

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (ASA1\_4)
- Recertification Assessment
- Extension of Scope

<b>Sime Darby Plantation Berhad</b>
Client company Address: Level 3A, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7 47301 Ara Damansara Selangor, Malaysia
Certification Unit: <b>Strategic Operating Unit (SOU 3)</b> <b>Elphil Palm Oil Mill</b>
Location of Certification Unit: Batu 6, Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput Perak, Malaysia

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>Parent Company</b>	Sime Darby Plantation Berhad		
<b>RSPO Membership Number</b>	1-0008-04-000-00	<b>Membership Approval Date</b>	07/09/2004
<b>Address</b>	Head Office: Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Strategic Operating Unit (SOU 3) – Elphil Palm Oil Mill		
<b>Location / Address</b>	Batu 6, Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput, Perak, Malaysia		
<b>Website</b>	www.simedarbyplantation.com		
<b>Management Representative</b>	Mdm. Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mr. Jayaganesh Dharmeseelan (SOU Chairman)	<b>E-mail</b>	Kks.elphil@simedarbyplantation.com
<b>Telephone</b>	03-78487379 (Head Office) 05-5940178 (Mill)	<b>Facsimile</b>	03-78487356 (Head Office) 05-5940167 (Mill)

2. Certification Information			
<b>Certificate Number</b>	RSPO 550180	<b>Date of First Certification</b>	18/06/2011
		<b>Certificate Start Date</b>	18/06/2016
		<b>Certificate Expiry Date</b>	17/06/2021
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production		
<b>Visit Objectives</b>	is to evaluate SOU 3 Elphil Palm Oil Mill and its supply bases implementation of the RSPO requirements [RSPO P&C NI MY-NIWG 2019; RSPO Principle & Criteria Certification System June 2017; RSPO Supply Chain Certification Standard June 2017 General COC & relevant module for CPO Mills; RSPO Supply Chain Certification System June 2017.		
<b>Applicable Standards</b>	<input checked="" type="checkbox"/> RSPO P&C 2018 with supply chain Module <input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 with supply chain Module <input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 705883	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services (M) Sdn. Bhd.	24/03/2023

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MSPO 705885	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3		
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4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Elphil Palm Oil Mill	Elphil Palm Oil Mill, Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput, Perak, Malaysia	101° 5' 37" E	4° 53' 24" N
Elphil Estate	Elphil Estate, Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput, Perak	101° 5' 37" E	4° 53' 24" N
Kamuning Estate	Ladang Kamuning/Changkat Salak, Jalan Lintang 31100 Sungai Siput, Perak	101° 3' 35" E	4° 50' 41" N
Kinta Kellas Estate	Kinta Kellas Estate 31100 Sungai Siput, Perak	101° 4' 59" E	4° 28' 00" N

(Note for Auditors: Deg °; Minutes'; Seconds". The format must be two decimal points) (Eg. 3° 51' 14.01" N)

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Kamuning Estate	2,638.19	84.59	2,121.20	4,843.98	54.46
Elphil Estate	1,661.98	26.42	208.50	1,896.90	87.62
Kinta Kellas Estate	962.76	3.69	95.48	1,061.93	90.66
Total	5,262.93	114.70	2,425.18	7,802.81	

**Note:**  
Kamuning Estate

- OP Mature ; 2112.19ha + OP Immature ; 526 ha : Total 2638.19 ha.
- 2121.20 ha is inclusive 810 ha (Rubber Area) + 1311.20 ha for Other areas (Instructures: 151.79 Ha, Plantable reserve land : 0.50 Ha, Unplantable reserve land : 238.77 ha , TOL ; -42.28, nursery 6.87 ha, Field transfer area ; 955.55 Ha).
- Current total area ; 4843.98 as per land title.

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Kamuning	526.00	618.00	1,182.19	312.00	-	2,112.19	526.00
Elphil Estate	371.07	353.39	421.35	497.07	19.10	1,290.91	371.07

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Kinta Kellas Estate	100.65	342.59	248.66	270.86		862.11	100.65
<b>Total (ha)</b>	997.72	1,313.98	1,852.2	1,079.93	19.10	4265.21	997.72
<b>Note:</b>							

<b>7. Certified Tonnage of FFB (Own Certified Scope)</b>				
Estate	Tonnage / year			
	Estimated (June 2019-May 2020)	Actual		Forecast (June 2020-May 2021)
		Previous license period (Feb 2019 – May 2019)	Current license period (Jun 2019 – Feb 2020)	
Elphil	31,400	12,765.46	17,875.44	35,000
Kamuning	45,600	13,609.51	21,640.40	45,000
Kinta Kellas	20,500	7,310.79	15,380.24	23,000
Total	97,500	33,685.76	54896.08	103,000
<b>Note:</b>				

<b>8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *</b>				
Estate	Tonnage / year			
	Estimated (June 2019-May 2020)	Actual (Feb 2019-Feb 2020)		Forecast (June 2020-May 2021)
		Previous license period (Feb 2019 – May 2019)	Current license period (Jun 2019 – Feb 2020)	
Kalumpong	N/A	300.43	-	N/A
Chersonese	N/A	248.76	-	N/A
Total	N/A	549.19		N/A
<b>Note:</b>				

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b>				
Independent FFB Supplier	Tonnage / year			
	Estimated (June 2019-May 2020)	Actual (Feb 2019-Feb 2020)		Forecast (June 2020-May 2021)
		Previous license period	Current license period	
<b>Note:</b>				

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		(Feb 2019 – Apr 2019)	(May 2019 – Feb 2020)	
Tang Tatt	N/A	24941.85	67355.872	N/A
Eng Huat		9963.47	28020.116	
Felcra Kg Jasa		44.03	317.713	
Felcra Sg Siput		0	58.63	
Total	N/A	34949.35	95752.331	N/A
<b>Total</b>				

**Note:**

<b>10. Certified Tonnage</b>				
Mill Capacity: 45 MT/hr  SCC Model: MB	Estimated (June 2019-May 2020)	Actual (Feb 2019-Feb 2020)		Forecast (June 2020-May 2021)
	FFB	FFB		FFB
	97,500	<i>Previous license period (Feb 2019 – May 2019)</i>	<i>Current license period (June 2019-Feb 2020)</i>	103,000.00
		34,234.95	54,896.08	
	CPO (OER: 21.54%)	CPO (OER: 20.43%)		CPO (OER: 20.49%)
	21,002	6,856.69	11,328.63	21,104.70
	PK (KER: 5.26%)	PK (KER: 5.62%)		PK (KER: 5.50%)
	5,128.50	1,955.46	3,051.50	5,665.00

**Note:**

<b>11. Actual Sold Volume (CPO) (Feb 2019-Feb 2020)</b>					
Current License period (June 2019-Feb 2020)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	6,950.54	0	0	3,579.46	10,530.00
Previous License period (Feb 2019-May 2019)					
CPO (MT)	2,856.21	0	0	2,296.05	5,152.26
<b>12. Actual Sold Volume (PK) (Feb 2019-Feb 2020)</b>					
Current License period (June 2019-Feb 2020)					

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	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	2,053.80	0	0	954.80	3,008.60
<b>Previous License period (Feb 2019-May 2019)</b>					
PK (MT)	843.98	0	0	800.00	1,643.98

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



## Section 2: Assessment Process

### Certification Body:

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

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

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site surveillance assessment was conducted from 9 – 14/3/2020. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

On site Major NC verification was not able to be conducted due to Movement Control Order in Malaysia. Major NC verification was conducted via documentation review, photos, video recordings and interview. All the corrective action and evidence of implementation were found to be adequate. The Major NC closed on 5/6/2020.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2018 (MYNI 2019) and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

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

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between

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the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

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

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

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (RC)</b>	<b>Year 2 (ASA 1_1)</b>	<b>Year 3 (ASA 1_2)</b>	<b>Year 4 (ASA 1_3)</b>	<b>Year 5 (ASA 1_4)</b>
Elphil Palm Oil Mill	X	X	X	X	X
Elphil Estate		X	X	X	X
Kamuning Estate	X	X	X	X	X
Kinta Kellas Estate	X		X	X	X

**Tentative Date of Next Visit:** March 8, 2021 - March 11, 2021

**Total No. of Mandays:** 12 mandays

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**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Muhammad Fadzli Masran	Trainee Lead Auditor	He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. Fluent in Bahasa Malaysia and English Language. During 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.
Mohamed Hidir Zainal Abidin	Team member	He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, environmental issues, HCV/HCS and worker consultation.
Elzy Ovktafia	Team member	She graduated from Universiti Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters and currently in the midst of completing the AISP level (professional certificate and recognition from the Incorporated Society of Planters). She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Audit for Social Compliance Programme (URSA, ETI) 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.

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**Accompanying Persons:**

Name	Role
NA	

**2.3 Assessment Plan**

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

**PRELIMINARY AGENDA (Revision 00)**

Date	Time	Subjects	MFM	MHZA	EOC
Monday 9/03/2020	PM	Audit Team Travelling	√	√	√
Tuesday 10/03/2020	08.30 – 9.00	Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize Audit plan</li> </ul>	√	√	√
Kamuning Estate	09.00 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	09.00 – 1.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		√	
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 16.30	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√
Wednesday 11/03/2020	08.30 – 12.30	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√	√
Elphil POM	09.00 – 13.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		√	
	12.30 – 13.30	Lunch	√	√	√

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	13.30 – 16.30	Lab, weighbridge and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation.  RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√
Thursday 12/03/2020  Elphil Estate	09.00 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	09.00 – 1.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		√	
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 16.30	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√
Friday 13/03/2020	08.30 – 12.45	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	09.00 – 1.30	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		√	
	12.45 – 14.15	Lunch and Jumaat Prayer	√	√	√
	14.15 – 16.30	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	16.30 – 17.00	Preparation of audit report	√	√	√
	17.00 – 17.30	Closing Meeting	√	√	√
Saturday 14/03/2020	PM	Audit Team Travelling	√	√	√

### Section 3: Assessment Findings

#### 3.1 Normative requirement applied for this assessment:

- Sime Darby Plantation Berhad Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- (Malaysia) National Interpretation (2019) for RSPO P&C 2018
- Independent Smallholder Standard 2019

#### 3.2 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	Yes. Please refer to appendix B for details on the mills and estates of Sime Darby Plantations Berhad Group.	Complied
Have all the estates and mills certified within five years after obtaining RSPO membership?	No, Target to receive certification for two management units [SDP Liberia and PT Mitra Austral Sejahtera (PT MAS)] shifted to end 2020:  - SDP Liberia operation has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was put on-hold due to security & safety issue. After due consideration on the current engagement with the House of Representative in Liberia, the time bound plan of RSPO Certification for SDP Liberia is set to 2019/2020 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process. The progress of the above is under management monitoring for readiness towards certification.  - SDP has also been addressing the legacy social issues at PT MAS and regularly updating the progress status to resolve this case to RSPO and other relevant stakeholders.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	Yes, two newly acquired management units under Markham Farming Company Limited are targeted for certification by end 2020.	Complied

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

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

**3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
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 Elphil Certification Unit.	NA

**3.4 Details of Nonconformities**

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

During this Assessment there were two (2) Major; one (1) Minor nonconformities and no Opportunity For Improvement raised. The SOU 3 Elphil Palm Oil Mill and its supply bases Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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



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Non-conformity			
<b>NCR Ref #</b>	1893075-202003-M1	<b>Clause &amp; Category (Major / Minor)</b>	6.2.3 Critical (Major)
<b>Date Issued</b>	13/3/2020	<b>Due Date</b>	10/6/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	5/6/2020
<b>Statement of Nonconformity:</b>	There is non-compliance with legal/labour law.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	<p>Found non-compliance with legal/labour law as below:</p> <p>Elphil POM's contractor worker (Maju Mech):</p> <p>1. The payment of salary is paid on 10th every month, not before or on 7th every month. This is not comply with Employment Act 1955, Section 19, Time of payment of wages 19. Every employer shall pay to each of his employees not later than the seventh day after the last day of any wage period the wages, less lawful deductions, earned by such employee during such wage period:</p> <p>Provided that if the Director General is satisfied that payment within such time is not reasonably practicable, he may, on the application of the employer, extend the time of payment by such number of days as he thinks fit.</p> <p>2. There is no evidence that Maju Mech or Mekar Hijau Jaya Enterprise has contribute SOCSO for Md Ali. This is not comply with Akta Keselamatan Sosial Pekerja 1969, Pekeliling Majikan Bil 3 Tahun 2018.</p>		
<b>Corrections:</b>	<p>Assistant Engineer will personally check thoroughly the contract workers documentation especially on their salary payment and SOCSO contribution.</p> <p>The contractor (Maju Mech Engineering Sdn Bhd) has been spoken that they should comply with EA 1955 where the payment of workers salary should paid before or on 7th every month and to comply with Akta Keselamatan Sosial Pekerja 1969 for SOCSO contribution.</p> <p>A copy of their documentation will be kept for reference and individual contract workers (mill and contractors) will be put on the list for monitoring and tracking on monthly basis.</p>		
<b>Root Cause Analysis:</b>	Monitoring on contract workers documentation not effective.		
<b>Corrective Actions:</b>	<p>Next payment of salary for the month of March 2020, the payment to the contract workers should be before or on 7th every month with evidence.</p> <p>The contract worker has been flown back to his country due to expired permit work and no longer allowed to continue working in the mill.</p> <p>The mill management to ensure contract workers hired should comply with EA 1955 and Akta Keselamatan Sosial Pekerja 1969 and documented.</p>		
<b>Assessment Conclusion:</b>	<u>Major NC verification:</u>		

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	<p>On site Major NC verification was not able to be conducted due to Movement Control Order in Malaysia. Major NC verification was conducted via documentation review, photos, video recordings and interview.</p> <p>Evidence verified:</p> <ul style="list-style-type: none"> <li>i. Maju Mech contract termination dated 13/3/2020 signed by the Mill Manager</li> <li>ii. New contract agreement between Elphil POM and Maju Mech Engineering (M) Sdn. Bhd. dated 1/5/2020 include clause             <ul style="list-style-type: none"> <li>a. No. 7. stated the salary payment must not be later than 7th.</li> <li>b. No. 9. stated all workers must be covered under SOCSO</li> </ul> </li> <li>iii. Payslip for the month of March 2020 for workers with Passport no. BP 06xx681 paid on 5/4/2020 including Socso deduction.</li> </ul> <p>The evidences verified found adequate. Thus, the Major NC was effectively closed on 5/6/2020. The effectiveness of the implementation will be verified during next assessment.</p>
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Non-conformity			
<b>NCR Ref #</b>	1893075-202003-M2	<b>Clause &amp; Category (Major / Minor)</b>	6.2.2 Critical (Major)
<b>Date Issued</b>	13/3/2020	<b>Due Date</b>	10/6/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	5/6/2020
<b>Statement of Nonconformity:</b>	The employment contract for contractor worker is not in accordance with the worker's work permit.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	In Elphil POM, found that contractor worker for Maju Mech namely Md Ali is a worker of Mekar Hijau Jaya Enterprise as per work permit, but having the employment contract with Maju Mech. Seen the agreement signed between Mekar Hijau Jaya Enterprise and Maju Mech on labour lent. This is not comply with Immigration Act 1959/63, Employing a person who is not in possession of a valid Pass 55B. (1) Any person who employs one or more persons, other than a citizen or a holder of an Entry Permit who is not in possession of a valid Pass shall be guilty of an offence and shall, on conviction, be liable to a fine of not less than ten thousand ringgit but not more than fifty thousand ringgit or to imprisonment for a term not exceeding twelve months or to both for each such employee.		
<b>Corrections:</b>	Assistant Engineer will personally check thoroughly the contract workers documentation especially on work permit and others. The mill management to ensure that contract workers agreement with any contractor should have employment contract with them not to other contractor A copy of their documentation will be kept for reference and individual contract		

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	workers (mill and contractors) will be put on the list for monitoring and tracking on monthly basis.
<b>Root Cause Analysis:</b>	Monitoring on contract workers documentation not effective.
<b>Corrective Actions:</b>	The contract worker (Md Ali) has been flown back to his country due to expired permit work and no longer allowed to continue working in the mill.
<b>Assessment Conclusion:</b>	<p><u>Major NC verification:</u> On site Major NC verification was not able to be conducted due to Movement Control Order in Malaysia. Major NC verification was conducted via documentation review, photos, video recordings and interview.</p> <p>Evidence verified:</p> <ul style="list-style-type: none"> <li>i. Maju Mech contract termination dated 13/3/2020 signed by the Mill Manager</li> <li>ii. New contract agreement between Elphil POM and Maju Mech Engineering (M) Sdn. Bhd. dated 1/5/2020 include clause:             <ul style="list-style-type: none"> <li>a. No 10. stated the workers must be direct employees of Maju Mech Engineering (M) Sdn. Bhd.</li> </ul> </li> <li>iii. A copy of Maju Mech Engineering (M) Sdn. Bhd. worker passport no BP09xx101 valid till 12/8/2022 and permit no 194xx5251M valid till 20/11/2020</li> <li>iv. Contract workers monitoring records with data such as:             <ul style="list-style-type: none"> <li>a. Name</li> <li>b. Employer</li> <li>c. Permit no. and expiry date</li> <li>d. Passport no. and expiry date</li> <li>e. SOCSO, EPF contribution</li> <li>f. Workers agreement</li> <li>g. Last date of salary payment</li> </ul> </li> </ul> <p>The evidences verified found adequate. Thus, the Major NC was effectively closed on 5/6/2020. The effectiveness of the implementation will be verified during next assessment</p>

Non-conformity			
<b>NCR Ref #</b>	1893075-202003-N1	<b>Clause &amp; Category (Major / Minor)</b>	7.3.1 (Minor)
<b>Date Issued</b>	13/3/2020	<b>Due Date</b>	Next Assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	-
<b>Statement of Nonconformity:</b>	Waste management plan was not effectively implemented.		
<b>Requirement Reference:</b>	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
<b>Objective Evidence:</b>	Sime Darby Industrial (SDI) is contracted to transport waste generated from maintenance activities such as used oil, used hydraulic, used battery and oil filter based on DOE's written approval, ref:AS(BB) 91/110/619/161 Jilid 14(69) dated 6th September 2011.		

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	At Kinta Kellas Estate, collection and disposal of waste generated from maintenance activity was done by appointed contractor, Kubota Malaysia Sdn Bhd which now no longer under full management control of Sime Darby Industrial (SDI). No evidence of written approval obtained from DOE for Kubota Malaysia Sdn Bhd's waste collection activity at the point of assessment.
<b>Corrections:</b>	Estate had identified the approved contractor as listed in the DOE website as SW disposal contractor. However, the Kubota Malaysia is still remain as contractor maintenance and not allowed to collect all the waste during maintenance activity.
<b>Root Cause Analysis:</b>	Kinta Kellas Estate assumed that, the approval is applicable to Kuboto Malaysia Sdn Bhd due to previously this entity fully owned by the SDI. The estate management is not notice the transaction of the ownership.
<b>Corrective Actions:</b>	The implementation of the SW management will be handle by the CepSwam person. All the data related in the SW management being manage by the appointed person.
<b>Assessment Conclusion:</b>	The effectiveness of the implementation will be verified during next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	NA

Positive Findings	
PF #	Description
PF 1	NA

**3.4.1 Status of Nonconformities Previously Identified and Observations**

Non-conformity			
<b>NCR Ref #</b>	1744213-201902-M1	<b>Clause &amp; Category (Major / Minor)</b>	2.1.1 (Major)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	07/05/2019
<b>Statement of Nonconformity:</b>	Evidence of compliance with the relevant legal requirements was insufficient.		
<b>Requirement Reference:</b>	Evidence of compliance with relevant legal requirements shall be available.		
<b>Objective Evidence:</b>	Elphil POM: The 1st stack sampling for new boiler chimney was not conducted for 2018.		

