

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (2\_2)**
- Recertification Assessment (Choose an item.)**
- Extension of Scope**

<p><b>Client Company name (Parent Company):</b>  <b>Sime Darby Plantation Berhad</b></p>
<p>Client company Address:  Level 3A, Main Block, Plantation Tower No, 2, Jalan PJU 1A/7 47301 Ara Damansara  Selangor, Malaysia</p>
<p>Certification Unit:  <b>Strategic Operating Unit (SOU 26)</b>  <b>Sandakan Bay Palm Oil Mill</b></p> <p>Location of Certification Unit:  KM 34, Off Jalan Sukau Kinabatangan, Suanlamba District 90009 Sandakan, Sabah,  Malaysia</p>
<p>Date of Final Report:  30<sup>th</sup> December 2020</p>

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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>	Level 3A, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Sandakan Bay Palm Oil Mill		
<b>Location / Address</b>	KM 34, Off Jalan Sukau Kinabatangan, Suanlamba District 90009 Sandakan, Sabah, Malaysia		
<b>Website</b>	<a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a>		
<b>Management Representative</b>	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, Group Sustainability Department) Ms Nor Azian Anuar (Sandakan Bay Palm Oil Mill Manager)	<b>E-mail</b>	<a href="mailto:shylaja.vasudevan@simedarbyplantation.com">shylaja.vasudevan@simedarbyplantation.com</a> <a href="mailto:nor.azian.anuar@simedarbyplantation.com">nor.azian.anuar@simedarbyplantation.com</a>
<b>Telephone</b>	+603-78484379 (Head Office) +6089-622276/247225 (Mill)	<b>Facsimile</b>	+603 78484363 (Head Office) +6089-622276 (Mill)

2. Certification Information			
<b>Certificate Number</b>	<b>RSPO 537872</b>	<b>Date of First Certification</b>	1/10/2008
		<b>Certificate Start Date</b>	1/10/2018
		<b>Certificate Expiry Date</b>	30/09/2023
<b>Scope of Certification</b>	Palm oil and Palm Kernel Production		
<b>Visit Objectives</b>	To conduct a surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organisation's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.		
<b>Assessment Cycle</b>	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.)		

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	<input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 2 ; ASA 2) <input type="checkbox"/> Scope Extension
<b>Applicable Standards</b>	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> <i>Malaysia</i> National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019
<b>Supply Chain Module</b>	<input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 682050	MS 2530-4 Malaysia Sustainable Palm Oil (MSPO) Part 4	BSI Services (M) Sdn Bhd	8/02/2023
MSPO 689878	MS 2530-3 Malaysia Sustainable Palm Oil (MSPO) Part 3		8/02/2023
MSPO 714122	MSPO Supply Chain Certification Standard		5/11/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Sandakan Bay POM	KM 34, Off Jalan Sukau Kinabatangan, Suanlamba District 90009 Sandakan, Sabah, Malaysia	5° 38' 26" N	118° 10' 03" E
Segaliud Estate	Jalan Sandakan-Lahad DatuBatu 36, 90009, Sandakan, Sabah, Malaysia	5° 43' 33" N	117° 45' 20" E
Sentosa Estate	KM 34, Off Jalan Sukau Kinabatangan, Suanlamba District 90009 Sandakan, Sabah, Malaysia	5° 36' 19" N	118° 10' 19" E
Tigowis Estate	KM 34, Off Jalan Sukau Kinabatangan, Suanlamba District 90009 Sandakan, Sabah, Malaysia	5° 44' 57" N	118° 13' 03" E
Tun Tan Estate	KM 34, Off Jalan Sukau Kinabatangan, Suanlamba District 90009 Sandakan, Sabah, Malaysia	5° 38' 29" N	118° 10' 45" E

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Tunku Estate	KM 34, Off Jalan Sukau Kinabatangan, Suanlamba District 90009 Sandakan, Sabah, Malaysia	5° 42' 31" N	118° 10' 48" E
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#### 5. Description of Supply Base

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Segaliud Estate	4,252.75	261.19	306.19	4,820.13	88.23
Sentosa Estate	3,208.73	74.64	262.17	3,545.54	90.50
Tigowis Estate	1,879.99	9.93	184.10	2,074.02	90.64
Tun Tan Estate	2,775.05	4.74	345.81	3,125.60	88.29
Tunku Estate	2,887.48	30.00	281.57	3,199.05	90.27
<b>Total</b>	<b>15,004.00</b>	<b>380.5</b>	<b>1,379.84</b>	<b>16,764.34</b>	<b>89.41</b>

#### 6. Plantings & Cycle

Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Segaliud Estate	1,390.65	2,388.27	473.83	0	0	2,862.10	1,390.65
Sentosa Estate	1,109.57	1,508.78	0	0	590.38	2,099.16	1,109.57
Tigowis Estate	518.64	1,015.38	155.05	0	190.92	1,361.35	518.64
Tun Tan Estate	683.93	1,598.21	0	0	492.91	2,091.12	683.93
Tunku Estate	1,066.20	1,185.45	0	0	635.83	1,821.28	1,066.20
<b>Total (ha)</b>	<b>4,768.99</b>	<b>7,696.09</b>	<b>628.88</b>	<b>0</b>	<b>1,910.04</b>	<b>10,235.01</b>	<b>4,768.99</b>

#### 7. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year			
	Estimated (Oct 2019 – Sept 2020)	Actual (June 2019 – July 2020)		Forecast (Oct 2020 – Sept 2021)
		Previous license period (June 2019 – Sept 2019)	Current license period (Oct 2019 – July 2020)	
Segaliud Estate	60,299.34	19,955.90	54,792.79	79,128.37

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Sentosa Estate	39,200.00	12,898.39	35,497.79	39,653.35
Tigowis Estate	23,908.75	9,016.59	22,211.64	24,626.37
Tun Tan Estate	30,875.34	12,322.62	30,702.47	41,731.87
Tunku Estate	34,824.36	10,913.03	20,071.21	35,458.50
<b>Total</b>	189,107.79	65,106.53	163,275.90	220,598.46
			228,382.43	

<b>8. Certified Tonnage of FFB (from other certified unit(s))</b>				
Estate	Tonnage / year			Forecast (Oct 2020 – Sept 2021)
	Estimated (Oct 2019 – Sept 2020)	Actual (June 2019 – July 2020)		
Nil	N/A	Previous license period (June 2019 – Sept 2019)	Current license period (Oct 2019 – July 2020)	N/A
<b>Total</b>				

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
Independent FFB Supplier	Tonnage / year			Forecast (Oct 2020 – Sept 2021)
	Estimated (Oct 2019 – Sept 2020)	Actual (June 2019 – July 2020)		
Nil		Previous license period (June 2019 – Sept 2019)	Current license period (Oct 2019 – July 2020)	
3 <sup>rd</sup> party FFB supplier	N/A	11,720.33	34,989.95	N/A
<b>Total</b>	N/A	46,710.28		N/A

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10. Certified Tonnage				
	Estimated (Oct 2019 – Sept 2020)	Actual (June 2019 – July 2020)		Forecast (Oct 2020 – Sept 2021)
	FFB	FFB		FFB
<b>Mill Capacity: 60 MT/hr</b>	189,107.89	Previous license period (June 2019 – Sept 2019)	Current license period (Oct 2019 – July 2020)	220,598.46
		65,106.53	<b>163,275.90</b>	
<b>SCC Model: MB</b>	<b>CPO (OER: 22.06%)</b>	<b>CPO (OER: 21.92%)</b>		<b>CPO (OER: 22.60%)</b>
	41,717.28	14,782.39	<b>35,282.46</b>	49,855.25
	<b>PK (KER: 4.97%)</b>	<b>PK (KER: 5.71%)</b>		<b>PK (KER: 5.05%)</b>
	13,148.66 (with volume extension)	3,618.96	<b>9,414.30</b>	11,140.22

11. Actual Sold Volume (CPO)					
Current License period (Oct 2019 – July 2020)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	0	0	0	21,682.37	21,682.37
Previous License period (June 2019 – Sept 2019)					
<b>CPO (MT)</b>	0	0	0	10,480.60	10,480.60
<b>Total</b>	0	0	0	*32,162.97	32,162.97

\*including credit sales on March 2020, stock transaction ID ST-TR-881af754-668e (CPO: 10,000mt)

12. Actual Sold Volume (PK)					
Current License period (Oct 2019 – July 2020)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>PK (MT)</b>	8,374.27	0	0	783.16	9,157.43
Previous License period (June 2019 – Sept 2019)					
<b>PK (MT)</b>	2,424.73	0	0	581.50	3,006.23
<b>Total</b>	10,799.00	0	0	1,364.66	12,163.66

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<b>13. Independent Smallholders Certification Claims</b>		
	<b>Credit</b>	<b>Physical Volume (MT)</b>
<b>IS-CSPO</b>	-	-
<b>IS-CSPKO</b>	-	-
<b>IS-CSPKE</b>	-	-

## 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 84,000 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.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **4-6/8/2020**. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

Due to the COVID-19 pandemic, the Critical NC close out off-site assessment was conducted on **30/10/2020**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2018 for the Production of Sustainable Palm Oil (**RSPO P&C MYNI 2019**) was used to guide the assessment 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 (and smallholders) of its supply base.

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

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

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

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

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

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification2)</b>	<b>Year 2 (ASA 2_1)</b>	<b>Year 3 (ASA 2_2)</b>	<b>Year 4 (ASA 2_3)</b>	<b>Year 5 (ASA 2_4)</b>
Sandakan Bay POM	√	√	√	√	√
Segaliud Estate	√	-	-	√	-
Sentosa Estate	-	√	-	√	-
Tigowis Estate	-	√	-	-	√
Tun Tan Estate	-	-	√	-	√
Tunku Estate	√	-	√	-	-

**Tentative Date of Next Visit:** September 1, 2021 - September 3, 2021

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**Total No. of Mandays:** 9 man days

**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>
Mohamed Hidir Zainal Abidin	Team Leader	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, safety and health, environmental and workers and stakeholders consultation.
Elzy Ovktafia	Team Member	She graduated from Universiti Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP & AISP from the Incorporated Society of Planters and currently studying Master of Science (Occupational Safety & Health) in Universiti Utara Malaysia. She involves in audits and technical reviews works mainly for Sustainability Programme includes RSPO & MSPO for more than 4 years across 11 countries. She is a qualified Lead Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015, ISO 14001:2015 and a Social Compliance Auditor. 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. She is able to communicate in fluent Bahasa Malaysia and English.
Amir Bahari	Team Member	He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and

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		estates best practices, environmental, HCV and GHG. He is fluent in both verbal/written in Bahasa Malaysia and English.
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**Accompanying Persons:** *Not applicable*

**2.3 Assessment Plan**

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

Date	Time	Subjects	MH	AB	EO
Monday 3/8/2020	PM	Audit team travel Sandakan via MH 2710 ETA 1325. Check in at Sandakan Style Hotel.	√	√	√
Tuesday 4/8/2020  <b>Tun Tan Estate</b>	0730	Audit team travel to Tun Tan Estate	√	√	√
	0830 - 0900	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 (including stakeholder’s consultation).</li> <li>Verification on previous audit findings</li> </ul>			
	0830 - 1200	<b>Tun Tan Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	1200 - 1300	Lunch	√	√	√
	1300 - 1630	<b>Tun Tan Estate</b> Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Tuesday, 5/8/2020  <b>Tunku Estate</b>	0730	Audit team travel to Tunku Estate	√	√	√
	0900 - 1200	<b>Tunku Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area			

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		(agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.			
	1000 – 1100	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	√
	1200 – 1300	Lunch	√	√	√
	1300 – 1630	<b>Tunku Estate</b> Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630 – 1700	Interim Closing Briefing	√	√	√
Thursday 6/8/20	0730	Travel to Sandakan Bay POM	√	√	√
<b>Sandakan Bay POM</b>	0900 – 1200	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area.			
		RSPO Supply chain requirements for mill (module E: Mass Balance) - Identity Preserved Module - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities - Record keeping - Extraction Rate - Processing - Registration of transaction - Claims	√	-	√
	1200 – 1300	Lunch	√	√	√
	1300 – 1630	<b>Sandakan Bay Palm Oil Mill</b> Document Review P1 – P7: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	√	√	√

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	1600 - 1630	Verify any outstanding issues & Preparation for closing Meeting	√	√	√
	1630 - 1730	Closing Meeting	√	√	√
Friday 7/8/2020	AM	MSPO SCC audit	√	-	√
	PM	Audit team travel back via AirAsia AK5195 flight ETD (1825-2115)	√	√	√

**Major @ Critical NC Close Out**

PRELIMINARY AGENDA		
Time	Subjects	Mohd Hidhir
09.00 – 09.15	Opening Meeting via MS team <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> <li>Briefing on remote verification plan</li> </ul>	√
09.15 – 10.30	Tun Tan & Tunku Estate – Verification on previous Major NC. Site observation, workers interview (individual and group session) if necessary Document review – implemented evidence	√
10.30 – 11.30	Sandakan Bay POM – Verification on previous Major NC. Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence	√
11.30 – 12.00	Closing meeting	√

### Section 3: Assessment Findings

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

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

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



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	<a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations">http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</a>  ACOP 2019 has been cross-referenced as below: <a href="https://www.rspo.org/members/29/Sime-Darby-Plantation-Berhad">https://www.rspo.org/members/29/Sime-Darby-Plantation-Berhad</a>	
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No lapses.  SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat	Yes
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	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above.	Yes
<b>Un-Certified Units or Holdings</b> ( <i>any non-compliance against the below shall be raised as Major Non-compliance</i> )		
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>	HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).	Yes
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	No new plantings. As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI):  <a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations">http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</a>	Yes
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.  <i>Note:</i> <i>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>. The progress on the Liabilities shall be verified and reported. Please refer to BSI-RSPO Secretariat approval.</i>	No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above.  This is further check in the website: <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a> .  Management units with potential liability is 17 and a total of 15 management units has submitted the LUCA to RSPO.	Yes
Any Labor disputes are being resolved through	No stakeholder comments or complaints received.	Yes

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a mutually agreed process, in accordance with RSPO P&C criterion 6.3.		
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	There is no legal non-compliance found in Chaah Certification Unit. This is further confirmed through the stakeholder consultation held, legal documentation review and interview with	Yes
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available. <i>Note: if the internal audit is conducted against the RSPO P&amp;C only, it is a non-compliance.</i>	Yes. The sustainability unit has conducted the internal audit for 9 units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1 <sup>st</sup> 2010. Other than that, land conflicts and land disputes also being audited and approved by Head of Sustainability-Indonesia (Alagendran Maniam) on 22/05/2019.  The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.	Yes
Have there been any stakeholder (including NGO) consultation conducted? <i>Note: if there is any negative comment from the stakeholders, the assessment team is required directly consult with the stakeholder regarding the comment and resolutions.</i>	None noted. No stakeholder comments or complaints received.	Yes

**3.3 Progress of scheme smallholders and/or outgrowers (Not applicable )**

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

**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 **2** Critical; **1** Minor nonconformities and **0** Opportunity For Improvement raised. The **Sandakan Bay Palm Oil Mill and supply base** Certification unit submitted Corrective Action Plans for the

