100.00</td><td>100.00</td><td>100.00</td></tr> </table> <p>There were no other problem soils (e.g. podzols and acid sulphate soils) on SOU 8.</p> | 13 | Local Aluv. | - | - | 2.38 | 14 | Munchong | - | - | 2.76 | 15 | Organic clay | - | - | 8.14 | 16 | Pdg Besar | - | - | 13.59 | 17 | Sedu | - | 10.20 | 7.09 | 18 | Tavy | - | - | 0.78 | 19 | Tongkang | - | 5.00 | - | 20 | jugra | - | 1.47 | - | 21 | Teluk | - | 1.13 | - | 22 | Tualang | - | 5.17 | - | 23 | Parit Botak | - | 2.04 | - | 24 | Sabrang | - | 0.89 | - | 25 | Unclassified | 12.84 | - | - | 26 | Carey | - | 1.46 | - | | TOTAL | 100.00 | 100.00 | 100.00 | |
| 13 | Local Aluv. | - | - | 2.38 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 14 | Munchong | - | - | 2.76 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 15 | Organic clay | - | - | 8.14 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 16 | Pdg Besar | - | - | 13.59 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 17 | Sedu | - | 10.20 | 7.09 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 18 | Tavy | - | - | 0.78 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 19 | Tongkang | - | 5.00 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 20 | jugra | - | 1.47 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 21 | Teluk | - | 1.13 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 22 | Tualang | - | 5.17 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 23 | Parit Botak | - | 2.04 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 24 | Sabrang | - | 0.89 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 25 | Unclassified | 12.84 | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 26 | Carey | - | 1.46 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | TOTAL | 100.00 | 100.00 | 100.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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. | Like all SDPB Estates, the estates visited in East SOU 8 continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by: a) Slope & River Protection Policy b) Buffer Zone & 25-degree slope and in item 8 Section 4 | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | <p>c) Land Preparation for Terracing in ARM Manual.</p> <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in some mature areas. The cover crop <i>Mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>Neprolepis biserrata</i> in the inter rows were sighted during the visit. The slope maps were provided by the R&D Precision Agriculture Unit with details as follows:</p> <table border="1" data-bbox="1048 726 1720 1098"> <thead> <tr> <th>No</th> <th>Topography</th> <th>East</th> <th>D Durian</th> <th>Sepang</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0-2</td> <td>100%</td> <td>100%</td> <td>36.62</td> </tr> <tr> <td>2</td> <td>2-6</td> <td>-</td> <td>-</td> <td>48.78</td> </tr> <tr> <td>3</td> <td>6-12</td> <td>-</td> <td>-</td> <td>14.30</td> </tr> <tr> <td>4</td> <td>12-20</td> <td>-</td> <td>-</td> <td>0.30</td> </tr> <tr> <td>5</td> <td>20-25</td> <td>-</td> <td>-</td> <td>0.00</td> </tr> <tr> <td>6</td> <td>>25</td> <td>-</td> <td>-</td> <td>0.00</td> </tr> <tr> <td></td> <td>Total</td> <td>100%</td> <td>100%</td> <td>100%</td> </tr> </tbody> </table> <p>Figures denote %. 100 % is the total titled area of the estate.</p> | No | Topography | East | D Durian | Sepang | 1 | 0-2 | 100% | 100% | 36.62 | 2 | 2-6 | - | - | 48.78 | 3 | 6-12 | - | - | 14.30 | 4 | 12-20 | - | - | 0.30 | 5 | 20-25 | - | - | 0.00 | 6 | >25 | - | - | 0.00 | | Total | 100% | 100% | 100% | |
|-------|--|---|----------|------------|------|----------|--------|---|-----|------|------|-------|---|-----|---|---|-------|---|------|---|---|-------|---|-------|---|---|------|---|-------|---|---|------|---|-----|---|---|------|--|-------|------|------|------|--|
| No | Topography | East | D Durian | Sepang | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 0-2 | 100% | 100% | 36.62 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 2-6 | - | - | 48.78 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 6-12 | - | - | 14.30 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | 12-20 | - | - | 0.30 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | 20-25 | - | - | 0.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | >25 | - | - | 0.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Total | 100% | 100% | 100% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.5.3 | There is no new planting of oil palm on steep terrain. | <p>This compliance being addressed in the "<i>Slope and River Protection</i>" signed by the CEO dated Jan 2015 stating the following among others; "Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly".</p> | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | |
|---|--|--|-----|
| 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 all estates visited. | Yes |
| 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 all estates visited. | Yes |
| 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 all estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates. | Yes |
| 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 all estates visited. | Yes |
| 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 all estates visited. | Yes |
| 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 all estates visited. | Yes |
| 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. Dusun Durian Estate The Water Management Plan is available dated 19 October 2019. Sepang Estate | Yes |

| | | | |
|-------|--|---|-----|
| | | <p>The Water Management Plan for 2020 is available indicating the management of Rain Water and Domestic Consumption Water (SYABAS).</p> <p>East Estate</p> <p>A water management plan is available in the Environmental Management Plan to :</p> <ul style="list-style-type: none"> - Monitor the quality of main water inlet/outlet for pollutants from estate's operations. - Contingency during water shortage. - Monitor the usage of fresh water on monthly basis - Reuse/recycle wastewater. | |
| 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 period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> | <p>There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.</p> | Yes |
| 7.7.6 | <p>(C) All existing plantings on peat are managed according to the RSPO Manual on Best Management Practices (BMPs) for</p> | <p>There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.</p> | Yes |

| | existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance. | | | | | | | | | | | | | | | | |
|--|--|--|--------------------------|---------------|--------|--------------------------|------|-----|---------------|---|--------|------------------------------------|-------------------------|---------|--------|------------------------|--|
| 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 all estates visited. | Yes | | | | | | | | | | | | | | |
| 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. | SOU 8 Mill /estates had established its Water Management Plan for year 2020 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as; a) Implementation of rain water harvest, b) Construction of water gate for effective management of field drains, c) Establishment of <i>Mucuna bracteata</i> to prevent erosion, d) Side drain at field road to control water, frond stacking, e) Enhancement of ground vegetation at bare ground area. The water sources are as shown below: | Yes | | | | | | | | | | | | | | |
| | | <table border="1"> <thead> <tr> <th></th> <th>Water sources</th> <th>Usage</th> <th>Monitoring & measurement</th> <th>Freq</th> <th>PIC</th> <th>Review status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SYABAS</td> <td>Purchased for domestic consumption</td> <td>Monitoring water supply</td> <td>Monthly</td> <td>AM Mgr</td> <td>Liaison with Authority</td> </tr> </tbody> </table> | | Water sources | Usage | Monitoring & measurement | Freq | PIC | Review status | 1 | SYABAS | Purchased for domestic consumption | Monitoring water supply | Monthly | AM Mgr | Liaison with Authority | |
| | Water sources | Usage | Monitoring & measurement | Freq | PIC | Review status | | | | | | | | | | | |
| 1 | SYABAS | Purchased for domestic consumption | Monitoring water supply | Monthly | AM Mgr | Liaison with Authority | | | | | | | | | | | |

| | | | | | | |
|---|--|---|----------------|----------|---------------------------------|---|
| 2 | Rain water | Domestic use Workshop Chemical mixing | Rain fall data | On-going | AM Mgr | Water harvesting for general washing |
| 3 | Water tank | Emergency water supply | - | - | AM Mgr | Request water supply from other estates |
| <p>The contingency plan during water shortage</p> | | | | | | |
| | Area/incident | Action steps | | | PIC | Status |
| 1 | Water shortage/ prolonged dry season | To obtain water from local authority /estate catchment To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP | | | Manager AM/Mill Engineer | As and when required |
| 2 | Severe water pollution/ Contamination | To obtain water from local authority To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP | | | Manager AM//Mill Engineer | As and when required |
| <p>The Estate had implemented water managements plans which covered:</p> <ul style="list-style-type: none"> a) Water shortage contingencies b) Water pollution prevention | | | | | | |

- c) Reduce wastage
- d) Identification & management of waste waters
- e) Monitoring rainfall
- f) Regular water quality analysis.

Water management plan review date sighted on selective basis.

| | Estate/Mill | Review date | Issues |
|---|-------------|-------------|--------|
| 1 | D Durian | 07/01/2020 | Nil |
| 2 | Sepang | Jan 2020 | Nil |
| 3 | East Estate | Jan 2020 | Nil |

The water reduction plan is shown below;

| | Issues/Areas | Action Steps | PIC | Status |
|---|----------------------------|---|----------------|----------|
| 1 | Rain water collection | Large containers are to be placed at strategic locations to collect rain water The rainwater shall be recycled for washing heavy machinery | AM/Field staff | On-going |
| 2 | Leakage on plumbing system | Frequent inspection to detect leakage Fix any leakage | AM/Field staff | On-going |
| 3 | Water compartmentalization | To conserve level of soil moisture To minimize water stress during dry season | AM/Field staff | On-going |
| 4 | Handling of chemicals | To recycle water spillage while mixing of chemical at mixing area | AM/Field staff | On-going |
| 5 | education | Avoid excessive usage during cleaning Close pipe to prevent water dripping | AM/Field staff | On-going |