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	<p>Document reviewed on the OT Request/ Approval Form for July 2018 and January 2019 in the POM found that workers have worked exceeded 130 hours of overtime for that particular month. The management also admitted that the workers have worked more than the allowable limit due to workers' shortage.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Month</th> <th style="width: 40%;">Employee Number</th> <th style="width: 40%;">Total hours of overtime</th> </tr> </thead> <tbody> <tr> <td rowspan="2">July 2018</td> <td>13xx90</td> <td>177 hours</td> </tr> <tr> <td>14xx87</td> <td>181.5 hours</td> </tr> <tr> <td rowspan="2">Jan 2019</td> <td>12xx19</td> <td>222 hours</td> </tr> <tr> <td>13xx46</td> <td>144.5 hours</td> </tr> </tbody> </table>	Month	Employee Number	Total hours of overtime	July 2018	13xx90	177 hours	14xx87	181.5 hours	Jan 2019	12xx19	222 hours	13xx46	144.5 hours
Month	Employee Number	Total hours of overtime												
July 2018	13xx90	177 hours												
	14xx87	181.5 hours												
Jan 2019	12xx19	222 hours												
	13xx46	144.5 hours												
<b>Corrective Actions:</b>	<p>Stack sampling issue.</p> <p>1). Quotation already obtained for stack monitoring from Environmental Science Sdn.Bhd for boiler no.2 stack monitoring.</p> <p>2). Scheduled for boiler no.2 (Jan-March, July-Sept) Scheduled for boiler no.1 (April-Jun, Oct-Dec), provided the boiler running.</p> <p>OT issue</p> <p>1). Interview conducted to employ new workers by march 2019.</p> <p>2). Shuffle workers in six month period for them to learn new station and available to cover workers who may be on leave.</p> <p>The agreement between SDP and the contractor with new rate will be effective from Jan 2019</p>													
<b>Assessment Conclusion:</b>	<p><u>ASA 1 4 verification</u></p> <p>Based on the evidence sighted including plan established, the CAP confirmed to be effective and no recurrence of issue found. Hence, the major NC remained close.</p>													

Non-conformity			
<b>NCR Ref #</b>	1744213-201902-M2	<b>Clause &amp; Category (Major / Minor)</b>	6.5.2 (Major)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	07/05/2019
<b>Statement of Nonconformity:</b>	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.) were not implement effectively.		
<b>Requirement Reference:</b>	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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<b>Objective Evidence:</b>	<p>Elphil POM: The POM has also engaged contractor to supply skill workers to work in the workshop. Seen the employment contract signed between the contractor and the workers. However, the terms and conditions as below were not properly stated in the contract:</p> <ul style="list-style-type: none"> <li>a. Notice of Period</li> <li>b. Termination of service by the employee</li> <li>c. Clause 7: Overtime on Rest Day or Public Holiday: Salary x 2.0</li> </ul> <p>Elphil Estate: The employment contracts for the contractor’s workers sighted where Clause 4.1 stated daily rate of pay is RM 38.40 per day which is not accordance to Minimum Wage Order 2016.</p>
<b>Corrective Actions:</b>	<p>1).To contact Majumerch for an improved contract agreement with the mentioned details</p> <p>2).The contractor will payback of the short pay to the workers by March 2019.</p>
<b>Assessment Conclusion:</b>	<p><u>ASA 1 4 verification</u></p> <p>Based on the evidence sighted including plan established, the CAP confirmed to be effective and no recurrence of issue found. Hence, the major NC remained close.</p>

Opportunity for Improvement	
OFI#	Description
OFI 1	NA

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1306204M1 -5.2.2	Major	5.2.2	24/3/2016	Closed out on 7/6/2016
1306204M2 – 6.5.2	Major	6.5.2	24/3/2016	Closed out on 19/5/2016
1306204N1 – 4.3.2	Minor	4.3.2	24/3/2016	Closed out on 23/03/2017
1306204N2 – 4.4.1	Minor	4.4.1	24/3/2016	Closed out on 23/03/2017
1306204N3 – 4.7.5	Minor	4.7.5	24/3/2016	Closed out on 23/03/2017
1306204N4 – 6.6.2	Minor	6.6.2	24/3/2016	Closed out on 23/03/2017
1453612-201703-M1	Major	4.7.1	23/03/2017	Closed out on 09/05/2017
1453612-201703-M2	Major	4.7.2	23/03/2017	Closed out on 09/05/2017
1453612-201703-M3	Major	4.7.5	23/03/2017	Closed out on 09/05/2017
1453612-201703-M4	Major	4.4.2	23/03/2017	Closed out on 09/05/2017
1453612-201703-M5	Major	5.1.1	23/03/2017	Closed out on 09/05/2017
1453612-201703-M6	Major	5.3.2	23/03/2017	Closed out on 09/05/2017

1453612-201703-M7	Major	6.3.1	23/03/2017	Closed out on 09/05/2017
1453612-201703-M8	Major	6.5.2	23/03/2017	Closed out on 09/05/2017
1453612-201703-M9	Major	2.1.1	23/03/2017	Closed out on 09/05/2017
1453612-201703-N1	Minor	4.7.3	23/03/2017	Closed out on 13/03/2018
1453612-201703-N2	Minor	4.7.6	23/03/2017	Closed out on 13/03/2018
1453612-201703-N3	Minor	5.3.3	23/03/2017	Closed out on 13/03/2018
1453612-201703-N4	Minor	6.9.3	23/03/2017	Closed out on 13/03/2018
1453612-201703-N5	Minor	6.10.3	23/03/2017	Closed out on 13/03/2018
1606941-201802-M1	Major	SCCS E.5.1	15/03/2018	Closed out on 14/5/2018
1606941-201802-N1	Minor	6.8.3	15/03/2018	Closed out on 22/02/2019
1606941-201802-N2	Minor	5.1.2	15/03/2018	Closed out on 22/02/2019
1606941-201802-N3	Minor	5.6.1	15/03/2018	Closed out on 22/02/2019
1744213-201902-M1	Major	2.1.1	22/02/2019	Closed out on 07/05/2019
1744213-201902-M2	Major	6.5.2	22/02/2019	Closed out on 07/05/2019
1893075-202003-M1	Major	6.2.3	13/03/2020	Closed out on 05/06/2020
1893075-202003-M2	Major	6.2.2	13/03/2020	Closed out on 05/06/2020
1893075-202003-N1	Minor	7.3.1	13/03/2020	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 SOU 3 Elphil Palm Oil Mill and its supply bases 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	
<b>Internal Stakeholders</b> Gender Committee Representatives	<b>Union/Contractors</b> VIH Construction Sdn. Bhd

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Foreign & local workers NUPW Representatives	Maju Mech Seong Hsing Sdn. Bhd. Sri AS Pushpah Enterprise Amusu management Services Sdn. Bhd. Gunasekaren a/l Buchia
<b>Government Departments</b> SJK (T) Ladang Changkat Salak Labour Department, Kuala Kangsar	<b>NGO/Communities/Neighbourhood villages</b> Sr. Staff, Ladang Sungai Siput PENGHULU mukim Sg. Siput Surau S. Jaya

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks:</b> <u>Contractors &amp; Suppliers (Yih Construction Sdn Bhd, Maju Mech, Seong Hsing Sdn Bhd, Sri AS Pushpah Enterprise, Amusu Management Sdn Bhd)</u>            No complaint raised by the contractors &amp; suppliers. Agreement and Vendor Integrity Pledge were signed by them. Some of contractors &amp; suppliers attended the stakeholder meeting conducted by estate &amp; mill. They aware of RSPO &amp; MSPO.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No other issue.</p>
<b>2</b>	<p><b>Feedbacks:</b> <u>Gender Committee Representatives</u>            The meeting was conducted quarterly as per Gender Committee Handbook. No sexual harassment or domestic violence case reported. New mother need assessment been conducted if there is a new mother in each unit.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No other issue.</p>
<b>3</b>	<p><b>Feedbacks:</b> <u>NUPW Representatives</u>            The selection of the representative is through the election from the workers. It was held between NUPW and members only, without the company interference. Any complaints will be solved in the NUPW meeting with management. Minute of meeting and letter of appointment sighted.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No other issue.</p>
<b>4</b>	<p><b>Feedbacks:</b> <u>Penghulu Mukim Sungai Siput</u>            There are about 9 traditional villages under Penghulu Mukim's territory. He attended the last stakeholder meeting and the matters discussed were cattle in estate and flood season in Kampung Sungai Sejuk. Both issues were in progress of completion. No land encroachment from Sime Darby land however villagers request to use Sime Darby road to passby.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No other issue.</p>
<b>5</b>	<p><b>Feedbacks:</b> <u>SJK(T) Ladang Changkat Salak</u>            The school management would like to extend their appreciation to Sime Darby Management for the full support and assistance such as grasscutting, cleaning services, donation, etc. The attendance of students</p>



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	were good and no child labour issue. PIBG has provided van to pick up the students from home to school therefore transportation is not an issue.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No other issue.
<b>6</b>	<b>Feedbacks:</b> Jabatan Tenaga Kerja Kuala Kangsar The officer in charge (Puan Wani) clarified on the worker of contractor been paid for their salary on 10 <sup>th</sup> every month is not allowed.
	<b>Management Responses:</b> Noted on the information and will inform the contractor.
	<b>Audit Team Findings:</b> An NC was raised under the employment condition, clause 6.2.3

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
Kamuning (Sime Darby Plantation Berhad)	N/A	4843.98	No	No	Yes, Sime Darby acquired (freehold and leased) all the land directly from the state of Perak government.
Elphil Estate (Sime Darby Plantation Berhad)	N/A	1,865.43	No	No	Yes, Sime Darby acquired (freehold and leased) all the land directly from the state of Perak government.
Kinta Kellas (Sime Darby Plantation Berhad)	N/A	1060.74	No	No	Yes, Sime Darby acquired (freehold and leased) all the land directly from the state of Perak government.

Previous land owner / user comment	
	<b>Feedbacks: N/A</b>
	<b>Management Responses: N/A</b>
	<b>Audit Team Findings: N/A</b>

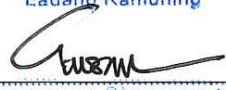

### 3.6 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team consist of Muhammad Fadzli Masran, Mohamed Hidhir Zainal Abidin and Elzy Ovktafia.

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**Formal Signing-off of Assessment Conclusion and Recommendation**

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that SOU 3 Elphil Palm Oil Mill and its supply bases has complied with the RSPO Principles & Criteria's 2018 (MYNI 2019) and RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of SOU 3 Elphil Palm Oil Mill and its supply bases is continued.

Report prepared by	Acceptance of Assessment Conclusion
<b>Name:</b> Muhammad Fadzli Masran	<b>Name:</b> Jayaganesh Dharmeseelan
<b>Company Name:</b> BSI Services Malaysia Sdn Bhd	<b>Company Name:</b> SIME DARBY PLANTATION BERHAD (Company No: 647766-V) Ladang Kamuning
<b>Title:</b> Client Manager	<b>Title:</b> 
<b>Signature:</b> 	<b>Signature:</b> Jayaganesh Dharmeseelan Senior Manager (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.)
<b>Date:</b> 5/8/2020	<b>Date:</b> 7/8/2020

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<p><b>Principle 1: Behave ethically and transparently</b>            Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p><b>Criteria 1.1</b>            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><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p>	<p>Documents required for all unit of certification available in Elphil Certification Unit:            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>	<p>Complied</p>
<p>1.1.2</p>	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p>	<p>SOU 3 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 conducted on 20/02/2020 at Kelab Seri Kamuning, Kamuning Estate. It was attended by 27 representatives from contractors, government officer and local community representatives. In Elphil POM &amp; Estate, the stakeholder consultation was held on 06/02/2020 at Meeting Room,</p>	<p>Complied</p>

		KKS Elphil while in Kinta Kellas Estate, the stakeholder consultation was held on 16/10/2020.	
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained.	<p>Request by stakeholders conducted through stakeholders meeting, visitor books, 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>Kamuning Estate:            SJKT Ladang Changkat Salak (letter dated 08/04/2019) request for field grasscutting on Sunday 21/04/2019.</p> <p>Elphil POM/Estate:            Lembaga Kuil Sri Maha Mariamman (letter dated 29/06/2019) request to withdraw RM600 and other donation for the festival on 28/06/2019 – 08/07/2019.            SK Methodist (letter dated 27/02/2020) request for roller for school field.            SJK(T) Ladang Elphil (letter dated 02/04/2019) request for using estate field for Sports Day on 21/04/2019.</p> <p>Kinta Kellas Estate:            Employee (Rajakili a/p Ayah Pillai) letter dated 10/07/2019 request for prayer ceremony, canopy installation, external visitor 100 people invited and clean water supply on 11-12/07/2019.</p>	Complied
1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</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>	Complied

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		<p>Stakeholder meeting on 20/02/2020 at Kelab Seri Kamuning, Kamuning Estate, 06/02/2020 at Meeting Room, KKS Elphil for both Elphil POM &amp; Elphil Estate and 16/10/2020 at Kinta Kellas Estate.</p> <p>The policies were communicated through the muster briefing to workers on 13/01/2020 &amp; 13/02/2020 at Kamuning Estate, 10 &amp; 17/02/2020 at Elphil POM, 03/03/2020 at Elphil Estate and 24/01/2020 at Kinta Kellas Estate.</p> <p>The person in charge for social issues (communication and consultation) is as below:</p> <p>Kamuning Estate: Senior Manager Kamuning Estate (Mr. Jayaganesh A/L Dharmeseelan) as per appointment letter dated 01/01/2020 signed by Regional CEO (Mohd Ramlan bin Ramle).</p> <p>Elphil POM: Assistant Manager (Asrul Ajib bin Jaafar) as per appointment letter dated 08/01/2020 signed by Manager (Muhammad Irsan Azmi).</p> <p>Elphil Estate: Assistant Manager (Mohamad Azmiel bin Muhamad Nor) as per appointment letter dated 10/09/2018 signed by Manager (Mohd Sabri bin Shafiey).</p> <p>Kinta Kellas Estate: Acting Manager Kinta Kellas Estate (Mr Fazlysham) as per appointment letter dated 01/01/2020 signed by CEO Northern Region.</p>	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.	<p>The latest stakeholders list updated as at January 2020. Stakeholder’s details available included person in charge, address, e-mail and contact number.</p> <p>Example as below:</p> <p>Kamuning Estate: (Transporter) Amusu Management Services Sdn Bhd, Sungai Siput Perak for FFB, EFB and Compost Transporter.</p> <p>Elphil POM: (Contractor) IE Technical Engineering Services, Ipoh Perak for Electrical.</p> <p>Elphil Estate: (Local Community Heads) Mr Yang Keng Lan and Mr Veera Kutty, Kampung Baru Simpang Jalong, Sungai Siput Perak.</p>	Complied

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		Kinta Kellas Estate: (Government) Lembaga Air Perak Pusat Operasi Batu Gajah.	
<b>Criteria 1.2</b>			
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 where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The policy was developed in Bahasa Malaysia and English.</p> <p>The latest Group Sustainability &amp; Quality Policy Statement also includes the clause 'promoting good governance and transparency: abiding by the Group Policies &amp; Authorities (GPA) and the Code of Business Conduct (COBC) signed by Group Managing Director on 02/12/2019'. It was communicated to the workers on 13/01/2020 at Kamuning Estate and 29/01/2020 at Kinta Kellas Estate during muster briefing.</p>	Complied
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 establish the Vendor Integrity Pledge and Vender COBC as a due diligence for external parties engaged by Operating Units.</p> <p>Sighted sampled for Yih Construction Sdn Bhd at Kamuning Estate, Sri As Pushpah at Elphil Estate, Gunasekaran A/L, Buchia at Kinta Kellas Estate and Majumech at Elphil POM.</p>	Complied
<b>Principle 2: Operate legally and respect rights</b>			
Implement legal requirements as the basic principles of operation in any jurisdiction.			
<b>Criteria 2.1:</b>			
There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<b>(C)</b> The unit of certification complies with applicable legal requirements.	SOU 8 had continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and	Complied

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		<p>SQM sustainability team. SOU 8 had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were:</p> <p><u>Elphil POM</u></p> <ul style="list-style-type: none"> <li>i. MPOB License no. 540132004000 for processing 150000 ton FFB. Valid from 1/6/2019 – 31/5/2020.</li> <li>ii. DOE License no. 004583. Valid from 30/6/2019 – 30/6/2020</li> <li>iii. DOE Contradiction License no. 005440. Valid from 5/6/2019 – 4/6/2020</li> <li>iv. Private Installation License no. 000534/2020. Valid from 30/12/2019 – 29/12/2019</li> <li>v. Fire Certificate License No: 313693. Valid till 13.12.2020</li> <li>v. Competent Person             <ul style="list-style-type: none"> <li>a. AESP for Confined Space                 <ul style="list-style-type: none"> <li>- NW-PNG-AE-R-0357-R valid till 19/2/2021</li> <li>- NW-PNG-AE-R-0111-R valid till 23/1/2021</li> </ul> </li> <li>b. CePSWam – cert no. CePSWam/209543 valid from 23/12/2019 – 22/12/2020</li> <li>c. Engine Driver category A4 cert. no. PK64/2002.</li> </ul> </li> </ul> <p><u>Kamuning Estate</u></p> <ul style="list-style-type: none"> <li>i. MPOB License no.524034002000. Valid from 1/10/2019 – 30/9/2020.</li> <li>ii. MPOB Oil Palm Nrsery License no. 55841011000. Valid from 1/3/2020 – 28/2/2021</li> <li>iii. Air compressor permit no. PMT-PK/19 37418 and PMT-PK/19 37417. Valid from 19/7/2019 till 18/10/2020</li> <li>iv. Diesel permit no A001894 and A001895. Valid from 19/2/2020 – 18/2/2021</li> </ul> <p><u>Kinta Kellas Estate</u></p> <ul style="list-style-type: none"> <li>i. MPOB License no.528648002000. Valid from 1/4/2019 – 31/3/2020.</li> <li>ii. Air compressor permit no. PMT-PK/19 31882. Valid from 11/3/2019 till 10/6/2020.</li> <li>iii. Diesel permit no A002305. Valid from 18/7/2019 – 17/7/2020.</li> </ul>	
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<p>2.1.2</p>	<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>Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. A mechanism to ensure compliance to legal and other requirement has been documented in EQMS &amp; MQMS (Estate &amp; Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 3. PSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p>Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.</p> <p>SOU 3 has established list of all relevant laws and requirement and documented in Legal and Requirement Register. The list were updated on annually basis or new updates on the register. Latest updated was done in January 2020 for newly gazette Minimum Wages Order 2020 and amendment for Workers Minimum Standards of Housing and Amenities Act 2019.</p>	<p>Complied</p>
<p>2.1.3</p>	<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 legal boundary at estates visited was clearly demarcated by constructing security trenches along the boundary and it was visibly maintained.</p> <p><u>Kamuning Estate</u>  The legal boundary was clearly demarcated with security trenches as sighted at P97A adjacent to housing area, Taman Lintang and P97B adjacent to smallholder’s farms.</p> <p><u>Elphil Estate</u>  The legal boundary was clearly demarcated with security trenches and blue color PVC pole as sighted at P98G and P00G adjacent with smallholders farms.</p> <p><u>Kinta Kellas Estate</u></p>	<p>Complied</p>



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		The legal boundary was clearly demarcated with security trenches and blue color PVC pole as sighted at P14A adjacent with smallholders farms.	
<b>Criteria 2.2</b>			
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.	List of contracted parties is maintained and documented. For FFB suppliers, external FFB supplier listed under Outside Crop Producer (OCP). 3 suppliers were listed; Eng Huat Latex, Tang Tatt Trading and FELCRA. Other contracted parties listed under list of external stakeholders dated 19/2/19.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.  Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.	All contracts those for FFB supply, contain specific clauses on meeting applicable legal requirements were spelled out in the contract. FFB contract, P/P/0120/FFB01570L for January to December 2020 is referred to.  Evidence of due diligence is demonstrated during vendor registration phase where the contractor has to sign a Vendor Pledge Registration (VIP) and to comply with para a(i); Vendor Code of Business Conduct (VCOBC) and a(ii); all applicable laws and regulations related anti-bribery, fraud and corruption.	Complied
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.	Generic clause related to disallowing child, forced and trafficked labour written in Vendor Pledge Registration @ VIP and to undertake Vendor Code of Business Conduct (VCOBC) with regards to labour and human rights. Verified VIP for labour contractor; "supply contract labour for workshop", Maju Mech Engineering (M) Sdn Bhd. Validity of contract is from 1 <sup>st</sup> July 2017 until 30 <sup>th</sup> June 2019 and extended until 31 <sup>st</sup> January 2020. Refer to contract extension dated 28 <sup>th</sup> February 2020.	Complied
<b>Criteria 2.3</b>			
All FFB supplies from outside the unit of certification are from legal sources.			