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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 Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

<b>Non-conformity</b>			
<b>NCR Ref #</b>	1942048-202008-M1	<b>Clause &amp; Category (Critical / Minor)</b>	2.1.1 Critical (Major)
<b>Date Issued</b>	06/08/2020	<b>Due Date</b>	05/11/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/11/2020
<b>Statement of Nonconformity:</b>	Compliance with legal requirements were not effectively demonstrated.		
<b>Requirement Reference:</b>	i) The Unit of Certification complies with legal requirements ii) Section 12E(1), Environmental Protection Enactment 2002 - 6.2 (ii, iii) Pengemukaan Laporan Alam Sekitar, Laporan Pematuhan Alam Sekitar hendaklah dikemukakan ke JPAS sekurang-kurangnya setiap enam (6) bulan bermula dari tarikh menandatangani surat aku janji. Jadual pengemukaan Laporan Pematuhan Alam Sekitar adalah sewatlewatnya setiap April dan October sehingga projek tamat. Laporan Pematuhan Alam Sekitar hendaklah dikemukakan mengikut tempoh yang ditetapkan tanpa sebarang kegagalan		
<b>Objective Evidence:</b>	Based on EIA (CK/EV403-4321/17) dated May 2018 by Chemsain Konsultant Sdn Bhd, total of 1,228.20 ha will be replanted in FY2019/2020. As to-date, there was no "Laporan Pematuhan Alam Sekitar" @ Environmental Compliance Reporting (ECR) for FY 2019/2020 for Tun Tan and Tunku Estate.		
<b>Corrections:</b>	The estate management through Group Sustainability Department will submit a letter to Environmental Protection Department Sabah detailing the replanting commenced, overdue of ECR and mitigation plan. Estate management through zone office, will appoint a registered environmental consultant to carry out compliance monitoring once in every 6 months as stated in the EIA report		
<b>Root Cause Analysis:</b>	The failure to submit Environmental Compliance Reporting (ECR) was due to misinterpretation of the EIA approval conditions. The estate management have assumed that ECR to commence once the cycle of replanting for the particular year is completed.		
<b>Corrective Actions:</b>	a) All estate management to appoint dedicated personnel in charge of EIA/ECR related matters. This PIC should be able to monitor and keep track all the progress and status of ECR (on-going/ discontinued/yet started) in Sandakan Bay. b) Estate management will also collaborate with Group Sustainability (Conservation & Biodiversity Unit) in organizing an awareness session on EIA/ECR		
<b>Assessment Conclusion:</b>	Remote Major NC close out verification: i) Official appointment of person in charge for EIA/PMM and ECR was sighted for all estates under SOU26. Verified letter of appointment to estate assistant		

	<p>manager in September 2020 for all estates. Details of their roles and responsibilities explicitly written in the letter.</p> <p>ii) Awareness of EIA and ECR was carried out on 5th November 2020 by external trainer and registered EPD consultant, Chemsain. Implemented evidences were verified and sufficient to close the major NC effectively on 5/11/20. Continuous implementation will be further verified in the next surveillance assessment.</p>
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Non-conformity			
<b>NCR Ref #</b>	1942048-202008-M2	<b>Clause &amp; Category (Critical / Minor)</b>	6.2.3 Critical (Major)
<b>Date Issued</b>	06/08/2020	<b>Due Date</b>	05/11/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/11/2020
<b>Statement of Nonconformity:</b>	Compliance to the Sabah Labour Ordinance was not effectively implemented.		
<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>In Sandakan Bay POM, pay slip and thumb print records was sampled for the weighbridge clerk for March, Apr and May 2020. It was found that (Employee ID: 000082335-Weighbridge Clerk) has worked overtime after 10 pm and started her work again without having 11 hours continuous rest before start her work as below:</p> <p>MAY 2020 04/05/2020: 13:58 PM-22.23 PM &amp; 05/05/2020: 06:38 AM-16:06 PM 08/05/2020: 14:06 PM-23:17 PM &amp; 09/05/2020: 06:40 AM-16:12 PM</p> <p>APRIL 2020 06/04/2020: 13:57 PM-23:07 PM &amp; 07/04/2020: 06:50 AM-16:12 PM 10/04/2020: 13:53 PM-22:03 PM &amp; 11/04/2020: 06:52 AM-16:14 PM</p> <p>This is not complying with the JTK Permit Wanita Bekerja Malam Seksyen 75, Ordinan Buruh (Sabah Bab 67) for Sandakan Bay POM: 1.3 Memberi pekerja-pekerja wanitanya suatu tempoh rehat bebas dari kerja selama 11 jam berterusan sebelum dibenarkan bekerja semula.</p>		
<b>Corrections:</b>	a) Training additional weighbridge operator and make 3 shift arrangement during CPO dispatches especially dispatches via tankers. b) Prepare working scheduled for weighbridge operator during palm product dispatches to avoid any breach of Section 75, Sabah Ordinance (Sabah Bab 67).		
<b>Root Cause Analysis:</b>	<p>a) This problem occurred during Malaysian Government announced Movement Control Order (MCO) from 18th March 2020 until 9th June 2020 due to pandemic Covid-19 virus.</p> <p>b) During MCO mill need to comply with 50% workforce reduction in daily operation including mill weighbridge operation which consist of 2 operators in 2 shifts arrangement as per guidelines from Kementerian Perdagangan Antarabangsa dan Industri (MITI).</p>		

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	<p>c) In conjunction to strictly comply with the MITI’s guidelines, all refineries operation has limited operating hour and it caused CPO/PK dispatch need to be arranged to ensure the lorries arrived at buyers within buyer’s operational hours. Furthermore, the frequency of dispatches at 3 times in a week as per approval by IPD Kinabatangan Sabah, we have to arrange as maximum as possible lorries to transport our products to buyers during dispatch days.</p> <p>d) The condition as item (c) caused mill to arrange dispatch in the evening and it required additional time duration due to many tankers were queuing to complete the loading activities.</p> <p>e) Thus, mill has initiated an action plan by appointed additional 1 operator and conducted a training of weighbridge operation in order to arrange weighing operation at 3 shifts during CPO dispatches.</p> <p>f) Since it was an ad-hoc arrangement, mill unable to do job rotation and new operator was assigned in normal morning shift during training period. This training and supervision was commenced from 1st April 2020 until 30th May 2020. The training duration of 2 months is practicable in ensuring she fully understand with all the operation fundamental and security concern especially in handling our palm products. Thus, in some circumstances during daily operation, there is where the existing operators may come early to assist and guide our new operator that caused insufficient rest hour of 11 hours before next shift work.</p> <p>g) During MCO, mill only allowed CPO dispatches via tankers despite of using barge as mill usual practices before the MCO as per instruction from Lembaga Pelabuhan-Pelabuhan Sabah dated 17th April 2020 to cease all individual jetties to contain the Covid-19 virus.</p>
<p><b>Corrective Actions:</b></p>	<p>a) Appointed person in-charge (PIC) to monitor all weighbridge operator working hour in daily basis to avoid any breach of Section 75, Sabah Ordinance (Sabah Bab 67).</p> <p>b) In future, mill to review the weighbridge shift arrangement from 2 shift to 3 shift arrangement daily instead 3 shift arrangement only during dispatches via tankers</p> <p>c) In future mill to replace 1 female weighbridge operator to male operator since her employment contract will reached 10 years of services in 3 years coming.</p>
<p><b>Assessment Conclusion:</b></p>	<p>Remote Major NC close out verification:</p> <p>i) Official appointment of person in charge to monitor weighbridge operator working hours was verified. Details of their roles and responsibilities explicitly written in the letter date 20th August 2020</p> <p>ii) Work schedule for August and September was verified. If required, 3 shift will be schedule and to ensure no weighbridge operator work more than 12 hours in each shift. Shift pattern (8 hours) shift 1: 0700-1500, shift 2: 1300-2100, shift 3: 2100-0600. New weighbridge operator in-training assigned for morning shift 0700-1500. Verified punch card and night work record for August and September 2020. Sufficient rest hours (11 hours) is monitored based on clock out time during night shift (2&amp;3).</p> <p>iii) Interview with the person in charge and gender committee head was carried out via ICT platform. It was verified that all decision and arrangement made by management was made in consultation with the gender committee. All conditions under section 75, Sabah Ordinance (Sabah Bab 67) have fulfilled including the needs of transportation and shift allowance for the operator. Gender committee meeting minute dated 29th August 2020 is referred to</p>

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	Implemented evidences were verified and sufficient to close the major NC effectively on 30/10/20. Continuous implementation will be further verified in the next surveillance assessment
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Non-conformity			
<b>NCR Ref #</b>	1942048-202008-N1	<b>Clause &amp; Category (Critical / Minor)</b>	2.1.3 Minor
<b>Date Issued</b>	06/08/2020	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Demarcation of legal or authorised boundaries was not visibly maintained.		
<b>Requirement Reference:</b>	i) Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. ii) Sime Darby Plantation EQMS, Section B7, Boundaries issue:1 dated 1/11/2008, clause 7.2 – Estate boundaries must be marked with iron pipes, planted along boundary lines and painted with red/white alternate rings		
<b>Objective Evidence:</b>	Based on site observation at estate boundary with smallholders (Kebun Tani and Hari Maju), there was no boundary marking visibly maintained along the boundary area.		
<b>Corrections:</b>	To install boundary markers (iron pipe with red/white alternate rings) at identified boundaries		
<b>Root Cause Analysis:</b>	Failure of monitoring boundary markers by estate staff as they were not aware of the Standard Operating Procedure (SOP)		
<b>Corrective Actions:</b>	To brief estate field staff on SOP for Boundary Marker and prepare schedule of monitoring of estate boundary markers at identified locations		
<b>Assessment Conclusion:</b>	The CAP was accepted. The effective implementation will be verified during next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Good feedbacks from the stakeholders.

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

Non-conformity			
<b>NCR Ref #</b>	1795017-201904-N1	<b>Clause &amp; Category (Critical / Minor)</b>	4.7.5 (Minor)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	6/8/2020
<b>Statement of Nonconformity:</b>	The fire drill was not conducted as per established procedure.		
<b>Requirement Reference:</b>	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.		
<b>Objective Evidence:</b>	Based on document review at Sandakan Bay POM, found that Fire evacuation drill was not conducted for 2019 as per emergency preparedness and response procedure (SD/SDH/GSQM/ESH/206). The last fire drill was conducted on 16/03/2018.		
<b>Corrective Actions:</b>	Mill Management will appoint a PIC to monitor the firefighting equipment and drill.		
<b>Assessment Conclusion:</b>	ASA2_2 verification: The latest fire drill was carried out on 4/11/19 and 21/2/20 at Sandakan Bay POM. Post mortem report and lesson learned from drill exercise reported and available for verification. PIC responsible is the mill QA supervisor to ensure planning of annual exercise executed as per plan. No recurrence of issue observed, thus the previous minor NC is effectively closed on 6/8/20. Continuous implementation will be further verified in the assessment.		

Non-conformity			
<b>NCR Ref #</b>	1795017-201904-N2	<b>Clause &amp; Category (Critical / Minor)</b>	4.6.10 (Minor)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	6/8/2020
<b>Statement of Nonconformity:</b>	The proper disposal of waste materials were not effectively understand and demonstrate by the workers as per established procedure, Landfill Management (SD/SDP/PSQM(ESH)/203-EN7)		
<b>Requirement Reference:</b>	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3).		
<b>Objective Evidence:</b>	<u>Sentosa Estate</u> The estate have provided 3R bin at the housing area for recycle waste. However, during site visit at Landfill area in P19A, found that used of plastic bottles were dump in the landfill.		
<b>Corrective Actions:</b>	Estate has plan to conduct briefing on 3R awareness program in accordance to the Landfill Management SOP to the workers in August 2019.		



<b>Assessment Conclusion:</b>	ASA2_2 verification: 3R awareness has been initiated by SOU26 estates and based on site observation, plastic bottles been segregated at source. No evidence of plastic bottles dumped at land fill (19A1) of Tunku Estate and land fill (P11A) at Tun Tan Estate. Thus, the previous minor NC is effectively closed on 6/8/20.
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Non-conformity			
<b>NCR Ref #</b>	1795017-201904-N3	<b>Clause &amp; Category (Critical / Minor)</b>	5.1.2 (minor)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	6/8/2020
<b>Statement of Nonconformity:</b>	The EIA mitigation plan was not effectively monitored and implemented as per the EIA Mitigation plan for replanting, submitted and approve by Environment Protection Department under section 'Kawalan Bahan Minyak dan Sisa Toksik' item no. 22.		
<b>Requirement Reference:</b>	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.		
<b>Objective Evidence:</b>	Sighted at the replanting area, the contractor's skid tank for diesel were placed at field P19A without proper mitigation plan as per EIA for replanting approved by EPD.		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>Estate management will include briefing on relevant EIA mitigation plan for replanting during replanting kick off meeting with contractor to ensure the EIA mitigation plan is followed.</li> <li>Estate to conduct regular monitoring on contractor compliance to the EIA mitigation plan during the replanting works.</li> </ol>		
<b>Assessment Conclusion:</b>	ASA2_2 verification: Based on site verification at Tunku Estate's replanting area (P19/20), no evidence of diesel skid tank placed at the area. Kick off meeting with contractor prior to work was verified as well as briefing on relevant environmental mitigation and (do's and don'ts). No recurrence of issue noted thus the previous NC is closed effectively on 6/8/20. Continuous implementation will be further verified in the next assessment.		

Non-conformity			
<b>NCR Ref #</b>	1795017-201904-N4	<b>Clause &amp; Category (Critical / Minor)</b>	4.1.2 (minor)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	6/8/2020
<b>Statement of Nonconformity:</b>	Mechanism to check implementation of procedures not consistently in place.		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures shall be in place.		