| | | 5 | Re-streaming | Re stream from sterilizer condensate pit for dilution | Mill engineer | | On-going | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|---|------------------------------|---|---------------|--|----------|--|----------|---------------------|-----------------------|----------------------------------|---|---------------------|--|------------------|---------------------|---|--------|---------------------------|-----------------|---------------|--|--------------|-----------------|--------------------|---------------|---|-------------|---|------------------------------|---------------|---|-----|----------------|---------------|---------------|---|-----------|------------------------------|-------------|-----------------------------------|
| The Mill Identification & Management of Waste Water | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table border="1"> <thead> <tr> <th data-bbox="1032 512 1088 592"></th> <th data-bbox="1088 512 1227 592">location</th> <th data-bbox="1227 512 1525 592">Wastewater produced</th> <th data-bbox="1525 512 1715 592">Treatment/containment</th> <th data-bbox="1715 512 1921 592">Reuse/recycle/di posal method</th> </tr> </thead> <tbody> <tr> <td data-bbox="1032 592 1088 735">1</td> <td data-bbox="1088 592 1227 735">Processing stations</td> <td data-bbox="1227 592 1525 735">Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water</td> <td data-bbox="1525 592 1715 735">Oil recovery/ETP</td> <td data-bbox="1715 592 1921 735">Recover into system</td> </tr> <tr> <td data-bbox="1032 735 1088 775">2</td> <td data-bbox="1088 735 1227 775">Boiler</td> <td data-bbox="1227 735 1525 775">Blow down, cleaning water</td> <td data-bbox="1525 735 1715 775">Sludge pit, ETP</td> <td data-bbox="1715 735 1921 775">Monsoon drain</td> </tr> <tr> <td data-bbox="1032 775 1088 847"></td> <td data-bbox="1088 775 1227 847">Process ramp</td> <td data-bbox="1227 775 1525 847">Rainfall runoff</td> <td data-bbox="1525 775 1715 847">Sedimentation trap</td> <td data-bbox="1715 775 1921 847">Monsoon drain</td> </tr> <tr> <td data-bbox="1032 847 1088 919">3</td> <td data-bbox="1088 847 1227 919">Engine room</td> <td data-bbox="1227 847 1525 919">Steam condensate, turbine cooling water</td> <td data-bbox="1525 847 1715 919">Monsoon drain, recycled tank</td> <td data-bbox="1715 847 1921 919">Monsoon drain</td> </tr> <tr> <td data-bbox="1032 919 1088 959">4</td> <td data-bbox="1088 919 1227 959">Lab</td> <td data-bbox="1227 919 1525 959">Cleaning water</td> <td data-bbox="1525 919 1715 959">Process drain</td> <td data-bbox="1715 919 1921 959">Monsoon drain</td> </tr> <tr> <td data-bbox="1032 959 1088 1059">5</td> <td data-bbox="1088 959 1227 1059">Wash room</td> <td data-bbox="1227 959 1525 1059">Toilet water, cleaning water</td> <td data-bbox="1525 959 1715 1059">Septic tank</td> <td data-bbox="1715 959 1921 1059">Collected by licensed contractor.</td> </tr> </tbody> </table> | | | | | | | | | location | Wastewater produced | Treatment/containment | Reuse/recycle/di posal method | 1 | Processing stations | Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water | Oil recovery/ETP | Recover into system | 2 | Boiler | Blow down, cleaning water | Sludge pit, ETP | Monsoon drain | | Process ramp | Rainfall runoff | Sedimentation trap | Monsoon drain | 3 | Engine room | Steam condensate, turbine cooling water | Monsoon drain, recycled tank | Monsoon drain | 4 | Lab | Cleaning water | Process drain | Monsoon drain | 5 | Wash room | Toilet water, cleaning water | Septic tank | Collected by licensed contractor. |
| | location | Wastewater produced | Treatment/containment | Reuse/recycle/di posal method | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Processing stations | Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water | Oil recovery/ETP | Recover into system | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Boiler | Blow down, cleaning water | Sludge pit, ETP | Monsoon drain | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Process ramp | Rainfall runoff | Sedimentation trap | Monsoon drain | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Engine room | Steam condensate, turbine cooling water | Monsoon drain, recycled tank | Monsoon drain | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Lab | Cleaning water | Process drain | Monsoon drain | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Wash room | Toilet water, cleaning water | Septic tank | Collected by licensed contractor. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | b) Workers have adequate access to clean water. | All water supply in the entire SOU 8 are made by SYABAS (state authority). Supplies are made to all housing areas and office complexes. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| <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>The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemicals application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The buffer zones established are as follows:</p> <table border="1" data-bbox="1048 671 1675 951"> <thead> <tr> <th>No</th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the GSQM Unit with latest revision dated on 13/06/2011. During the field visit there was no spraying activities or signs left in such an area. The buffer zones identified at the estates are as follows:</p> <table border="1" data-bbox="1048 1153 1758 1337"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Buffer zone area</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>D Durian</td> <td>Nursery</td> <td>water catchment</td> </tr> <tr> <td>2</td> <td>Sepang</td> <td>-</td> <td>-</td> </tr> <tr> <td>3</td> <td>East</td> <td>P06B</td> <td>Estate Bund</td> </tr> </tbody> </table> | No | River width | Buffer zone | 1 | > 40 meters | 50 meters | 2 | 20 - 40 meters | 40 meters | 3 | 10 - 20 meters | 20 meters | 4 | 5 - 10 meters | 10 meters | 5 | < 5 meters | 5 meters | No | Estate | Buffer zone area | Remarks | 1 | D Durian | Nursery | water catchment | 2 | Sepang | - | - | 3 | East | P06B | Estate Bund | <p>Yes</p> |
|--------------|---|--|-----------------|-------------|-------------|---|-------------|-----------|---|----------------|-----------|---|----------------|-----------|---|---------------|-----------|---|------------|----------|----|--------|------------------|---------|---|----------|---------|-----------------|---|--------|---|---|---|------|------|-------------|------------|
| No | River width | Buffer zone | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | > 40 meters | 50 meters | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 20 - 40 meters | 40 meters | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 10 - 20 meters | 20 meters | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | 5 - 10 meters | 10 meters | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | < 5 meters | 5 meters | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| No | Estate | Buffer zone area | Remarks | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | D Durian | Nursery | water catchment | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Sepang | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | East | P06B | Estate Bund | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | <i>Estate</i> | <i>HCV area</i> | <i>Remarks</i> |
|---|---------------|-----------------|----------------|
| 1 | D Durian | P04B1 (HCV 4) | Sg Langat |
| 2 | Sepang | P05C1 (HCV4) | Water pond |
| 3 | East | P09C1 (HCV 4) | Forest tree |
| 4 | East | P08C3 (HCV6) | Mah Meri Grave |

Samples are taken from the mill and estates for detection of any pollution arising from the mill and estates activities. Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Extracted record of both the estates with details below;

Among others management plan taken:

- Regular inspection at buffer/HCV areas
- Monitor water from surrounding areas
- Track, measure and report all activities around river
- Train and educate workers.

Results of water sampling as shown below:

There were no issues on the water quality for the sampling points:

| | | <table border="1"> <thead> <tr> <th colspan="9">East Mill Water Analysis 31/1/19</th> </tr> <tr> <th colspan="9">Parameter</th> </tr> <tr> <th>No</th> <th>Item</th> <th>STD</th> <th>TG1</th> <th>TG2</th> <th>TG3</th> <th>River A</th> <th>River B</th> <th>River C</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>6-9</td> <td>6.5</td> <td>3.3</td> <td>2.9</td> <td>5.6</td> <td>6.5</td> <td>6.3</td> </tr> <tr> <td>3</td> <td>BOD</td> <td>3</td> <td><1</td> <td>1</td> <td>2</td> <td>3</td> <td>1</td> <td>7</td> </tr> <tr> <td>4</td> <td>COD</td> <td>25</td> <td>96</td> <td>52</td> <td>196</td> <td>492</td> <td>1640</td> <td>840</td> </tr> <tr> <td>5</td> <td>SS</td> <td>50</td> <td>14</td> <td>4</td> <td>8</td> <td>32</td> <td>152</td> <td>76</td> </tr> <tr> <td>6</td> <td>AN</td> <td>0.3</td> <td>3</td> <td>3</td> <td>3</td> <td>3</td> <td><1</td> <td><1</td> </tr> <tr> <td>7</td> <td>DO</td> <td>5-7</td> <td>3.47</td> <td>3.05</td> <td>3.03</td> <td>2.91</td> <td>3.19</td> <td>2.49</td> </tr> <tr> <td>8</td> <td>P</td> <td>0.2</td> <td>0.01</td> <td>0.00</td> <td>0.00</td> <td>0.012</td> <td>0.056</td> <td>0.161</td> </tr> </tbody> </table> | East Mill Water Analysis 31/1/19 | | | | | | | | | Parameter | | | | | | | | | No | Item | STD | TG1 | TG2 | TG3 | River A | River B | River C | 1 | pH | 6-9 | 6.5 | 3.3 | 2.9 | 5.6 | 6.5 | 6.3 | 3 | BOD | 3 | <1 | 1 | 2 | 3 | 1 | 7 | 4 | COD | 25 | 96 | 52 | 196 | 492 | 1640 | 840 | 5 | SS | 50 | 14 | 4 | 8 | 32 | 152 | 76 | 6 | AN | 0.3 | 3 | 3 | 3 | 3 | <1 | <1 | 7 | DO | 5-7 | 3.47 | 3.05 | 3.03 | 2.91 | 3.19 | 2.49 | 8 | P | 0.2 | 0.01 | 0.00 | 0.00 | 0.012 | 0.056 | 0.161 | |
|----------------------------------|--|---|----------------------------------|--------------|----------|---------|----------|----------|---|----|-----|-----------|------|------|---|----------|------|--------|-------|-------|----|------------|-------|-----|-----|-----|---------|---------|---------|---|----|-----|-----|--------------|------|-----|-----|-----|-----|-----|---|----|---|---|---|---|---|---|-----|----|----|----|-----|-----|------|-----|---|----|----|----|---|---|----|-----|----|---|----|-----|---|---|---|---|----|----|---|----|-----|------|------|------|------|------|------|---|---|-----|------|------|------|-------|-------|-------|--|
| East Mill Water Analysis 31/1/19 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Parameter | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| No | Item | STD | TG1 | TG2 | TG3 | River A | River B | River C | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | pH | 6-9 | 6.5 | 3.3 | 2.9 | 5.6 | 6.5 | 6.3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | BOD | 3 | <1 | 1 | 2 | 3 | 1 | 7 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | COD | 25 | 96 | 52 | 196 | 492 | 1640 | 840 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | SS | 50 | 14 | 4 | 8 | 32 | 152 | 76 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | AN | 0.3 | 3 | 3 | 3 | 3 | <1 | <1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | DO | 5-7 | 3.47 | 3.05 | 3.03 | 2.91 | 3.19 | 2.49 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | P | 0.2 | 0.01 | 0.00 | 0.00 | 0.012 | 0.056 | 0.161 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.8.3 | <p>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> | <p>Based on "<i>Compliance Schedule</i>" EPOM disposed effluent on land application in East Estate. Sighted quarterly report has been submitted to DOE by quarterly basis. Latest submission for to DOE on 12/01/2020 for period Oct to Dec 2019. Among of indicator were:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Oct – Dec 19</th> <th>STD</th> <th>4/10/19</th> <th>12/11/19</th> <th>13/12/19</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>5-9</td> <td>7.80</td> <td>8.10</td> <td>7.80</td> </tr> <tr> <td>2</td> <td>BOD mg/l</td> <td>5000</td> <td>1105.0</td> <td>221.0</td> <td>222.0</td> </tr> <tr> <td>3</td> <td>A Nitrogen</td> <td>0-100</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>4</td> <td>Total N</td> <td>0-200</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>5</td> <td>Oil & Grease</td> <td>0-25</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table> | No | Oct – Dec 19 | STD | 4/10/19 | 12/11/19 | 13/12/19 | 1 | pH | 5-9 | 7.80 | 8.10 | 7.80 | 2 | BOD mg/l | 5000 | 1105.0 | 221.0 | 222.0 | 3 | A Nitrogen | 0-100 | - | - | - | 4 | Total N | 0-200 | - | - | - | 5 | Oil & Grease | 0-25 | - | - | - | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| No | Oct – Dec 19 | STD | 4/10/19 | 12/11/19 | 13/12/19 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | pH | 5-9 | 7.80 | 8.10 | 7.80 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | BOD mg/l | 5000 | 1105.0 | 221.0 | 222.0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | A Nitrogen | 0-100 | - | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Total N | 0-200 | - | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Oil & Grease | 0-25 | - | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | <table border="1"> <thead> <tr> <th colspan="6">Dusun Durian Estate 27/11/2019</th> </tr> <tr> <th></th> <th></th> <th>STD</th> <th>P08K</th> <th>P02K</th> <th>P11A</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>6-9</td> <td>3.1</td> <td>5.1</td> <td>3.2</td> </tr> <tr> <td>3</td> <td>BOD</td> <td>3</td> <td>6</td> <td>7</td> <td>5</td> </tr> <tr> <td>4</td> <td>COD</td> <td>25</td> <td>40</td> <td>32</td> <td>28</td> </tr> <tr> <td>5</td> <td>SS</td> <td>50</td> <td>4</td> <td>2</td> <td>2</td> </tr> <tr> <td>6</td> <td>AN</td> <td>0.3</td> <td>2</td> <td>2</td> <td>2</td> </tr> <tr> <td>7</td> <td>DO</td> <td>5-7</td> <td>2.98</td> <td>2.98</td> <td>2.98</td> </tr> <tr> <td>8</td> <td>P</td> <td>0.2</td> <td>0.003</td> <td>0.017</td> <td>ND</td> </tr> </tbody> </table> | Dusun Durian Estate 27/11/2019 | | | | | | | | STD | P08K | P02K | P11A | 1 | pH | 6-9 | 3.1 | 5.1 | 3.2 | 3 | BOD | 3 | 6 | 7 | 5 | 4 | COD | 25 | 40 | 32 | 28 | 5 | SS | 50 | 4 | 2 | 2 | 6 | AN | 0.3 | 2 | 2 | 2 | 7 | DO | 5-7 | 2.98 | 2.98 | 2.98 | 8 | P | 0.2 | 0.003 | 0.017 | ND | |
|--------------------------------|--|--|--------------------------------|------------|-------|---------|------------|---|--------|-------|-------|------|------|--------|-------|-------|------|-----|--------|-------|-------|------|---|----------|-------|-------|------|-----|--------|-------|-------|------|---|---------|-------|-------|------|---|---------|-------|-------|------|---|--------|-------|-------|------|------|------|------|---|---|-----|-------|-------|----|--|
| Dusun Durian Estate 27/11/2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | STD | P08K | P02K | P11A | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | pH | 6-9 | 3.1 | 5.1 | 3.2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | BOD | 3 | 6 | 7 | 5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | COD | 25 | 40 | 32 | 28 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | SS | 50 | 4 | 2 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | AN | 0.3 | 2 | 2 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | DO | 5-7 | 2.98 | 2.98 | 2.98 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | P | 0.2 | 0.003 | 0.017 | ND | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7.8.4 | Mill water use per tonne of FFB is monitored and recorded. | <p>The mill processing water are obtained from the SYABAS adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording detailed sampled (water usage per MT of fresh fruit bunches (FFB) below;</p> <table border="1"> <thead> <tr> <th>No</th> <th>Month</th> <th>Water</th> <th>FFB /mt</th> <th>Water /FFB</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jan 19</td> <td>12518</td> <td>11628</td> <td>1.08</td> </tr> <tr> <td>2</td> <td>Feb 19</td> <td>11091</td> <td>10501</td> <td>1.06</td> </tr> <tr> <td>3</td> <td>Mac 19</td> <td>15458</td> <td>12322</td> <td>1.25</td> </tr> <tr> <td>4</td> <td>April 19</td> <td>14341</td> <td>11203</td> <td>1.28</td> </tr> <tr> <td>5</td> <td>May 19</td> <td>17833</td> <td>13481</td> <td>1.32</td> </tr> <tr> <td>6</td> <td>June 19</td> <td>13775</td> <td>10924</td> <td>1.26</td> </tr> <tr> <td>7</td> <td>July 19</td> <td>16638</td> <td>12675</td> <td>1.31</td> </tr> <tr> <td>8</td> <td>Aug 19</td> <td>18245</td> <td>14718</td> <td>1.24</td> </tr> </tbody> </table> | No | Month | Water | FFB /mt | Water /FFB | 1 | Jan 19 | 12518 | 11628 | 1.08 | 2 | Feb 19 | 11091 | 10501 | 1.06 | 3 | Mac 19 | 15458 | 12322 | 1.25 | 4 | April 19 | 14341 | 11203 | 1.28 | 5 | May 19 | 17833 | 13481 | 1.32 | 6 | June 19 | 13775 | 10924 | 1.26 | 7 | July 19 | 16638 | 12675 | 1.31 | 8 | Aug 19 | 18245 | 14718 | 1.24 | Yes | | | | | | | | | |
| No | Month | Water | FFB /mt | Water /FFB | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Jan 19 | 12518 | 11628 | 1.08 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Feb 19 | 11091 | 10501 | 1.06 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Mac 19 | 15458 | 12322 | 1.25 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | April 19 | 14341 | 11203 | 1.28 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | May 19 | 17833 | 13481 | 1.32 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | June 19 | 13775 | 10924 | 1.26 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | July 19 | 16638 | 12675 | 1.31 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | Aug 19 | 18245 | 14718 | 1.24 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | <table border="1"> <tr> <td>9</td> <td>Sept 19</td> <td>13812</td> <td>9807</td> <td>1.41</td> </tr> <tr> <td>10</td> <td>Oct 19</td> <td>15346</td> <td>11449</td> <td>1.34</td> </tr> <tr> <td>11</td> <td>Nov 19</td> <td>13905</td> <td>9973</td> <td>1.39</td> </tr> <tr> <td>12</td> <td>Dec 19</td> <td>11894</td> <td>8115</td> <td>1.47</td> </tr> </table> <p>A slightly higher water usage noted, due to the proportionate reduction in volume of FFB being processed. There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc.</p> | 9 | Sept 19 | 13812 | 9807 | 1.41 | 10 | Oct 19 | 15346 | 11449 | 1.34 | 11 | Nov 19 | 13905 | 9973 | 1.39 | 12 | Dec 19 | 11894 | 8115 | 1.47 | |
|--|---|---|---|---------|-------|--------|-----------|-------------|--------|-----------------|--|--|----|---------------------------|--|---|------|-------------------|---|----------------------------|------|------|--|
| 9 | Sept 19 | 13812 | 9807 | 1.41 | | | | | | | | | | | | | | | | | | | |
| 10 | Oct 19 | 15346 | 11449 | 1.34 | | | | | | | | | | | | | | | | | | | |
| 11 | Nov 19 | 13905 | 9973 | 1.39 | | | | | | | | | | | | | | | | | | | |
| 12 | Dec 19 | 11894 | 8115 | 1.47 | | | | | | | | | | | | | | | | | | | |
| Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised. | | | | | | | | | | | | | | | | | | | | | | | |
| 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>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2020. The document was updated on Jan 2020 2019. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Backhoe tractor</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel</td> </tr> <tr> <td>2</td> <td>Van / Supervisory vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.</td> </tr> <tr> <td>3</td> <td>Electrical supply</td> <td>To reduce reliance on gen-sets for power supply</td> <td>Utilisation of TNB sources</td> </tr> </tbody> </table> | | | No | Target | Objective | Action plan | 1 | Backhoe tractor | To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment | To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel | 2 | Van / Supervisory vehicle | To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment | To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time. | 3 | Electrical supply | To reduce reliance on gen-sets for power supply | Utilisation of TNB sources | Yes | | |
| No | Target | Objective | Action plan | | | | | | | | | | | | | | | | | | | | |
| 1 | Backhoe tractor | To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment | To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel | | | | | | | | | | | | | | | | | | | | |
| 2 | Van / Supervisory vehicle | To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment | To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time. | | | | | | | | | | | | | | | | | | | | |
| 3 | Electrical supply | To reduce reliance on gen-sets for power supply | Utilisation of TNB sources | | | | | | | | | | | | | | | | | | | | |