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2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/ smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> </ul>	<p>For directly sources FFB, as minimum a valid MPOB license is required for registration. Details of MPOB license summarized as per the following :</p> <table border="1" data-bbox="994 427 1832 659"> <thead> <tr> <th>Estate/Out growers</th> <th colspan="3">MPOB license &amp; validity</th> </tr> </thead> <tbody> <tr> <td>Eng Huat Latex Concentrate Sdn Bhd</td> <td>505907315000</td> <td>valid</td> <td>until 30/4/20</td> </tr> <tr> <td>Tang Tatt Trading Sdn Bhd</td> <td>524517015000</td> <td>valid</td> <td>until 31/10/20</td> </tr> <tr> <td>Felcra Berhad (kaw. Sg Siput Utara)</td> <td>503060102000</td> <td>valid</td> <td>until 31/05/20</td> </tr> </tbody> </table>	Estate/Out growers	MPOB license & validity			Eng Huat Latex Concentrate Sdn Bhd	505907315000	valid	until 30/4/20	Tang Tatt Trading Sdn Bhd	524517015000	valid	until 31/10/20	Felcra Berhad (kaw. Sg Siput Utara)	503060102000	valid	until 31/05/20	Complied
Estate/Out growers	MPOB license & validity																		
Eng Huat Latex Concentrate Sdn Bhd	505907315000	valid	until 30/4/20																
Tang Tatt Trading Sdn Bhd	524517015000	valid	until 31/10/20																
Felcra Berhad (kaw. Sg Siput Utara)	503060102000	valid	until 31/05/20																
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.	Information with regards of indirect source of FFB from out-growers are still in progress. As minimum, a valid MPOB license is required for registration and evidence of legality.	N/A																
<p><b>PROCEDURAL NOTE:</b> For Implementation Procedure for 2.3.2 refer to Annex 4.</p>																			
<p><b>Principle 3: Optimise productivity, efficiency, positive impact and resilience</b> Implement plans, procedures and systems for continuous improvement.</p>																			
<p><b>Criteria 3.1</b> 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><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p>	<p>SOU 3 has continued its commitment to long term sustainability and improvements through a capital expenditure program. The management has forecasted 5 years business plan from FY 2020 – 2024. Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. Sighted the annual budget FY 2020 and business plan FY 2020 – FY 2024 In the 5 years business plan include items as follows: a. Palm oil mill i. Mill intake – FFB input</p>	Complied																

		<ul style="list-style-type: none"> <li>ii. Production of CPO</li> <li>iii. Production of PK</li> <li>iv. Total Palm Oil Extraction</li> <li>v. Total Palm Kernel Extraction</li> <li>vi. Mill cost</li> <li>b. Oil Palm Estate             <ul style="list-style-type: none"> <li>i. Total crop projection and yield potential</li> <li>ii. Activity direct cost                 <ul style="list-style-type: none"> <li>a. Mature upkeep</li> <li>b. Manuring</li> <li>c. Harvesting and collection</li> <li>d. Transportation</li> <li>e. Nursery</li> </ul> </li> <li>iii. Estate administration                 <ul style="list-style-type: none"> <li>a. Admin Cost</li> <li>iv. Labour overhead</li> <li>v. Road and bridges</li> <li>vi. Cost of production.</li> </ul> </li> </ul> </li> </ul> <p>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2024) and well documented upon request.</p>	
<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p>	<p>SOU 3 have long range replanting program until FY 2024. Replanting planned for the palm older than 25 years, non-performance field (yield) and ganoderma infected palm. Observed the replanting program for the next financial year as follows:</p> <p><u>Kamuning Estate</u>          2020: 145.00 ha for field 99D1, 99A1, 98B, 01E          2021: 140.00 ha for field 97A, 97B, 99B1          2022: 136.00 ha for field 99D, 99I, 00F          2023: 0.00 ha          2024: 133.00 ha for field 00D1, 00E, 00F1</p>	<p>Complied</p>

		<p><u>Elphil Estate</u> Refer notes 2020: 0.00 ha 2021: 151.99 ha for field P92A, P98G, P00K, P97E, P98C 2022: 91.41 ha for field P98F, P99F 2023: 57.20 ha for field P99G, P00C 2024: 129.99 ha for field P99P, P99P1</p> <p><u>Kinta Kellas Estate</u> 2020: 63.02 ha for field P99B 2021: 0.00 ha 2022: 157.02 ha for field P99B, P97, P99A, P00A 2023: 0.00 ha 2024: 84.67 ha for field P99</p>	
<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>Sime Darby has established SOP on Management Review documented in SOM, Section 5, and Management responsibility version 2, issued in 2015. Management review was conducted on annually basis by Operating Unit as per SOP established. The meeting discussed on matters as follows: i. introduction by chairman ii. Arising issue iii. Results of Internal Audit iv. Customer feedback v. Process performance and product conformity vi. Status of preventive and corrective actions vii. Follow-up actions from management reviews viii. Changes that could affect the management system ix. Recommendations for improvement x. Improvement of the effectiveness of the Management System and Process xi. Resource Needed/ Appendices/ Attachments Latest Management Review Meeting was conducted as follows:</p>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>i. Elphil mill - 3/2/2020</li> <li>ii. Kamuning Estate - 15/2/2020</li> <li>iii. Elphil Estate - 28/2/2020</li> <li>iv. Kinta Kellas Estate - 29/1/2020</li> </ul>	
<p><b>Criteria 3.2</b>          The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
3.2.1	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p>	<p>Estates visited has developed continual Improvement Plan and documented in the Kaizen Charter/LSS projects, Environmental Management Plan, Pollution Prevention Plan and Energy Management Plan. Sighted the sampled plan/projects at estates visited as follows:          For palm oil mill, Continual Improvement was demonstrated based on project initiated by mill management through KAIZEN/Lean Six Sigma project. The project focus mainly on cost saving and process losses minimization for each financial year. Sample of completed project for FY 2019/2020:</p> <ul style="list-style-type: none"> <li>i. To provide safe working environment for water treatment operators - installation of platform softener. (03.12.2019)</li> <li>ii. Reduction of TNB Consumption by Full Turbine Utilization (Completion Date – 03.12.2019)</li> <li>iii. To generate profit from the sale of palm kernel shell in Elphil Oil Mill. (Completed Date – 03.12.2019)</li> </ul> <p>Mechanization for field operation such as Mechanical Grabber for FFB evacuation has been sighted at estates visited.          The estates have also moved towards chemical reduction and introducing more Integrated Pest Management in their practices. This could be verified through the sighting of beneficial plants all around the estates and the Beneficial Plant Plans that were available for monitoring.          Among the plan sighted as follows:</p> <ul style="list-style-type: none"> <li>i. To develop beneficial plant nursery and progressive planting of Tunera Subulata, Cassia cobanensis, Antigonan leptopus and Euphorbia heterophyll.</li> <li>ii. To plant beneficial plant along the main road.</li> <li>iii. To plant beneficial plant along the estate boundary</li> </ul>	Complied

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		iv. To maintain barn owl boxes in the field v. To conduct rat and barn owl census annually.	
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 template has not been released by RSPO as of this audit date.	Complied
<p><b>PROCEDURAL NOTE</b> for 3.2.2: THE RSPO metrics template is awaiting decision/ agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p>			
<p><b>Criteria 3.3</b> Operating procedures are appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>SOP was established for the Estates. Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU8 as a guidance document to conduct estate operation. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc.</p> <p>Palm Mill holds two SOPs: sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill.</p> <p>Sime Darby has established a system to monitor the mill operation. The visited the operating units on timely basis. Their reports covers on all aspect of operation.</p>	Complied
3.3.2	A mechanism to check consistent implementation of procedures is in place.	Sime Darby has established mechanism to monitor the implementation of their procedure by Mill advisor/ Plantation Advisor Visit, Structured Oil Recovery Assessment (SORA) and Planning and Monitoring Unit, Performance Monitoring Visit and Agronomist Visit. The visit focusing on Yield Improvement, Crop	Complied

		Recovery, Replanting and Immature Palms Maintenance and Mature Upkeep on all aspect of operations in the mill and estates.	
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>The estates and mill visited maintained all records of visit and monitoring and available at the office for review. Sighted the sampled records as follows:</p> <p><u>EPOM</u> Structured Oil Recovery Assessment (SORA) latest visit to Elphil POM was on 21 – 23/1/2020. The report covering on process control/safety, process losses, product quality, housekeeping/upkeep/environment and security. No major issue issued from the visit. All issue raised has been rectified and addressed by the mill management.</p> <p><u>Kamuning Estate</u> Agronomist were scheduled to visit on annually basis. Latest visit was conducted on 26 - 27/3/2019. The report covers on yield, Palm nutritional status, Manuring history, Fertiliser requirement, fertiliser analysis, field observation and organic matters.</p> <p><u>Elphil Estate</u> Latest agronomist visit was conducted on 15 - 16/3/2019. The report covers on yield, Palm nutritional status, Manuring history, Fertiliser requirement, fertiliser analysis, field observation and organic matters.</p> <p><u>Kinta Kellas Estate</u> Agronomist were scheduled to visit on annually basis. Latest visit was conducted on 13/3/2019. The report covers on yield, Palm nutritional status, Manuring history, Fertiliser requirement, fertiliser analysis, field observation and organic matters. Structured Crop Recovery Assessment (SCRA) latest visit on the estate was on 22/1/2020. The report was available at the estate for review. The report covers on crop recovery and crop quality. No issue raised during the visit.</p>	Complied

		Visit from Planning and Monitoring Units (PMU) reports were made available during the visit. Noted reports observed for visit carried out on 20/1/2020. The report covered on replanting, immature and mature manuring application and Building and Facilities Management. No major issue was raised during the audit.	
<b>Criteria 3.4</b>			
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.			
3.4.1	<b>(C)</b> 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>There is no new planting in Elphil Certification Unit. Based on the Standard Operation Manual; subsection 5.4; Planning and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure, POM and Estates carried out the annual review of environmental impacts documented in Registration of Environmental Aspects and Impacts. The assessment covers all main and support operation at mill and estate.</p> <p>The latest review was done on 27/1/20 at Kamuning Estate related to loose fruit siever operation.</p>	Complied
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><b>Social</b>  The Social Impact Assessment (SIA) Report for SOU 3 Elphil dated 24th – 27th August 2015 is established by PSQM Department. The SIA developed based on the consultation with internal and external stakeholders.</p> <p><b>Environmental</b>  SOU 3 has established Environmental Management Plan and was made available in the estates/mill for review. Internal stakeholder was consulted for during review process especially for those interact directly with the activities at estate’s workstation. Result of participation will be considered as part of EIA review process.</p> <p><u>Kamuning Estate</u></p>	Complied



		<p>No major revision reported and 1 additional environmental aspect related to loose fruit seiver operation incorporated in the register dated 27/1/20.</p> <p><u>Elphil POM</u> No changes reported in EAI and EIE during annual review dated 7/1/20.</p>	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p>	<p><b>Social</b> The Social Management Plan for Jan-Dec 2020 available for Elphil Certification Unit. It mentions the objectives, category, action, frequency, person in charge and monitoring period. Example seen as below: Kamuning Estate: To solve issue from gender committee meeting: Hornet nest at executive bungalow, employee’s housing complex upkeep and employee’s housing complex repair in Q1 2020.</p> <p>Elphil POM: SRJKT Head Master has requested for cleaning service, broken gate repair and temporary house for night tuition teacher. The Social Action Plan available for each units and the input were gathered from the meeting minutes (Gender Committee, NUPW, Safety Meeting, Complaint &amp; Request from internal &amp; external stakeholders and muster briefing).</p> <p>Elphil Estate: Unclean water supply at housing complex area: to install water filter and put in the budget for on individual water supply. Kinta Kellas Estate: To brief all the tractor drivers on the restriction to enter workers housing complex.</p> <p><b>Environmental</b> The management plan established base on operation with significant impact to the environment. The management plan was reviewed annually. The management plan stated the environmental issue, mitigation actions, monitoring plan and person responsible for monitoring implementation. Plan dated 30/1/20 for FY2020 was made available for review.</p>	Complied

<b>Criteria 3.5</b>			
A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination are documented and made available to the workers and their representatives where applicable.	SDPSB has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2 <sup>nd</sup> December 2019, where the management is committed to contributing to a better society includes respecting, upholding & no-exploitation of fundamental human rights, providing safe and healthy workplaces and protecting workers' welfare and engaging and empowering communities. The SOPP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liason and recruitment, documentation and processing, workforce management centre (WMC) Sua Betong, Careline and estate are available upon request.	Complied
3.5.2	Employment procedures are implemented and records are maintained.	The SOPP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liason and recruitment, documentation and processing, workforce management centre (WMC) Sua Betong, Careline and estate are available upon request. This procedure been explained to worker during the induction training on their first time arrival. Seen the training certificates for the workers who has attended the induction training/records as below:  <u>Kamuning Estate:</u> Maksum (17/07/2014) Yadav Kusheshwar (14/03/2018) Modal Swapan (16/01/2018)  <u>Elphil POM:</u> Sujendren A/I Tangavellu (24/02/2020) Adiswandi (24/02/2020)	Complied

		<p><u>Elphil Estate:</u>          Jumalin (03/04/2017)          Mudahar (03/04/2017)          Mohammad Gaffar Sheikh (02/11/2015)</p> <p><u>Kinta Kellas Estate</u>          Ramjee Malla (13/03/2017)          Sahil Reza (16/08/2019)          Ahmad Abdul Kholiq (29/08/2017)          Subrata Kumar Biswas (03/09/2015)</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 Regina A/P Sollay at Kamuning Estate and Muhammad Syahmi Shawal at Kinta Kelas Estate.</p>	
<p><b>Criteria 3.6</b></p>			
<p>An Occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p><b>C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>Sime Darby has established the Group Policy on Health and Safety signed by the Managing Director on Jan 2015. The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate.</p> <p>Sime Darby has established SOP for HIRARC. Refer Estate Quality Management System, Level 2: Standard Operating Manual, Subsection 5.4: Planning, Appendix 5.4.1a Hazard Identification, Risk Assessment and Risk Control (HIRARC) Procedure ver. 1 Year 2008, issue no. 1 dated 1/4/2008.</p> <p>SOU 3 has conducted assessment for risk on all the operations and documented in Hazard Identification, Risk Assessment, and Risk Control</p>	<p>Complied</p>

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		<p>(HIRARC) and chemical Hazard Risk Assessment. The assessment cover all main operations and support operations in such as follows:</p> <p>Estates: Harvesting, weeding, manuring, office operation, security, pest and disease and other support operation.          Mill: security, office, store, weighbridge, fruit handling, threshing and etc.          The assessment also covers working type, job step, hazard, effect, existing control, type, probability, etc.          The HIRARC was reviewed at minimum once a year, if accident occur or changes on the operation.</p> <p><u>Elphil POM</u>          Latest HIRARC review was conducted on 14/2/2020 due to accident occur on 13/2/2020 and pressing station involving workshop personnel.</p> <p><u>Kamuning Estate</u>          The OSH committee discusses any issues regarding the HIRARC during OSH committee meetings. Latest review was conducted 08/7/2019 due to an accident that happened on 3/7/2019.</p> <p><u>Elphil Estate</u>          Latest HIRARC review was conducted on 4/3/2020 due to changes in operation as new machineries, FM3 were used for spraying operation.</p> <p><u>Kinta Kellas Estate</u>          Annual review was conducted on 20/1/2020. No changes done to the HIRARC as there is no new activity and procedure in FY 2019.</p>	
3.6.2	<b>(C)</b> The effectiveness of the H&S plan to address health and safety risks to people is monitored.	<p>The operating units has established and documented safety and health plan. The plan was monitored on timely basis by the person responsible assigned. Sighted the implementation of the management plan as follows:</p> <p><u>Elphil POM</u></p>	Complied

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		<p>The mill has established safety and health plan and documented in OSH and Other Requirements Plan FY 2020. The plan covers on OSH committee, NADOPOD and ESH reporting, First Aid, Machinery Annual Inspection, Chemical Management, Factory and Machinery Act, Confined space management, ERP and training. Sighted the sampled implementation of the management plan as follows:</p> <ul style="list-style-type: none"> <li>i. NADOPOD reporting, JKPP 8 form for FY 2019 was submitted to DOSH through MyKKP system on 2/1/2020.</li> <li>ii. Medical surveillance was conducted on annually basis for workers involve with hexane and Manganese. Latest surveillance was conducted in December 2019. 12 workers was send for the surveillance and found fit to work.</li> <li>iii. LEV monitoring was conducted on annually basis. Latest monitoring was conducted on 25/11/2019 by certified Hygiene Technician with DOSH Reg. no. HQ/16/JHII/00/23. Refer report no. HQ/16/JHII/00/23-2019/056.</li> <li>iv. Annual Audiometric Test was conducted on 7/10/2019 by certified OSH doctor with Reg. no. HQ/08/DOC/00/641. Refer report no. PRO/OCT/19(SDPSB/87), JKPP H/E 127/12/4-65/17. 3 workers were found with STS and was send for retest on 9/3/2020.</li> </ul> <p><u>Elphil Estate</u></p> <ul style="list-style-type: none"> <li>i. Latest medical surveillance was conducted in July 2019 by certified OHD with Reg. no. HQ/11/DOC/00/200. 25 workers were send for surveillance and found fit to work as chemical handlers.</li> <li>ii. Workplace Inspection was conducted on quarterly basis prior to Safety and Health committee meeting. Sighted the WPI report dated 20/2/2020, 21/11/2019, 20/8/2019 and 20/5/2019. The results of the inspection were discussed during safety and health committee meeting.</li> </ul> <p><u>Kinta Kellas Estate</u></p>	
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		<p>i. Latest medical surveillance for chemical handlers was conducted in January 2020 by certified OHD with Reg. no. HQ/08/DOC/00/649. 7 workers were send for surveillance and found fit to work as chemical handlers.</p> <p>ii. Workplace Inspection was conducted on quarterly basis prior to Safety and Health committee meeting. Sighted the WPI report dated 25/2/2020, 28/11/2019, 3/9/2019 and 10/6/2019. The results of the inspection were discussed during safety and health committee meeting.</p> <p>iii. Monthly medical check-up for chemical handlers were conducted monthly by the estate medical assistant. Sighted the records of medical check-up conducted on 28/2/2020, 29/1/2020, 30/12/2019, 29/11/2019 and 30/10/2019.</p>	
<p><b>Criteria 3.7</b>  All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
3.7.1	<p><b>(C)</b> 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&amp;C, in a form they understand, and which includes assessments of training.</p>	<p>The mill has established training plan base on training need analysis conducted and documented in Training Plan. The training plan covers all job designation including the contractors.</p> <p>For contractors, there are 8 trainings such as OHS, discipline and waste management incorporated, and it being briefed before starts any works and recorded in "Permit to Work".</p>	Complied
3.7.2	<p>Records of training are maintained.</p>	<p>The estate visited has established training plan base on the training need analysis conducted. The training plan covers all job designation including the contractors.</p> <p>Sighted the sample training records as follows:</p> <p><u>Elphil POM</u></p> <p>i. EAI and EIE training dated 14/2/2019  ii. Recycle awareness training dated 15/2/2019  iii. Water treatment plant operator training dated 7/2/2019</p>	Complied