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<b>Objective Evidence:</b>	Visit to Clinic in Tigowis estate found raw food with no proper labeling being stored in refrigerator used for medications including vaccines storage. No clear or specific procedures/instructions available to either allow or not allow such practice that generally looks unsuitable. The practice was inconsistent to the other visited clinic sites.
<b>Corrective Actions:</b>	Estate management will put clear instruction of 'no food storage allowed' signage on the clinic's refrigerator that use for storage of medication and conduct spot checks on the storage item in the Clinic refrigerator.
<b>Assessment Conclusion:</b>	ASA2_2 verification: Based on site visit at Tun Tan and Tunku Estate's clinic, it was verified that no other item stored in the refrigerator. Only medicine and vaccine stored in the refrigerator. Signage 'no food storage allowed' was available as part of administrative control. No recurrence of issue observed, thus the previous minor NC is closed effectively on 6/8/20. Continuous implementation will be further verified in the next assessment

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1649805-201805-M1	Major	4.7.2	28/06/2018	Closed on 20/08/2018
1649805-201805-M2	Major	6.3.2	28/06/2018	Closed on 20/08/2018
1649805-201805-M3	Major	2.1.1	28/06/2018	Closed on 20/08/2018
1649805-201805-N1	Minor	4.7.3	28/06/2018	Closed on 28/06/2019
1649805-201805-N2	Minor	6.10.3	28/06/2018	Closed on 28/06/2019
1795017-201904-N1	Minor	4.7.5	28/06/2019	Closed on 6/8/2020
1795017-201904-N2	Minor	4.6.10	28/06/2019	Closed on 6/8/2020
1795017-201904-N3	Minor	5.1.2	28/06/2019	Closed on 6/8/2020
1795017-201904-N4	Minor	4.1.2	28/06/2019	Closed on 6/8/2020
1942048-202008-M1	Major	2.1.1	6/08/2020	Closed on 5/11/2020
1942048-202008-M2	Major	6.2.3	6/08/2020	Closed on 30/10/2020
1942048-202008-N1	Minor	2.1.3	6/08/2020	"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 *Sandakan Bay Palm Oil Mill and supply base* Certification Unit’s environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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

List of Stakeholders contacted	
<b>Internal/External Stakeholders</b> Kampung Manggis/neighbouring smallholder Gender Committee Representatives Foreign & Local Workers Representatives	<b>Union/Contractors</b> Contractor (Ooi Trading, Yee Ping Trading, YIH Construction, Maju Jaya PLT)
<b>Government Departments</b> -	<b>NGO</b> -

Stakeholders comment	
1	<b>Feedbacks:</b> <u>Neighboring Smallholder/villagers</u> No land encroachment and the border were clearly marked. They have a good relationship with Sandakan Bay estates.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No further information.
2	<b>Feedbacks:</b> <u>Contractors, vendors &amp; suppliers</u> There is no late payment issue from Estate to contractors. Agreement is valid and signed by both parties. Contractor workers’ pay slip were kept in office.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No further information.

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3	<p><b>Feedbacks:</b> <u>Gender Committee</u> No sexual harassment case reported. New mother's need assessment was conducted concurrently during the gender committee meeting. Meeting and activities were actively conducted and participated by the members.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No further information.</p>
4	<p><b>Feedbacks:</b> <u>Foreign &amp; Local Workers</u> No discrimination practice in workplace. They were treated fairly. During the COVID-19 lockdown, they are still working, and some are not working still get paid to the minimum wage. No other complaints.</p> <p><b>Management Responses:</b> Noted on the information.</p> <p><b>Audit Team Findings:</b> No further information.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not applicable as all estates has the 2 cycle of planting.					



Previous land owner / user comment	
1	<p><b>Feedback: N/A</b></p> <p><b>Management Response:</b></p> <p><b>Audit Team Findings:</b></p>

### 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

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

<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that <b>Sandakan Bay Palm Oil Mill and supply base</b> has complied with the RSPO Principles and Criteria 2018 for Sustainable Palm Oil (<b>RSPO P&amp;C MYNI 2019</b>) 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 <b>Sandakan Bay Palm Oil Mill and supply base</b> is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name: Mohamed Hidhir Zainal Abidin</b>	<b>Name: MOHD SYAFRIE BIN ASIS</b>
<b>Company Name: BSI Services (M) Sdn Bhd</b>	<b>Company Name: SIME DARBY PLANTATION (SABAH) SDN BHD- SEGALUD EST</b>
<b>Title: Lead Auditor</b>	<b>Title: SENIOR MANAGER</b>
<p><b>Signature:</b></p> 	<p><b>Signature:</b>  <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p>  <p><b>SIME DARBY PLANTATION (SABAH) SDN BHD</b>          (Company No. 29859-V)  <b>SEGALUD ESTATE</b></p> <p>.....  <b>SENIOR MANAGER</b></p>
<b>Date: 24<sup>th</sup> December 2020</b>	<b>Date: 24<sup>th</sup> December 2020</b>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 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.			
1.1.1	<p><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Documents required for all unit of certification available in Sandakan Bay Certification Unit:</p> <ul style="list-style-type: none"> <li>• Land titles/user rights</li> <li>• Occupational health and safety plans</li> <li>• Plans and impact assessments relating to environmental and social impacts</li> <li>• HCV documentation</li> <li>• Pollution prevention and reduction plans</li> <li>• Details of complaints and grievances</li> <li>• Continuous improvement plans,</li> <li>• Public summary of certification assessment report</li> <li>• Group Sustainability Policy</li> <li>• Record of contributions to community development</li> </ul>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>SOU 26 has conducted combined 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 have raised some issue and discussed with the management during the meeting. Sighted the latest minutes meeting conducted at respective estates as below:</p>	Complied

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		<ol style="list-style-type: none"> <li>1. Tun Tan Siew Sin Estate: 18/06/2020 (OOI Trading, Yee Trading and HUMANA).</li> <li>2. Tunku Estate: 06/03/2020 (Contractors &amp; Neighbouring Estate), 14/07/2020 (Contractors) &amp; 10/07/2020 (Workers Housing Committee).</li> </ol> <p>Sandakan Bay POM: 24/02/2020 (Outside Crop Plantation) &amp; 20/07/2020 (Neighbouring Estate, worker’s representative and mill housing complex).</p>	
1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.          - Critical (Major) compliance -</p>	<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> <ol style="list-style-type: none"> <li>1. Tun Tan Siew Sin Estate: Request for opening HUMANA school H189 on 22/07/2020.</li> <li>2. Tunku Estate: Request for conducting Polio Vaccination at Tunku Estate on 15-18 March 2020 by Pejabat Kesihatan Kawasan Sandakan.</li> </ol> <p>Sandakan Bay POM: Request for top soil from SK Kebangsaan Sukau on 09/01/2020.</p>	Complied
1.1.4	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.          - Critical (Major) compliance -</p>	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</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:</p> <ul style="list-style-type: none"> <li>• Tun Tan Siew Sin Estate: 18/06/2020 (OOI Trading, Yee Trading and HUMANA).</li> <li>• Tunku Estate: 06/03/2020 (Contractors &amp; Neighbouring Estate), 14/07/2020 (Contractors) &amp; 10/07/2020 (Workers Housing Committee).</li> <li>• Sandakan Bay POM: 24/02/2020 (Outside Crop Plantation) &amp; 20/07/2020 (Neighbouring Estate, worker’s representative and mill housing complex).</li> </ul> <p>Sandakan Bay POM: 24/02/2020 (Outside Crop Plantation) &amp; 20/07/2020 (Neighbouring Estate, worker’s representative and mill housing complex).</p> <p>The new Group Sustainability Policy:</p> <ul style="list-style-type: none"> <li>• Tun Tan Siew Sin Estate: It was communicated through the muster briefing to workers on 19/06/2020.</li> <li>• Tunku Estate: It was communicated through the training to workers on 23/07/2020.</li> <li>• Sandakan Bay POM: It was communicated through the training to workers on 16/01/2020.</li> </ul> <p>The person in charge for social issues (communication and consultation) is as below:</p> <ul style="list-style-type: none"> <li>• Tun Tan Siew Sin Estate: Senior Assistant Manager (Mohammad Shamsuri Baharin) as per appointment letter dated 06/01/2020.</li> <li>• Tunku Estate: Assistant Manager (Jason Jonik @ Henry) as per appointment letter dated 01/03/2020.</li> </ul>	
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		Sandakan Bay POM: Mill Engineer (Muhammad Na'imusyahmi bin Ghazali) as per appointment letter 31/03/2019.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	The latest stakeholders list updated as at January 2020. Stakeholder's details available included person in charge, address, e-mail and contact number. Example seen as below: <ol style="list-style-type: none"> <li>1. Tun Tan Siew Sin Estate: Contractors (Ooi Trading), Address: TB 7849 Lorong Jen Loong 4, Jalan Kuhara Lama 91000 Tawau Sabah, Contact No: 0198839385/0897144001.</li> <li>2. Tunku Estate: Vendors/Suppliers (Cybertech Enterprise), Address: Ground Floor, Lot 5, Bandar Indah, Mile 4, Sandakan, Sabah, Contact No: 013-880818 (Mr. Johnny).</li> <li>3. Sandakan Bay POM: Sabah Plantation Industry Employees Union (SPIEU). Address: P.O.box 1873, 91403 Tawau, Sabah. Contact No: Tel: 019-8335126/ 089-667831, Fax: 089-666370.</li> </ol>	Complied
<b>Criterion 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. - Minor compliance -	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.  The latest Group Sustainability & Quality Policy Statement also includes the clause 'promoting good governance and transparency: abiding by the Group Policies & 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 19/06/2020	Complied



		(Tun Tan Siew Sin Estate), 23/07/2020 (Tunku Estate) and 16/01/2020 (Sandakan Bay POM).	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Sime Darby Plantation has established the Vendor Integrity Pledge (VIP) and Vendor COBC as a due diligence for external parties engaged by Operating Units. Sighted sampled as below: <ol style="list-style-type: none"> <li>1. Tun Tan Siew Sin Estate: Ooi Trading (Director) has signed the VIP and Vendor COBC dated 07/09/2018.</li> <li>2. Tunku Estate: Sri Manjung (Director) has signed the VIP and Vendor COBC dated 01/06/2020.</li> </ol> <ul style="list-style-type: none"> <li>- Sandakan Bay POM: Pengangkutan Kekal Sdn Bhd (Manager) has signed the VIP and Vendor COBC dated 24/04/2019.</li> </ul>	Complied
<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 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 legal requirements - Critical (Major) compliance -	Evidence of compliance with legal requirements  <u>Tun Tan Estate</u> Permit and license checked: i) MPOB license, 531250002000 “ <i>menjual dan mengalih</i> ” valid until 31/7/21. Estate hectarage – 3,143.23 ha ii) Diesel Permit, serial number: S002242, ref. no.: PPDNKK.SDK.94/20001(SK), storage capacity: 20,000 litre valid until 31/10/20 iii) Certificate of fitness (CF) for air compressor, reg. no. SB PMT 999, valid until 15/9/20. iv) <i>Lesen Untuk Menggaji Pekerja Bukan Pemaastautin (Seksyen 118, Ordinan Buruh (Sabah Bab 67)</i> , No. license: JTK.H.KBN.600-4/1/1/01261/0415, valid until 31/7/21	Non-compliance

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		<p>Indonesian: 137, Philippines: 59  v) Salary Deduction permit, Seksyen 113(4), Labour Ordinance (Sabah Cap 67), Serial no.: 600-1/2/13/22(11/KBN/2019-0160) valid until 15/5/21.</p> <p><u>Tunku Estate</u>  Permit and license checked:  i) MPOB license, 528340002000 “<i>menjual dan mengalih</i>” valid until 31/3/21. Estate hectarage – 3,203.11 ha  ii) Diesel Permit, serial number: S002310, ref. no.: PPDNKK.SDK.11/2012(SK), storage capacity: 20,000 litre valid until 14/11/20  iii) Certificate of fitness (CF) for air compressor, reg. no. SB PMT 996, valid until 16/8/20  iv) <i>Lesen Untuk Menggaji Pekerja Bukan Pemaastautin (Seksyen 118, Ordinan Buruh (Sabah Bab 67), No. license: JTK.H.KBN.600-4/1/1/01261/0422, valid until 23/8/20.</i>  Indonesian: 212, Philippines: 10  v) Salary Deduction permit, Seksyen 113(4), Labour Ordinance (Sabah Cap 67), Serial no.: 600-1/2/13/143(11/KBN/2018-0345) valid until 12/11/2020.  - <i>Tabung Surau/Gereja</i>  - Electricity  - Processing fees for travel documents  vi) License for electrical installation, serial no. 01412, license no. 2019/03314, installation capacity: 323 kW valid until 10/3/21.</p> <p><u>Sandakan Bay POM</u>  i) DOE License/Jadual Pematuhan: JPKKS/12/003534 (validity period 1/7/2020 - 30/6/2021) for 60 mt/hr and method of POME discharge is land application and composting. BOD limit is &lt; 20 mg/l.</p>	
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		<p>ii) Contravene of licence for air emission, for emission limit not exceeding 400 mg/m<sup>3</sup> for particulate matter (PM) and opacity not more than Ringelmann no.2. Compliance schedule, JPLP/PBU/12/005181, license no. 005181 valid until 30<sup>th</sup> August 2020.</p> <p>iii) License for electrical installation, serial no. 41201, license no. 2019/03340, installation capacity: 4,717.5 kW valid until 11/1/21.</p> <p>iv) Diesel Permit, serial number: S002299, ref. no.: PPDNKK.SDK.02/2000(SK), storage capacity: 18,160 litre valid until 30/10/20</p> <p>v) MPOB license, 508777804000 (FFB – milling, CPO, PK, SPO – storage etc) valid until 30/11/20. Approved processing capacity: 288,000 mt.</p> <p>vi) Competent person for electrical installation, A4: PJ-T-4-B-0631-2013, valid until 11/5/21</p> <p>vii) <i>Permit Wanita Bekerja Malam, Seksyen 75, Ordinan Buruh (Sabah Bab 67)</i>, serial no. 600-1/2/13/79(05/KBN/2018-0252) valid until 24/7/20. Renewal application has been submitted on 24<sup>th</sup> June 2020 to Kinabatangan Labour Office and pending for approval.</p> <p>viii) <i>Permit Sekatan Kerja Lebih Masa, Seksyen 104(7), Ordinance Buruh (Sabah Bab 67)</i>, for maximum 120 hours per month; serial no. 600-1/2/13/79(08/KBN/2018-0253) valid until 24/7/20. Renewal application has been submitted on 24<sup>th</sup> June 2020 to Kinabatangan Labour Office and pending for approval.</p> <p>Based on EIA (CK/EV403-4321/17) dated May 2018 by Chemsain Konsultant Sdn Bhd, total of 1,228.20 ha will be replanted in FY2019/2020. As to-date, there was no "Laporan Pematuhan Alam Sekitar" @ Environmental Compliance Reporting (ECR) for FY 2019/2020 for Tun Tan and Tunku Estate. Thus, major NC was issued.</p>	
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2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>SOU26 had documented the Legal &amp; Other Requirements Register (LORR) covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment. Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4a: Procedure for Legal and Other Requirements dated 1 November 2008. Tracking of changes is by Sime Darby SQM team disseminated to all SOU. Latest review was done on 16/6/20.</p>	Complied
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Referring to Sime Darby Plantation EQMS, Section B7, Boundaries issue:1 dated 1/11/2008. 7.2 – Estate boundaries must be marked with iron pipes, planted along boundary lines and painted with red/white alternate rings. Based on site observation at estate boundary with smallholders (Kebun Tani and Hari Maju), there was no boundary marking visibly maintained along the boundary area. Thus, a minor NC was issued.</p>	Non-compliance
<b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>List of contracted parties is maintained and documented under stakeholder list at each visited operating units.</p> <p><u>Sandakan Bay POM</u></p> <p>For FFB suppliers, external FFB supplier listed under Outside Crop Producer (OCP) with the total 14 suppliers.</p> <p><u>Tun Tan Estate</u></p> <p>Replanting contractor, Generasi Beringin Sdn Bhd signed date 1<sup>st</sup> November 2019.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p>	<p>All contracts those for FFB supply, contain specific clauses on meeting applicable legal requirements were spelled out in the contract. FFB contract sampled;</p>	Complied