RSPO Public Summary Report
Revision 9 (Nov 2019)

The utilization of fossil fuel in 2019 is being monitored with records shown below:

| Site | <i>East Mill 2019</i> | | | <i>Ladang East 2019</i> | | |
|-------|-----------------------|----------|------------|-------------------------|----------|------------|
| Month | FFB mt | Diesel L | Diesel/FFB | FFB mt | Diesel L | Diesel/FFB |
| Jan | 11628 | 3092 | 0.27 | 7915 | 14719 | 1.86 |
| Feb | 10501 | 1102 | 0.10 | 8442 | 13913 | 1.65 |
| Mac | 12322 | 937 | 0.08 | 9089 | 15410 | 1.70 |
| Apr | 11203 | 825 | 0.07 | 9374 | 17173 | 1.83 |
| May | 13481 | 1166 | 0.09 | 9086 | 15220 | 1.68 |
| Jun | 10924 | 990 | 0.09 | 8676 | 13176 | 1.57 |
| July | 12675 | 1207 | 0.10 | 10618 | 17735 | 1.67 |
| Aug | 14718 | 1093 | 0.07 | 10905 | 15791 | 1.45 |
| Sep | 9807 | 1116 | 0.11 | 9362 | 14433 | 1.54 |
| Oct | 11449 | - | - | 8988 | 13785 | 1.53 |
| Nov | 9973 | - | - | 7915 | 15120 | 1.91 |
| Dec | 8115 | - | - | 7832 | 13653 | 1.74 |

| Site | <i>Ladang Sepang 2019</i> | | | <i>Ladang D Durian 2019</i> | | |
|-------|---------------------------|----------|------------|-----------------------------|----------|------------|
| Month | FFB mt | Diesel L | Diesel/FFB | FFB mt | Diesel L | Diesel/FFB |
| Jan | 5131 | 6069 | 1.18 | 4259 | 7578 | 1.78 |
| Feb | 4986 | 6699 | 1.34 | 4367 | 5894 | 1.35 |
| Mac | 5555 | 4608 | 0.83 | 4930 | 9073 | 1.84 |

| | | | | | | |
|------|------|------|------|------|------|------|
| Apr | 5555 | 4620 | 0.83 | 5110 | 8532 | 1.67 |
| May | 5276 | 6894 | 1.31 | 5348 | 8329 | 1.59 |
| Jun | 4846 | 6294 | 1.30 | 4164 | 8052 | 1.93 |
| July | 4884 | 7025 | 1.44 | 4634 | 8356 | 1.80 |
| Aug | 5081 | 6759 | 1.33 | 4983 | 7979 | 1.60 |
| Sep | 4443 | 4355 | 0.98 | 4332 | 7174 | 1.66 |
| Oct | 3940 | 5599 | 1.42 | 4190 | 5512 | 1.32 |
| Nov | 3511 | 6291 | 1.79 | 3686 | 6063 | 1.65 |
| Dec | 2824 | 5713 | 2.02 | 3175 | 5185 | 1.63 |

In conclusion the total consumption of both shell and fibre over the CPO production is at an average of 4.8. When the renewable energy consumption is maximized the utilization of non-renewable is reduced. Similarly, the estate records and monitors the diesel utilization over the running hours of gen-set and other vehicles running.

Performance variation in view of several factors i.e.