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		<ul style="list-style-type: none"> <li>iv. RSPO SCCS for weighbridge clerk training dated 31/1/2019</li> <li>v. MSPO/RSPO SCCS for contractor briefing dated 30/1/2019</li> <li>vi. RSPO SCCS training dated 5/9/2019</li> <li>vii. Hearing conservation and PPE training dated 6/2/2019</li> <li>viii. Chemical handling training dated 29/1/2019</li> <li>ix. First aid training dated 12-15/10/2019</li> <li>x. Fire drill training dated 6/1/2020</li>   <li><u>Kamuning Estate</u></li> <li>i. MB Operator training dated 4/2/2020</li> <li>ii. Recycle campaign, Safety and environment training dated 5/3/2020</li> <li>iii. HIRARC and Accident report training dated 2/3/2020</li> <li>iv. IPM training dated 29/2/2020</li> <li>v. New mother, human right, sexual harassment and reproductive rights briefing dated 22/2/2020</li> <li>vi. Scheduled waste training dated 20/2/2020</li> <li>vii. PPE and Inter pump maintenance training dated 11/2/2020</li> <li>Road safety briefing dated 5/2/2020</li> <li>Viii. Safety, PPE for spraying training dated 3/2/2020</li> <li>ix. RSPO new criteria briefing dated 23/1/2020</li> <li>x. Contractors machineries operator safety briefing dated 20/1/2020</li> <li>xi. Contract workers management training dated 10/12/2019</li> <li>xii. Firefighting training dated 23/11/2019</li>   <li><u>Kinta Kellas Estate</u></li> <li>i. Rat baiting training dated 24/2/2020</li> <li>ii. progressive pruning SOP training dated 21/2/2020</li> <li>iii. Chemical handling and SW handling training dated 20/2/2020</li> <li>iv. New Policy, whistle blowing, buffer zone and HCV training dated 24/1/2020</li> <li>v. tractor maintenance training dated 26/11/2019</li> <li>vi. Spraying techniques and safety aspects for sprayers training dated 16/8/2019</li> </ul>	
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		<ul style="list-style-type: none"> <li>vii. SOP for spraying training dated 5/7/2019</li> <li>viii. chemical handling and triple rinsing training dated 22/4/2019</li> <li>ix. Fire drill training dated 18/4/2019</li> <li>x. First aid training dated 16/2/2020, 18/2/2019 (8 first aider)</li> </ul>	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p>	<p>Relevant personnel to supply chain implementation as defined by the CU are the personnel that involve in supply chain implementation such as Assistant Managers, QA, clerk, lab supervisor &amp; assistant, weighbridge operators. The latest RSPO SCCS training was carried out as follows:</p> <ul style="list-style-type: none"> <li>i. RSPO SCCS for weighbridge clerk training dated 31/1/2019</li> <li>ii. MSPO/RSPO SCCS for contractor briefing dated 30/1/2019</li> <li>iii. RSPO SCCS training dated 5/9/2019</li> </ul>	Complied
<b>Criterion 3.8</b>			
Supply chain requirement for mills ( <b>note: all supply chain requirements are considered as critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle</b> )			
<b>Definition</b>			
3.8.1	<p>Definition Identity Preserved Mill D.1:</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme. 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 processes certified and uncertified FFB without physically separating them, then only Module E is applicable.</p>	<p>As per SOP established and documented in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under Glossary section define the meaning of RSPO Identity preserved as supply chain model assured that the RSPO certified oil palm product delivered to the end user uniquely identifiable ta a single RSPO certified supply base.</p> <p>As the Elphil POM is using Model E, Mass Balance, the criteria is non-applicable.</p>	Complied



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3.8.2	<p>Definition Mass Balance Mill E.1</p> <p>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 3<sup>rd</sup> 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</p>	<p>As per SOP established and documented in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under Glossary section define the meaning of RSPO Mass Balance as supply chain model that allows certified claim to be transferred from one palm oil products to another through physical blending or administratively under strictly control circumstances.</p>	N/A
3.8.3	<p>Explanation (Volume and product integrity) – D.2, E.2</p> <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&amp;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 is available in the public summary report.</p> <p>Elphil POM has registered the Palmtrace ID: RSPO_PO1000000191 for RSPO certified transaction.</p>	Complied
3.8.4	<p>Documented procedures – 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</p>	<p>Procedure for supply chain has been established and documented in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply</p>	Complied

	<p>elements of the applicable supply chain model specified. This shall include at minimum the following: Complete and up-to-date procedures covering the implementation of all the elements of the supply chain model requirements.</p>	<p>Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019. Among the subjects covered in the procedure are:</p> <ol style="list-style-type: none"> <li>1. Introduction</li> <li>2. Objectives</li> <li>3. Scope</li> <li>4. Responsibilities</li> <li>5. Control of documents and records</li> <li>6. Delivery of FFB from estate</li> <li>7. Receiving FFB at the mill</li> <li>8. Process monitoring</li> <li>9. Products dispatch</li> <li>10. Non-conforming products and/or documents</li> <li>11. Products claims</li> <li>12. Outsourced contractors</li> <li>13. Training</li> <li>14. Reclassification of mill's supply chain model</li> <li>15. Production volume</li> <li>16. Conversion factors</li> <li>17. Internal audit</li> <li>18. Complaints</li> <li>19. Management review</li> </ol> <p>The Mill Manager holds the hold the responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements as stated in the Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 4.0 Responsibilities.</p>	
	<p>Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p>		Complied
	<p>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.</p>		Complied
	<p>The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>		Complied
3.8.5	<p>Internal Audit – 5.3.2 The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p>	<p>Addressed in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 18.0 Internal Audit. Based on the procedure, the</p>	Complied

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	Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	internal audit is to be conducted annually as per Internal Audit Procedure. Refer SOP ref. no. SD/SDP/PSQM/IAP.	
	Effectively implements and maintains the standard requirements within its organisation.	Combined internal audit for supply chain was last conducted on 21/1/2020 by 4 internal auditor from Group Sustainability and Quality Management Department. No non-conformity for RSPO SCCS were raised during the internal audit.	Complied
	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.	The results of Internal Audit was discussed in the Management Review Meeting as sighted in minutes meeting conducted on 3/2/2020 under section 2: Results of Internal Audit.	Complied
3.8.6	Purchasing Goods In – 5.4, D.4.1/ D.4.2, E.4.1/E.4.2 The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.	Addressed in the Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 6.0 delivery FFB from Estate.	Complied
	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	Similar to last assessment daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and uncertified FFB. Records verified by internal and external audit. Elphil mill have system to verify at the weighbridge. Information for RSPO certified FFB were recorded in FFB Consignment notes and weighbridge tickets. Records verified during the audit as follow: Sighted the sampled delivery off FFB as follows:	Complied
	The site shall have a mechanism in place for handling non- conforming oil palm products and/or documents.	i. Kamuning Estate Date: 16/12/2019 C/N no.: 014067 RSPO Cert. no. RSPO 550180 W. Ticket no.: 120072 Net Weight: 10710 kg	Complied

		<p>ii. Elphil Estate Date: 31/12/2019 C/N no.: 9371 RSPO Cert. no. RSPO 550180 W. Ticket no.: 120549 Net Weight: 11440 kg</p> <p>iii. Kinta Kellas Estate Date: 16/12/2019 C/N no.: 15495 RSPO Cert. no. RSPO 550180 W. Ticket no.: 120075 Net Weight: 11130 kg</p> <p>iv. Felcra Kawasan Kg. Jasa Date: 20/12/2019 C/N no.: 975267 RSPO Cert. no.: non-certified W. Ticket no.: 120221 Net Weight: 1550 kg</p> <p>v. Tang Tatt Trading Sdn. Bhd Date: 20/12/2019 C/N no.: T47691 RSPO Cert. no.: non-certified W. Ticket no.: 120207 Net Weight: 22870 kg There is no overproduction of certified tonnage of CPO. Mechanism in place for handling non-conforming oil palm products and/or documents has been documented in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating</p>	
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		<p>Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 11 Non-conforming products and/or documents.</p> <p>Where there is contamination of RSPO/MSPO certified material during receiving, processing, storage and dispatch, the mill/estate shall downgrade the materials following the downgrade order: RSPO: IP -&gt; MB -&gt; Non-certified.</p>	
3.8.7	<p><b>Outsourcing Activities – 5.5</b></p> <p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organisation (not the tank farm manager).</p>	<p>Sime Darby has established Standard Operating procedure for outsourced activities as per Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019, Section 13.0: Outsourced Contractors.</p> <p>In the SOP under section 13.1 stated that CPO Mill cannot outsourced processing activities like refining or crushing.</p>	Complied
	<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>Sime Darby has established Standard Operating procedure for outsourced activities as per Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019, Section 13.0: Outsourced Contractors.</p>	Complied

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<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>In the SOP under section 13.1 stated that CPO Mill cannot outsourced processing activities like refining or crushing.</p> <p>The list of outsourced contractor was sighted, "list of stakeholder as at January 2020" include the transport contractor for CPO and PK Mayang Bayumas Sdn. Bhd.</p> <p>Sighted the sampled contracts between The Sime Darby Plantation Bhd. with Mayang Bayumas Sdn. Bhd dated 19/12/2017 and extension email for contract extension dated 1/5/2019.</p>	
<p>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>		
<p>d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</p>		
<p>The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.</p>	<p>Stated in the contract agreement between The Sime Darby Plantation Bhd. with Mayang Bayumas Sdn. Bhd dated 19/12/2017, mentioned the site has legal ownership of all input material to be included in outsourced processes as per Annexure 5, RSPO Supply Chain Certification Standard.</p> <p>The mill ensure that outsourced activities (transportation) is not contaminated with non-certified materials as per agreement. There is no outsourced processes within Elphil Palm Oil Mill, hence this requirement is not applicable.</p>	<p>Complied</p>
<p>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.</p>	<p>Sime Darby has issued Memorandum to all contractors dated 26/6/2019. In the memorandum stated the contractors have to comply as follows;</p> <p>i. Comply with local legal requirements</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>ii. Attend the RSPO/ISCC/MSP0/SCCS briefing or training organized by the company</li> <li>iii. Having signed and enforceable agreement with the company</li> <li>iv. Provide access to the auditors to contractors’ operation site(s) and employees whenever deemed necessary</li> <li>v. Having related working permits</li> <li>vi. Ensure PPE utilization by contractors’ employee while being in the company premise.</li> </ul>	
3.8.8	<p>Record keeping – 5.9</p> <p>The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.</p>	<p>Elphil Palm Oil Mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements. For certified infeed and product monitoring, balance sheet entitled “RSPO Records for Oil Mills” is referred to. As at 29 February 2020, closing stock for CPO and PK is still surplus after delivery.</p>	Complied
	<p>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.</p>	<p>Retention time for all records and reports is 3 years based on the (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019 under clause 5.4 of the SOP.</p>	Complied
	<p>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.</p>	<p>NA – product of the CPO mill is containing 100% palm oil.</p>	N/A

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	<p>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.</p> <p>Or</p> <p>E.5.1 –</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.)</li> </ul>	<p>Not applicable. Elphil POM is under mass balance module.</p> <p>Balance sheet entitled "RSPO Records for Oil Mills" from July 2019 to February 2020 is referred to. Transaction data will be reconciled every 3 month. No negative stock recorded as at closing February 2020 with surplus of stock, CPO: 622.19 mt PK: 456.48 mt.</p>	<p>Complied</p>
<p>3.8.9</p>	<p>Conversion Factors – 5.10</p> <p>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 (<a href="http://www.rspo.org">www.rspo.org</a>)</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Last year's average from Feb 2019-Feb 2020 were 20.43% (OER) &amp; 5.62% (KER).</p>	<p>Complied</p>



	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.	Complied
3.8.10	<p>Processing – D.6</p> <p>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.</p>	N/A	Complied
3.8.11	<p>Sales and goods out – 5.6</p> <p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment / delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number.</li> <li>• Information shall be complete and can be presented either on a single document or across</li> </ul>	<p>Elphil POM ensured the required information is available in document form. Sampled of CPO contract: S/C-PSD/2003/CPO0309B (RSPO CPO-MB) dated 04/03/2020, quantity 250 mt (delivery month – March 2020).</p> <p>The name and address of the buyer; XXX</p> <p>The name and address of the seller: KKS Elphil, Sungai Siput, Perak</p> <p>The loading or shipment/ delivery date;</p> <p>e.g. 10/03/2020</p> <p>The date on which the documents were issued;</p> <p>A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</p> <p>Crude Palm Oil (CPO) RSPO MB</p> <p>The quantity of the products delivered; e.g. 8.060 MT</p>	Complied

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	<p>a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</p> <ul style="list-style-type: none"> <li>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.</li> </ul>	<p>Any related transport documentation; e.g. 131 – Mayang Bayumas Sdn Bhd</p> <p>Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 550180 (SC Model: MB).</p> <p>A unique identification number: palm trace no: available in a few forms e.g. DN no., seal no., etc.</p>	
3.8.12	<p>Registration of Transactions – 5.7</p> <p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>Are mills, traders, crushers and refineries; and</li> <li>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.</li> </ul>	<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>	Complied
	<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>Based on downloaded palm trace transaction recorded for CPO is 206.83 MT. Based on quarterly records and balance from Feb 2019-Feb 2020, the following were recorded in Supply Chain declaration</p>	Complied

	<p><b>Trace:</b> 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><b>Remove:</b> RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</p> <p><b>Confirm:</b> Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</p>		
3.8.13	<p>Claims – 5.11</p> <p>The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>RSPO trademark was not use and Elphil POM is not making any RSPO claim on its product. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied
<p><b>Principle 4: Respect community and human rights and deliver benefit</b></p> <p>Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p><b>Criteria 4.1</b></p> <p>The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
4.1.1	<p><b>(C)</b> 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</p>	<p>SDPSB has the implemented a Sime Darby’s Human Rights Charter where they committed to recognizing the role of Human Rights Defenders in accordance to the United Nations declaration on Human Rights Defender.</p>	Complied

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	and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	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 workers on 27/01/2020 & 13/02/2020 by Assistant Manager at Kamuning Estate, 10 & 17/02/2020 at Elphil POM and 03/03/2020 at Elphil Estate and 24/01/2020 at Kinta Kellas Estate.	
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:  Respecting, upholding & no-exploitation of fundamental human rights.  Providing safe and healthy workplaces, and protecting workers' welfare.  Engaging and empowering communities.  This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers.	Complied
<b>Criteria 4.2</b>			
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	<b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).  The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.  Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	The policy was communicated through the muster briefing to workers on 27/01/2020 & 13/02/2020 by Assistant Manager at Kamuning Estate, 10 &	Complied

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		17/02/2020 at Elphil POM and 03/03/2020 at Elphil Estate and 24/01/2020 at Kinta Kellas Estate.	
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.	<p>Sighted the Buku Kerosakan Rumah and External Complaint Book have the agreed resolution within timeframe.</p> <p>There were no other complaint other than housing maintenance issues. Sample taken as below:</p> <p>Kamuning Estate:</p> <p>06/02/2020: Broken key at house no H10 (Yupi's house) and settled on 08/03/2020.</p> <p>20/02/2020: broken pipe ¾ inches at house no E5 (Subramaniam's house) and settled on 21/02/2020.</p> <p>Elphil POM:</p> <p>05/02/2020: House no 01; broken lamp, pipe, window, mosquito net and door lock.</p> <p>31/12/2019: House no 11; broken sink and toilet.</p> <p>Elphil Estate:</p> <p>05/03/2020: House no 100A; broken lamp at living room.</p> <p>05/03/2020: House 110; broken door lock.</p> <p>Kinta Kelas Estate:</p> <p>11/03/2020: House no B9/24; 1 unit of lamp is not function in bedroom.</p> <p>04/03/2020: Low water pressure at house no 43/79.</p>	Complied
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	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	Complied

	groups to support them and/or act as observers, as well as the option of a third-party mediator.	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.	
<b>Criteria 4.3</b>			
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>Elphil 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>Kamuning Estate:</p> <p>Assist in dismantling of old temple building using excavator (RM1,500) on Feb 2020.</p> <p>Assist ATM for Hari Angkatan Tentera Darat on Mar 19.</p> <p>Donation stationery to SJK(T) Ladang Changkat Salak on Apr 19 (RM500).</p> <p>Sanitation work at Rumah Orang Tua &amp; Kurang Upaya Sungai Siput (U) on 2 monthly basis (RM600).</p> <p>Elphil POM:</p> <p>Bacaan Yasin dan Doa Selamat on 28/02/2020.</p> <p>Lawatan ke Gunung Lang Ipoh for worker's wellness on 05/12/2019.</p> <p>Aktiviti Memasak Rendang for worker's activities on 03/10/2019.</p> <p>Elphil Estate:</p> <p>Lembaga Kuil Sri Maha Mariamman (letter dated 29/06/2019) request to withdraw RM600 and other donation for the festival on 28/06/2019 – 08/07/2019.</p> <p>SK Methodist (letter dated 27/02/2020) request for roller for school field.</p>	Complied