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	<p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>i) Agriculturist Incorporated Sdn Bhd, P/B/0220/FFB01603L for one (1) year from January to December 2020.</p> <p>ii) Maishang Estates Sdn Bhd, P/B/0220/FFB01609L for one (1) year from January to December 2020.</p> <p>iii) Sekona Cocoa Sdn Bhd, P/B/0220/FFB01613L for one (1) year from January to December 2020.</p> <p>Evidence of due diligence is demonstrated during vendor registration phase where the contractor has to sign a Vendor Integrity Pledge (VIP) registration 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.</p> <p>VIP checked:</p> <p>a) Ooi Trading (R4966/00)</p> <p>b) Generasi Beringin (502138-S)</p> <p>c) Agriculturist Incorporated Sdn Bhd (70112K)</p> <p>d) Maishang Estate Sdn Bhd (101440-D)</p> <p>e) Sekona Cocoa Sdn Bhd (99796K)</p>	
2.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>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 the above sampled suppliers evidently available for verification.</p>	Complied
<b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.			
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> </ul>	<p>For directly sources FFB own supply base and OCP estate, details of OCP summarized as per below sample:</p>	Complied

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	<ul style="list-style-type: none"> <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>- Critical (Major) compliance -</p>	<table border="1"> <tr> <td>Estate/Out growers</td> <td>MPOB license &amp; validity</td> <td>GPS Location</td> </tr> <tr> <td>Maishang Estates Sdn Bhd</td> <td>504732602000 valid until 31/5/21</td> <td>Lat: 5.521860, Long: 118.221680</td> </tr> <tr> <td>Sekona Cocoa Sdn Bhd</td> <td>561753002000 valid until 31/5/21</td> <td>Lat: 5.444317 long: 118.141862</td> </tr> <tr> <td>Agriculturists Incorporated Sdn Bhd</td> <td>503630802000 valid until 28/02/21</td> <td>Lat: 5.451276 long: 118.145343</td> </tr> </table>	Estate/Out growers	MPOB license & validity	GPS Location	Maishang Estates Sdn Bhd	504732602000 valid until 31/5/21	Lat: 5.521860, Long: 118.221680	Sekona Cocoa Sdn Bhd	561753002000 valid until 31/5/21	Lat: 5.444317 long: 118.141862	Agriculturists Incorporated Sdn Bhd	503630802000 valid until 28/02/21	Lat: 5.451276 long: 118.145343			
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2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>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. For Sandakan Bay POM SOU26, the was no indirect FFB received from collection centres, agents or other intermediaries.</p>			Complied												
<p><b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b></p>																	
<p><b>Criterion 3.1:</b> There is an implemented management plan 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>- Critical (Major) compliance -</p>	<p>SOU 26 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</p> <p>In the 5 years business plan include items as follows:</p> <p>a. Palm oil mill</p>			Complied												

		<ul style="list-style-type: none"> <li>i. Mill intake – FFB input</li> <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</li> </ul> </li> <li>b. Manuring</li> <li>c. Harvesting and collection</li> <li>d. Transportation</li> </ul>	
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>SOU 26 have long range replanting program until FY 2025. Replanting planned for the palm older than 25 years, nonperformance field (yield) and ganoderma infected palm.</p> <p><u>Tun Tan Estate</u></p> <p>2021: 109.65 ha          2022: 121.90 ha          2023: 341.07 ha</p>	Complied
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Management review was carried out on 15<sup>th</sup> June 2020 combined with RSPO SCCS review.</p>	Complied
<p><b>Criterion 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>			

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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>- Critical (Major) compliance -</p>	<p>The CU visited has established continual improvement plan. Sighted the sampled plan/projects at CU visited as follows:</p> <p>Estates</p> <ul style="list-style-type: none"> <li>i. SIME card</li> <li>ii. To identify unsafe act and condition to minimize near misses/accident occurrences</li> <li>iii. SEMUA 2.0</li> <li>iv. To keep tracks on the FFB movement from the field up to the mill.</li> <li>v. SMS IT system</li> <li>vi. Reporting on accidents, OSH program, alert and expiring dates for permits and licenses</li> <li>vii. Sime Darby Digital Supervision</li> <li>viii. Reporting on field inspection</li> <li>ix. Sanitation</li> </ul>	Complied
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b></p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>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>- Minor Compliance -</p>	<p>Report of the Palm GHG Version 4, ACOP latest for 2019 were made available for verification</p>	Complied
<b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>SOP available for the Palm Oil Mill and the Estates. 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. Estates have a separate</p>	Complied



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		<p>SOP (Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual) covers land preparation, planting material, upkeep, harvesting, transport etc.</p> <p>Noted updated procedure under RSPO SCCS procedure:          iii) RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15, version: 2, issue: 5 dated April 2019.</p>							
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>Sime Darby has established a system to monitor the mill and estate operation. The Structured Oil Recovery Assessment (SORA) (for Mill) / Structured Crop Recovery Assessment (SCRA) (for estates) and Planning and Monitoring Unit visited the operating units quarterly. Their reports covers on all aspect of operation. In addition, visit by agronomist was made yearly. The report focusing on rainfall, yield [performing and underperforming], palm nutrition status, field observation agronomic matters and fertilizer recommendation has been included in the report. All the reports of monitoring were available at estate and mill office for references.</p> <p>Plantation Advisory Department, Performance Monitoring Unit, Quality Management Unit (PSQM) inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Third party visit/inspection was also done as part legal compliance monitoring.</p>	Complied						
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Records of monitoring verified as per the following:</p> <table border="1" data-bbox="1144 1241 1928 1334"> <thead> <tr> <th>Department/ Inspector</th> <th>Date of visit/ref. report</th> <th>Remark/action taken</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Department/ Inspector	Date of visit/ref. report	Remark/action taken				Complied
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		Mill advisory	10-11 <sup>th</sup> March 2020	Progress on monthly reporting	
		Electrical engineer visit	15 <sup>th</sup> July 2020, NTM Engineering	Status reported in legal compliance monitoring	
<p><b>Criterion 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.</p>					
3.4.1	<p><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/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting in SOU 26 (Sandakan Bay POM Certification Unit). Sighted the Social Impact Assessment (SIA) report July 2013. The report includes both positive and negative impact and its recommendation.</p> <p>In Sabah, for any replanting project a PMM (Proposed Mitigation Measures) is required for less than 250 ha project and EIA (Environmental Impact Assessment) for more than 250 ha.</p> <p>SOU 26 estates has a progressive replanting project entitled "Proposed Replanting of Oil Palm Plantation on 4,628.40 ha at Sandakan Zone Estates, Sandakan and Kinabatangan Districts, Sabah. EIA approval ref: JPAS/PP/SDK/600-1/11/1/303(36) dated 19 September 2018. "Aku Janji" dated 19<sup>th</sup> September 2018 between JPAS Director and SOU26 Regional Manager in-lined with section 12E(1), Environmental Protection Enactment 2002.</p>			Complied
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>There is no new planting in SOU 26 (Sandakan Bay POM Certification Unit). The assessment was used methodology of interview workers based on workstation, harvesters, sprayers, union representatives, gender committee, contractor, supplier, local community, neighbouring estate, government &amp; HUMANA</p>			Complied

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		<p>School. The secondary data collection – document review/file checking also been made.</p> <p>SOU 26 has established Environmental Management Plan and was made available in the estates/mill for review. Internal stakeholders (estate and mill team) were consulted for during review process especially for those interact directly with the activities at estate’s and mill’s workstation. Result of participation will be considered as part of EIA review process. If there is any environmental incidents or changes of process (new installation/modification, EIA will be reviewed to evaluate the environmental impact.</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.          - Critical (Major) compliance -</p>	<p>There is no new planting in SOU 26 (Sandakan Bay POM Certification Unit). Sighted the Social Action Plan based on the SIA and issues raised through the gender committee and external communication.</p> <p>Examples seen as below:</p> <ul style="list-style-type: none"> <li>• Tun Tan Siew Sin Estate: Harvester concerns: Apdi (harvester) claimed during harvesting, partical of the debris enter the eyes of the harvester. Action plan: to provide training to ensure all harvesters follow the SOP during harvest the FFB. Completed on 05/08/2020. PIC: Manager/S.A/Joseph.</li> <li>• Tunku Estate: Novel Borneo &amp; Mai Shang lorry seen overspeeding which may lead accident. Action plan: to identify all driver lorry and spot check/checking by Auxiliary Police at main road. Status is done. PIC: Jason Jonik.</li> <li>• Sandakan Bay POM: Hosuing condition/living improvement: complaint on housing for contractor's workers takes long time to be solved. Some takes weeks,</li> </ul>	Complied

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		<p>even months. Action plan: mill to see all workers to get feedbacks on the details of housing problem and come out with plans on how to resolve them. Status: all complaints are completely attended and monitored except for order hose delay. PIC: Naim/mandora. Completion date: done and continuously monitor.</p> <p>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 January 2020 was made available for review.</p> <p>Summary of environmental aspect impact, date review: 1/3/2020 was made available for review.</p>	
<p><b>Criterion 3.5:</b> A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>SDPSB has implemented Group Sustainability &amp; 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 &amp; no-exploitation of fundamental human rights, providing safe and healthy workplaces and protecting workers' welfare and engaging and empowering communities.</p> <p>The SOPP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liason and recruitment, documentation and processing (Doc no: WMU/DP SOPP/JAN2016/R1), workforce management centre and estate are available upon request.</p>	<p>Complied</p>

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3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>The SOPP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liason and recruitment, documentation and processing processing (Doc no: WMU/DP SOPP/JAN2016/R1), workforce management centre (WMC) and estate are available upon request. This procedure been explained to worker during the induction training on their first-time arrival.</p>	Complied																																
<p><b>Criterion 3.6:</b> An occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>																																			
3.6.1	<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>- Critical (Major) compliance –</p>	<p>The estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following;</p> <p>a) Change in work process b) Revision/changes in legislative requirement c) Occurrence of accidents</p> <p>The estates had list of review on HIRARC dated 11/10/2019 and 09/3/20 respectively for Tun Tan and Tunku Estates.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">Areas/Activities</th> <th></th> <th style="text-align: center;">Areas /Activities</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>Palm /bunch census</td> <td style="text-align: center;">11</td> <td>Harvesting &amp; collection</td> </tr> <tr> <td style="text-align: center;">2</td> <td>Circle /selective spraying</td> <td style="text-align: center;">12</td> <td>Transportation workers</td> </tr> <tr> <td style="text-align: center;">3</td> <td>Confined space</td> <td style="text-align: center;">13</td> <td>Walking palm to palm</td> </tr> <tr> <td style="text-align: center;">4</td> <td>Drainage-machine</td> <td style="text-align: center;">14</td> <td>Loose fruit collection</td> </tr> <tr> <td style="text-align: center;">5</td> <td>Grass cutting</td> <td style="text-align: center;">15</td> <td>In field machine 15 mt</td> </tr> <tr> <td style="text-align: center;">6</td> <td>Compound sanitation</td> <td style="text-align: center;">16</td> <td>Water catchment</td> </tr> <tr> <td style="text-align: center;">7</td> <td>Fertilizer application</td> <td style="text-align: center;">17</td> <td>Chemical mixing</td> </tr> </tbody> </table>		Areas/Activities		Areas /Activities	1	Palm /bunch census	11	Harvesting & collection	2	Circle /selective spraying	12	Transportation workers	3	Confined space	13	Walking palm to palm	4	Drainage-machine	14	Loose fruit collection	5	Grass cutting	15	In field machine 15 mt	6	Compound sanitation	16	Water catchment	7	Fertilizer application	17	Chemical mixing	Complied
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3.6.2	<b>(C)</b> The effectiveness of the H&S plan to address health and safety risks to people is monitored.	SDPB Health and Safety plan among others include the following:	Complied																																												

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	<p>- Critical (Major) compliance -</p>	<p>a) zero accident case in major accident (class I &amp; class II).  b) to achieve &gt; 1,000,000-man hours without LTI  c) to enhance OSH awareness through comprehensive ESH Training (target 70%).</p> <p>The implementation of OSH plan was monitored by internal audits conducted by OSH officers from RSQM department. The OSHA plan among others initiated by the estates/mill are as follows;</p> <table border="1" data-bbox="1191 710 1908 1343"> <thead> <tr> <th>No</th> <th>Task</th> <th>Activity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>OSH Legal Compliance</td> <td>Review all relevant legal compliance</td> </tr> <tr> <td rowspan="3">2</td> <td rowspan="3">Emergency Response Plan</td> <td>ERP Training</td> </tr> <tr> <td>Fire drill</td> </tr> <tr> <td>Enforcement Visit</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">OSH Management System</td> <td>Review documentation</td> </tr> <tr> <td>HIRARC review</td> </tr> <tr> <td rowspan="3">4</td> <td rowspan="3">Risk Management</td> <td>Identify High Risk Area</td> </tr> <tr> <td>maintenance</td> </tr> <tr> <td>Hygiene Tech</td> </tr> <tr> <td rowspan="3">5</td> <td rowspan="3">Accident Investigation/ Reporting</td> <td>Accident Investigation</td> </tr> <tr> <td>JKKP 8/6 submission</td> </tr> <tr> <td>Chemical Register</td> </tr> </tbody> </table>	No	Task	Activity	1	OSH Legal Compliance	Review all relevant legal compliance	2	Emergency Response Plan	ERP Training	Fire drill	Enforcement Visit	3	OSH Management System	Review documentation	HIRARC review	4	Risk Management	Identify High Risk Area	maintenance	Hygiene Tech	5	Accident Investigation/ Reporting	Accident Investigation	JKKP 8/6 submission	Chemical Register	
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**Criterion 3.7:** All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.