- a) Infrastructure of estates,
- b) Community size / no of gen-sets,
- c) No. of vehicles / age of machine.
- d) Weather interference / crop production volume

There is no opportunity for the estates to capitalize the utilisation of fibre/shell as part of their energy production in replacement of fossil fuel with the current technology limitation.

| | | | |
|---|---|--|------------|
| | | <p>East Mill</p> <p>A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2019, identified in the following</p> <ul style="list-style-type: none"> a) Environmental Aspect Identification Summary FY 2019 reviewed accordingly. b) Environmental Impact Evaluation Summary FY 2019 reviewed accordingly. <p>Renewable energy usage & diesel consumption 2019 was established and monitored by monthly basis. All work in relation to the diesel utilisation has been outsourced effective Oct 2019. To Reduce Diesel usage – by maintenance of the boiler & machineries to ensure at optimum level, to monitor diesel usage, provide training to workers regarding reduce fuel and diesel usage for boiler. Diesel consumption for the mill as shown in the above table.</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> | | | |
| <p>7.10.1</p> | <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>SOU 8 Mill and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <ul style="list-style-type: none"> a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment. b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report. | <p>Yes</p> |
| <p>7.10.2</p> | <p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that</p> | <p>SOU 8 has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1.</p> | <p>Yes</p> |

| | <p>may result directly from the development are estimated and a plan to minimize them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> | | | | | | | | | | | | | | |
|---------------|---|---|----|-----------------------|--------|---|-----|--|---|-------|---|---|------|--|------------|
| <p>7.10.3</p> | <p>(C) Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.</p> | <p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. (SM/5.2/EAI) and (SM/5.2/EIE) which covers estates and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1048 807 1883 1257"> <thead> <tr> <th>No</th> <th>Environment receptors</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>land</td> <td>Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.</td> </tr> </tbody> </table> <p>East Mill has conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit.</p> | No | Environment receptors | Source | 1 | Air | Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping). | 2 | Water | Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down | 3 | land | Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics. | <p>Yes</p> |
| No | Environment receptors | Source | | | | | | | | | | | | | |
| 1 | Air | Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping). | | | | | | | | | | | | | |
| 2 | Water | Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down | | | | | | | | | | | | | |
| 3 | land | Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics. | | | | | | | | | | | | | |

| | | | |
|---|---|--|-----|
| | | <p>The mill was also equipped with a Continuous Emission Monitoring System (CEMS).</p> <p>The audit team has verified the condition of the CEMS during the audit. The system was found to be in functional condition.</p> <p>Data from the stack is connected online to DOE’s office. Boiler smoke emission data are within the DOE limit.</p> <p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent.</p> <p>‘Pollution prevention plan and waste management action plan’ – is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly. Among of action has been taken by CU were:</p> <ul style="list-style-type: none"> • Scheduled wastes – were disposed through Kualiti Alam Sdn Bhd and Malik Family ResourcesTech Sdn Bhd • Domestic wastes are disposed to designated area located far from housing complexes and waterways. • Full compliance to zero burning practices | |
| 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. | There was no evidence that fire had been used to prepare land for replanting in all estates. No fire was used for waste disposal. | Yes |
| 7.11.2 | The unit of certification establishes fire prevention and control measures for the areas under its direct management. | <p>There was no land preparation by burning ever since SDPB practice zero burning as per the policy in:</p> <p>a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation</p> <p>b) Carbon Policy</p> <p>The use of fire for waste disposal and for preparing land for oil palm cultivation or replanting was not practiced in all estates. From field</p> | Yes |

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| | | visits (2016, 2017 & 2018 Replants) and interviews with the workers there is no open burning being practiced in the estates The Group policy of "Zero open burning" has been enforced since July 2008. The operating units adhered to the policy of "Zero open burning" for any replanting. Furthermore, Sime Darby Plantation assigned 1 person based in HQ being in charge to detect any open fire in the Company's' fields using the Global Spot Watch. This is the measures taken by the organization to pledge towards zero open burning. | |
| 7.11.3 | The unit of certification engages with adjacent stakeholders on fire prevention and control measures. | This is no relevant as SDPB practices zero burning throughout the plantation areas. | Yes |
| 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 | <p>(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</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> | The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2). Hence, the requirement under this indicator does not apply. | Yes |
| 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>The audit findings have confirmed that there is no new planting after 15/11/2018 in SOU 8 estates (refer 7.3.1 to 7.4.2). Hence the current HCV assessment of the estates remains valid.</p> <p>There is no reduction in the HCV area indicating there is no new planting taking place. And no new land clearing after 15/11/2018, hence the current HCV assessment of those plantations remains valid.</p> | Yes |

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| | 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. | The audit findings have confirmed that there is no new planting after 15/11/2018 in SOU 8 estates (refer 7.3.1 to 7.4.2). | |
| 7.12.3 | <i>Indicator is not applicable in Malaysia context.</i> | Not applicable | NA |
| 7.12.4 | (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 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). | The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15/11/2018 in SOU 8 estates (refer 7.3.1 to 7.4.2). Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PA/GM and also personnel from the Sustainability unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any. Highlights if any are discussed during the management review or management meetings subject to the urgency of the situation. | Yes |
| 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. | The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird, presence of wild boar and monkeys occasionally sighted. The appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan reviewed in Jan 2020. | Yes |
| 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 | The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15/11/2018 in SOU 8 estates (refer 7.3.1 to 7.4.2). Employees were briefed during muster and also during session on the protection of RTE. During interview at site and field visit these knowledge were crosschecked to ascertain the understanding level of the workers. They were aware of the importance | Yes |

| | | | |
|--------|---|---|-----|
| | national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. | of protection and the penalty in event of any violation. Awareness was also made via posters and signage at the estates complexes. | |
| 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. | The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15/11/2018 in SOU 8 estates (refer 7.3.1 to 7.4.2). Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PA/GM and also personnel from the Sustainability unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any. | Yes |
| 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, the Remediation and Compensation Procedure (RaCP) applies. | The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15/11/2018 in SOU 8 estates (refer 7.3.1 to 7.4.2). Hence, the requirement under this indicator does not apply. (refer 7.3.1 to 7.4.2). | Yes |

Appendix B: Approved Time Bound Plan

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:</p> <p>i) SDP - RSPO Certification Status for Malaysia Operations</p> <p>ii) SDP- RSPO Certification Status for Indonesia Operations</p> <p>iiia) Updates on PT MAS</p> <p>iiiii) 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: <i>Angsana Mini POM closed down in 2016. Selabak POM is being mothballed.</i></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 Mitral Austral Sejahtera: The properties was sold and currently SDP have no control in the management. The property was disposed on 25 June 2019 and an official letter on disposal of PT Mas was sent to RSPO Secretariat on 27 June 2019. Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019. Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP.</p> <p>As at Dec 2017, a total of 28,712 Ha of smallholders have been certified. The entire KKPA (1-5) in Sebanban, 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>Liberia As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</p> |

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|-------------------|----|----|---|----|--|
| Total SOUs | 33 | 24 | 1 | 58 | Other remarks: 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. |
|-------------------|----|----|---|----|--|

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 | 12/08/11 | 11/08/20 | SPO 550179 | |
| 2 | Chersonese | Kuala Kurau, Perak | 01/10/11 | 04/10/21 | CU-RSPO-815148, RSPO 590800 | |
| 3 | Elphil | Sg Siput, Perak | 18/06/11 | 17/06/21 | RSPO 550180 | |
| 4 | Flemington | Teluk Intan, Perak | 05/10/11 | 04/10/21 | CU-RSPO-819144, RSPO 590802 | |
| 5 | Seri Intan | Teluk Intan, Perak | 03/03/11 | 02/03/21 | CU-RSPO-811218, RSPO 0015 | |
| 5 | Selaba | Teluk Intan, Perak | 03/03/11 | 02/03/21 | CU-RSPO-819142, RSPO 0016 | |
| 5a | Sg Samak | Teluk Intan, Perak | NA | NA | NA | Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down. |
| 6 | Tennamaram | Bestari Jaya, Selangor | 03/03/11 | 02/03/21 | CU-RSPO-819143, RSPO 0014 | |
| 7 | Bkt Kerayong | Kapar, Selangor | 15/04/11 | 14/04/21 | RSPO 550181 | |
| 8 | East | Carey Island, Selangor | 19/05/10 | 18/05/20 | SPO 543543 | |
| 9 | West | Carey Island, Selangor | 19/05/10 | 18/05/20 | SPO 543594 | |
| 9a | Sepang | Sepang, Selangor | NA | NA | NA | Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down. |
| 10 | Bukit Puteri | Raub, Pahang | 07/06/11 | 06/07/21 | CU-RSPO-815147, 18502206 001, 824 502 14020 | |

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|-----|-----------------|-------------------------------|----------|----------|---|---|
| 11 | Kerdau | Temerloh, Pahang | 07/06/11 | 06/07/21 | CU-RSPO-819155, 18502207 001, 824 502 14019 | |
| 12 | Jabor | Kuantan, Pahang | 07/06/11 | 06/07/21 | CU-RSPO-819156, RSPO 928288, 824 502 16049 | |
| 13 | Labu | Nilai, Negeri Sembilan | 30/12/11 | 29/12/21 | CU-RSPO-819163, SGSRSP/PM/MY13/01284, 824 502 16039, SGS-RSPO/PC17-00004, CURSPO-855480 | |
| 14 | Tanah Merah | Port Dickson, Negeri Sembilan | 19/05/10 | 18/05/20 | SPO 541905 | |
| 15 | Sua Betong | Port Dickson, Negeri Sembilan | 18/02/14 | 17/02/24 | 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 | 07/06/11 | 06/07/21 | CU-RSPO-819157, RSPO 928188, 824 502 16051 | |
| 17 | Kempas | Jasin, Melaka | 20/05/15 | 19/05/20 | RSPO-PC 00101 | |
| 18 | Diamond Jubilee | Jasin, Melaka | 05/10/11 | 04/10/21 | CU-RSPO-819146, RSPO 591224 | |
| 19 | Pagoh | Muar, Johor | 28/01/14 | 27/01/24 | 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 | 20/10/10 | 19/10/15 | NA | Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down. |
| 20 | Chaah | Chaah, Johor | 18/11/10 | 17/11/20 | RSPO 548299 | |
| 21 | Gunung Mas | Kluang, Johor | 19/05/10 | 18/05/20 | RSPO 901888 | |
| 22 | Bukit Benut | Kluang, Johor | 05/10/11 | 04/10/21 | CU-RSPO-819147, RSPO 591229 | |
| 23 | Ulu Remis | Layang-layang, Johor | 11/04/11 | 10/04/21 | SGS-RSPO/PM-00722, 824 502 16042 | |
| 24 | Hadapan | Layang-layang, Johor | 29/03/11 | 28/03/21 | SGS-RSPO/PM-00715, 824 502 16040, BVC-RSPO20170623-01 | |
| 25 | Segaliud | Sandakan, Sabah | 20/05/10 | 19/05/15 | NA | Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down. |

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|-----|--------------|------------------|----------|----------|-------------------------------|---|
| 26 | Sandakan Bay | Sandakan, Sabah | 01/10/08 | 30/09/23 | RSPO 537872 | |
| 27 | Melalap | Tenom, Sabah | 21/01/11 | 20/01/21 | RSPO 547124 | |
| 28 | Binuang | Kunak, Sabah | 16/01/09 | 12/07/20 | RSPO 001 | |
| 29 | Giram | Kunak Sabah | 16/01/09 | 12/07/20 | RSPO 002 | |
| 30 | Merotai | Tawau, Sabah | 16/01/09 | 12/07/20 | RSPO 004 | |
| 30a | Jeleta Bumi | Kunak, Sabah | NA | NA | NA | Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down. |
| 30b | Mostyn | Kunak Sabah | NA | NA | NA | Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down. |
| 31 | Lavang | Bintulu, Sarawak | 30/12/11 | 29/12/21 | CU-RSPO-819166, MUTU-RSPO/053 | |
| 32 | Rajawali | Bintulu, Sarawak | 30/12/11 | 29/12/21 | CU-RSPO-819167, RSPO 0020 | |
| 33 | Derawan | Bintulu, Sarawak | 30/12/11 | 29/12/21 | CU-RSPO-819169, RSPO 0019 | |
| 34 | Pekaka | Bintulu, Sarawak | 30/12/11 | 29/12/21 | CU-RSPO-815150, MUTU-RSPO/054 | Mill is mothballed, supply base merged into Lavang effective Dec 2017. |

Legends

| | | |
|-------------------------------|-----------------------------|---------------------|
| Pending Certification by RSPO | Mill closed down/Mothballed | NA - NOT APPLICABLE |
|-------------------------------|-----------------------------|---------------------|

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/Tanah Putih, Pujud, Rokan Hilir, Riau | 16/01/12 | 15/01/22 | MUTU-RSPO/011, SGS-RSPO/PC17-00005, SGS-RSPO/PC17-00005 | |
| 2 | PT SAJANG HEULANG | ANGSANA MINI | Sebamban, Indonesia | NA | NA | MUTU-RSPO/006b | Mill closed down |