		<p>SJK(T) Ladang Elphil (letter dated 02/04/2019) request for using estate field for Sports Day on 21/04/2019.</p> <p>Kinta Kellas Estate:</p> <p>Employee (Rajakili a/p Ayah Pillai) letter dated 10/07/2019 request for prayer ceremony, canopy installation, external visitor 100 people invited and clean water supply on 11-12/07/2019.</p>																			
<p><b>Criteria 4.4</b>          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><b>(C)</b> 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>Sime Darby did not acquire land from landowners, but leased it directly from the government. The quit rent payment was done accordingly as requirement from the state government.</p> <p>No customary land within mill and estate in SOU 3.</p> <p>Sighted sample copies of title as following:</p> <p>Kamuning Estate</p> <p>The estate holds 38 land titles. Sighted the sampled land titles as follows:</p> <table border="1" data-bbox="994 1002 1718 1347"> <thead> <tr> <th>Ownership No.</th> <th>Lot No.</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td>GRN 00012934</td> <td>006414</td> <td>690.3278</td> </tr> <tr> <td>GRN 00012950</td> <td>006416</td> <td>661.3239</td> </tr> <tr> <td>GRN 0012946</td> <td>000076</td> <td>20.4366</td> </tr> <tr> <td>GRN 00052967</td> <td>002971</td> <td>12.2167</td> </tr> <tr> <td>GRN 0012948</td> <td>006417</td> <td>10.5377</td> </tr> </tbody> </table> <p>Elphil Estate</p>	Ownership No.	Lot No.	Hectare	GRN 00012934	006414	690.3278	GRN 00012950	006416	661.3239	GRN 0012946	000076	20.4366	GRN 00052967	002971	12.2167	GRN 0012948	006417	10.5377	<p>Complied</p>
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		<p>The estate holds 21 land titles. Sighted the sampled land titles as follows:</p> <table border="1" data-bbox="994 411 1720 756"> <thead> <tr> <th>Ownership No.</th> <th>Lot No.</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td>GRN 45680</td> <td>1294</td> <td>182.7153</td> </tr> <tr> <td>GRN 123184</td> <td>18521</td> <td>141.2000</td> </tr> <tr> <td>GRN 52005</td> <td>1550</td> <td>122.2655</td> </tr> <tr> <td>GRN 123771</td> <td>16222</td> <td>238.7000</td> </tr> <tr> <td>GRN 42312</td> <td>1222</td> <td>81.2076</td> </tr> </tbody> </table> <p>Kinta Kellas Estate</p> <p>The estate holds 58 land titles. Sighted the sampled land titles as follows:</p> <table border="1" data-bbox="994 852 1720 1085"> <thead> <tr> <th>Ownership No.</th> <th>Lot No.</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td>PN 00348596</td> <td>0317847</td> <td>194.9000</td> </tr> <tr> <td>GRN 00005352</td> <td>048286</td> <td>10.3953</td> </tr> <tr> <td>GRN 00005451</td> <td>048285</td> <td>184.6379</td> </tr> </tbody> </table>	Ownership No.	Lot No.	Hectare	GRN 45680	1294	182.7153	GRN 123184	18521	141.2000	GRN 52005	1550	122.2655	GRN 123771	16222	238.7000	GRN 42312	1222	81.2076	Ownership No.	Lot No.	Hectare	PN 00348596	0317847	194.9000	GRN 00005352	048286	10.3953	GRN 00005451	048285	184.6379	
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<p>4.4.2</p>	<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</p>	<p>Sime Darby did not acquire land from landowners, but leased it directly from the government. The quit rent payment was done accordingly as requirement from the state government.</p> <p>No customary land within mill and estate in SOU 3. Hence, this requirement is not applicable (N/A).</p>	<p>Complied</p>																														



	<p>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>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>Sime Darby did not acquire land from landowners, but leased it directly from the government. The quit rent payment was done accordingly as requirement from the state government.</p> <p>No customary land within mill and estate in SOU 3. Hence, this requirement is not applicable (N/A).</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>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>Sime Darby did not acquire land from landowners, but leased it directly from the government. The quit rent payment was done accordingly as requirement from the state government.</p> <p>No customary land within mill and estate in SOU 3. Hence, this requirement is not applicable (N/A).</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>	

4.4.3	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	<p>Sime Darby did not acquire land from landowners, but leased it directly from the government. The quit rent payment was done accordingly as requirement from the state government.</p> <p>No customary land within mill and estate in SOU 3. Hence, this requirement is not applicable (N/A).</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>	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	<p>Sime Darby did not acquire land from landowners, but leased it directly from the government. The quit rent payment was done accordingly as requirement from the state government.</p> <p>No customary land within mill and estate in SOU 3. Hence, this requirement is not applicable (N/A).</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>	Complied
4.4.5	<b>(C)</b> 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>Sime Darby did not acquire land from landowners, but leased it directly from the government. The quit rent payment was done accordingly as requirement from the state government.</p> <p>No customary land within mill and estate in SOU 3. Hence, this requirement is not applicable (N/A).</p>	N/A

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4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p>	<p>Sime Darby did not acquire land from landowners, but leased it directly from the government. The quit rent payment was done accordingly as requirement from the state government.</p> <p>No customary land within mill and estate in SOU 3. Hence, this requirement is not applicable (N/A).</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>	N/A
<p><b>Criteria 4.5</b></p> <p>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.</p>			
4.5.1	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	Complied
4.5.2	<p><b>(C)</b> 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</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	Complied

	available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.		
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.	Complied
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.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of anew concession or land title to the operator.	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied

4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.8	<b>(C)</b> 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.	Complied
<b>Criteria 4.6</b>			
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	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	There is no customary rights in Elphil Certification Unit.	Complied
4.6.2	<b>(C)</b> 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.	There is no customary rights in Elphil Certification Unit.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.	There is no customary rights in Elphil Certification Unit.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	There is no customary rights in Elphil Certification Unit.	Complied

<b>Criteria 4.7</b>			
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Complied
<b>Criteria 4.8</b>			
The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied

	certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.		
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use right, there claims will be settled using the relevant requirements (Indicator 4.4.2, 4.4.3 and 4.4.4)	SDPSB has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in participatory way with involvement of affected parties (including neighbouring communities where applicable)	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
<p><b>Principle 5: Support smallholder inclusion</b>            Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p><b>Criteria 5.1</b>            The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Current and previous period prices paid for FFB are publicly available and accessible by out growers/smallholders and displayed at weighbridge. Purchase of oil palm fruit from external parties is arranged by HQ.	Complied
5.1.2	<b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders (at least once a year or upon request).	Evidence for regular explanation on the FFB pricing to out growers/smallholders is available. Briefing was done during contract signing session which was last done in January 2020.	N/A
5.1.3	<b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Pricing of FFB is based on MPOB latest price and it was publicly available at weighbridge. No bidding contract between mill and supplier and they are free to send their crop to other mill or collection centre.	N/A

5.1.4	<b>(C)</b> 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.	No binding contract between mill and out growers that includes finance, loans/credit and repayments through FFB price reductions for replanting and or other mechanisms at Elphil POM. Thus, this indicator is not available	N/A						
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	<p>Contract is available for long term and shot term contract of service for mill and estate. Below are the sample of contracts checked:</p> <table border="1" data-bbox="994 715 1832 948"> <thead> <tr> <th data-bbox="994 715 1272 762">Contractor</th> <th data-bbox="1272 715 1550 762">Job scope</th> <th data-bbox="1550 715 1832 762">Contract period</th> </tr> </thead> <tbody> <tr> <td data-bbox="994 762 1272 948">YIH Construction Sdn Bhd</td> <td data-bbox="1272 762 1550 948">Replant job order on land preparation and related work for (oil palm) replanting (2019D)</td> <td data-bbox="1550 762 1832 948">Effective 1<sup>st</sup> October 2018 valid for 2 years</td> </tr> </tbody> </table>	Contractor	Job scope	Contract period	YIH Construction Sdn Bhd	Replant job order on land preparation and related work for (oil palm) replanting (2019D)	Effective 1 <sup>st</sup> October 2018 valid for 2 years	N/A
Contractor	Job scope	Contract period							
YIH Construction Sdn Bhd	Replant job order on land preparation and related work for (oil palm) replanting (2019D)	Effective 1 <sup>st</sup> October 2018 valid for 2 years							
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	<p>Agreed payment are made in timely manner and receipts specifying details and amount paid are given. Summary of payment made to the contractor as per the following:</p> <table border="1" data-bbox="994 1059 1832 1287"> <thead> <tr> <th data-bbox="994 1059 1272 1107">Contractor</th> <th data-bbox="1272 1059 1550 1107">Payment details</th> <th data-bbox="1550 1059 1832 1107">Remarks</th> </tr> </thead> <tbody> <tr> <td data-bbox="994 1107 1272 1287">Gunasekaran A/L Buchia</td> <td data-bbox="1272 1107 1550 1287">Tax invoice no. 1289 dated 2/3/20, payment date 6/3/20.</td> <td data-bbox="1550 1107 1832 1287">Payment term 45 days from issuance of payment certificate.</td> </tr> </tbody> </table>	Contractor	Payment details	Remarks	Gunasekaran A/L Buchia	Tax invoice no. 1289 dated 2/3/20, payment date 6/3/20.	Payment term 45 days from issuance of payment certificate.	N/A
Contractor	Payment details	Remarks							
Gunasekaran A/L Buchia	Tax invoice no. 1289 dated 2/3/20, payment date 6/3/20.	Payment term 45 days from issuance of payment certificate.							



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		Rajan Excavator Contractor	Tax invoice no. IV-02201 dated 4/3/20, payment dated 4/3/20.	Payment term 45 days from issuance of payment certificate.																		
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Records of weighing equipment stamping was maintained on annual basis at visited operating units. Summary of stamping records as follows:			<table border="1"> <thead> <tr> <th>Weighing equipment</th> <th>Model/capacity</th> <th>Date of stamping, certificate no.</th> <th>Operating Unit</th> </tr> </thead> <tbody> <tr> <td>M/Toledo IND 560</td> <td>MPK (E), 0138169-GHN, 60,000 kg</td> <td>ATP-ATK 034662 stamped on 13/6/19</td> <td>Kamuning Estate</td> </tr> <tr> <td>M/Toledo IND310</td> <td>MPK (E) 04240886, 01264406 KK 60,000 kg</td> <td>AIP-ATK 015618 stamped on 21/11/19, AIP-ATK 022933 stamped on 21/11/19</td> <td>Elphil POM</td> </tr> <tr> <td>M/Toledo IND246</td> <td>MPK (E) B521963024, 40,000 kg</td> <td>AIP-ATK 009055 stamped on 23/12/19</td> <td>Kinta Kellas Estate</td> </tr> </tbody> </table>	Weighing equipment	Model/capacity	Date of stamping, certificate no.	Operating Unit	M/Toledo IND 560	MPK (E), 0138169-GHN, 60,000 kg	ATP-ATK 034662 stamped on 13/6/19	Kamuning Estate	M/Toledo IND310	MPK (E) 04240886, 01264406 KK 60,000 kg	AIP-ATK 015618 stamped on 21/11/19, AIP-ATK 022933 stamped on 21/11/19	Elphil POM	M/Toledo IND246	MPK (E) B521963024, 40,000 kg	AIP-ATK 009055 stamped on 23/12/19	Kinta Kellas Estate	Complied
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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	No independent smallholders within Elphil POM certification unit			Complied																	

	internal control system (ICS), who holds the certificates, and who holds and sells the certified material.		
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	No independent smallholders within Elphil POM certification unit	Complied
<b>Criteria 5.2</b>			
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.	No independent smallholders within Elphil POM certification unit	Complied
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder or RSIS).	No independent smallholders within Elphil POM certification unit	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	No independent smallholders within Elphil POM certification unit	Complied
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	No independent smallholders within Elphil POM certification unit	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	No independent smallholders within Elphil POM certification unit	Complied

<b>Principle 6: respect workers' rights and conditions</b> Protect workers' rights and ensure safe and decent working conditions.			
<b>Criteria 6.1</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> 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.	SDPSB has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02 <sup>nd</sup> December 2019. The policy shall be guided by the commitments spelt out in the Company's in Human Rights Charter (HRC) 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.  The policy was communicated through the muster briefing to workers on 27/01/2020 & 13/02/2020 by Assistant Manager at Kamuning Estate, 10 & 17/02/2020 by Engineer at Elphil POM, 03/032020 at Elphil Estate and 24/02/2020 at Kinta Kellas Estate.	Complied
6.1.2	<b>(C)</b> 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.	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 electricity supply) and medical care (panel clinic) are given to all employees without discrimination.  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.  Overtime paid as per Employment Act 1995 (EA). Sampled workers are as 6.5.1.	Complied
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are	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	Complied

	based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	stakeholder’s consultation, worker’s interview, complaint book and trade union meeting.  Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste.	
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.	There is no pregnancy test conducted in Elphil Certification Unit. Confirmed through the interview session to workers and Gender Committee Minute of Meeting.	Complied
6.1.5	<b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly.  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 22/01/2020, 15/11/2019, 23/08/2019, 17/05/2019 and 22/02/2019 (Kamuning Estate), 08/01/2020, 14/10/2019, 24/07/2019, 24/04/2019 and 28/01/2019 (Elphil POM & Elphil Estate), 19/12/2019, 14/09/2019, 08/06/2019 and 23/03/2019. The activities such as Sukaneka, Bengkel Menangani Keganasan Gender, pap smear test, etc. were held.  No sexual harassment case been report and confirmed through interviewed with the chairman and female workers.	Complied

6.1.6	There is evidence of equal pay for the same work scope.	The equal pay can be seen through the pay slip reviewed for both female and male in clause 6.2.2 and 6.2.3.	Complied
<p><b>Criteria 6.2</b>          Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p><b>(C)</b> 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>	<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><u>Kamuning Estate:</u>          Employee ID: 139252 (Mondal Swapan Kumar)          Employee ID: 103900 (Maksum)          Employee ID: 141114 (Yadav Kusheshwar)          Employee ID: 112446 (Regina A/P Sollay)          Yih Construction Sdn Bhd – Juperi bin latif          Yih Construction Sdn Bhd – Saw Kheng Han          Yih Construction Sdn Bhd – Hamizan Bin Mustapa</p> <p><u>Elphil POM:</u>          Employee ID: 124389 (Sulhadi)          Employee ID: 135390 (Puteri Azian)          Employee ID: 146086 (Aksi Jayadi)          Maju mech Enginering: Abul Basar          Maju mech Enginering: Md Ali</p> <p><u>Elphil Estate:</u>          Employee ID: 147633 (Dibakar Tikadar)</p>	Complied

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		<p>Employee ID: 24698 (Fatimah Bathmavathi binti Abdullah) Employee ID: 85191 (Tanka Prasad Gautam) Employee ID: 139571 (Lalu Sepriadi) Sri As Pushpah: Yati binti Kasim Sri As Pushpah: Emmyliana binti Junid</p> <p><u>Kinta Kellas Estate:</u> Employee ID: 132037 (Ramjee Malla) Employee ID: 136479 (Ahmad Abdul Kholiq) Employee ID: 153675 (Sahil Reja) Employee ID: 116765 (Subrata Kumar Biswas)</p> <p>It is explained to the workers in the workers with the assistance of the senior worker from the same country during arrival through the induction training. Sighted the certificates of attendance from MAPA &amp; MPOA titled "Kursus Induksi Pekerja Asing" 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 Elphil 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>	
6.2.2	<p><b>(C)</b> 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> <p>However, in Elphil POM, found that contractor worker for Maju Mech namely Md Ali is a worker of Mekar Hijau Jaya Enterprise as per work permit but having the employment contract with Maju Mech. Seen the agreement signed between Mekar Hijau Jaya Enterprise and Maju Mech on labour lent. This is not comply with Immigration Act 1959/63, Employing a person who is not in possession of a valid Pass 55B. (1) Any person who employs one or more</p>	<p style="text-align: center;">Critical (Major non- conformance)</p>

		<p>persons, other than a citizen or a holder of an Entry Permit who is not in possession of a valid Pass shall be guilty of an offence and shall, on conviction, be liable to a fine of not less than ten thousand ringgit but not more than fifty thousand ringgit or to imprisonment for a term not exceeding twelve months or to both for each such employee.</p>	
<p>6.2.3</p>	<p><b>(C)</b> 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><u>Kamuning Estate:</u>  Employee ID: 139xxx (Mondal Swapan Kumar)  Employee ID: 103xxx (Maksum)  Employee ID: 141xxx (Yadav Kusheshwar)  Employee ID: 112xxx (Regina A/P Sollay)  (Yih Construction Sdn Bhd) -Juperi bin latif  (Yih Construction Sdn Bhd) – Saw Kheng Han  (Yih Construction Sdn Bhd)-Hamizan Bin Mustapa</p> <p><u>Elphil POM:</u>  Employee ID: 124xxx(Sulhadi)  Employee ID: 135xxx (Puteri Azian)  Employee ID: 146xxx (Aksi Jayadi)  Maju mech Engineering: Abul Basar  Maju mech Engineering: Md Ali</p> <p>However in Elphil POM, it was found that contractor worker is not complied with:  The payment of salary is paid on 10<sup>th</sup> every month, not on/or 7<sup>th</sup> every month. This is not comply with Employment Act 1955, Section 19, Time of payment of wages 19. Every employer shall pay to each of his employees not later than</p>	<p>Critical  (Major non-conformance)</p>

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		<p>the seventh day after the last day of any wage period the wages, less lawful deductions, earned by such employee during such wage period: Provided that if the Director General is satisfied that payment within such time is not reasonably practicable, he may, on the application of the employer, extend the time of payment by such number of days as he thinks fit. There is no evidence that Maju Mech has contribute to SOCSO for Md Ali. This is not comply with Akta Keselamatan Sosial Pekerja 1969, Pekeliling Majikan Bil 3 Tahun 2018.</p> <p><u>Elphil Estate:</u> Employee ID: 147xxx (Dibakar Tikadar) Employee ID: 24xxx (Fatimah Bathmavathi binti Abdullah) Employee ID: 85xxx (Tanka Prasad Gautam) Employee ID: 139xxx (Lalu Sepriadi) Sri As Pushpah: Yati binti Kasim Sri As Pushpah: Emmyliana binti Junid</p> <p><u>Kinta Kellas Estate:</u> Employee ID: 132xx (Ramjee Malla) Employee ID: 136xxx (Ahmad Abdul Kholiq) Employee ID: 153xxx (Sahil Reja) Employee ID: 116xxx (Subrata Kumar Biswas)</p>	
6.2.4	<p><b>(C)</b> 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</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 use of electricity and water is provided with subsidize rate as per employment contract. Seen the Budget for housing repairs, sanitation, garden upkeep (Elphil POM: LA040110 LO-HSE-Repairs-CN) and CAPEX from all operating units.</p> <p>Seen the record for weekly linesite inspection done by Medical Assistant in Weekly basis. During the field assessment, it was observed that the housing</p>	Complied



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	detailing the upgrade of infrastructure. A reasonable time (5years)is allowed to upgrade the infrastructure.	are in good conditions. For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilizes).	
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 Sungai Siput (Elphil POM & Elphil Estate and Kamuning Estate) and Batu Gajah (Kinta Kelas Estate) where the accessibility to the grocery and shops is available in housing area or they can go to the nearest town by public transport.	Complied
6.2.6	A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.	Sime Darby Plantation Berhad - Elphil POM has 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.	Complied

**PROCEDURAL NOTE:**

RSPO STANDARD STANDING COMMITTEE  
 14th of October 2019

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

With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavor to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist<sup>1</sup>

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

In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks<sup>1</sup>. These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.