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<p>3.7.1</p>	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance –</p>	<p>The annual training program has been established and significantly covers all aspects of the MSPO/RSPO requirements. There were also additional subjects including the estate operating procedures, parameters, vehicles maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects. The program mainly covers both requirement of the estates and mill in SOU 26. The subjects for the training are issued and assisted by the RSQM personnel. The following topics included in the annual training program 2020 among others as follows;</p> <table border="1" data-bbox="1198 715 1930 1394"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">(Estate) subject</th> <th colspan="3">schedule</th> </tr> <tr> <th>1-4</th> <th>5-9</th> <th>9-12</th> </tr> </thead> <tbody> <tr><td>1</td><td>Requirement RSPO MSPO</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>2</td><td>ESH objective, target &amp; program</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>3</td><td>New FW – Induction Program</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>4</td><td>Duties of field staff</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>5</td><td>ESH role &amp; function</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>6</td><td>Competency, training &amp; awareness</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>7</td><td>ERP procedure and evacuation</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>8</td><td>Legal &amp; other requirement</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>9</td><td>Permit - work / tools equipment</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>10</td><td>HIRARC &amp; EAI</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>11</td><td>Non Conformity Corr/preventive action</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>12</td><td>Complaint &amp; grievance procedure</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>13</td><td>SOP &amp; ECP for individual procedure</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>14</td><td>PPE adherence</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>15</td><td>Scheduled waste management</td><td>-</td><td>-</td><td>/</td></tr> <tr><td>16</td><td>Supplier selection &amp; evaluation</td><td>-</td><td>/</td><td>-</td></tr> <tr><td>17</td><td>Estates practices SOP</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>18</td><td>SDS understanding</td><td>/</td><td>/</td><td>-</td></tr> <tr><td>19</td><td>Riparian Zone Management</td><td>/</td><td>-</td><td>-</td></tr> <tr><td>20</td><td>Sexual Harassment</td><td>-</td><td>/</td><td>-</td></tr> </tbody> </table>		(Estate) subject	schedule			1-4	5-9	9-12	1	Requirement RSPO MSPO	/	-	-	2	ESH objective, target & program	/	-	-	3	New FW – Induction Program	/	/	/	4	Duties of field staff	/	-	-	5	ESH role & function	/	-	-	6	Competency, training & awareness	/	-	-	7	ERP procedure and evacuation	-	/	-	8	Legal & other requirement	-	/	-	9	Permit - work / tools equipment	/	-	-	10	HIRARC & EAI	-	/	-	11	Non Conformity Corr/preventive action	-	/	-	12	Complaint & grievance procedure	-	/	-	13	SOP & ECP for individual procedure	-	/	-	14	PPE adherence	-	/	-	15	Scheduled waste management	-	-	/	16	Supplier selection & evaluation	-	/	-	17	Estates practices SOP	/	/	/	18	SDS understanding	/	/	-	19	Riparian Zone Management	/	-	-	20	Sexual Harassment	-	/	-	<p>Complied</p>
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3.7.2	Records of training are maintained. - Minor Compliance -	<p>The estates and mill training are held/organized during the daily briefing prior to work commencement. Mainly the issues discussed/briefed were related to estate and mill operations, environmental and safety compliance. These training records are maintained and were sighted during the audit.</p> <table border="1"> <thead> <tr> <th></th> <th>Subject</th> <th>T Tan</th> <th>Tunku</th> <th>SPOM</th> </tr> </thead> <tbody> <tr><td>1</td><td>SOP Weeding / HIRARC</td><td>-</td><td>22/2/20</td><td>24/6/20</td></tr> <tr><td>2</td><td>Company Policies Briefing</td><td>-</td><td>23/7/20</td><td>03/9/19</td></tr> <tr><td>3</td><td>RSPO Briefing to employees</td><td>04/7/20</td><td>24/1/20</td><td>28/1/20</td></tr> <tr><td>4</td><td>Harvesting safety awareness</td><td>08/5/20</td><td>08/1/20</td><td>-</td></tr> <tr><td>5</td><td>Tractors driving SOP</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>6</td><td>OSH guidelines Sime Card</td><td>19/6/20</td><td>15/11/19</td><td>18/2/19</td></tr> <tr><td>7</td><td>Air compressor SOP</td><td>-</td><td>-</td><td>17/2/19</td></tr> <tr><td>8</td><td>RSPO MSPO awareness</td><td>-</td><td>13/6/20</td><td>04/2/20</td></tr> <tr><td>9</td><td>Circle raking</td><td>28/2/20</td><td>-</td><td>-</td></tr> <tr><td>10</td><td>Workshop management</td><td>-</td><td>-</td><td>17/12/19</td></tr> <tr><td>11</td><td>Spraying SOP</td><td>28/2/20</td><td>20/1/20</td><td>-</td></tr> <tr><td>12</td><td>Nursery Operations</td><td>-</td><td>29/2/20</td><td>-</td></tr> <tr><td>13</td><td>FFB crop quality</td><td>28/5/20</td><td>-</td><td>-</td></tr> <tr><td>14</td><td>Harvesting SOP</td><td>13/7/20</td><td>05/3/20</td><td>-</td></tr> <tr><td>15</td><td>Harvesting Safety awareness</td><td>09/6/20</td><td>25/2/20</td><td>-</td></tr> <tr><td>16</td><td>Fire Drill</td><td>12/7/20</td><td>12/9/19</td><td>21/2/20</td></tr> <tr><td>17</td><td>Fire Drill</td><td>-</td><td>8/11/19</td><td>04/11/19</td></tr> <tr><td>18</td><td>Chemical spillage ERP</td><td>-</td><td>06/9/19</td><td>17/7/20</td></tr> <tr><td>19</td><td>First Aid - Refresher briefing</td><td>13/3/20</td><td>13/2/20</td><td>21/2/20</td></tr> <tr><td>20</td><td>FFB quality</td><td>18/2/20</td><td>-</td><td>23/10/19</td></tr> <tr><td>21</td><td>Rat Baiting</td><td>03/2/20</td><td>10/2/20</td><td>-</td></tr> <tr><td>22</td><td>Working at height</td><td>-</td><td>-</td><td>13/7/19</td></tr> </tbody> </table>		Subject	T Tan	Tunku	SPOM	1	SOP Weeding / HIRARC	-	22/2/20	24/6/20	2	Company Policies Briefing	-	23/7/20	03/9/19	3	RSPO Briefing to employees	04/7/20	24/1/20	28/1/20	4	Harvesting safety awareness	08/5/20	08/1/20	-	5	Tractors driving SOP	-	-	-	6	OSH guidelines Sime Card	19/6/20	15/11/19	18/2/19	7	Air compressor SOP	-	-	17/2/19	8	RSPO MSPO awareness	-	13/6/20	04/2/20	9	Circle raking	28/2/20	-	-	10	Workshop management	-	-	17/12/19	11	Spraying SOP	28/2/20	20/1/20	-	12	Nursery Operations	-	29/2/20	-	13	FFB crop quality	28/5/20	-	-	14	Harvesting SOP	13/7/20	05/3/20	-	15	Harvesting Safety awareness	09/6/20	25/2/20	-	16	Fire Drill	12/7/20	12/9/19	21/2/20	17	Fire Drill	-	8/11/19	04/11/19	18	Chemical spillage ERP	-	06/9/19	17/7/20	19	First Aid - Refresher briefing	13/3/20	13/2/20	21/2/20	20	FFB quality	18/2/20	-	23/10/19	21	Rat Baiting	03/2/20	10/2/20	-	22	Working at height	-	-	13/7/19	Complied
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		23	Health Awareness	17/4/20	10/1/20	12/3/20	
		24	Harvesting SOP	18/2/20	24/9/19	-	
		25	Gen set operations	-	-	05/3/20	
		26	Pesticides Handling	-	06/7/20	-	
		27	Chemical spraying	-	-	-	
		28	Replanting	5/11/19	18/1/20	-	
		29	First Aid Kit & ERP handling	13/3/20	13/2/20	17/7/20	
		30	IPM management	12/2/20	17/1/20	-	
		31	Working hours	01/4/20	-	22/01/20	
		32	Protection -HCV riparian zone	04/8/20	17/10/19	-	
		33	fertilizer - application	03/3/20	12/6/20	-	
		34	Harvesting activities SOP	28/2/20	14/01/20	-	
		35	Process SOP	-	-	5/2/20	
		36	Driving SOP & PPE	14/4/20	17/6/20	23/10/19	
		37	Line site hygiene	23/6/20	07/1/20	08/1/20	
		38	PPE adherence	03/5/20	05/9/19	30/1/20	
		39	SW management	-	28/2/20	24/6/20	
		40	Spraying P& D	28/2/20	-	-	
		42	Covid 19 reminders -MCO	27/3/20	03/7/20	29/7/20	
		43	Sexual harassment / COBC	27/6/20	31/10/19	08/4/20	
		44	Security management	02/4/20	25/10/19	28/1/20	
		45	Creche management/guideline	-	03/7/20	-	
		46	TKI induction program	07/4/20	16/1/20	03/9/19	
		47	Drug Abuse Campaign	-	-	5/3/20	
		48	Safety awareness	-	-	06/11/19	
		49	Laboratory	-	-	17/7/20	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor Compliance -	Relevant personnel to supply chain implementation as defined by the CU are the personnel that involve in supply chain implementation such as Assistant Managers, staff and weighbridge operators.					Complied

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		The latest RSPO SCCS training was carried out on 20/07/2020 attended by operating unit representative. The refresher training was given by PSQM Sabah Region representatives.	
<b>Criterion 3.8:</b> Supply chain requirement for mills (note: All supply chain requirements are considered as <b>Critical (C)</b> . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	Not applicable	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	Sandakan Bay Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. 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	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. The figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year (forecast volume of October 2019 to	Complied

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	produced shall then be recorded in each subsequent annual surveillance report.	September 2020). The actual tonnage produced from last audit date (June 2020 – July 2020) recorded annual surveillance report.	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The registration of PalmTrace will be carried out by the Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Company has registered their mill in the PalmTrace:- Members ID – Sandakan Oil Mill: RSPO_PO1000000065 Licence valid until 30/9/2020 Member category : Oil Mill Details of palm trace transaction summarized under table C of the report.	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c) 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 mill’s procedures for the implementation of this standard.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ul>	<p>SOP for Sustainable Supply Chain and Traceability, Issue No 5, Dated April 2019 which covered control of documents and records, delivery of FFB from the estate, receiving FFB at the mill, process monitoring, CPO and PK despatch, non-conforming material/product, product claims, production volume, conversion factor, internal audit, outsourced contractor, training, reclassification of mill’s supply chain model, complaints and management review.</p> <p>Sandakan Bay Palm Oil Mill has prepared a dedicated records and Forms in relation to RSPO Supply Chain Certification.</p> <p>Sustainability training plan &amp; records for year 2020 sighted available during the audit. The training was conducted on 20/07/2020. Interview with weighbridge operator found that she understands on the supply chain for palm oil mill.</p> <p>SOP for Sustainable Supply Chain and Traceability, Issue No 5, Dated April 2019 has identified every responsible personal who involved in the implementation RSPO Supply Chain Certification.</p>	Complied

		<p>Roles and responsibility for RSPO Supply Chain team were clearly defined clause 4.0 responsibilities under the Head of Operating Unit. Through the interview with Mill Assistant, he can demonstrate awareness of the established procedure.</p> <p>Sandakan Bay POM is Mass Balance POM therefore, the mixing of FFB is allowed.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) 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 mill shall maintain the internal audit records and reports.</p>	<p>Sandakan Bay POM has established SOP for Sustainable Supply Chain and Traceability, Issue No:5, Dated April 2019 which mentioned that internal audit will be conducted annually in accordance to Internal audit Procedure (SD/SDP/PSQM/IAP).</p> <p>Internal audit has been conducted on 22/06/2020 by SQM Sabah Region. There were 1 Major NC and 1 OFI raised for RSPO SCCS. The NC and OFI raised has been closed.</p> <p>Sandakan Bay POM has established SOP for Sustainable Supply Chain and Traceability, Issue No:5, Dated April 2019 which covered management review, which need to be conducted on annually at planned intervals. The management review for Sandakan Bay POM was conducted on 15/07/2020, chaired by the mill manager. All the inputs have been discussed accordingly, eg: Results of internal audits covering RSPO Supply Chain Certification Standard, Customer feedback, matters of arising from previous meeting, recommendation, etc.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>	<p>When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill. E.g. of information available in the DO is as follows:</p> <ul style="list-style-type: none"> <li>• Consignment note no. (12478)</li> <li>• Estate's names (Segaliud Estate – E043)</li> </ul>	Complied

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	<p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<ul style="list-style-type: none"> <li>• Date &amp; time of delivery (24/7/20)</li> <li>• Field No. (10D, 13F)</li> <li>• No. of bunches (1367 bunches)</li> <li>• Vehicle no. (SS7602N)</li> <li>• Seal no. (044998)</li> <li>• Net weight (18.48 kg)</li> </ul> <p>In estate’s consignment note, details of RPPO certificate number available for verification. RSPO cert. no. (RSPO 537872)</p> <p>E.g. of information available in the mill’s weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> <li>• Name of estates (Tun Tan – E047)</li> <li>• Field No. (1992D7, 2011A)</li> <li>• Vehicle no. (ST3157E)</li> <li>• Date (24/7/20)</li> <li>• Total bunches (574 bunches)</li> <li>• Net weight (8730 kg)</li> </ul> <p>Based on the license period (October 2019 – September 2020), there was no overproduction of certified FFB (165,273.50 mt vs 189,109.79 mt)</p> <p>Addressed in the SOP clause 10.0 Non-conforming Products and/or Documents. Based on the procedure, where there is contamination of RSPO certified material during receiving, processing, storage and dispatch, the mill shall downgrade the materials in such order: MB to conventional.</p>	
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<p>3.8.8</p>	<p><b>Sales and Goods Out</b></p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<p>Sandakan Bay POM ensured the required information is available in document form as below:</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>• Crude Palm Oil (CPO) RSPO IP</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>• Available in a few forms e.g. DN no., seal no.</li> </ul> <p>Sample the weighbridge ticket/dispatch note as below:</p> <p>A) CSPO  Weighbridge ticket: 006148  Buyer: Kunak SDP Sabah (KB)  Address: Kunak, Sabah  Contract No: S/I-SB/2007/CPO0004  Shipment date: 21/07/2020  Quantity: 35,120 kg  Product: CPO RSPO MB  Transport: Yee Ping Trading Sdn Bhd  Supply chain cert no: RSPO 537872</p> <p>B) CSPK  Weighbridge ticket: 006183  Buyer: Lahad Datu Edible Oils Sdn Bhd  Address: Lahad Datu, Sabah</p>	<p>Complied</p>
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		<p>Contract No: S/BSB/2007/RMPK0003          Shipment date: 24/07/2020          Quantity: 15,120 kg          Product: Palm Kernel RSPO MB          Transport: Yee Ping Trading Sdn Bhd          Supply chain cert no: RSPO 537872</p>	
<p>3.8.9</p>	<p><b>Outsourcing Activities</b></p> <ul style="list-style-type: none"> <li>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</li> <li>ii) The mill shall ensure the following:             <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b) The mill 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 mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The mill 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 all information, when this is announced in advance.</li> </ul> </li> </ul>	<p>Mill is not outsourcing any of mill activities. The independent third parties involve in Mill operation is only transportation services for CPO and PK. Sighted the agreement between Sandakan Bay POM and all suppliers and contractors dated 20/07/2020. Mentioned that all contractor needs to follow RSPO/MSPO/SCCS requirements in accordance with the Sime Darby Plantation Bhd Management System and additional from that, all contractor shall ensure to reserve the right of the certification body to audit the outsourcing activities and ensure to provide relevant access for duly accredited CBs to your respective operations, systems and any and all information when this is announced in advance. Sighted that Pengangkutan Kekal Sdn Bhd has signed the agreement on 05/08/2020.</p> <p>Based on the agreement, mill has the legal ownership on the products delivered.</p>	<p>Complied</p>



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3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The list of outsourced contractors was sighted, "list of stakeholders" to include the transport contractor for CPO and PK (Yee Ping Trading Sdn Bhd & Pengangkutan Kekal Sdn Bhd). The independent third parties involve in Mill operation is only transportation services for CPO and PK.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	No new contractor used for the processing or physical handling of RSPO certified oil palm products (transportation).	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> <li>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</li> <li>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</li> <li>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> <li>a) 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 certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</li> <li>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three</li> </ul> </li> </ul>	Accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements available for verification. As spelt out in its supply chain procedure, Clause 5.4, records are to be maintained minimum of two years.	Complied