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|----|------------------------------|----------------|--|----------|----------|----------------|---|
| 3 | PT SAJANG HEULANG | MUSTIKA | Sebamban, Indonesia | 03/07/13 | 02/07/23 | MUTU-RSPO/027 | |
| 4 | PT LADANGRUMPUN SUBURUBADI | ANGSANA | Sebamban, Indonesia | 09/11/16 | 08/11/21 | MUTU-RSPO/006a | |
| 5 | PT LANGGENG MUARAMAKMUR | BEBUNGA | Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur | 16/03/12 | 03/08/22 | MUTU-RSPO/014 | Recertification of Bebunga POM is in progress. |
| 6 | PT KRIDATAMA LANCAR | SUKAMANDANG | Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah | 02/09/16 | 01/09/21 | MUTU-RSPO/003 | |
| 7 | PT BAHARI GEMBIRA RIA | LADANG PANJANG | Kumpeh Ulu, Jambi, Muaro Jambi, Jambi | 09/07/12 | 28/11/22 | MUTU-RSPO/019 | |
| 8 | PT TUNGGAL MITRA PLANTATIONS | MANGGALA | Riau, Indonesia | 25/11/10 | 24/11/20 | MUTU-RSPO/002 | |
| 9 | PT PARIPURNA SWAKARSA | PONDOK LABU | Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan | 16/03/12 | 19/07/22 | MUTU-RSPO/016 | Recertification of Pondok Labu POM is in progress. |
| 10 | PT BERSAMA SEJAHTERA SAKTI | GUNUNG ARU | Sebamban, Indonesia | 21/10/16 | 20/10/21 | MUTU-RSPO/005 | |
| 11 | PT GUTHRIE PECCONINA | RANTAU PANJANG | Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan | 16/03/12 | 19/11/22 | MUTU-RSPO/017 | Recertification of Rantau Panjang POM is in progress. |
| 12 | PT LAGUNA | RANTAU | Sungai Durian, Kotabaru, | 30/12/11 | 05/05/22 | MUTU-RSPO/009 | |
| 13 | MANDIRI | BETUNG | Kalimantan Selatan | 01/04/14 | 31/03/24 | MUTU-RSPO/035 | |
| 14 | PT INDOTRUBA TENGAH | SEKUNYIR | Kalimantan Tengah, Indonesia | 23/11/10 | 22/11/20 | MUTU-RSPO/001 | |
| 15 | PT SWADAYA ANDIKA | SELABAK | Sungai Durian, Kotabaru, Kalimantan Selatan | NA | NA | MUTU-RSPO/015 | Mill is mothballed. |
| 16 | PT BINA SAINS CEMERLANG | SG PINANG | Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan | 11/09/12 | 28/11/22 | MUTU-RSPO/020 | |
| 17 | PT TEGUH SEMPURNA | PEMANTANG | Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah | 09/09/16 | 8-Sep-21 | MUTU-RSPO/004 | |

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|----------|---|-----------------------|--|----------------------|----------------------|--------------------------------|--|
| 18 19 | PT BHUMIREKSA NUSA SEJATI | TELUK BAKAU MANDAH | Pelangiran, Sg. Guntung, Indragiri Ilir, Riau | 01/12/16 01/04/14 | 30/11/21 31/03/24 | MUTU-RSPO/008 MUTU-RSPO/036 | |
| 20 | PT ANEKA INTIPERSADA | TELUK SIAK | Tualang, Perawang, Siak, Riau | 06/12/16 | 07/12/21 | MUTU-RSPO/007 | |
| 21 | PT TAMACO GRAHA KRIDA | UNGKAYA | Witaponda, Kolonodale, Morowali, Sulawesi Tengah | 10/07/12 | 28/12/22 | MUTU-RSPO/018 | |
| 22 | PT SIME INDO AGRO | BK AJONG | Kalimantan Barat, Indonesia | 18/07/16 | 17/07/21 | MUTU-RSPO/088 | |
| 23 | PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI | BLANG SIMPO | Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam | 03/05/13 | 02/05/23 | MUTU-RSPO/026 | |
| 24 | PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI | LEMBIRU | Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat | 03/07/14 | 02/07/24 | MUTU-RSPO/044 | |
| 25 | PT MITRAL AUSTRAL SEJAHTERA | MAS Mill | Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat | NA | NA | NA | PT Mitral Austral Sejahtera: The properties was sold and currently SDP have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT Mas was sent to RSPO Secretariat on 27/06/2019. Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019.Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP. |

Legends

| | | |
|-------------------------------------|--------------------------------|------------------------|
| Pending Certification by RSPO | Mill closed down/Mothballed | NA - NOT APPLICABLE |
|-------------------------------------|--------------------------------|------------------------|

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2019 for East POM 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 East POM and supply base are as following:

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | 1.36 |
| PKO | 0 |

| Extraction | % |
|------------|-------|
| OER | 21.96 |
| KER | 4.93 |

| Production | t/yr |
|--------------|------------|
| FFB Process | 136,596.53 |
| CPO Produced | 29996.3 |
| PKO Produced | 6727.6 |

| Land Use | Ha |
|-----------------------------|-----------------|
| OP Planted Area | 14224.84 |
| OP Planted on peat | 0 |
| Conservation (forested) | 0 |
| Conservation (non-forested) | 0 |
| Total | 14224.84 |

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 | 87,689.88 | 0.65 | 0.00 | 0.00 | 0.00 | 0.00 | 87,689.88 | 0.64 |
| CO ₂ Emission from fertilizer | 10,029.78 | 0.07 | 82.16 | 0.10 | 0.00 | 0.00 | 10,111.94 | 0.07 |
| NO ₂ Emission | 7,259.18 | 0.00 | 64.69 | 0.08 | 0.00 | 0.00 | 7,323.87 | 0.05 |
| Fuel Consumption | 600.06 | 0.00 | 5.72 | 0.01 | 0.00 | 0.00 | 605.78 | 0.00 |
| Peat Oxidation | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Sink | | | | | | | | |
| Crop Sequestration | -83,110.14 | -0.61 | -750.14 | -0.92 | 0.00 | 0.00 | -83,860.28 | -0.16 |
| Conservation Sequestration | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Total | 22,468.76 | 0.17 | -597.57 | -0.74 | 0.00 | 0.00 | 21,871.19 | 0.16 |

Summary of Mill Emission and Credit

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| | tCO ₂ e | tCO ₂ e/tFFB |
|------------------------------|--------------------|-------------------------|
| Emission | | |
| POME | 26,775.23 | 0.20 |
| Fuel Consumption | 30.25 | 0.00 |
| Grid Electricity Utilization | 1,374.03 | 0.01 |
| Credit | | |
| Export of Grid Electricity | 0.00 | 0.00 |
| Sales of PKS | 0.00 | 0.00 |
| Sales of EFB | 0.00 | 0.00 |
| Total | 28,179.51 | 0.21 |

Summary of Kernel Crusher Emission and Credit (if applicable)

| Emissions | tCO ₂ e |
|--------------------------------|--------------------|
| PK from own mill | 0 |
| PK from other source | 0 |
| Fuel Consumptions | 0 |
| Total Crusher emissions | 0 |

*This mill has no kernel crusher operation.

| Palm Oil Mill Effluent (POME) Treatment: | |
|---|-----|
| Divert to Compost (%) | 0 |
| 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 (Jan 2019-Jan 2020) | | | | |
|--|---------------------|---|---|-----------------------------|
| No. | Month - Year | Volume of FFB from certified supply bases (mt) | Volume of FFB from uncertified supply bases (mt) | Total FFB/Month (mt) |
| | January 2019 | 11,437.37 | - | 11,437.37 |
| | February 2019 | 10,455.53 | - | 10,455.53 |
| | March 2019 | 12,279.81 | - | 12,279.81 |
| | April 2019 | 11,348.93 | - | 11,348.93 |
| | May 2019 | 13,381.25 | - | 13,381.25 |
| | June 2019 | 10,903.83 | - | 10,903.83 |
| | July 2019 | 12,747.44 | - | 12,747.44 |
| | August 2019 | 14,563.73 | - | 14,563.73 |
| | September 2019 | 10,088.81 | - | 10,088.81 |
| | October 2019 | 11,257.81 | - | 11,257.81 |
| | November 2019 | 9,846.72 | - | 9,846.72 |
| | December 2019 | 8,077.33 | - | 8,077.33 |
| | January 2020 | 12,935.93 | - | 12,935.93 |
| | TOTAL | 149,324.49 | | 149,324.49 |

| B. Monthly Records of Certified CPO & PK since the last audit (Jan 2019-Jan 2020) | | | |
|--|---------------------|---------------------------|--------------------------|
| No. | Month - Year | Certified CPO (mt) | Certified PK (mt) |
| | January 2019 | 3,165.49 | 627.49 |
| | February 2019 | 2,317.50 | 534.72 |
| | March 2019 | 2,755.59 | 661.45 |
| | April 2019 | 2,446.61 | 568.21 |
| | May 2019 | 2,940.39 | 656.20 |
| | June 2019 | 2,322.29 | 492.39 |
| | July 2019 | 2,768.53 | 636.28 |
| | August 2019 | 3,355.06 | 785.63 |
| | September 2019 | 2,154.90 | 502.53 |
| | October 2019 | 2,532.32 | 490.75 |
| | November 2019 | 2,209.29 | 471.26 |
| | December 2019 | 1,707.31 | 380.27 |
| | January 2020 | 2,681.74 | 558.04 |

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| | | | |
|--|--------------|------------------|-----------------|
| | TOTAL | 33,357.02 | 7,365.22 |
|--|--------------|------------------|-----------------|

C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) (Jan 2019-Jan 2020)

| No. | Month- Year | Buyers Name | Palmtrace Trading License Number | Certified CPO Sold (mt) | Certified PK Sold (mt) |
|-----|-------------|---------------------------------|--|-------------------------|------------------------|
| 1 | Jan 2019 | Sime Darby Oils Langat Refinery | TR-c25aad17-7e6e TR-0af1d4e5-1d12 TR-4fcb5ce0-a3e0 TR-91280d63-b291 TR-8f6559a3-4530 TR-0d3a9c07-aaf2 TR-f9504750-c55b TR-85bc17c5-6c28 TR-49341d4c-6ede TR-c0d4191b-5a54 TR-bd376f9c-7d4c TR-fa190a66-d5ae TR-d46649ab-4bc5 TR-f1aab2cd-2014 TR-8846491d-bceb TR-2f277b5b-dc08 TR-c550a882-b3c9 TR-0e9bade3-6c70 TR-ca777382-f4f7 TR-1012a43a-633d TR-c15fd0e2-c7f0 TR-11496667-c7b2 TR-c529d85d-3c33 TR-1c43c11c-bdcf TR-ad351de0-1fe4 TR-fef20d14-1b2f TR-5ef8c7f7-66cc TR-76350395-e112 TR-dc44b184-97e1 TR-a9f956c5-8356 TR-3f83ebb3-515f TR-f92ff730-d80d TR-e3cf2fd2-bdce TR-0439bfb4-0d68 TR-43e4a1bf-b52c TR-6642c519-8f6f TR-1673f617-409f TR-8530c243-c7d8 TR-2fa340c0-e8b8 TR-ed7b9b6c-afc0 TR-eda44c42-ac47 TR-24d6cf6e-202e TR-b5df4af2-2a46 TR-e752b756-bfd0 TR-28b830d1-d1a2 TR-6abc9e27-0cd0 TR-019e675b-7b63 TR-a9b27bb9-95f4 | 2,329.10 | |