***For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage<sup>1</sup>.***

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

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

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

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

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

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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 Elphil 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.	Complied
<p><b>Criteria 6.3</b></p> <p>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>			
6.3.1	<b>(C)</b> 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.	The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below: We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to: Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively. 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. Sighted the letter from NUPW to Estate Manager the election meeting at Changkat Salak Estate (Kamuning Estate) on 14/05/2018 (Ref letter: NUPW/PK/5/2018).	Complied
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	Minit Mesyuarat Antara Pihak Ladang Dan Wakil NUPW 2019 dated 08/10/2019 involved the representative from employer and employee available in Kamuning Estate, 09/01/2020 at Elphil POM and 05/12/2019 at Kinta Kellas Estate.	Complied

6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	<p>In Elphil POM, sighted the election of NUPW Committee Members (NUPW/PK/6/2018) on 05<sup>th</sup> June 2018 as below:</p> <p><u>Elphil POM</u>  Chairman: Mr. Mariappan a/l Sengan  Secretary: Mr. Bakiyathan a/l Palanisamy  Committee: Mr. Ramesh a/l Rajandran</p> <p><u>Elphil Estate</u>  Chairman: Mdm. Narayani d/o Karupiah  Secretary: Mr. Silvarajoo s/o Sinnakarappan  Committee: Mr. Rajan s/o Gopal</p> <p>Based on the worker’s interview, the selection of NUPW representative made from the election among the NUPW member without management interference. Foreign workers included in the committee formation and appointment letter was sighted.</p>	Complied
<b>Criteria 6.4:</b> Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	<p>The Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <p>Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</p> <p>Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</p>	Complied

		<p>Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations.</p> <p>Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities.</p> <p>Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use.</p> <p>Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees.</p> <p>Protecting the Rights of Children: We seek to promote the wellbeing of children, and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography.</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 &amp; protecting the rights of children available in the Vendor COBC dated 07 Feb 2020, Human Rights Charter-protecting the rights of children.</p>	
6.4.2	<p><b>(C)</b> 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 screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liaison &amp; Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</p>	Complied

6.4.3	<b>(C)</b> 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 Elphil POM certification unit.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	The unit of certification has communicated the Human Right Charter, Social Policy and Vendor COBC through the stakeholder meeting and muster briefing.	Complied
<b>Criteria 6.5:</b>			
There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below: We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to: Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims. Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation. The policy was communicated through the Gender Committee meeting conducted quarterly.	Complied
6.5.2	<b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	SDPSB has implemented Social Policy, Gender Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Briefing of the policies was conducted during morning muster and the policies was displayed at the notice board outside the office.	Complied

6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	There are new mothers assessments conducted through Gender Committee Meeting. In Kamuning Estate & Elphil Estate, there is no new needs for new mother while in Elphil POM, there is no new mother.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	Gender committee has been formed in each unit for the medium of sexual harassment grievances by female.	Complied
<b>Criteria 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited: <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty to the workers for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	<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 Amoza Travels for India (INR 50000) 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> <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 Elphil POM.</p> <p>The termination of service clearly stated that the termination of employment if:</p> <p>The company is not satisfied with your performance            You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term.</p>	Complied

		<p>You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime.          You have breached any express or implied terms of your employment.          Fail medical examination based on FOMEMA result.</p>	
6.6.2	<p><b>(C)</b> 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> <ul style="list-style-type: none"> <li>a. Providing equal opportunity</li> <li>b. Respecting freedom of association</li> <li>c. Eradicating any form of exploitation</li> <li>d. Ensuring favorable working conditions</li> <li>e. Enhancing Safety and Health</li> </ul> <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 as included in the Group Sustainability Policy on 10 &amp; 17/02/2020.          For eg: All the workers have provided with induction training in Sua Betong Estate or based estate during their arrival to Malaysia.</p>	Complied
<p><b>Criteria 6.7:</b>          The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;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>The Estate and Mill Manager in SOU 3 has been appointed as Person Responsible / Chairman for Safety and Health in the estate as per appointment letter dated 1/1/2020 signed by the Regional CEO. The Estate Manager has appointed the medical Assistant as person responsible for Safety and health issue in the estate and Mill.          The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, workplace inspection, and training. Sighted the minutes meeting records as follows:</p>	Complied



		<p><u>Elphil POM</u>  i. 20/1/2020  ii. 21/10/2019  iii. 19/7/2019  iv. 20/4/2019</p> <p><u>Kamuning Estate</u>  i. 25/2/2020  ii. 6/12/2019  iii. 6/9/2019  iv. 14/6/2019</p> <p><u>Elphil Estate</u>  i. 27/12/2019  ii. 26/9/2019  iii. 26/6/2019  iv. 20/3/2019</p> <p>Kinta Kellas  i. 4/3/2020  ii. 6/12/2019  iii. 13/9/2019  iv. 17/6/2019</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>Accident of emergency procedure is presented in Mill Quality Management System Standard Operation manual (MQMS SOM) dated November 1st, 2008. Flowchart of emergency handling was presented in Appendix 5.5.3.3. Noted during interview with workers show the satisfactory understanding on the emergency procedure established. Sighted sampled training was conducted as follows:  <u>Elphil POM</u>  i. First aid training dated 12-15/10/2019  ii. Fire drill training dated 6/1/2020  <u>Kamuning Estate</u></p>	<p>Complied</p>

		<p>i. Firefighting training dated 23/11/2019</p> <p>ii. First Aid training dated 22/11/2019</p> <p>Elphil Estate</p> <p>i. First Aid training dated 22/11/2019</p> <p>ii. Fire Fighting training 23/11/2019</p> <p>Kinta Kellas Estate</p> <p>i. Fire drill training dated 18/4/2019</p> <p>ii.. First aid training dated 16/2/2020, 18/2/2019 (8 first aider)</p>	
6.7.3	<p><b>(C)</b> 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>The estates visited provided appropriate PPE to all workers according to the job type. The PPE given as per HIRARC and Pictorial Safety Standard (PSS) dated 17/3/2008. Sighted during site visit at all estates visited, the sprayers were provided with wellington boots, apron, nitrile gloves and half face respirator. The PPE issuance records were available for review.</p>	Complied
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p>	<p>Medical care is provided to all the employees. Reviewed on workers profile records found that all workers are covered by the accident insurances.</p> <p>Elphil POM</p> <p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Sighted the form 8A, "Jadual Caruman" for December 2019, January and February 2020.</p> <p>Kamuning Estate</p> <p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Sighted the form 8A, "Jadual Caruman" for November, December 2019 and January 2020.</p> <p>Elphil Estate</p> <p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Sighted the form 8A, "Jadual Caruman" for November, December 2019 and January 2020.</p> <p>Kinta Kellas</p>	Complied

		Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Sighted the form 8A, "Jadual Caruman" for February 2020																
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated.. JKPP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2019 as reported to DOSH as follows:</p> <table border="1"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Elphil POM</td> <td>2</td> <td>13</td> </tr> <tr> <td>Kamuning estate</td> <td>6</td> <td>687</td> </tr> <tr> <td>Elphil Estate</td> <td>2</td> <td>91</td> </tr> <tr> <td>Kinta Kellas</td> <td>1</td> <td>2</td> </tr> </tbody> </table>	Operating units	Accident Cases	LTA	Elphil POM	2	13	Kamuning estate	6	687	Elphil Estate	2	91	Kinta Kellas	1	2	Complied
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<p><b>Principle 7:</b> Protect, conserve and enhance ecosystem and the environment.</p>																		
<p><b>Criteria 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>																		
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	<p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators. The estate has established IPM program. The plan was reviewed on annually basis. The IPM consist of Planting Beneficial Plant, Rat Baiting Applications and Barn Owl Census. Sighted the sampled implementation of the plan as follows: Kamuning Estate</p> <p>i. Barn owl census was conducted 2 rounds per year. Ratio barn owl box in the estate was at 1:43 h. Latest barn owl box census was conducted shows</p>	Complied															

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		<p>occupancy rate recorded at average of at 41% in Main Division and 38.24% in Changkat Salak Division.</p> <p>ii. The estate continuously planting beneficial plant such as Tunera subulata, Cassia cobanensis, Antigonan leptopus. The estate has completed 63% planting of beneficial plant compare to program.</p> <p>Elphil Estate</p> <p>i. Barn owl census was conducted 2 rounds per year. Ratio barn owl box in the estate was at 1:10 ha. Latest barn owl box census was conducted in December 2019. Occupancy rate recorded at average of at 41.93% in Kamiri Division.</p> <p>ii. Rat baiting was conducted 2 campaign per year. Latest Rat Baiting campaign was conducted on Augus 2019. The baiting rounds was at 2 – 3 rounds with acceptance level at 4 – 18%.</p> <p>Kinta Kellas Estate</p> <p>i. Rat baiting was conducted 2 campaign per year. Latest Rat Baiting campaign was conducted on November 2019. The baiting rounds was at 2 – 3 rounds with acceptance level at 19%.</p> <p>ii. The estate continuously planting beneficial plant such as Tunera subulata, Cassia cobanensis, Antigonan leptopus. As at FY 2019, the estae has completed planting of beneficial plant at 0.17 dm/planted ha.</p> <p>iii. Barn owl census was conducted 2 rounds per year. Ratio barn owl box in the estate was at 1:10 h. Latest barn owl box census was conducted in July 2019. Occupancy rate recorded at average of at 55%.</p>	
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.	In SOU 3, 4 plant species were used for IPM such as Tunera subulata, Cassia cobanensis, Antigonan leptopus and Euphorbia heterophylla.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	No evidence and records of fire usage for pest control at all estate visited. Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest:	Complied

		<p>"We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:</p> <p>ix. Zero tolerance of the use of fire within our land boundaries and conservation areas, and the establishment of effective monitoring and prevention systems, as well as protective firefighting measures in and around our operation."</p>																
<p><b>Criteria 7.2:</b>  Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>																		
7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p>	<p>The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 1/7/2011. Selected products are specific to the target pest, weed and disease. Some of recommended pesticides are:</p> <p>Immature planting (sample)</p> <p>i. General weeds : Glyphosate</p> <p>ii. Pennisetum polystachion : Metsulfuron Methyl</p> <p>iii. Stenochlaena palustris : Sodium chlorate</p> <p>Mature planting</p> <p>i. Grass weed and Asystasia : glyphosate &amp; 2,4-D amine</p> <p>The selection is also evaluated by the agronomist during his visit to the estate</p>	Complied															
7.2.2	<p><b>(C)</b> 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 pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate.</p> <p>Sighted the sampled records of pesticides usage per ha at estate visited as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Elphil</th> <th>Kinta Kellas</th> </tr> </thead> <tbody> <tr> <td>Jan 19</td> <td>1.8683</td> <td>0.62</td> </tr> <tr> <td>Feb 19</td> <td>0.0981</td> <td>0.09</td> </tr> <tr> <td>Mar 19</td> <td>0.1372</td> <td>46.82</td> </tr> <tr> <td>Apr 19</td> <td>0.2222</td> <td>0.04</td> </tr> </tbody> </table>	Month	Elphil	Kinta Kellas	Jan 19	1.8683	0.62	Feb 19	0.0981	0.09	Mar 19	0.1372	46.82	Apr 19	0.2222	0.04	Complied
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7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5.</p> <p>The estates visited has established management plan to reduce chemical usage FY 2020. The mitigation plan include:</p> <ul style="list-style-type: none"> <li>i. To plant beneficial plant</li> <li>ii. To increase ratio of BOB from ratio 1:30 to 1:10</li> <li>iii. Planting Legume Cover Crop</li> </ul> <p>The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators.</p>	Complied																								
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p>	<p>No evidence of prophylactic use of pesticides in the estates visited.</p>	Complied																								

<p>7.2.5</p>	<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"> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> <li>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> </ul>	<p>Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.3: Protect and disclose environmental impacts and minimise resource use stated:</p> <p>'We aim to minimise our foot print and continuously reduce our use of resources through:</p> <ul style="list-style-type: none"> <li>iv. Implementing integrated pest management programs, with no use of paraquat or chemicals classed as hazardous under the WHO 1A. We will phase out the WHO 1B and those additional chemicals listed in the Stockholm or Rotterdam Conventions."</li> </ul> <p>Sighted and verified at all estates visited, Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class II, III &amp; IV chemical used at visited estates.</p>	<p>Complied</p>
<p>7.2.6</p>	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p>	<p>The pesticides operators has been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly medical check-up done by the Medical Assistant. Observed the implementation during site visit and workers interview in following estate:</p> <p>Elphil Estate</p> <ul style="list-style-type: none"> <li>i. P&amp;D spraying training dated 16/11/2019</li> <li>ii. Chemical management training dated 11/12/2019</li> <li>iii. Schedule waste training dated 4/3/2020</li> <li>iv. Spraying, PPE and chemical handling dated 17/2/2019</li> </ul>	<p>Complied</p>

		<p>Kamuning Estate  vi. Scheduled waste training dated 20/2/2020  vii. PPE and Interpump maintenance training dated 11/2/2020  Viii. Safety, PPE for spraying training dated 3/2/2020  Kinta Kellas Estate  i. Rat baiting training dated 24/2/2020  iii. Chemical handling and SW handling training dated 20/2/2020  vi. Spraying techniques and safety aspects for sprayers training dated 16/8/2019  vii. SOP for spraying training dated 5/7/2019  viii. chemical handling and triple rinsing training dated 22/4/2019</p>	
7.2.7	<b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.	Complied
7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	<p>Empty pesticides container were identified as recycle waste. All empty pesticides containers were triple rinse, puncture and stored at designated stored before disposed to licensed contractors, SS Setia Technology Enterprise. Refer approval letter from DOE no AS (B) J 91/110/619/069 Jld 3(37) dated 24/10/2018. Sighted the implementation of the triple rinse during site visit at the storage area.</p> <p>Latest sampled records of empty containers disposal as follows:</p> <p>Kamuning Estate  i. Cash sales receipt no. 1508 dated 23/10/2019</p> <p>Elphil Estate  i. Cash sales receipt no. 1595 dated 18/1/2020  ii. Cash sales receipt no. 1507 dated 23/10/2019</p> <p>Kinta Kellas  i. Cash sales receipt no. 1534 dated 22/11/2019</p>	Complied



7.2.9	<b>(C)</b> 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.	No aerial spray conducted at all operating units in SOU 3.	Complied
7.2.10	<b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Estates visited conducted medical surveillance on annually basis base on CHRA recommendation. Sighted the sample records of medical surveillance conducted as follows: Elphil Estate i. Latest medical surveillance was conducted in July 2019 by certified OHD with Reg. no. HQ/11/DOC/00/200. 25 workers were send for surveillance and found fit to work as chemical handlers. Kinta Kellas Estate i. Latest medical surveillance for chemical handlers was conducted in January 2020 by certified OHD with Reg. no. HQ/08/DOC/00/649. 7 workers were send for surveillance and found fit to work as chemical handlers. ii. Monthly medical check-up for chemical handlers were conducted monthly by the estate medical assistant. Sighted the records of medical check-up conducted on 28/2/2020, 29/1/2020, 30/12/2019, 29/11/2019 and 30/10/2019.	Complied
7.2.11	<b>(C)</b> 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.	Sime Darby has established Gender Policy on Motherhood Responsibilities and Reproductive Rights on prohibition of all confirmed pregnant and breast-feeding woman to work with pesticidesThe policy has been communicated to the workers through induction training for new workers, morning briefing, iCARE Safety and Health Townhall meeting, and displayed at various notice board within the estate. The estates visited prohibited all confirmed pregnant and breast-feeding woman to work with pesticides as per internal memo signed by the estate manager. The memo has been displayed on the notice board at few strategic place in the estate.	Complied

<b>Criteria 7.3:</b>			
Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	<p>The waste management plan is established under Waste Management Plan dated 30/1/20. The waste are categorized as domestic waste, industrial waste, scheduled waste and recyclable waste.</p> <p>The collected waste are being segregated at the waste collection site for recyclable and non-recyclable. During field assessment at the waste collection centres / landfills, it was observed that all waste are completely buried. No waste scattered at the surrounding area.</p> <p>At waste storage area, it was found that recyclable and hazardous waste were kept separate at designated storage area. Scheduled waste are completely labelled and stored with secondary containment and spill kits. No evidence of spills observed during site visit.</p> <p>Sime Darby Industrial (SDI) is contracted to transport waste generated from maintenance activities such as used oil, used hydraulic, used battery and oil filter based on DOE's written approval, ref:AS(BB) 91/110/619/161 Jilid 14(69) dated 6<sup>th</sup> September 2011.</p> <p>At Kinta Kellas Estate, collection and disposal of waste generated from maintenance activity was done by appointed contractor, Kubota Malaysia Sdn Bhd which now no longer under full management control of Sime Darby Industrial (SDI). No evidence of written approval obtained from DOE for Kubota Malaysia Sdn Bhd's waste collection activity at the point of assessment. Thus, a minor NC was raised.</p>	Minor non-conformance
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	The disposal of type of waste are as per the waste management plan dated FY 2020. Interview with the waste disposal site workers confirmed that they understand about the waste segregation. For the hazardous waste, disposal waste made by DOE's license contractor. For estates, Sime Darby Industrial (SDI) is contracted to transport waste generated from maintenance activities	Complied

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		<p>such as used oil, used hydraulic, used battery, oil filter etc. Refer to DOE's written approval, ref:AS(BB) 91/110/619/161 Jilid 14(69) dated 6<sup>th</sup> September 2011</p> <p>Chemical containers are being disposed through Department of Agriculture (DOA)'s appointed contractor, SS Setia Teknologi Enterprise. Refer to DOA letter; dated 7/12/15 ref. no JP KRP 207/12/471 JLD VI. Empty chemical container need to be triple rinsed prior to collection/disposal.</p> <p><u>Kamuning Estate</u></p> <p>Recycle waste was send to recycler, SS Setia Teknologi Enterprise. Latest disposal, dated 23/10/19 summarize:</p> <table border="1" data-bbox="994 798 1827 1353"> <thead> <tr> <th>Estate</th> <th>Item</th> <th>Invoice/Ticket number</th> <th>Weight/ quantity</th> </tr> </thead> <tbody> <tr> <td>Kamuning</td> <td>Chemical container (hand pump, Kenlon, Ally/Basta/Galoon, 209 litre drum)</td> <td>DO no. 1508 dated 23/10/19 Weighbridge ticket no. 21 dated 23/10/19</td> <td>6,100 kg</td> </tr> <tr> <td>Kinta Kellas</td> <td>Chemical container – 40 pcs Fertilizer bag - 1530 kg</td> <td>DO no. 1534 dated 22/11/19</td> <td>1,530 kg + 40 pcs chemical container</td> </tr> </tbody> </table>	Estate	Item	Invoice/Ticket number	Weight/ quantity	Kamuning	Chemical container (hand pump, Kenlon, Ally/Basta/Galoon, 209 litre drum)	DO no. 1508 dated 23/10/19 Weighbridge ticket no. 21 dated 23/10/19	6,100 kg	Kinta Kellas	Chemical container – 40 pcs Fertilizer bag - 1530 kg	DO no. 1534 dated 22/11/19	1,530 kg + 40 pcs chemical container	
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		Hazardous waste disposal summary:					
		Waste code	Consignme nt no./ quantity	Waste Contractor/ Transporter	Date of disposal	Estate	
		SW305 (used lubricant), SW410 (Used filter)	110134100 , SW305 – 13 L, SW410 – 3 pcs	Sime Darby Industrial	3/2/20	Kamuning Estate	
		SW418 (discarded or off spec inks, paints etc.)	202002041 3XOAE4J, 0.0310 mt	Kualiti Alam Sdn Bhd	5/2/20	Elphil POM	
		SW109 (waste containing mercury or its compound)	202002041 3D6204U, 0.025 mt	Kualiti Alam Sdn Bhd	5/2/20	Elphil POM	
		SW306 (spent hydraulic oil)	202002041 3E7BHHK, 0.513 mt	Kualiti Alam Sdn Bhd	5/2/20	Elphil POM	
7.3.3	The unit of certification does not use open fire for waste disposal.	Observation from the waste disposal sites could not observe any waste are disposed using open fire. Biodegradable waste are being landfilled while other non-biodegradable and hazardous waste is disposed through licensed disposer.					Complied