	(3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.		
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	The oil extraction rate (OER) and the kernel extraction rate (KER) for Sandakan POM is determined and set their own extraction rates based upon past experience, documented and applied consistently.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	For the last review period, OER and KER:	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill 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 products, including during transport and storage to strive for 100% separation.</p>	N/A	Complied
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	Shipping Announcement in the RSPO IT platform carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not within three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	There is no claim on RSPO SCCS used in Sandakan Bay POM	Complied

<b>General corporate communications</b>			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Sandakan Bay POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	Complied
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.	Not applicable as no off-product claim made by Sandakan Bay POM as to date.	Complied
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by Sandakan Bay POM as to date.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as no off-product claim made by Sandakan Bay POM as to date.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Sandakan Bay POM and verified through document and site review (notice board, business card, shipping documentation, etc).	Complied
<b>Business to business communications</b>			

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5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication was demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	As per interview with weighbridge operator, she said that the weighbridge ticket will be stated the info i.e: product/commodity with SCC model (Crude Palm Oil RSPO MB) and will stamp the RSPO certificate number. Verified the documents found that the supply chain model and certificate number were stated on the ticket.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Sandakan Bay POM was not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
<b>Business to consumer communication</b>			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.	Business to consumer communication	Not Applicable

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6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Sandakan Bay POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Sandakan Bay POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Sandakan Bay POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Sandakan Bay POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Sandakan Bay POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Sandakan Bay POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to	Sandakan Bay POM did not use business to consumer communication. Therefore, this requirement was not applicable.	Not Applicable

	<p>RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rsपो.org">www.rsपो.org</a>.</p>		
<p><b>MODULE B – MASS BALANCE SPECIFIC RULES</b></p>			
<p><b>Minimum Mass Balance content</b></p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>Site only apply MB model and the conventional CPO are downgraded from MB whenever demanded.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>Site only apply MB model and the conventional CPO are downgraded from MB whenever demanded.</p>	<p>Complied</p>
<p><b>Labelling and trademark (MB)</b></p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>• The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</li> <li>• The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>• Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the</li> </ul>	<p>Site only apply MB model and the conventional CPO are downgraded from MB whenever demanded.</p>	<p>Complied</p>

	<p>trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</p> <ul style="list-style-type: none"> <li>In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications &amp; Claims document.</li> </ul>		
<b>Messaging (MB)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>[Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain.</li> <li>The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</li> <li>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</li> <li>Messaging NOT ALLOWED in storytelling in product-related communications:</li> <li>Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</li> </ul>	<p>Site only apply MB model and the conventional CPO are downgraded from MB whenever demanded.</p>	<p>Complied</p>
<b>Principle 4: Respect community and human rights and deliver benefits</b>			
<b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
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, FFB suppliers and local communities and prohibits intimidation and harassment by the</p>	<p>SDPSB has implemented a Sime Darby's Human Rights Charter where they committed to recognizing the role of Human Rights Defenders in accordance to the United Nations declaration on Human Rights Defender.</p>	<p>Complied</p>

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	<p>unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights. The policy was communicated through the muster briefing/training to workers as below:</p> <ul style="list-style-type: none"> <li>• Tun Tan Siew Sin Estate: 19/06/2020.</li> <li>• Tunku Estate: 23/07/2020.</li> <li>• Sandakan Bay POM: 16/01/2020.</li> </ul> <p>It was also communicated to the external stakeholder through stakeholder consultation and company website.</p>	
<p>4.1.2</p>	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>SDPSB has implemented Group Sustainability and Quality Policy Statement dated 02 Dec 2019 where the management is committed to contributing to a better society:</p> <ol style="list-style-type: none"> <li>1. Respecting, upholding &amp; no-exploitation of fundamental human rights.</li> <li>2. Providing safe and healthy workplaces and protecting workers' welfare.</li> <li>3. Engaging and empowering communities.</li> </ol> <p>This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers.</p>	<p>Complied</p>
<p><b>Criterion 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</p>			
<p>4.2.1</p>	<p><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 whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</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>Complied</p>



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		Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	The policy was communicated through the muster briefing/training to workers as below: <ul style="list-style-type: none"> <li>• Tun Tan Siew Sin Estate: 19/06/2020.</li> <li>• Tunku Estate: 23/07/2020.</li> <li>• Sandakan Bay POM: 16/01/2020.</li> </ul>	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	Sighted the External Complaint Book have the agreed resolution within timeframe. There was no other major complaint other than housing maintenance issues. Sample taken as below: Tun Tan Siew Sin Estate: <ul style="list-style-type: none"> <li>• 12/06/2020; Water pipe broken at worker’s housing area reported by Medical Assistant. The issue was closed on 18/06/2020.</li> <li>• 20/12/2019: Broken door and water pipe has no water reported by Sudirman Hj Lambo (House no D 31). The issue was closed on 23/12/2020.</li> </ul> Tunku Estate: <ul style="list-style-type: none"> <li>• 30/09/2019: Complaint on the threat by Mandore to worker. Manager has conducted a meeting and advise the Mandore on the same day. The issue was closed on 30/09/2020.</li> <li>• 26/09/2019: Complaint on selling illegal topup and cigarettes at housing area. Investigation has been made on 20/09/2019 and the worker still doing the same thing. The</li> </ul>	Complied

		<p>issue then been forwarded to the management and closed on 28/08/2019.</p> <p>Sandakan Bay POM:</p> <ul style="list-style-type: none"> <li>22/02/2020: Complaint on broken door, door lock, and window nett (House B17). It was completed on 08/03/2020.</li> </ul> <p>22/02/2020: Complaint on damaged ceiling (House C-109). It was completed on 23/02/2020.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow.</p>	Complied
<p><b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Sandakan Bay POM certification unit have contributed to the internal and external stakeholders.</p> <p>As a group, the CSR was included in:  <a href="http://www.yayasansimedarby.com/our-projects/community-health">http://www.yayasansimedarby.com/our-projects/community-health</a></p> <p>For example, the management has contributed and supported the activities such as request as below:  Tun Tan Siew Sin Estate:</p> <ul style="list-style-type: none"> <li>Support the Polio vaccination program to SK Rancangan Suan Lamba dated 15/04/2020 – 30/04/2020 at Estate Clinic.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>Sponsor 'International Women's Day' activity for Gender Committee RM 409.81.</li> </ul> <p>Tunku Estate:</p> <ul style="list-style-type: none"> <li>COVID-19 Relief Aid to workers dated 30/04/2020.</li> <li>Greenbook for family project dated 14/04/2020. Tunku Estate has provided free vegetable seeds for workers.</li> </ul> <p>Sandakan Bay POM:</p> <ul style="list-style-type: none"> <li>10kg of rice given to workers for every 2 months.</li> </ul> <p>2 blocks of workers housing. Decryption: second year program of phasing out 16-year-old wooden worker housing, which do not meet the requirement of Workers Minimum Standard of Housing Amenities Act 1990. Status: Construction will be shared after get approval with top management. Project cost: budgeted of 2 blocks workers housing under CAPEX FY 2020. Current status: Awaiting Budgeted.</p>							
<b>Criterion 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.									
4.4.1	<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>- Critical (Major) compliance -</p>	<p>All land title was kept in the office and available for review.</p> <p>Tun Tan Siew Estate: Previous landowner is The North Borneo Trading Company Limited dated 03/03/1953 for 999 years for 2012.95 Hectare and 1130.28 Hectare. Seen the latest land cess to Majlis Perbandaran Sandakan dated 20/12/2019 invoice no: 075109401 amount RM 2,096.75.</p> <p>Tunku Estate: Previous landowner is The North Borneo Trading Company Limited as below:</p> <table border="1" data-bbox="1236 1310 1827 1375"> <thead> <tr> <th>Land titles</th> <th>Acre</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>CL 075327427</td> <td>1,839.29</td> <td>21/05/1973</td> </tr> </tbody> </table>	Land titles	Acre	Date	CL 075327427	1,839.29	21/05/1973	Complied
Land titles	Acre	Date							
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		<table border="1"> <tr> <td>CL 075109456</td> <td>1,886.55</td> <td>05/07/1988</td> </tr> <tr> <td>CL 075109563</td> <td>3,371.40</td> <td>10/07/1888</td> </tr> <tr> <td>CL 075109572</td> <td>817.65</td> <td>10/07/1888</td> </tr> </table> <p>Seen the latest cess to Majlis Perbandaran Sandakan dated 13/12/2019 invoice no: M455883 (RM 817.65), M455880 (RM 3,371.40), M455886 (RM 1,886.54) and M455885 (RM 1,839.30).</p> <p>Sandakan Bay POM: The land cess was paid by Tun Tan Siew Sin Estate as the area is under Tun Tan Siew Sin Estate.</p>	CL 075109456	1,886.55	05/07/1988	CL 075109563	3,371.40	10/07/1888	CL 075109572	817.65	10/07/1888	
CL 075109456	1,886.55	05/07/1988										
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4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no land dispute in SOU 26 Sandakan Bay certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied									
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	There is no land dispute in SOU 26 Sandakan Bay certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied									
4.4.2b	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. - Minor compliance -	There is no land dispute in SOU 26 Sandakan Bay certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied									
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and	There is no land dispute in SOU 26 Sandakan Bay certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn	Complied									

	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. - Minor compliance -	Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	
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). - Critical (Major) compliance -	There is no land dispute in SOU 26 Sandakan Bay certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	There is no land dispute in SOU 26 Sandakan Bay certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	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. - Critical (Major) compliance -	There is no land dispute in SOU 26 Sandakan Bay certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There is no land dispute in SOU 26 Sandakan Bay certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
<b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	There were no issues of land disputes recorded. All land title was kept in the office and available for review as per clause 4.4.1.	Complied

	- Critical (Major) compliance -		
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 available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	There is no land dispute in SOU 26 Sandakan Bay certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
4.5.3	<p>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.</p> <p>- Minor compliance -</p>	There is no land dispute in SOU 26 Sandakan Bay certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
4.5.4	<p>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.</p> <p>- Minor compliance -</p>	There is no land dispute in SOU 26 Sandakan Bay certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied
4.5.5	<p>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.</p> <p>- Minor compliance -</p>	There is no land dispute in SOU 26 Sandakan Bay certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	Complied

4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	There is no land dispute in SOU 26 Sandakan Bay certification unit at the time of audit. The land belongs Sime Darby Plantation Sdn Bhd and land ownership documents verified. Interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.	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. - Minor compliance -	There is no new land acquired for SOU 26 at the time of audit. This is verified during site visit at field, interview session with stakeholders and observation.	Complied
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no new land acquired for SOU 26 at the time of audit. This is verified during site visit at field, interview session with stakeholders and observation.	Complied
<b>Criterion 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. - Critical (Major) compliance -	There is no native and customary right land in SOU 26 (Sandakan Bay Certification Unit). Sighted the old land title mentioned that previous landowners are as below: Tun Tan Siew Estate: Previous landowner is The North Borneo Trading Company Limited dated 03/03/1953 for 999 years for 2012.95 Hectare and 1130.28 Hectare. Seen the latest land cess to Majlis Perbandaran Sandakan dated 20/12/2019 invoice no: 075109401 amount RM 2,096.75.  Tunku Estate: Previous landowner is The North Borneo Trading Company Limited as below:	Complied

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<p>4.6.2</p>	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair 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.</p> <p>- Critical (Major) compliance -</p>	<p>There is no native and customary right land in SOU 26 (Sandakan Bay Certification Unit).</p> <p>Sighted the old land title mentioned that previous landowners are as below:</p> <p>Tun Tan Siew Estate: Previous landowner is The North Borneo Trading Company Limited dated 03/03/1953 for 999 years for 2012.95 Hectare and 1130.28 Hectare. Seen the latest land cess to Majlis Perbandaran Sandakan dated 20/12/2019 invoice no: 075109401 amount RM 2,096.75.</p> <p>Tunku Estate: Previous landowner is The North Borneo Trading Company Limited as below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Land titles</th> <th style="text-align: center;">Acre</th> <th style="text-align: center;">Date</th> </tr> </thead> <tbody> <tr> <td>CL 075327427</td> <td style="text-align: center;">1,839.29</td> <td style="text-align: center;">21/05/1973</td> </tr> <tr> <td>CL 075109456</td> <td style="text-align: center;">1,886.55</td> <td style="text-align: center;">05/07/1988</td> </tr> <tr> <td>CL 075109563</td> <td style="text-align: center;">3,371.40</td> <td style="text-align: center;">10/07/1888</td> </tr> <tr> <td>CL 075109572</td> <td style="text-align: center;">817.65</td> <td style="text-align: center;">10/07/1888</td> </tr> </tbody> </table> <p>Seen the latest cess to Majlis Perbandaran Sandakan dated 13/12/2019 invoice no: M455883 (RM 817.65), M455880 (RM 3,371.40), M455886 (RM 1,886.54) and M455885 (RM 1,839.30).</p>	Land titles	Acre	Date	CL 075327427	1,839.29	21/05/1973	CL 075109456	1,886.55	05/07/1988	CL 075109563	3,371.40	10/07/1888	CL 075109572	817.65	10/07/1888	<p>Complied</p>
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<p>4.6.3</p>	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>There is no native and customary right land in SOU 26 (Sandakan Bay Certification Unit).</p> <p>Sighted the old land title mentioned that previous landowners are as below:</p> <p>Tun Tan Siew Estate: Previous landowner is The North Borneo Trading Company Limited dated 03/03/1953 for 999 years for 2012.95 Hectare and 1130.28 Hectare. Seen the latest land cess to Majlis Perbandaran Sandakan dated 20/12/2019 invoice no: 075109401 amount RM 2,096.75.</p> <p>Tunku Estate: Previous landowner is The North Borneo Trading Company Limited as below:</p> <table border="1" data-bbox="1238 823 1827 991"> <thead> <tr> <th>Land titles</th> <th>Acre</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>CL 075327427</td> <td>1,839.29</td> <td>21/05/1973</td> </tr> <tr> <td>CL 075109456</td> <td>1,886.55</td> <td>05/07/1988</td> </tr> <tr> <td>CL 075109563</td> <td>3,371.40</td> <td>10/07/1888</td> </tr> <tr> <td>CL 075109572</td> <td>817.65</td> <td>10/07/1888</td> </tr> </tbody> </table> <p>Seen the latest cess to Majlis Perbandaran Sandakan dated 13/12/2019 invoice no: M455883 (RM 817.65), M455880 (RM 3,371.40), M455886 (RM 1,886.54) and M455885 (RM 1,839.30).</p>	Land titles	Acre	Date	CL 075327427	1,839.29	21/05/1973	CL 075109456	1,886.55	05/07/1988	CL 075109563	3,371.40	10/07/1888	CL 075109572	817.65	10/07/1888	<p>Not Applicable</p>
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<p>4.6.4</p>	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no native and customary right land in SOU 26 (Sandakan Bay Certification Unit).</p> <p>Sighted the old land title mentioned that previous landowners are as below:</p> <p>Tun Tan Siew Estate: Previous landowner is The North Borneo Trading Company Limited dated 03/03/1953 for 999 years for 2012.95 Hectare and 1130.28 Hectare. Seen the latest land cess to</p>	<p>Not Applicable</p>															