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| | | | | | |
|---|----------|-------------------------------------|--|----------|-----|
| | | | TR-ee57d8ef-feaf TR-760b4996-85f9 TR-b08d06c0-48b9 TR-78993faa-fbf5 TR-403c8d43-4ec8 TR-34ae4773-f107 TR-ed5be630-9577 TR-c9687904-42cc TR-89c818f0-8fc8 TR-fb765b04-58b9 TR-cb75dee1-09ff TR-9a6fed7a-09d9 TR-2c0aa201-64b1 TR-01e1db46-882d TR-9c65bd49-7d9c TR-0260e0c5-c8c4 TR-eacb14ed-760b TR-824bc8ab-302a TR-7007a6b3-9186 TR-6eb25066-606d TR-fb29dd89-1f69 TR-c3c9ff16-8b41 TR-acf2336e-00c6 TR-409d0ff6-9ac1 TR-fbfb7f72-0cac | | |
| 2 | Feb 2019 | Sime Darby Oils Langat Refinery | TR-31c5a48b-6a17 TR-15df8969-2580 TR-16ab5b58-b554 TR-ceac2110-13d0 TR-c9014aae-7a3f TR-6fa0f843-db79 | 1,79.52 | |
| 3 | | Sime Darby Oils Carey Island KCP | TR-a0a77475-2d4c | | 400 |
| 4 | Mar 2019 | NIL | | | |
| 5 | Apr 2019 | Sime Darby Oils Langat Refinery | TR-8bfcd2e-3117 TR-ef5c74f1-fbfa TR-3b23dade-40ad TR-9dbfac26-d167 TR-d2872479-c4e8 TR-93f0adbc-f260 | 405 | |
| | | Sime Darby Oils Port Klang Refinery | TR-3b23dade-40ad TR-9dbfac26-d167 TR-d2872479-c4e8 TR-93f0adbc-f260 | 545.46 | |
| 6 | May 2019 | Sime Darby Oils Langat Refinery | TR-2ed72d31-71de TR-baba7b78-e849 TR-5807a176-0304 TR-ce6e4cb3-44ba TR-1aa3bc59-3b91 TR-d06b0def-bd51 TR-53e8a3fe-c866 TR-d03fec1f-7df0 TR-168945e3-fec6 TR-7dfcec7b-b7bd TR-c683ebba-b160 | 1,754.12 | |

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| | | | | | |
|----|-----------|-------------------------------------|--|----------|-----|
| | | Sime Darby Oils Port Klang Refinery | TR-2ed72d31-71de TR-baba7b78-e849 TR-5807a176-0304 TR-ce6e4cb3-44ba TR-1aa3bc59-3b91 | 814.97 | |
| 7 | | Sime Darby Oils Carey Island KCP | TR-45ec5e21-41eb | | 500 |
| 8 | June 2019 | Sime Darby Oils Langat Refinery | TR-ccec0e2d-f626 TR-5ead0393-76bd TR-9023eb1a-a050 TR-f4b795af-d076 TR-c804c467-49eb TR-48b44934-ae94 TR-9fc1574d-e008 TR-697115f4-f6b8 | 1,206 | |
| | | Sime Darby Oils Port Klang Refinery | TR-48b44934-ae94 TR-9fc1574d-e008 TR-697115f4-f6b8 | 746.21 | |
| 9 | Jul 2019 | Sime Darby Oils Port Klang Refinery | TR-e7f73175-f177 | 55.76 | |
| 10 | Aug 2019 | Sime Darby Oils Port Klang Refinery | TR-66813341-a0a8 | 96.49 | |
| 11 | | Sime Darby Oils Carey Island KCP | TR-7f20ec52-d44d | | 400 |
| 12 | Sep 2019 | Sime Darby Oils Langat Refinery | TR-9c5a7cf4-5a89 TR-b3d3ed1f-53d2 TR-2c9b0023-1f26 TR-51d0fe65-89b0 TR-147f0728-a183 TR-26940f3e-5ff5 TR-9de6b79c-4a1e TR-b12becb9-2711 TR-04c1d128-0465 TR-1f237f01-508f TR-3500a127-f727 TR-b87f26e1-616b TR-2dd989d7-e6eb TR-a3d375b0-504f TR-9923e0be-d6fe TR-1ca5fee0-69b8 TR-9fac4663-8b3c TR-f8d42168-3d23 TR-ed160a02-a1e7 TR-d01727d8-b49d TR-c13f9e46-5339 TR-8ef122e2-9588 TR-a311a153-9008 TR-6f09b717-465b TR-f6807d29-e9fc TR-e780709e-f0bf TR-4a25a7f6-ec35 TR-d099912d-8e89 TR-8c80a86a-99c9 TR-1e3f3a7c-a56c TR-27ab8ad3-18d9 | 1,827.62 | |

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| | | | | | |
|--------------|----------|----------------------------------|--|------------------|-----------------|
| | | | TR-73c7d77f-0d50 TR-f2bcea74-2c65 TR-6798a5aa-bff6 TR-ace3e9b3-c4fc TR-7f94e937-fab1 TR-3fbb7a75-ea3e TR-f18817f4-95e5 TR-5528cca3-380e TR-818fc3b0-b473 TR-a1d06bc8-de17 TR-b79d945a-f801 TR-6b27f845-ffa5 TR-d1ffa728-ab38 TR-6383004d-ba96 TR-70de1872-fdd9 TR-6910c411-bd66 TR-71bb7461-b20c TR-8a91771d-9381 TR-7d860dcb-d095 TR-a1c07d28-5254 TR-c3f24a69-88a2 TR-c97d1acf-3324 TR-5bf4f370-261b TR-74e7911a-1195 | | |
| 13 | Sep 2019 | Sime Darby Oils Carey Island KCP | TR-98de067e-2ded | | 750 |
| 14 | Oct 2019 | Sime Darby Oils Langat Refinery | TR-196c6d4a-4023 TR-85f42390-b869 TR-af2dde68-fa91 TR-e773ec2b-190e TR-2478abcd-f388 TR-d35cc76c-7c71 TR-3b75a582-4e1a | 2,683.13 | |
| 15 | Nov 2019 | Sime Darby Oils Langat Refinery | TR-79291e12-a83f TR-c7919b17-60bf TR-ec1fbf86-6b10 TR-fc556b01-deb1 TR-a5bca41f-778c | 1,865.91 | |
| 16 | | Sime Darby Oils Carey Island KCP | TR-c9055ee2-8b5c | | 550 |
| 17 | Dec 2019 | Sime Darby Oils Langat Refinery | TR-b25f570f-32aa | 245.16 | |
| TOTAL | | | | 14,754.45 | 2,600.00 |

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any) (Jan 2019- Jan 2020)

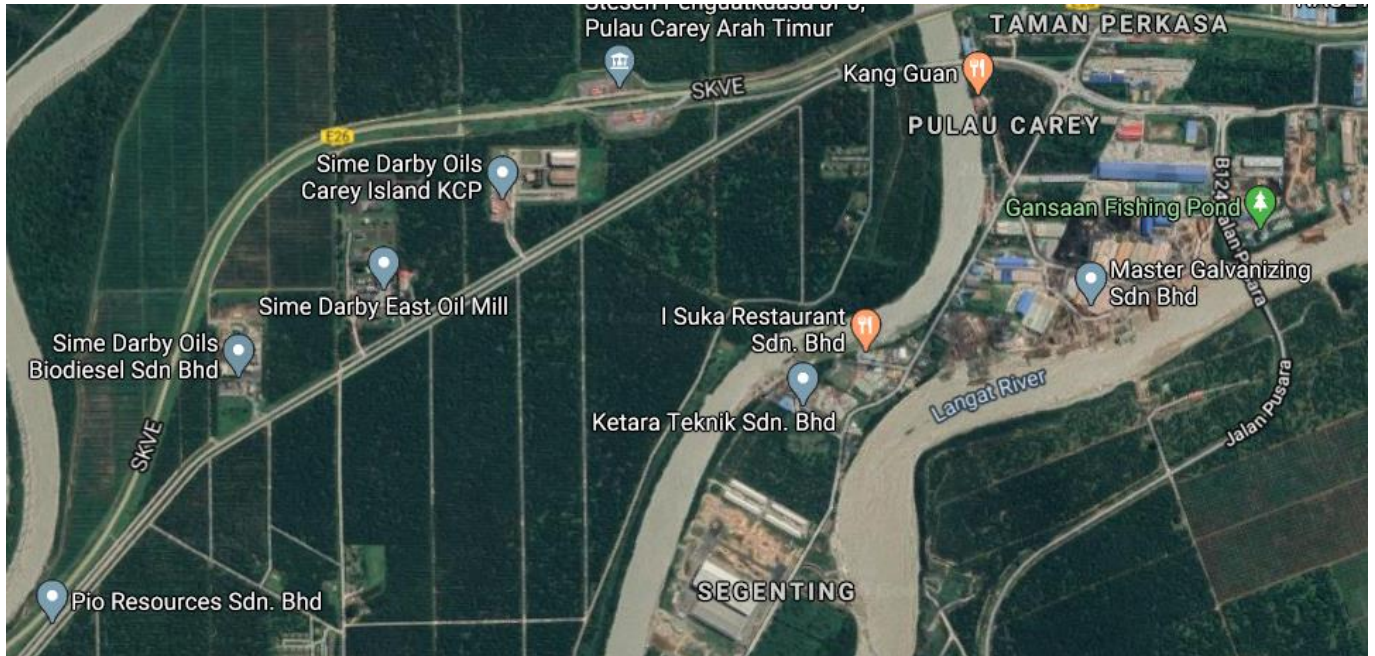
| No. | Month- Year | Buyers Name | Scheme Name | CPO Sold (mt) | PK Sold (mt) |
|-----|-------------|-------------|-------------|---------------|--------------|
| | | NIL | | | |
| | | | | | |

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| E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any) (Jan 2019-Jan 2020) | | | | |
|--|---------------------|-------------------------------------|----------------------|---------------------|
| No. | Month- Year | Buyers Name | CPO Sold (mt) | PK Sold (mt) |
| 1 | Jan 2019 – Jan 2020 | Sime Darby Oils Langat Refinery | 15,262.97 | |
| 2 | Jan 2019 – Jan 2020 | Sime Darby Oils Port Klang Refinery | 1,195.87 | |
| 3 | Jan 2019 – Jan 2020 | Sime Darby Oils Biodiesel Sdn Bhd | 1,742.3 | |
| 4 | Jan 2019 – Jan 2020 | Sime Darby Oils Carey Island KCP | | 4,706.97 |
| | TOTAL | | 18,201.14 | 4,706.97 |