<b>Criteria 7.4:</b> 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 as per SOP belows The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents; a) EQMS chapter B8 - Leguminous Cover Crops b) EQMS chapter B14 – Manuring c) ARM Section 8 – Manuring	Complied
7.4.2	Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	Plant Nutrition and Protection Unit (PNU) prepare the annual fertilizer recommendation base leaf analysis result. Leaf analysis show the nutrient level was used as the guidance for the recommendation. As per company SOP, the soil sampling analysis carried at 5 years interval. The leaf analysis and soil analysis report was made available for review. Noted the analysis report for estate visited as follows:  <u>Kamuning Estate</u> Latest soil sampling was conducted in Dec 2018. Latest leaf sampling analysis was carried out in November 2018. The report was stated in the 2019/20 Agronomic and Fertilizer Recommendations Report dated 25/4/2019.  <u>Elphil Estate</u> Latest soil sampling analysis was carried out on 8/3/2019. Refer report no. S40/2019 dated 17/4/2019. Latest leaf sampling analysis was carried out in Oct 2018. The report was stated in the 2019/20 Agronomic and Fertilizer Recommendations Report.  <u>Kinta Kellas</u>	Complied

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		Latest soil sampling analysis was carried out on 4/12/18. Latest leaf sampling analysis was carried out in Oct 2018. The report was stated in the 2019/20 Agronomic and Fertilizer Recommendations Report													
7.4.3	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>Nutrient recycling strategy is in place and includes use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. The strategy as follows:</p> <ul style="list-style-type: none"> <li>i. EFB applied at selected fields at the estates.</li> <li>ii. Fibre and POM were use as compost material.</li> <li>iii. Palm residues after planting were left in the biomass row to decompose.</li> </ul> <p>Sighted the sampled records for EFB disposal as follows:</p> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Month</th> <th>Elphil Estate (MT)</th> </tr> </thead> <tbody> <tr> <td>Jan 20</td> <td>432.04</td> </tr> <tr> <td>Feb 20</td> <td>522.30</td> </tr> </tbody> </table> <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Month</th> <th>Kinta Kellas Estate (MT)</th> </tr> </thead> <tbody> <tr> <td>Jun 19</td> <td>158.86</td> </tr> <tr> <td>Jul 19</td> <td>34.85</td> </tr> </tbody> </table>	Month	Elphil Estate (MT)	Jan 20	432.04	Feb 20	522.30	Month	Kinta Kellas Estate (MT)	Jun 19	158.86	Jul 19	34.85	Complied
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7.4.4	Records of fertiliser inputs are maintained.	<p>The estate maintain the records of manuring application as per recommendation by the agronomist</p> <p><u>Elphil Estate</u>  The estate maintain the records of manuring application as per recommendation by the agronomist.  Observed application records as per agronomist recommendation:</p>	Complied												

		<p>Month program: Jan 2020 Field: 2000G Ha program: 84.34 ha Type: Rock Phosphate Rate/palm: 1.00 – 1.50 kg/palm (base on blocks) Month completed: 23/2/2020</p> <p><u>Kinta Kellas Estate</u> Month program: Jan 2020 Field: 2012A Ha program: 97.62 ha Type: Rock Phosphate Rate/palm: 1.00 kg/palm (base on blocks) Month completed: 10/1/2020</p> <p>Month program: Jan 2020 Field: 2016A Ha program: 56.65 ha Type: Rock Phosphate Rate/palm: 1.00 kg/palm (base on blocks) Month completed: 29/1/2020</p>	
<p><b>Criteria 7.5:</b> Practices minimise and control erosion and degradation of soils.</p>			
7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.</p>	<p>Soil series map available for both estates visited.</p> <p><u>Kamuning Estate</u> No fragile soil categorized in the estate as per soil map issued by R&amp;D Precision Agriculture Unit dated dated 20/7/2016. Most soil series in the estate are as follows: Jerangau, Rengam, Munchong, Bungor, Local Aluvium, Langkawi, Harimau, Durian, Tavy Shallow</p>	Complied

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		<p><u>Elphil Estate</u>          No fragile soil categorized in the estate as per soil map issued by R&amp;D Precision Agriculture Unit dated dated 28/1/2015. Most soil series in the estate are as follows:          Bungor, Durian, Holyrood, Klau, Langkawi, Malacca, Munchong, Rengam, unclassified.</p> <p><u>Kinta Kellas Estate</u>          No fragile soil categorized in the estate. Most soil series in the estate are as follows:          Bungor, Malacca, Riverine Alluvium, Munchong, and Durian.</p>	
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.	<p>Sime Darby has established Slope and River Protection Policy signed by the Managing Director dated 15/1/2015. In the policy clearly stated that:</p> <p>i. Slope of &gt;25° must be excluded from any new planting development and replanting program.</p> <p>ii. Slope of &lt;25°, the existing crop and vegetation shall be maintained accordingly.</p> <p>Planting terraces had been constructed where slope &gt;10°. Fields are established with cover crops such as mucuna and soft grasses and ferns.</p>	Complied
7.5.3	There is no new planting of oil palm on steep terrain.	No new planting conducted at all estates visited.	Complied
<p><b>Criteria 7.6:</b>          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.</p>			
7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys	Soil series map available for both estates visited. No fragile soil categorized in the estates visited as per soil map issued by R&D Precision Agriculture Unit.	Complied



	identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	As sighted in estates visited, the estate have taken into account the land terrain, drainage and road systems in planning the 2020 replanting.																													
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.	Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest:  "We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:  vii. No new development of peat areas, regardless of depth or location. We will seek to rehabilitate existing plantings on peats where possible.	Complied																												
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	The R&D Precision Agriculture conducted assessment and provided the estates with topography maps. Sampled topography information at estates visited as follows:  <table border="1" data-bbox="990 831 1830 1182"> <thead> <tr> <th></th> <th>Kamuning</th> <th>Elphil</th> <th>Kinta Kellas</th> </tr> </thead> <tbody> <tr> <td>0° - 2°</td> <td>16.01</td> <td>52.06</td> <td>23.83</td> </tr> <tr> <td>2° - 6°</td> <td>32.71</td> <td>39.29</td> <td>44.96</td> </tr> <tr> <td>6° - 12°</td> <td>26.70</td> <td>7.22</td> <td>29.88</td> </tr> <tr> <td>12° - 20°</td> <td>18.48</td> <td>1.42</td> <td>1.34</td> </tr> <tr> <td>20° - 25°</td> <td>4.26</td> <td>0.02</td> <td>0.00</td> </tr> <tr> <td>&gt; 25°</td> <td>1.84</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table>		Kamuning	Elphil	Kinta Kellas	0° - 2°	16.01	52.06	23.83	2° - 6°	32.71	39.29	44.96	6° - 12°	26.70	7.22	29.88	12° - 20°	18.48	1.42	1.34	20° - 25°	4.26	0.02	0.00	> 25°	1.84	0.00	0.00	Complied
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<p><b>Criteria 7.7</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>																															

7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	No peat soil identified at all estates visited in SOU 3. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	No peat soil identified at all estates visited in SOU 3. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Complied
<b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance.			
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised.	No peat soil identified at all estates visited in SOU 3. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not applicable
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place.	No peat soil identified at all estates visited in SOU 3. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not applicable
7.7.5	<b>(C)</b> 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.  This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation	No peat soil identified at all estates visited in SOU 3. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not applicable

	period, company could submit other alternate methodologies to be considered by RSPO for recognition.		
7.7.6	<b>(C)</b> All existing plantings on peat are managed according to the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	No peat soil identified at all estates visited in SOU 3. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not applicable
7.7.7	<b>(C)</b> 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.	No peat soil identified at all estates visited in SOU 3. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not applicable
<b>Criteria 7.8</b>			
Practices maintain the quality and availability of surface and groundwater.			
7.8.1	A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Water management plan is in place and incorporated under Environmental Management Plan dated 30/1/20. The plan has included the availability of water sources and to avoid negative impacts on other users in the catchment. No restriction of access to clean water or contribute to pollution of water used by communities.	Complied
	b) Workers have adequate access to clean water.	Access to clean water is adequately provided to workers for household consumption. Water supply is by government @ <i>Lembaga Air Perak</i> at all visited estates.	

7.8.2	<p><b>(C)</b> 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>Documented as a Guidelines on River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). Buffer zones established as following:</p> <table border="1" data-bbox="994 459 1832 660"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>&gt; 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>&lt; 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p><u>Kamuning Estate</u>            There are no spraying activity along the river buffer zone with Sungai Nyamuk. The vegetation along the river buffer zone are well preserved. Monitoring of outgoing water was done every quarter. Latest report dated 14/2/20, ref: IE185/2020 exceeding the limit of Class IIA/IIB of NWQS for natural water ways. Internal corrective action request [WQ-01/CPAR (1)] has been issued to investigate the off-specification result. Further verification will be made on the ground to investigate possible source of pollution. Retest will be carried out if necessary.</p>	River width	Buffer zone	> 40 meters	50 meters	20 to 40 meters	40 meters	10 to 20 meters	20 meters	5 to 10 meters	10 meters	< 5 meters	5 meters	Complied
River width	Buffer zone														
> 40 meters	50 meters														
20 to 40 meters	40 meters														
10 to 20 meters	20 meters														
5 to 10 meters	10 meters														
< 5 meters	5 meters														
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>Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is monitored on monthly basis and reported via Online Environmental Reporting (OER) to DOE. Latest analysis report ref: EP50/2020 dated 11/2/20 is referred where BOD of final discharge is in compliance with the limit stipulated in mill's compliance schedule.</p>	Complied												
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p>	<p>The water usage by the mill is monitored on daily basis using flowmeter. As of December 2019, the water consumption is 0.83 mt water/mt FFB which below the target of 1:1 ratio.</p>	Complied												
<p><b>Criteria 7.9:</b>            Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>															

7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is implemented, monitored and documented.	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It was monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement.</p> <p>Apart from use of grid supply (TNB) for electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler. The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO.</p> <p>Electricity generation was through steam turbine and boiler where Palm fibre and PK shells were used as renewable energy/fuel. Monthly records of energy consumption of non-renewable and renewable fuel per metric ton of palm product at the Mill were available.</p> <p>Summary of renewal energy (RE) and diesel usage in 2019</p> <table border="1" data-bbox="994 847 1832 1042"> <thead> <tr> <th data-bbox="994 847 1272 962">Period</th> <th data-bbox="1272 847 1552 962">Renewable energy (turbine kWh) per CPO</th> <th data-bbox="1552 847 1832 962">Diesel Usage per FFB</th> </tr> </thead> <tbody> <tr> <td data-bbox="994 962 1272 1042">January – December 2019</td> <td data-bbox="1272 962 1552 1042">1.09</td> <td data-bbox="1552 962 1832 1042">0.069</td> </tr> </tbody> </table>	Period	Renewable energy (turbine kWh) per CPO	Diesel Usage per FFB	January – December 2019	1.09	0.069	Complied
Period	Renewable energy (turbine kWh) per CPO	Diesel Usage per FFB							
January – December 2019	1.09	0.069							
<p><b>Criteria 7.10:</b>  Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>									
7.10.1	<b>(C)</b> 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.	The GHG emissions for 2019 has been verified. Source of the emissions are mainly due to fossil fuel consumption, POME treatment and utilization of fertilizer. The fuel and fertilization consumption was documented in SAP and was cross reference to the estate records.	Complied						
7.10.2	<b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of	No development within Elphil POM Certification Unit since 2014.	N/A						

	emissions that 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).		
7.10.3	<b>(C)</b> Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.	Significant pollutants identification and plans are documented under Pollution Prevention Plan for period of January to December 2020. Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.	Complied
<b>Criteria 7.11:</b> Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning.	Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law – EQA and Regulations 1974. No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as (felling & chipping, cambering/land forming and path construction).	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas under its direct management.	Fire prevention and control measures has been established based on SDP Zero Burning Policy and Fire Prevention and Control Measures by GSQM. The established measures includes zero burning replanting technique, water management and peat area (if applicable), fire prevention and control, fire suppression and daily hot spots monitoring. Hot spot alert monitoring dashboard can be found via this link; <a href="http://www.simedarbyplantation.com/sustainability/hotspot-dashboard/">http://www.simedarbyplantation.com/sustainability/hotspot-dashboard/</a> . The above measures are developed based on risk area @ peat soil area.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	Engagement with adjacent stakeholders was done on 6/2/20 at Elphil Estate. SDP Zero Burning Policy and Fire Prevention and Control Measures presented to adjacent stakeholders.	Complied
<b>Criteria 7.12:</b>			

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><b>(C)</b> 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>	No development within Elphil POM certification unit.	Complied
7.12.2	<p><b>(C)</b> 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>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p>	<p>HCV Re-Assessment for Strategic Operating Unit (SOU) 3 Elphil has been conducted on 4-6/5/2017 by Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Sdn. Bhd. Final Report (Version 2.0) dated February 2017 was sighted. Summary of HCV area within Elphil POM certification unit as per the following:</p> <p>i) Water Catchment area – category HCV 4 (Kamuning Estate, Elphil Estate and Kinta Kellas Estate)</p> <p>ii) River Reserve – category HCV 4 (Kamuning Estate, Elphil Estate and Kinta Kellas Estate)</p> <p>iii) Slope/ Rocky area – category HCV 4 (Kamuning Estate)</p> <p>iv) Isolated remnant forest – category HCV 4 (Kamuning Estate)</p> <p>v) Limestone hill and cave – category HCV 3 (Elphil Estate)</p> <p>Total HCV area identified: 114.70 ha</p>	Complied
<p><b>PROCEDURAL NOTE</b> for 7.12.2:            Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p>			
7.12.3	<i>Indicator is not applicable in Malaysia context.</i>	Not applicable	N/A

7.12.4	<b>(C)</b> 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).	No new planting after 15 November 2018 within Elphil POM certification unit	N/A						
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	No local communities have been identified in HCV areas, HCS forest after 15 November 2018 within Elphil POM certification unit	N/A						
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	<p>A programme to regularly educate the workforce about the status of RTE species is in place. Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented. Signage was utilised as part of creating awareness among employees on the restriction of poaching/capturing/harming/collecting/killing the RTE species.</p> <p>Summary of training carried at all visited estates;</p> <table border="1" data-bbox="994 1318 1832 1364"> <thead> <tr> <th data-bbox="994 1318 1272 1364">Estate</th> <th data-bbox="1272 1318 1550 1364">Training</th> <th data-bbox="1550 1318 1832 1364">Date of training</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Estate	Training	Date of training				N/A
Estate	Training	Date of training							



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		Kamuning Estate	HCV training	4/3/20		
		Elphil Estate (Kemiri Division)	HCV/Buffer zone training	3/3/20		
		Kinta Kellas Estate	HCV training	24/1/20		
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.	<p>No new planting after 15 November 2018 within Elphil POM certification unit. Thus, this indicator is not available.</p> <p>For existing HCV area, on-going monitoring was done on monthly basis. HCV management plan incorporated under Environmental Management Plan for FY 2020 (January – December 2020). Animal sighting, encroachment/illegal activities and erosion being monitored and recorded using check sheet, <i>"Pemantauan HCV dan Pelan Konservasi"</i>. Based on last 3 month records, no evidence of animal sighting, encroachment/illegal activities and erosion recorded.</p> <p>Kinta Kells Estate – monthly check 28/2/20, 30/1/20 and 28/12/20.</p>				N/A
7.12.8	<b>(C)</b> 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.	<p>No land clearing since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Elphil POM certification unit. Thus, this indicator is not applicable.</p>				N/A

**Appendix B: Approved Time Bound Plan**

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

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

Financial year (July – June)	Targeted	Achieved/Status	Attachments
Jun-08	5 SOUs	<p><b>Achievement of Timebound Plan</b>                      Sime Darby Plantation has had all its SOUs (Malaysian &amp; 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> <ul style="list-style-type: none"> <li>i) SDP - RSPO Certification Status for Malaysia Operations</li> <li>ii) SDP- RSPO Certification Status for Indonesia Operations</li> <li>iii) Updates on PT MAS</li> <li>iii) RSPO SCCS status for Sime Darby Plantation (Downstream Operations)</li> </ul>
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)

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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 MAS has undergone RSPO Main assessment and is delayed due to some social disputes. The target date for certification is by 2017 subject to the progress of the matter being resolved.</p> <p>Smallholders As at Dec 2017, a total of 28,712 Ha of smallholders have been certified. The entire KKPA (1-5) in Sebamban, KKPA Sg. Cengal, and Plasma TGK and SIA (East and West Plasma) are now RSPO certified with a production capacity of 465,602 mt of FFB. Total scheme smallholders hectares are 51,353 and total communities are 22,613.</p> <p>Certification process for the remaining associated smallholders areas is on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and outgrowers by end 2020.</p> <p>Liberia Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification Stage 2 Assessment in March/April 2018. RSPO NPP process has been completed in 2011.</p>

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<b>Total SOUs</b>	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.
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**SDP - RSPO Certification Status for Malaysia Operations**

SOU NO	Name of SOU	Location	Date Certification	of	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '11		11-Aug-20	SPO 550179	
2	Chersonese	Kuala Kurau, Perak	5 Oct '11		4-Oct-21	CU-RSPO-815148, RSPO 590800	
3	Elphil	Sg Siput, Perak	18 Jun '11		17-Jun-21	RSPO 550180	
4	Flemington	Teluk Intan, Perak	5 Oct '11		4-Oct-21	CU-RSPO-819144, RSPO 590802	
5	Seri Intan	Teluk Intan, Perak	3 Mar '11		2-Mar-21	CU-RSPO-811218, RSPO 0015	
5	Selaba	Teluk Intan, Perak	3 Mar '11		2-Mar-21	CU-RSPO-819142, RSPO 0016	
5a	Sg Samak		3 Mar '11		NA	NA	
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11		2-Mar-21	CU-RSPO-819143, RSPO 0014	
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11		14-Apr-21	RSPO 550181	
8	East	Carey Island, Selangor	19 May '10		18-May-20	SPO 543543	
9	West	Carey Island, Selangor	19 May '10		18-May-20	SPO 543594	
9a	Sepang	Sepang, Selangor	19 May '10		NA	NA	

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10	Bukit Puteri	Raub, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020	
11	Kerdau	Temerloh, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019	
12	Jabor	Kuantan, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049	
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-21	CU-RSPO-819163, SGSRSPO/PM/MY13/01284, 824 502 16039, SGS-RSPO/PC17-00004, CURSPO-855480	
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-20	SPO 541905	
15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-24	SGS-RSPOPM-MY14/01364, 824 502 16032	Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill with Certificate No: CU- RSPO-819165, certification date: 30 Dec 2011.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '11	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051	
17	Kempas	Jasin, Melaka	20 May '15	19-May-20	RSPO-PC 00101	
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-24	RSPO 600305	Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	NA	
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-20	RSPO 548299	
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042	

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

Legends:

Certification  
 Withdrawal

**SDP- RSPO Certification Status for Indonesia Operations**

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
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1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	MUTU-RSPO/011, SGS-RSPO/PC17-00005, SGS-RSPO/PC17-00005	
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	2-Jul-23	MUTU-RSPO/027	
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	3-Aug-22	MUTU-RSPO/014	Recertification of Bebunga POM is in progress.
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	
7	PT BAHARI GEMBIRARIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	28-Nov-22	MUTU-RSPO/019	
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	24-Nov-20	MUTU-RSPO/002	
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	19-Jul-22	MUTU-RSPO/016	Recertification of Pondok Labu POM is in progress.