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<p><b>Criterion 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.</p>																		
4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.            - Critical (Major) compliance -</p>	<p>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.</p>	Complied															
4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.            - Critical (Major) compliance -</p>	<p>There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.</p>	Complied															
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.            - Minor compliance -</p>	<p>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.</p>	Not Applicable															

<b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate 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. - Minor compliance -	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.	Not Applicable
4.8.2	<b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Not Applicable
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 rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	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.	Not Applicable
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Not Applicable
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			

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5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>There were 14 outside crop growers sending their FFB to Sandakan Bay POM. The 1% MPOB FFB price for July 2020 was available for final July 2020 (KKS Sandakan Bay: 22.36 (MPOB 1% *RM/%). It was paste in front of the weighbridge office publicly.</p>	Not Applicable
5.1.2	<p><b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	<p>There was a meeting conducted between Sandakan Bay POM and all Outside Crop Producer on 24/02/2020 attended by FELCRA Pertama Estate, Mai Shang Estate, Amity Legion, etc. Among the issues discussed is security seal usage, mill weighbridge operation on Sunday, long waiting time at Mill Weighbridge and Weighbridge System Log Out.</p> <p>Apart from that, the FFB pricing calculation were explained to the Outside Crop during the agreement signed which is 1 year (start date: 01/02/2020 until 31/12/2020). There was no other request by smallholder on the FFB pricing.</p>	Not Applicable
5.1.3	<p><b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>The FFB pricing is solely based on the MPOB monthly rate provide to Sandakan Bay POM.</p>	Not Applicable
5.1.4	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>The agreement sighted has clearly mentioned the terms and conditions and signed by both parties.</p> <p>Sampled as below:</p> <ul style="list-style-type: none"> <li>• Mai Shang Estates Sdn Bhd dated 01/02/2020.</li> <li>• Agriculturist Incorporated Sdn Bhd dated 01/02/2020.</li> <li>• Sekona Cocoa Sdn Bhd dated 01/02/2020.</li> </ul> <p>Sime Darby has no bond/contract or provides loan to any outside crop company.</p>	Not Applicable

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5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	The Outside Crop Producer (OCP) has the contract agreement valid from signed date which is 1 year (start date: 01/02/2020 until 31/12/2020).	Complied												
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. - Critical (Major) compliance -	Sighted the payments for OCP as below: <ul style="list-style-type: none"> <li>• Mai Shang Estates Sdn Bhd: Invoice no: B/AFVCH-009164, date: 30/06/2020, amounted RM 1004.31.</li> <li>• Agriculturist Incorporated Sdn Bhd: Invoice no: B/AFVCH-009198, date: 31/07/2020, amounted RM 135,584.62</li> </ul> Sekona Cocoa Sdn Bhd: Invoice no: B/AFVCH-009164, date: 30/06/2020, amounted RM 1004.31.	Complied												
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Records of weighing equipment stamping was maintained on annual basis at visited operating units. Summary of stamping records as follows: <table border="1" data-bbox="1137 858 1930 1359"> <thead> <tr> <th>Weighing equipment</th> <th>Capacity</th> <th>Date of stamping, certificate no.</th> <th>Operating Unit</th> </tr> </thead> <tbody> <tr> <td>M/Toledo, serial no. B737684326</td> <td>50,000 kg @ 50 tonne</td> <td>SSD-ATK 029706 stamped on 11/8/20</td> <td>Tunku Estate</td> </tr> <tr> <td>M/Toledo serial no. B737684737</td> <td>60,000 kg @ 60 tonne</td> <td>JSD-ATK 000842 stamped on 24/17/20,</td> <td>Sandakan POM</td> </tr> </tbody> </table>	Weighing equipment	Capacity	Date of stamping, certificate no.	Operating Unit	M/Toledo, serial no. B737684326	50,000 kg @ 50 tonne	SSD-ATK 029706 stamped on 11/8/20	Tunku Estate	M/Toledo serial no. B737684737	60,000 kg @ 60 tonne	JSD-ATK 000842 stamped on 24/17/20,	Sandakan POM	Complied
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			50,000 kg @ 50 tonne	SSD-ATK 000843 stamped on 24/7/20	
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	No independent smallholders within Sandakan Bay POM certification unit			Complied
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. - Critical (Major) compliance -	The grievance mechanism for OCP is using the same grievance for all stakeholders which is through the complaint book, complaint box, whistleblowing procedure and person in charge for communication/social. So far, there is no complaint received from OCP to Sandakan Bay POM.			Complied
<b>Criterion 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 Company consults with interested smallholders (irrespective of type) within the Unit of Certification, 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. - Minor compliance -	Sandakan Bay POM has conducted the meeting with OCP on 24/02/2020 attended by FELCRA Pertama Estate, Mai Shang Estate, Amity Legion, etc. Among the issues discussed is security seal usage, mill weighbridge operation on Sunday, long waiting time at Mill Weighbridge and Weighbridge System Log Out. All the 14 OCP were from companies, no independent smallholder send FFB to Sandakan Bay POM.			Complied
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial	All the 14 OCP were from companies, no independent smallholder send FFB to Sandakan Bay POM. Therefore, this requirement is not applicable.			Complied

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	competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -		
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	All the 14 OCP were from companies, no independent smallholder send FFB to Sandakan Bay POM. Therefore, this requirement is not applicable.	Complied
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	The mill received no crop from smallholders. The outside crop suppliers being invited in the stakeholders meetings and briefing cum training are made in these sessions. Details as per minutes of meeting with the stakeholders.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	The mill received no crop from smallholders.	Complied
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 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. - Critical (Major) compliance -	SDPSB has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02nd 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.	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. - Critical (Major) compliance -	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	Complied

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		<p>free housing, subsidized water and electricity supplies, and medical care are given to all employees without discrimination.</p> <p>Foreign migrant workers. Refer to Letter of Employment, Employment Contract para" 14 – Annual leave: 14 days for &lt; 5 years and 16 days for &gt; 5 years.</p> <p>Overtime paid as per Employment Act 1995 (EA). Sampled workers are as 6.5.1.</p>	
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>There is no any discrimination based on religion, gender, nationality etc., during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting.</p> <p>Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Pregnancy test conducted in Sandakan Bay Certification Unit only when the female worker seeks Medical Assistant for treatment. If the workers confirmed pregnant, Medical Assistant will issue a recommendation letter to Assistant Manager for work change to light work and not involved in any chemical. Confirmed through the interview session to workers, Medical Assistant and Gender Committee Minute of Meeting.</p>	Complied
6.1.5	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>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 &amp; Quality Management (PSQM) Department. It explained the types of gender-based violence &amp; grievance procedures. Meetings were</p>	Complied



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		<p>conducted quarterly according to the handbook. Gender Committee were established by the mill and estates management.</p> <p>The meetings were conducted at respective units as below:</p> <ul style="list-style-type: none"> <li>• Tun Tan Siew Sin Estate: 15/07/2020 &amp; 09/01/2020. There were no sexual cases reported so far.</li> <li>• Tunku Estate: 06/07/2020 &amp; 19/12/2019. There were no sexual cases reported so far.</li> </ul> <p>Sandakan Bay POM: 18/07/2020 &amp; 14/02/2020. There were no sexual cases reported so far.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>There is no any discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting.</p> <p>Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste.</p>	Complied
<p><b>Criterion 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>- Critical (Major) compliance -</p>	<p>All the workers are under direct employment and some electrical works are under contractor 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 pay slip for employees (March, April and May 2020): as below:</p> <p>Tun Tan Siew Sin Estate:</p> <ul style="list-style-type: none"> <li>• Employee ID: 0000146201</li> <li>• Employee ID: 0000081266</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>• Employee ID: 0000130165</li> <li>• Employee ID: 0000130177</li> <li>• Employee ID: 0000087477</li> </ul> <p>Tunku Estate:</p> <ul style="list-style-type: none"> <li>• Employee ID: 0000071046</li> <li>• Employee ID: 0000156127</li> <li>• Employee ID: 0000095156</li> <li>• Employee ID: 0000149366</li> <li>• Employee ID: 0000125618</li> </ul> <p>Sandakan Bay POM:</p> <ul style="list-style-type: none"> <li>• Employee ID: 0000034419</li> <li>• Employee ID: 0000140893</li> <li>• Employee ID: 0000155985</li> <li>• Employee ID: 0000156698</li> <li>• Employee ID: 0000101885</li> </ul> <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 record of induction training to foreign workers as below:</p> <ul style="list-style-type: none"> <li>• Tun Tan Siew Sin Estate: Whistle blowing &amp; SPIEU briefing dated 25/07/2020.</li> <li>• Tunku Estate: Induction training dated 16/01/2020.</li> <li>• Sandakan Bay POM: Induction training dated 03/09/2019.</li> </ul>	
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<p>6.2.2</p>	<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. - Critical (Major) compliance -</p>	<p>All workers have the employment contract stated the regular working hours (9 hours for daily rate) and piece rates by works as per Sabah Labour Ordinance. Sighted the employment contract for employee March, April and May 2020: Tun Tan Siew Sin Estate:</p> <ul style="list-style-type: none"> <li>• Employee ID: 0000146201</li> <li>• Employee ID: 0000081266</li> <li>• Employee ID: 0000130165</li> <li>• Employee ID: 0000130177</li> <li>• Employee ID: 0000087477</li> </ul> <p>Tunku Estate:</p> <ul style="list-style-type: none"> <li>• Employee ID: 0000071046</li> <li>• Employee ID: 0000156127</li> <li>• Employee ID: 0000095156</li> <li>• Employee ID: 0000149366</li> <li>• Employee ID: 0000125618</li> </ul> <p>Sandakan Bay POM:</p> <ul style="list-style-type: none"> <li>• Employee ID: 0000034419</li> <li>• Employee ID: 0000140893</li> <li>• Employee ID: 0000155985</li> <li>• Employee ID: 0000156698</li> <li>• Employee ID: 0000101885</li> </ul>	<p>Complied</p>
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<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>- Critical (Major) compliance -</p>	<p>The paid salary sighted for Sandakan Bay Certification Unit for March, April and May 2020 were complied with the Minimum Wage Order 2019 (for all workers) and Minimum Wage Order 2020 (for workers in town, if applicable).</p> <p>Sighted the pay slip for employees as below:</p> <p>Tun Tan Siew Sin Estate:</p> <ul style="list-style-type: none"> <li>• Employee ID: 0000146201</li> <li>• Employee ID: 0000081266</li> <li>• Employee ID: 0000130165</li> <li>• Employee ID: 0000130177</li> <li>• Employee ID: 0000087477</li> </ul> <p>Tunku Estate:</p> <ul style="list-style-type: none"> <li>• Employee ID: 0000071046</li> <li>• Employee ID: 0000156127</li> <li>• Employee ID: 0000095156</li> <li>• Employee ID: 0000149366</li> <li>• Employee ID: 0000125618</li> </ul> <p>Sandakan Bay POM:</p> <ul style="list-style-type: none"> <li>• Employee ID: 0000034419</li> <li>• Employee ID: 0000140893</li> <li>• Employee ID: 0000155985</li> <li>• Employee ID: 0000156698</li> <li>• Employee ID: 0000101885</li> </ul>	<p>Non-compliance</p>
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		<ul style="list-style-type: none"> <li>Employee ID: 0000082335</li> </ul> <p>However, in Sandakan Bay POM, pay slip and thumb print records was sampled for the weighbridge clerk for March, Apr and May 2020, it was found that Nurul Syafiqah Andu (Employee id: 0000082335-Weighbridge Clerk) has worked overtime after 10 pm as below:</p> <p>MAY 2020</p> <p>04/05/2020: 13:58 PM-22.23 PM &amp; 05/05/2020: 06:38 AM-16:06 PM</p> <p>08/05/2020: 14:06 PM-23:17 PM &amp; 09/05/2020: 06:40 AM-16:12 PM</p> <p>APRIL 2020</p> <p>06/04/2020: 13:57 PM-23:07 PM &amp; 07/04/2020: 06:50 AM-16:12 PM</p> <p>10/04/2020: 13:53 PM-22:03 PM &amp; 11/04/2020: 06:52 AM-16:14 PM</p> <p>According to JTK Permit: Permit Wanita Bekerja Malam Seksyen 75, Ordinan Buruh (Sabah Bab 67):</p> <p>1.3 <i>Memberi pekerja-pekerja wanitanya suatu tempoh rehat bebas dari kerja selama 11 jam berterusan sebelum dibenarkan bekerja semula.</i> Thus, a major NC was issued</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</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 supplied with free of charge.</p>	Complied

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	<p>acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Seen the Budget for housing repairs, sanitation, garden upkeep and CAPEX &amp; OPEX from all operating units.</p> <p>Seen the record for weekly line site inspection done by Medical Assistant in Weekly basis. For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilizes).</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>The nearest town is Kinabatangan (65 km by road) or Sandakan (40 km by boat) where the accessibility to the grocery and shops is available in housing area.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>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 endeavour 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 (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).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils 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.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include</p>	<p>Sime Darby Plantation Berhad-Sandakan Bay 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 2019 and the decent living wage set up by the group which is foreign worker is RM2308.86 /worker and local RM2318.24/worker (housing basket: RM 38.56/foreign worker/4 Pax/house).</p>	Complied

	<p>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). 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.</p> <p><i>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 (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).</i></p> <p>Once these 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:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• 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</li> <li>• The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<p>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.</p> <p>- Minor compliance -</p>	<p>There are no casual workers hired in Sandakan Bay 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</p>	Complied

<p><b>Criterion 6.3:</b> 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>			
<p>6.3.1</p>	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability &amp; 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:</p> <ul style="list-style-type: none"> <li>• Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</li> <li>• Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> </ul> <p>Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively.</p> <p>During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join the SPIEU.</p>	<p>Complied</p>
<p>6.3.2</p>	<p>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.</p> <p>- Minor compliance -</p>	<p>Minit Mesyuarat Antara Pihak Ladang Dan Wakil SPIEU 2020 dated 21/06/2020 (Tun Tan Siw Sin Estate), 10/07/2020 (Tunku Estate) and 11/02/2020 (Sandakan Bay POM) involved the representative from employer and employee available. Issues discussed as below:</p> <ul style="list-style-type: none"> <li>• Tun Tan Siw Sin Estate: FM requested for spray/ha rate &amp; to provide the bus transportation for kids to Sekolah Menengah Sukau.</li> <li>• Tunku Estate: Issue on outside visitor for come inside estate during COVID 19 to be controlled.</li> </ul>	<p>Complied</p>