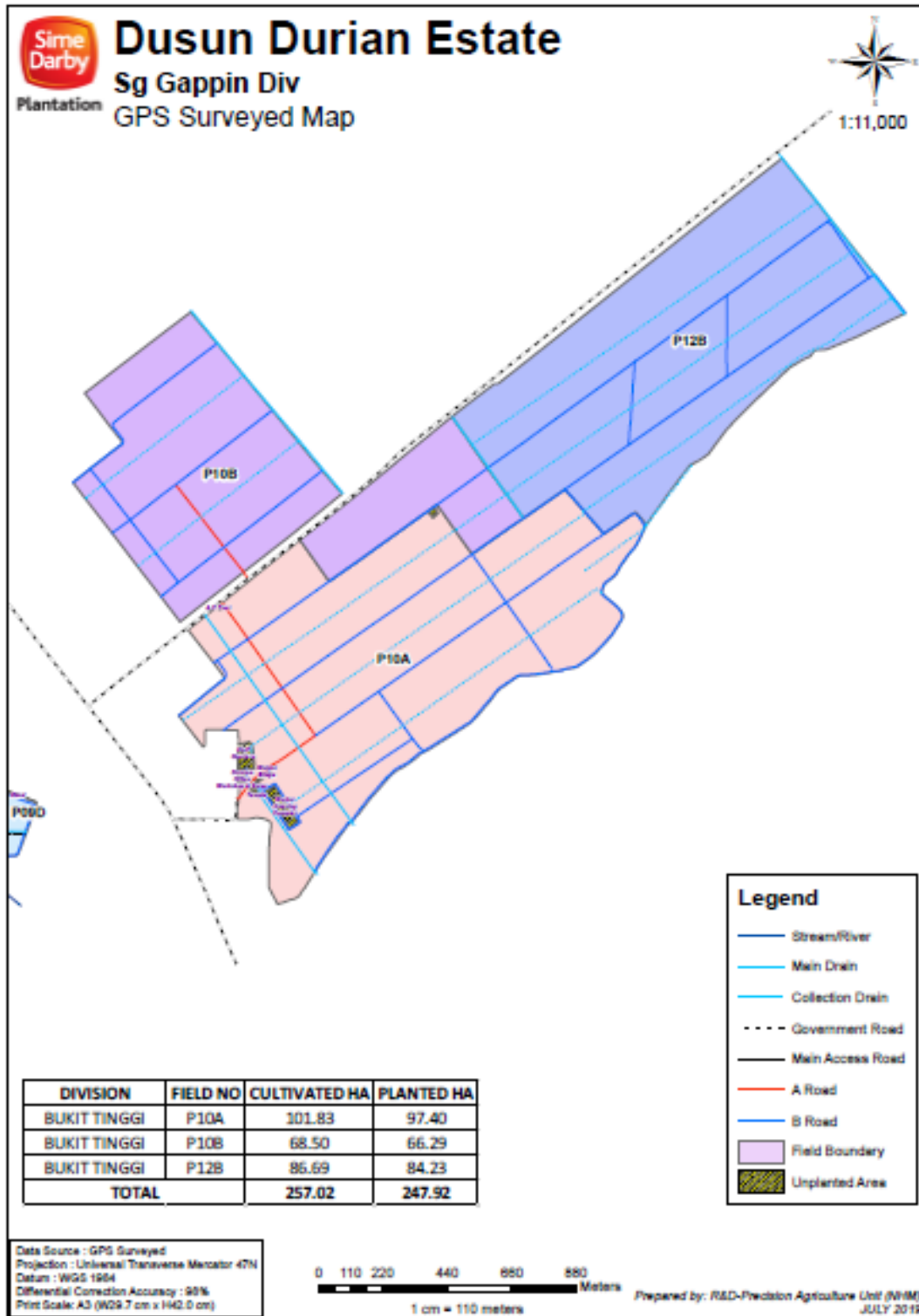
| F. Records of Certified CPO & PK Sold under RSPO Credits to Buyers since the last audit (if any) (Jan 2019-Jan 2020) | | | | |
|---|--------------------|--------------------|---|--|
| No. | Month- Year | Buyers Name | PalmTrace Trading License Number | RSPO Credits of Certified CPO or PK Sold (mt) |
| | | NIL | | |
| | | | | |
| | | | | |
| | | | | |