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10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	19-Nov-22	MUTU-RSPO/017	Recertification of Rantau Panjang POM is in progress.
12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11	05-Feb-22	MUTU-RSPO/009	
13		BETUNG		1-April-14	31-Mar-24	MUTU-RSPO/035	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	MUTU-RSPO/001	
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	16-Mar-17	MUTU-RSPO/015	Mill is mothballed.
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	28-Nov-22	MUTU-RSPO/020	
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU-RSPO/004	
18	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16	30-Nov-21	MUTU-RSPO/008	
19		MANDAH		1-April-14	31-Mar-24	MUTU-RSPO/036	



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20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU-RSPO/007	
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	28-Dec-22	MUTU-RSPO/018	
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	2-May-23	MUTU-RSPO/026	
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-24	MUTU-RSPO/044	
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	NA	NA	

**Legends**

Pending Certification by RSPO	Mill closed down/Mothballed	NA - NOT APPLICABLE
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**Appendix C: GHG Reporting Executive Summary**

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

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.37
PKO	1.37

Extraction	%
OER	20.47
KER	5.57

Production	t/yr
FFB Process	208,786.90
CPO Produced	42,744.37
PKO Produced	11,624.89

Land Use	Ha
OP Planted Area	10,818.98
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>10,818.98</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	51,057.01	0.61	355.37	0.65	0	0	51,412.38	1.26
CO <sub>2</sub> Emission from fertilizer	5,012.93	0.06	35.66	0.06	0	0	5,048.59	0.12
NO <sub>2</sub> Emission	2,794.88	0.03	24.64	0.04	0	0	2819.51	0.04
Fuel Consumption	419.71	0.01	2.76	0.01	0	0	422.27	0.02
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-46,533.25	-0.56	-321.81	-0.59	0	0	-46,855.06	-1.15
Conservation Sequestration	0	0	0	0	0	0	0	0
<b>Total</b>	<b>12,751.284</b>	<b>0.15</b>	<b>96.62</b>	<b>0.18</b>	<b>20,034.73</b>	<b>0</b>	<b>32,882.63</b>	<b>0.33</b>

*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	14,941	0.17
Fuel Consumption	291.64	0
Grid Electricity Utilization	0	0
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	15,232.64	0.17

**Summary of Kernel Crusher Emission and Credit (if applicable)**

Emissions	tCO <sub>2</sub> e
PK from own mill	-73,447.46
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	0

\*This mill has no kernel crusher operation.

<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

<b>POME Diverted to Anaerobic Digestion:</b>	
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**

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No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	February 2019	8,257.52	11,606.23	19,863.75
2	March 2019	9,291.49	13,320.47	22,611.96
3	April 2019	8,799.62	10,022.65	18,922.27
4	May 2019	7,886.32	11,093.92	18,980.24
5	June 2019	6,108.59	8,574.20	14,682.79
6	July 2019	5,842.30	10,789.56	16,631.858
7	August 2019	6,175.31	11,125.21	15,161.13
8	September 2019	6,330.36	10,640.13	16,970.486
9	October 2019	6,450.61	9,519.25	15,969.855
10	November 2019	5,554.02	7,919.83	13,473.846
11	December 2019	5,338.08	7,200.72	12,538.801
12	January 2020	5,691.97	7,700.58	13,392.547
13	February 2020	7,404.84	11,188.95	18,593.785
Total		89,131.03	130,701.70	217,793.32
<b>Note:</b>				

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	February 2019	1650.99	491.18
2	March 2019	1883.56	567.28
3	April 2019	1742.87	467.72
4	May 2019	1579.27	429.28
5	June 2019	1293.01	344.97
6	July 2019	1212.49	325.64
7	August 2019	1325.82	349.22
8	September 2019	1311.75	364.60
9	October 2019	1316.92	327.41
10	November 2019	1152.90	296.29
11	December 2019	1095.66	299.05
12	January 2020	1130.25	326.07
13	February 2020	1489.83	418.25

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Total	18,185.32	5,006.96
<b>Note:</b>		

<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	August 2019	aaa		2,897.78
2	August 2019	bbb	9,806.75	
	Total		9,806.75	2,897.78
<b>Note:</b>				

<b>D. Records of CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	NA			
<b>Note:</b>				

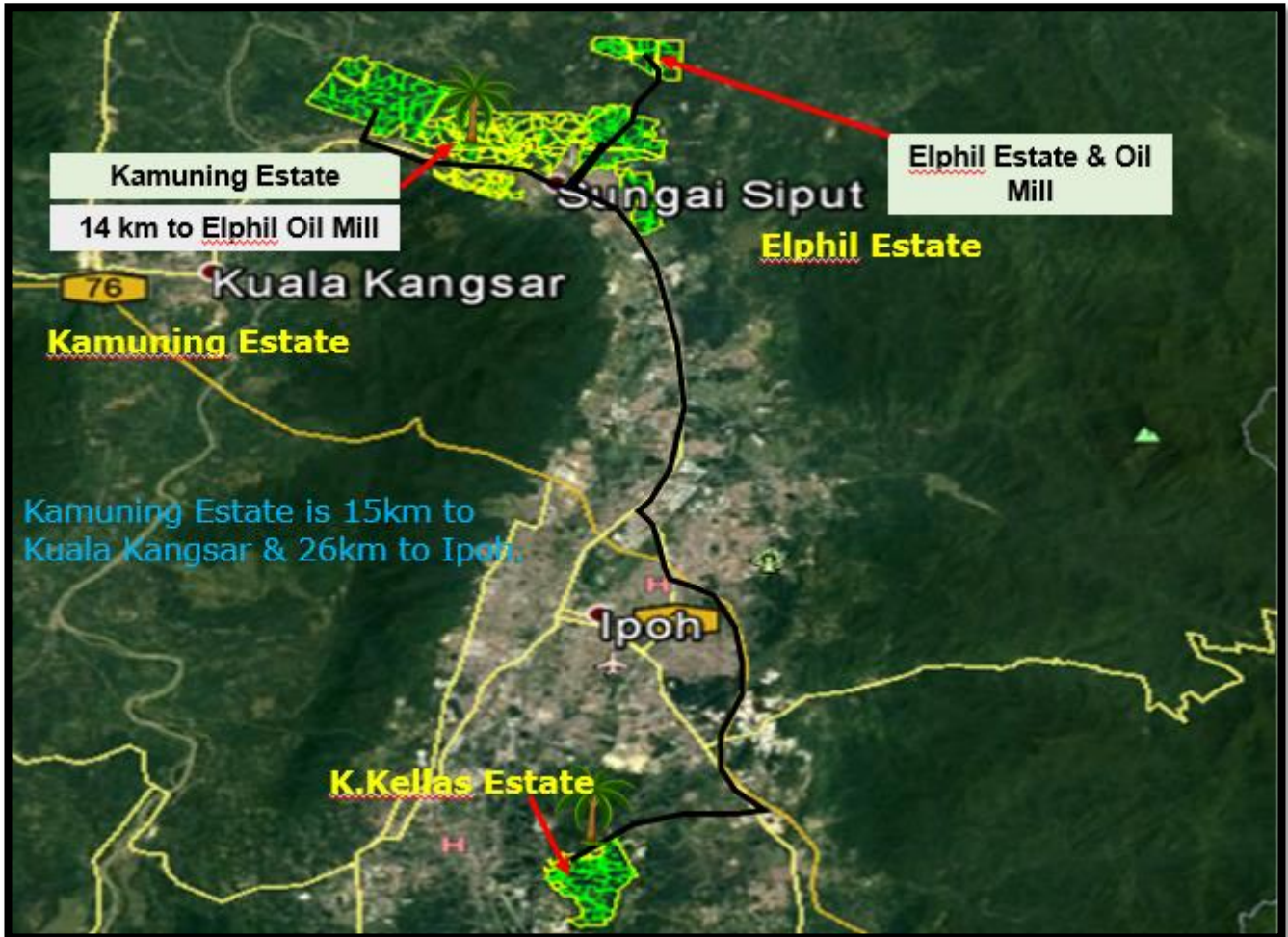
<b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (if any)</b>				
No.	Month- Year	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Feb-19	SDP Nuri	2864.1	0
4	Apr-19	SDP Nuri	1120.26	0
5	Apr-19	Mewah Oils	354.09	
6	May-19	PGEO	0	38.49
7	Jun-19	SDP Nuri	68.5	0
8	Jul-19	SDP KCP	0	205.17
9	Aug-19	PGEO	0	296.22
10	Sep-19	Bursa Malaysia	866.53	0
11	Sep-19	PGEO	0	205.17
12	Oct-19	PGEO	0	50.36
13	Oct-19	SinHuat Hin	0	297.37
14	Nov-19	PGEO	0	28.21
15	Dec-19	Bursa Malaysia	562.27	0
16	Dec-19	SinHuat Hin	0	477.75
17	Jan-20	Mewah Oils	39.76	0

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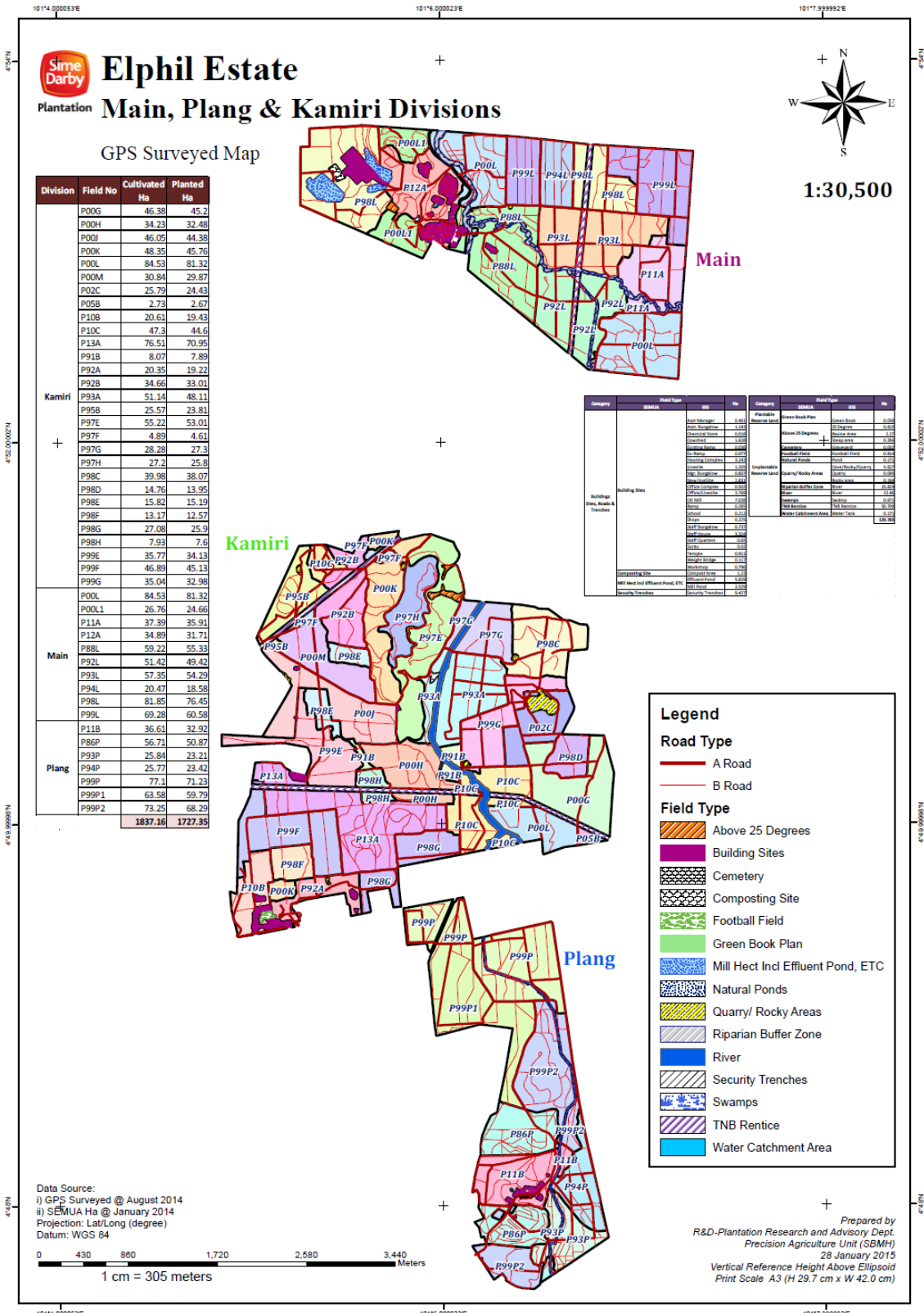
18	Feb-20	Sin Huat Hin	0	306.06
Total			5,875.51	2,688.20

<b>E. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>PalmTrace Trading License Number</b>	<b>RSPO Credits of Certified CPO Sold (mt)</b>
	NA		
<b>Note:</b>			

**Appendix E: Location Map of Certification Unit and Supply bases**

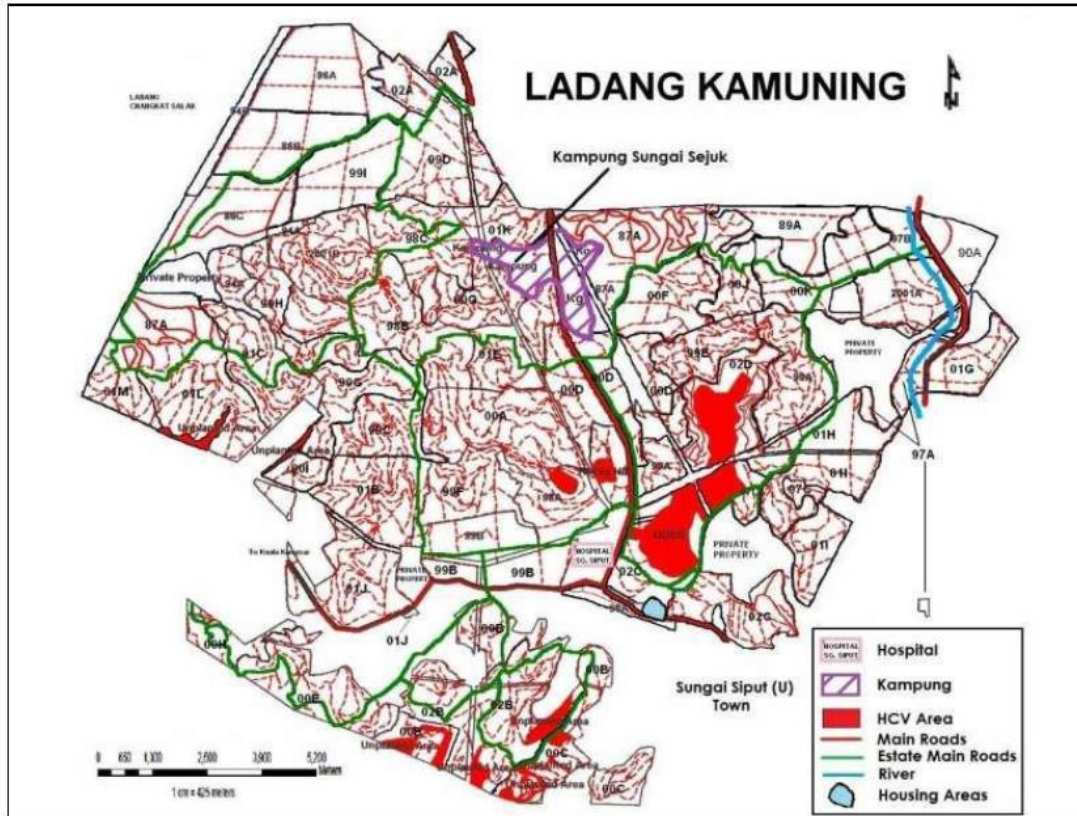


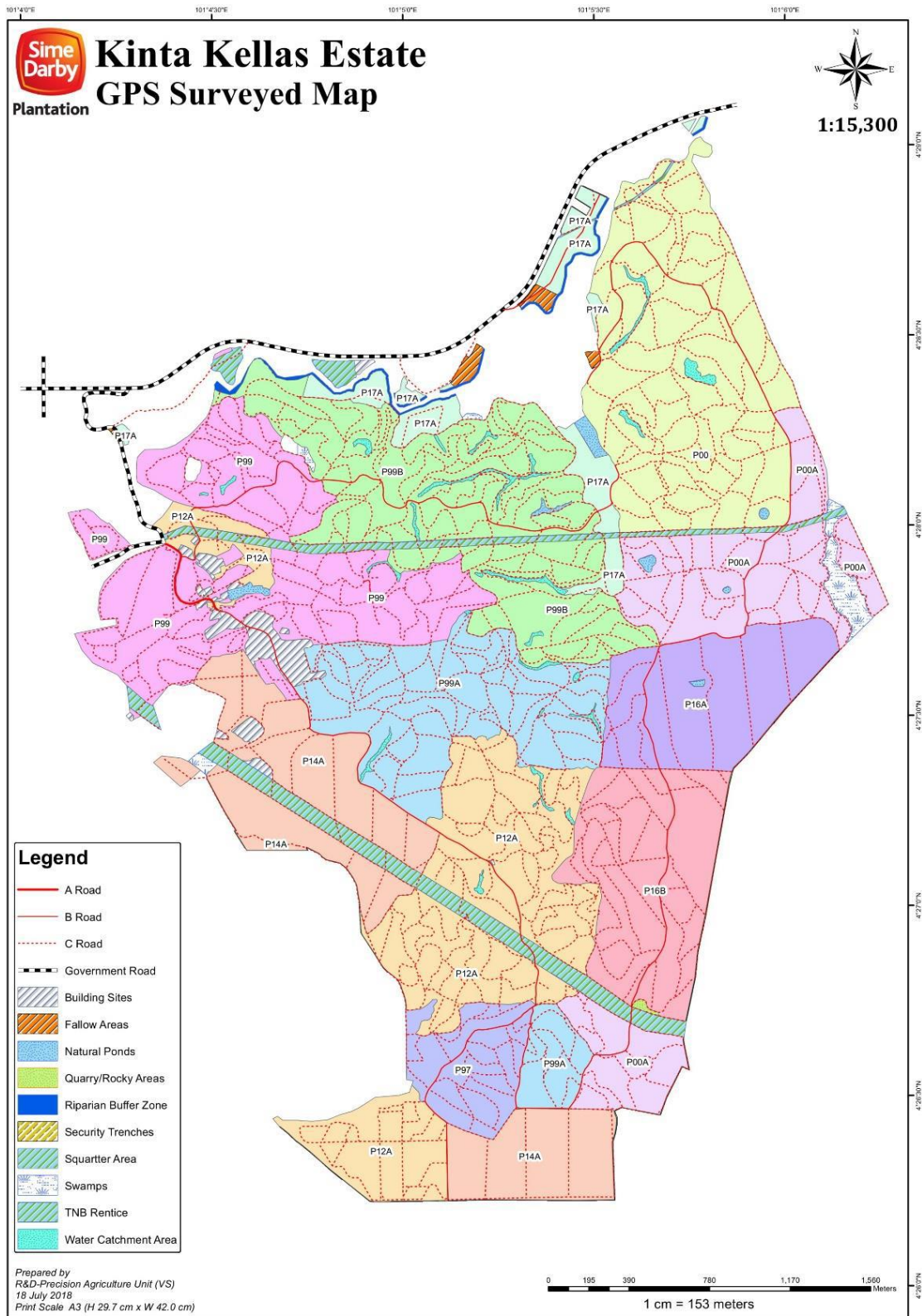
**Appendix F: Estate Field Map**





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**Appendix G: List of Smallholder Sampled**

Not applicable as no smallholders under Elphil 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