Appendix E: Location Map of Certification Unit and Supply bases

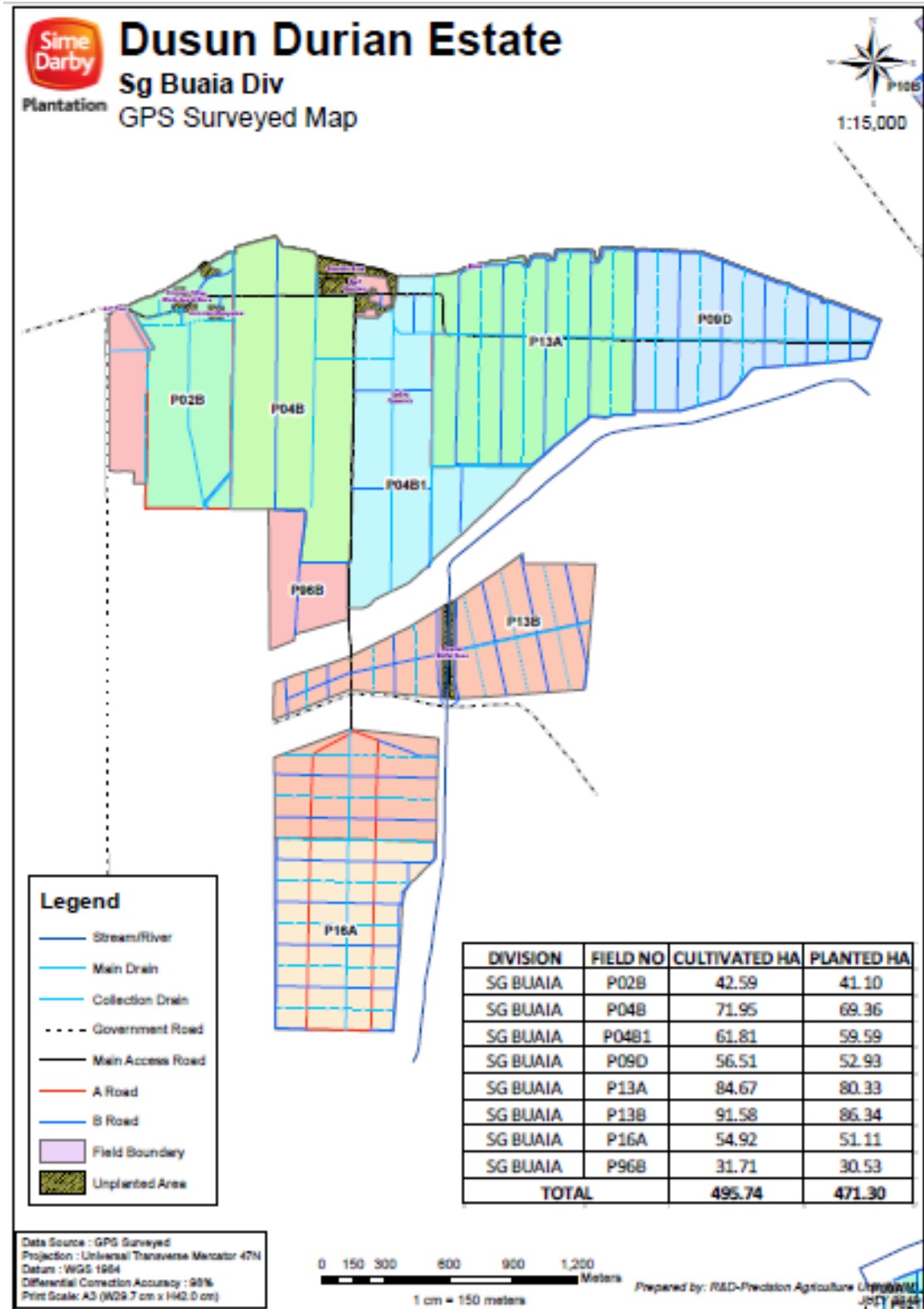


East Oil Mill

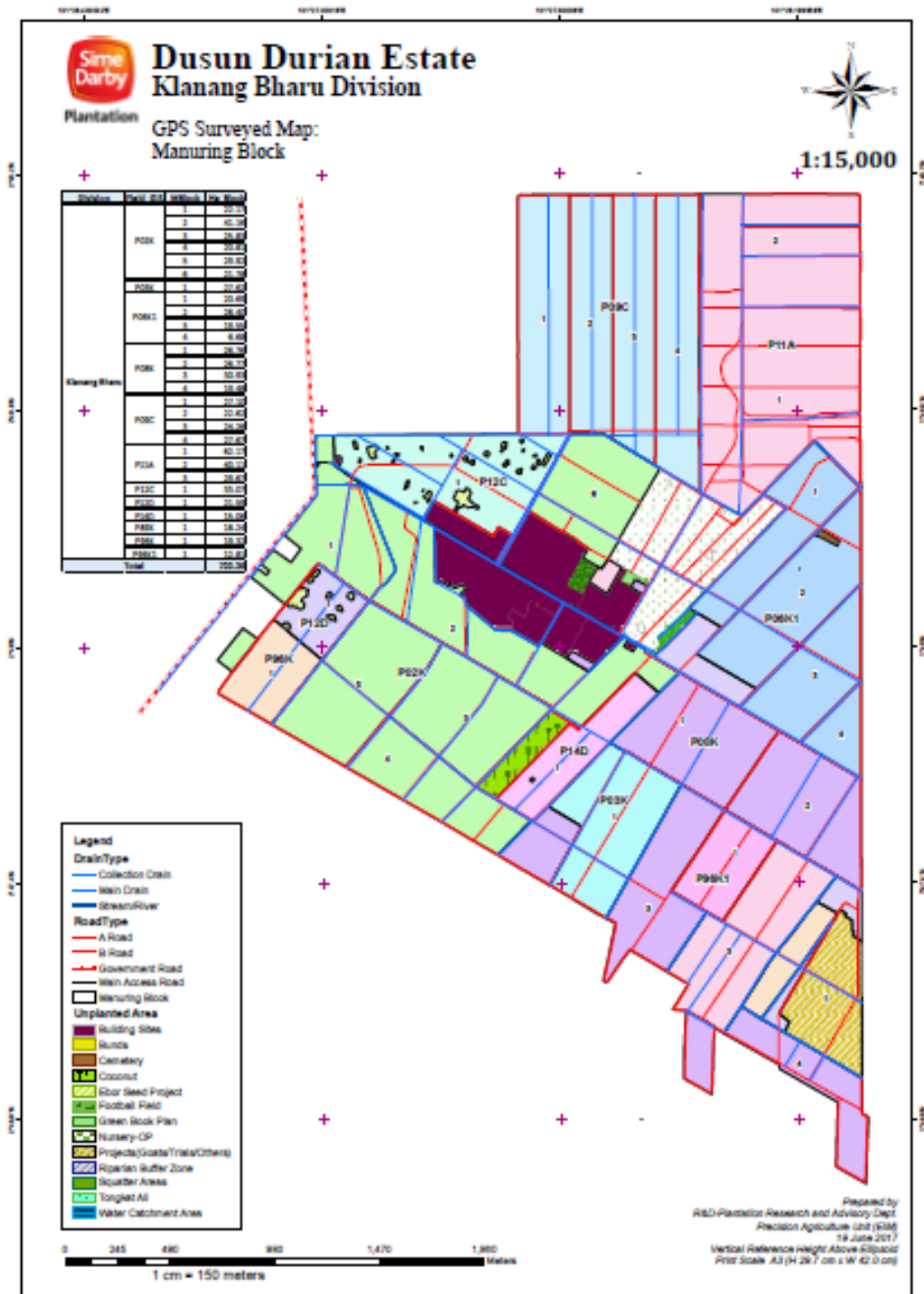
Appendix F: Estate Field Map

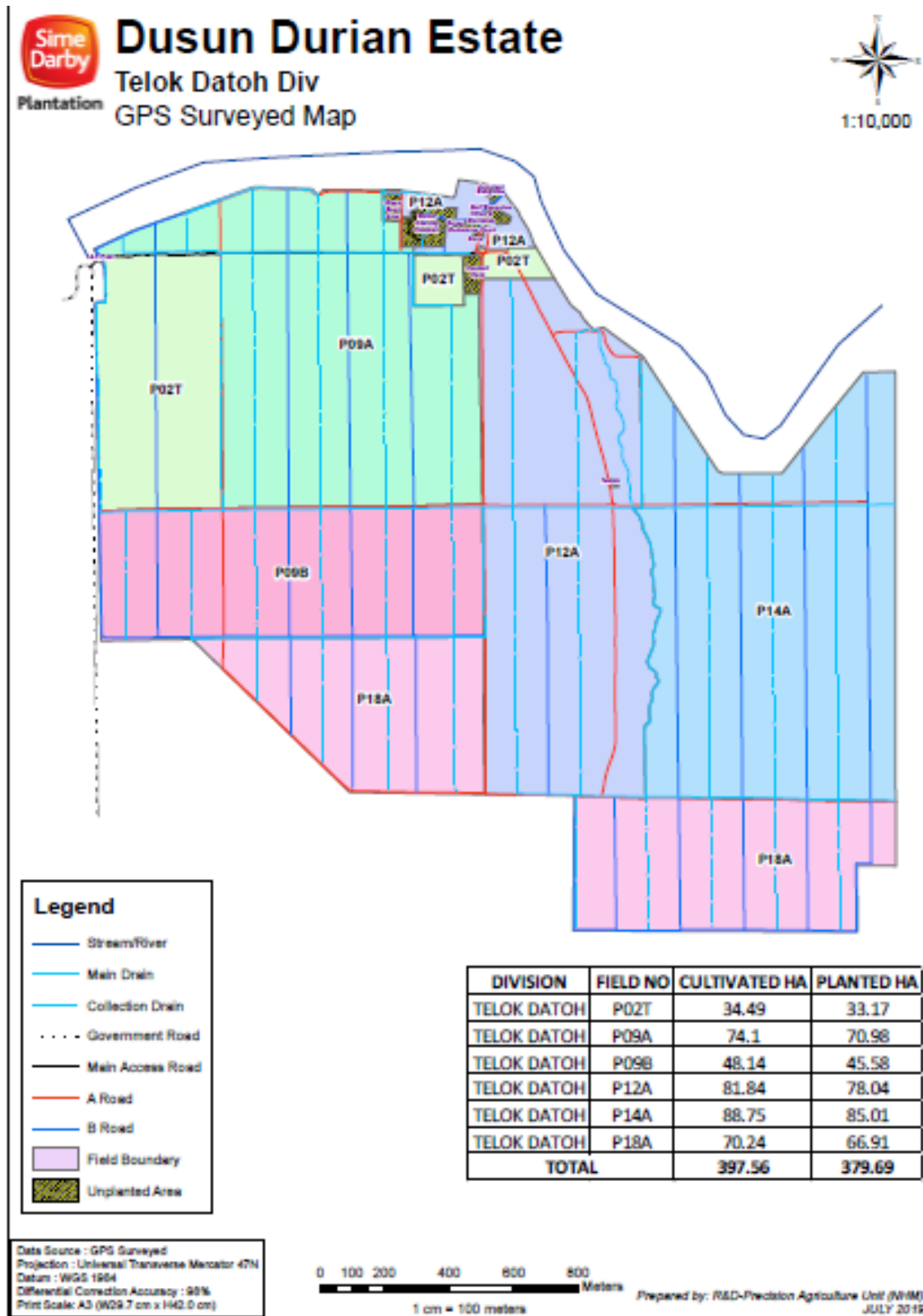


Dusun Durian Estate (Sg Gappin Division)

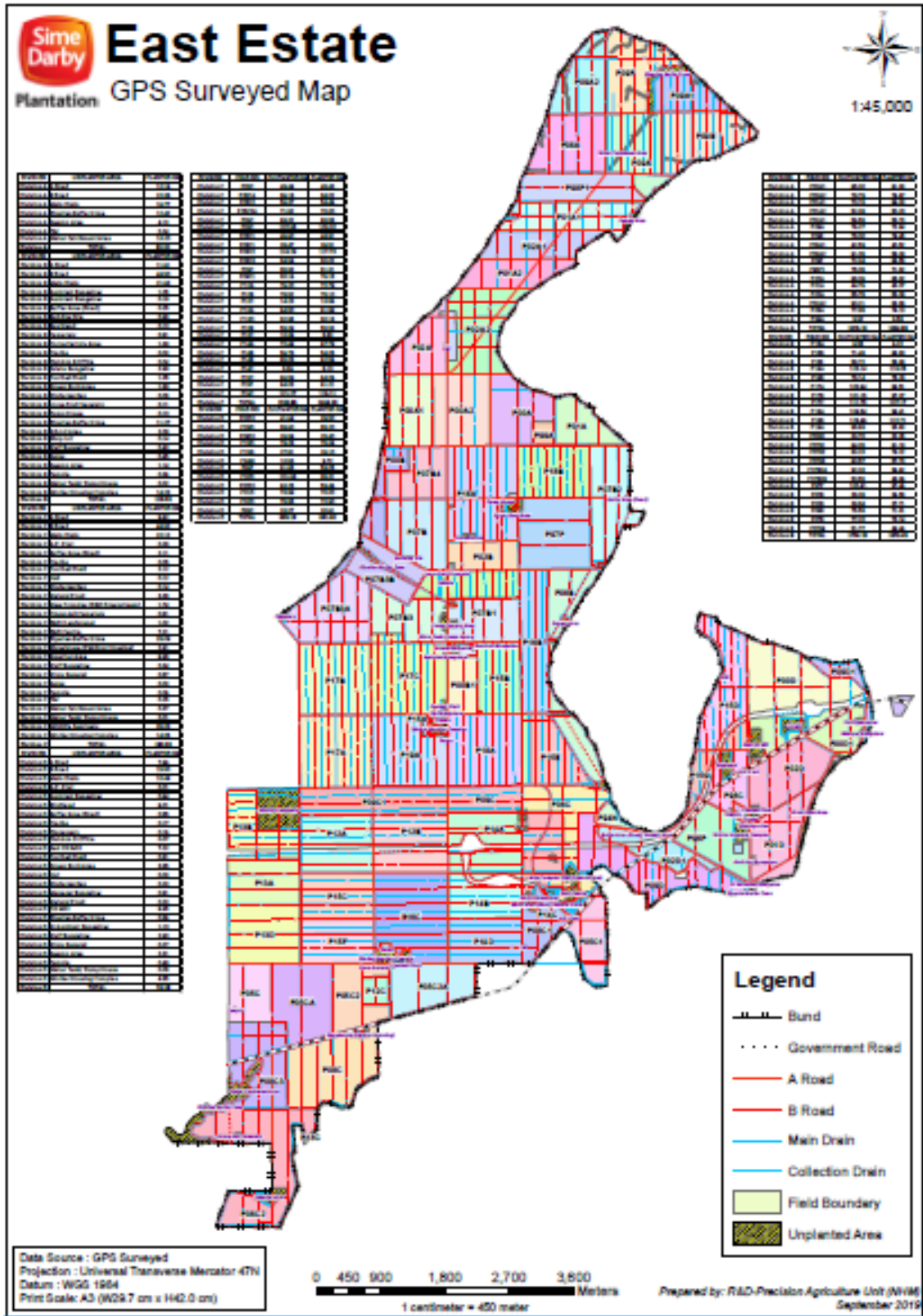


Dusun Durian Estate (Sg Buaia Division)

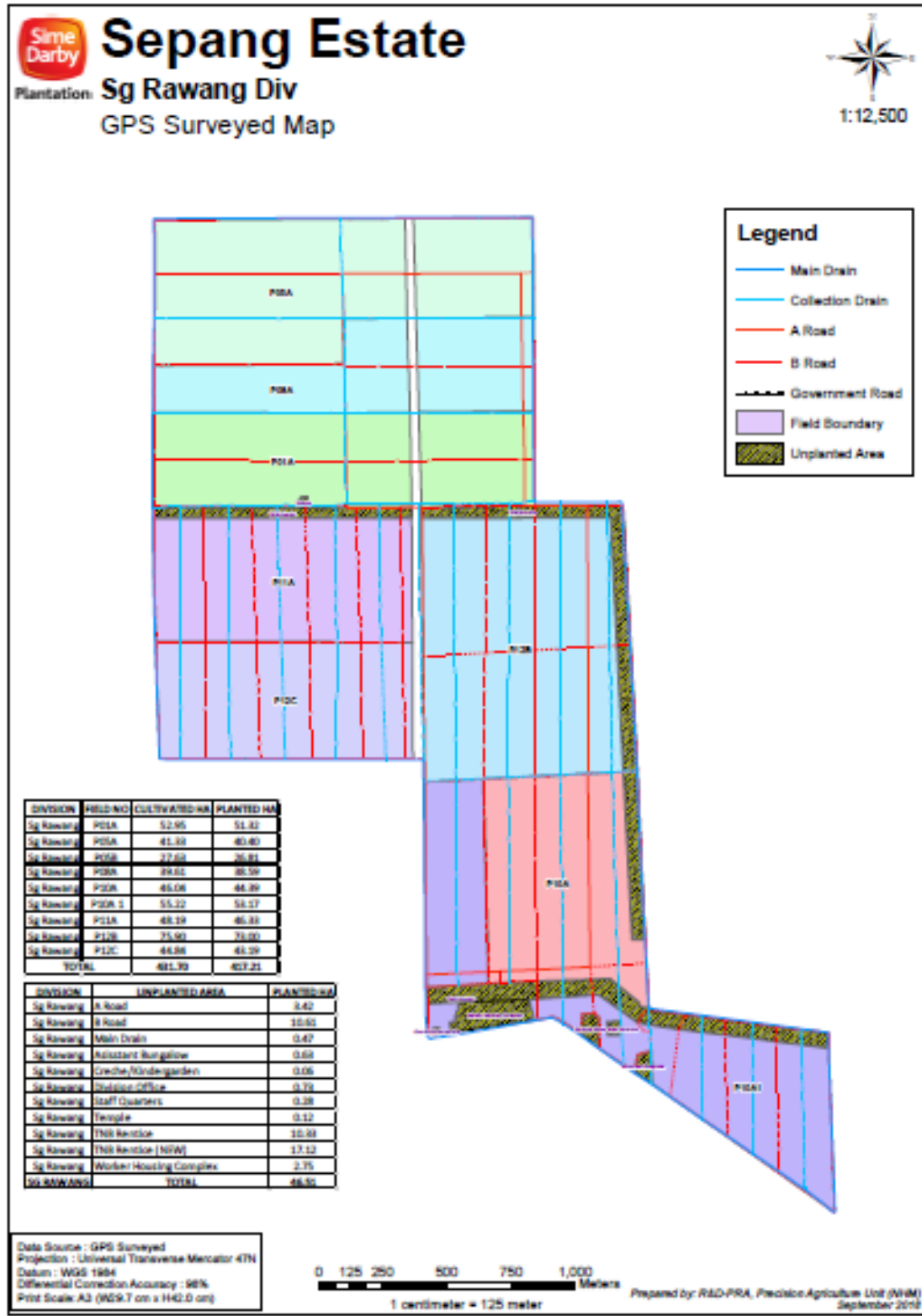




Dusun Durian Estate (Telok Datoh Division)



East Estate



Sepang Estate (Sg Rawang Division)

Appendix G: List of Smallholder Sampled

Not applicable as no smallholders under East POM & Supply Bases.

Appendix H: 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 |