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		Sandakan Bay POM: Article 2(2) Perjanjian Bersama: New agreement for 2020-2022 session.	
6.3.3	<p>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> <p>- Minor compliance -</p>	<p>Based on the worker's interview, the selection of SPIEU representative made from the election among the SPIEU member without management interference. Foreign workers included in the committee formation and appointment letter sighted.</p> <p>Sampled below appointment letter:</p> <ul style="list-style-type: none"> <li>• Tun Tan Siew Sin Estate: Ridzfar Abubakar Ahmadal dated 23/01/2020 &amp; Mohd Ali Semmi dated 23/01/2020.</li> <li>• Tunku Estate: Nurfithery Samsuddin dated 09/01/2020.</li> <li>• Sandakan Bay POM: Mr Wong Kon Soon (QA Supervisor) dated 01/01/2020</li> </ul> <p>The selection also based on the election meeting. This is further confirmed by the interview session.</p>	Complied
<b>Criterion 6.4:</b> Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<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> <ul style="list-style-type: none"> <li>• Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</li> <li>• Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> <li>• Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees.</li> </ul>	Complied

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		<p>We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees.</li> <li>• 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.</li> </ul> <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 21/06/2020, 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>- Critical (Major) compliance -</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 Liason &amp; Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause</p>	Complied

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		procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).	
6.4.3	<b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	There is no young worker employed in Sandakan Bay POM and Estate 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. - Minor compliance -	The unit of certification has communicated the Human Right Charter, Social Policy and Vendor COBC through the stakeholder meeting and muster briefing.	Complied
<b>Criterion 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. - Critical (Major) compliance -	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: <ul style="list-style-type: none"> <li>• 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.</li> <li>• Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation.</li> </ul> The policy was communicated through the Gender Committee meeting.	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	Complied

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	- Critical (Major) compliance -	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.	
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. - Minor compliance -	In Tun Tan Siew Sin Estate, the assessment for needs for new mother was conducted by Gender Committee. There were new mothers needs as sampled below: <ul style="list-style-type: none"> <li>• Tun Tan Siew Sin Estate: Hasna Hamsir (General Workers): child age 1 year 4 months. She requested for child care centre to be opened as usual during working hours. Action: will be opened in August 2020 follows as per SOP.</li> <li>• Tunku Estate: Nurlela Baco (Gardener): child age: 5 months. She requested to change work to housing area. Action: Agreed and will be approved.</li> <li>• Sandakan Bay POM: Norbayah Binti Sakka (Office Clerk0: child age: 15 months. She requested to have infant allowance since she sends the baby to babysitter. Management will take into consideration on the request on October 2020 (through HR region meeting). If this is not approved, other alternative will be offered.</li> </ul> In Tunku Estate, there were 2 new mothers but based on the new mothers need assessment, no request been made since their children were having formulae milk and being care by babysitter at Estate Creche.	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. - Minor compliance -	Gender committee has been formed in each unit for the medium of sexual harassment grievances by female.	Complied

Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <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 for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</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. This is further confirmed through interview session with workers.</p> <p>There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia was same with the employment contract signed between worker and estate/mill.</p> <p>Based on the workers interview, the overtime was given voluntarily if any work offered.</p> <p>The termination of service clearly stated that the termination of employment if:</p> <ol style="list-style-type: none"> <li>1. The company is not satisfied with your performance</li> <li>2. You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term.</li> <li>3. You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime.</li> <li>4. You have breached any express or implied terms of your employment.</li> </ol> <p>Fail medical examination based on FOMEMA result.</p>	Complied
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SDPSB has implemented a Sime Darby's Human Rights Charter on where they committed as below:</p> <p>a. Providing equal opportunity</p>	Complied

		<p>b. Respecting freedom of association  c. Eradicating any form of exploitation  d. Ensuring favourable working conditions  e. Enhancing Safety and Health</p> <p>They also provided awareness and training to all the foreign workers for them to understand their responsibility in respect of human rights as included in the Group Sustainability Policy on</p> <p>For eg: All the workers have provided with induction training in based estate during their arrival to Malaysia.</p>																									
<p><b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>																											
<p>6.7.1</p>	<p><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.  - Critical (Major) compliance -</p>	<p>Both the estates/mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held are recorded below.</p> <table border="1" data-bbox="1169 912 1877 1101"> <thead> <tr> <th>No</th> <th>Estate</th> <th>1st</th> <th>2nd</th> <th>3rd</th> <th>4th</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tun Tan</td> <td>16/6/20</td> <td>17/1/20</td> <td>26/10/19</td> <td>25/7/19</td> </tr> <tr> <td>2</td> <td>Tunku</td> <td>08/7/20</td> <td>19/12/19</td> <td>12/10/19</td> <td>28/6/19</td> </tr> <tr> <td>3</td> <td>SBPOM</td> <td>03/7/20</td> <td>03/4/20</td> <td>03/1/20</td> <td>3/10/19</td> </tr> </tbody> </table> <p>Agenda discussed among others;</p> <ul style="list-style-type: none"> <li>a) Confirmation of minutes previous meeting</li> <li>b) Workplace inspection report</li> <li>c) Accident report</li> </ul>	No	Estate	1st	2nd	3rd	4th	1	Tun Tan	16/6/20	17/1/20	26/10/19	25/7/19	2	Tunku	08/7/20	19/12/19	12/10/19	28/6/19	3	SBPOM	03/7/20	03/4/20	03/1/20	3/10/19	<p>Complied</p>
No	Estate	1st	2nd	3rd	4th																						
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		<ul style="list-style-type: none"> <li>d) Medical surveillance &amp; Audio metric</li> <li>e) Status of Safety Program &amp; Environmental</li> <li>f) First Aid Kit &amp; Fire Extinguishers Report</li> <li>g) HIRARC</li> <li>h) Complaint from Employee/External Party.</li> <li>i) Other matters</li> </ul> <p>Workplace inspections are made prior to the ESH meeting. There was deferment in the meeting in view of the MCO restriction control. This was remarked in the minutes of meeting dated 08/7/20 for Tunku Estate.</p> <p>The respective Managers were appointed as ESH Chairman (PIC) through letter signed by Regional General Manager Sabah North Region. All letters were sighted and verified.</p> <table border="1" data-bbox="1169 970 1874 1158"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Chairman</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tun Tan Estate</td> <td>Manager</td> <td>06/1/20</td> </tr> <tr> <td>2</td> <td>Tunku Estate</td> <td>Manager</td> <td>15/2/19</td> </tr> <tr> <td>3</td> <td>Sandakan Bay POM</td> <td>Manager</td> <td>30/12/19</td> </tr> </tbody> </table>	No	Estate	Chairman	Date	1	Tun Tan Estate	Manager	06/1/20	2	Tunku Estate	Manager	15/2/19	3	Sandakan Bay POM	Manager	30/12/19	
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6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid</p>	<p>The procedures for accident and emergencies has been established. There is formation of ERP Team &amp; ERP for all the identified incidences. In addition the procedures have been summarized in a chart flow form and displayed for information of all employees in</p>	Complied																

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	<p>equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>the estate. They includes emergencies relating fire, chemical spillage, flood and accident at work place.</p> <ul style="list-style-type: none"> <li>a) <i>Ahli J/Kuasa Pasukan Bertindak Kecemasan 2020</i> headed by the Estate/Mill Manager</li> <li>b) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Kebakaran</i></li> <li>c) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Banjir</i></li> <li>d) <i>Carta Aliran Pelan Tindakan Kecemasan Semasa Berlaku Tumpahan Kimia</i></li> </ul> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by RSQM and amended to tailor to the situation differences in the estates and mill.</p> <table border="1" data-bbox="1227 970 1854 1297"> <thead> <tr> <th></th> <th>Emergency situation</th> <th>Mill</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Fire</td> <td>/</td> <td>/</td> </tr> <tr> <td>2</td> <td>Oil spillage</td> <td>/</td> <td>-</td> </tr> <tr> <td>3</td> <td>Effluent overflow</td> <td>/</td> <td>-</td> </tr> <tr> <td>4</td> <td>Chemical spillage</td> <td>/</td> <td>/</td> </tr> <tr> <td>5</td> <td>Flood</td> <td>-</td> <td>/</td> </tr> <tr> <td>6</td> <td>Accident at work place</td> <td>-</td> <td>/</td> </tr> </tbody> </table> <p>ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The training are conducted by an accredited or qualified</p>		Emergency situation	Mill	Estate	1	Fire	/	/	2	Oil spillage	/	-	3	Effluent overflow	/	-	4	Chemical spillage	/	/	5	Flood	-	/	6	Accident at work place	-	/	
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organization who can demonstrate their suitability to provide training.

The trained personnel for the First Aid were among the employees working as field staff/mandores. The first aid boxes were available at various points in the estate office, workshop, and store. The estate distributed the first aid box to the mandores and brought along to the field during operations. In addition, there are also first aid boxes kept in the office, store and workshops

Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKPP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKPP 8 a mandatory requirement with submission as follows. Accident Statistics are being maintained in a satisfactory manner

	Estate	No of cases in 2019				JKPP 8 submission
		cases	LTI	Non LTI	Total	
1	Tun Tan	4	18	6	10	20/1/20
2	Tunku	0	0	0	0	20/1/20
3	SB POM	0	0	0	0	20/1/20

Tun Tan Estate had 1 case of 11 days LTI on 28/4/19. A general worker had cut in his right hand while collecting rubbish. Investigation was made and HIRARC was revised to increase the severity of the hazard identified in the general work.

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<p>6.7.3</p>	<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>- Critical (Major) compliance -</p>	<p>The estates and mill provide PPE to the employees such as apron, safety helmets, and safety shoes relevant to the work handled by the workers. Records of PPE issuance for the estate were sighted. During the site visit workers was observed to be in PPE. Based on the HIRARC carried out at the estates/mill the PPE types for the various activities has been identified and implemented.</p> <ul style="list-style-type: none"> <li>a) Harvester- Safety helmet, sickle cover, hand glove. wellington boots</li> <li>b) Sprayers- Respirator, nitrile glove (chemical resistant) goggles, wellington boots, apron.</li> <li>c) Manuring- Apron, wellington boots, dust mask, nitrile glove.</li> <li>d) Water treatment Plant Operator - Safety boots, ear muff, safety vest, helmet, cotton glove, dust mask.</li> </ul> <p>The mill issued PPE to its employees for their protection at workplace. Records of PPE issued are maintained individually to all employees. PPE issued to the workers is safety helmets, safety shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded.</p> <ul style="list-style-type: none"> <li>a) Mill operator – Safety boots, ear muff, safety vest, helmet, cotton glove</li> <li>b) Water treatment Plant Operator - Safety boots, ear muff, safety vest, helmet, cotton glove, dust mask.</li> <li>c) Sighted issuance of PPE records for the estates/mill employees in 2020.</li> </ul>	<p>Complied</p>
<p>6.7.4</p>	<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>Both the Estates and Mill in the SOU 26 uses SOCSO for the coverage for the local and foreign workers. The insurance coverage</p>	<p>Complied</p>

	<p>- Minor compliance -</p>	<p>has ceased effective 2018 following the Government directive on the coverage.</p> <table border="1" data-bbox="1220 475 1769 663"> <thead> <tr> <th></th> <th>Estate/Mill</th> <th>SOCISO ref no</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tun Tan Estate</td> <td>F9700006731F</td> </tr> <tr> <td>2</td> <td>Tunku</td> <td>99700006753B</td> </tr> <tr> <td>3</td> <td>S Bay POM</td> <td>F9706693M</td> </tr> </tbody> </table>		Estate/Mill	SOCISO ref no	1	Tun Tan Estate	F9700006731F	2	Tunku	99700006753B	3	S Bay POM	F9706693M	
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<p>6.7.5</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.                  - Minor compliance -</p>	<p>Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKKP 8. Records are kept for a minimum 10 years in the office. Summary for the year is described in the JKKP 8 a mandatory requirement with submission as follows. Accident Statistics are being maintained in a satisfactory manner.</p>	<p>Complied</p>												
<p><b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b></p>															
<p><b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>															
<p>7.1.1</p>	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.                  - Critical (Major) compliance -</p>	<p>SOU 26 Estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans.</p> <p>a) The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The plan was guided by SOPs ref OPC 04a, OPC 04b, OPC 04f, OPC 04g and OPC 04h.</p> <p>b) In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as <i>Turnera</i></p>	<p>Complied</p>												

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		<p><i>subulata, Cassia cobanensis, Antigonon leptopus, Euphorbia heterophylla,</i> along the roadsides and designated points in the fields and also within the nursery perimeter. To develop beneficial plant nursery comprised of the beneficial plant.</p> <p>c) The plan also advocated single layer EFB mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. These monthly detection and observations were carried by staff.</p> <p>d) Census records for Ganoderma affected palms were sighted.</p> <p>e) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year where recommended by the PA /Agronomist. Baiting are continued until bait acceptance threshold level</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>This is not practiced in the two estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM. The estates have declared this compliance in the status of IPM species invasiveness.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no land preparation in SOU 26 Mill and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <p>a) EQMS-SOP-SectionB2 - Under felling/clearing &amp; land preparation</p>	Complied

		<p>b) Carbon Policy</p> <p>SDP has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	
<p><b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
<p>7.2.1</p>	<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.          - Critical (Major) compliance -</p>	<p>All pesticides used were those officially registered under the Pesticide Act 1974. The CU confined usage to only class II, class III &amp; class IV pesticides.</p> <p>a) No illegal agrochemicals (stated by local and international laws) paraquat was used in the CU estates.</p> <p>b) The usage of the agrochemicals was based on the Agricultural Reference Manual (ARM) Section 15 and 16, SOP and in the Pictorial Safety Standard Book where written justifications had been provided for various fields operations.</p> <p>c) The Manual has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs.</p> <p>d) Purchases of pesticides are made on a centralized arrangement via Regional Office thus a control by the organization.</p>	<p>Complied</p>

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>- Critical (Major) compliance -</p>	<p>SOU 26 Estates had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available and verified.</p> <p>All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II ,class III &amp; class IV pesticides. No illegal agrochemicals (stated by local and international laws) in particular paraquat were used in their estates.</p>	Complied
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>- Critical (Major) compliance –</p>	<p>During the audit, it was observed and recorded that SOU 26 Estates had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions.</p> <ul style="list-style-type: none"> <li>a) Paraquat usage has been prohibited in all units and the entirety of the organization.</li> <li>b) The Safety Procedures for pesticides application were well described in Pictorial Safety Standard.</li> </ul>	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>- Minor compliance -</p>	<p>The estates of SOU 26 are committed to minimize the usage of agrochemicals through the implementation of IPM practices among others;</p> <ul style="list-style-type: none"> <li>a) The planting of beneficial plants i.e. Tunera subulata, Cassia cobanensis and Antigonon leptopus rate of 10 dm: 1 ha.</li> <li>b) Blanket spraying was not practiced by this CU and soft grasses maintained in the field. It had also been the</li> </ul>	Complied

		<p>practice that insecticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section 15 -Plant Protection</p> <p>There is no prophylactic use of pesticides. The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5.</p> <p>.</p>																			
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> <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>- Minor compliance -</p>	<p>The 2 estates in the SOU 26 confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.</p> <ul style="list-style-type: none"> <li>a) The review of the chemical register concluded that all pesticides used were of class II, III &amp; class IV. The use of paraquat had been prohibited in all SDP estates.</li> <li>b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used.</li> <li>c) Sighted from records and interviews with workers, staff and estate assistants, concluded that training were held with all precautions being taken and all legal requirements met. Register was updated on 01/6/20.</li> </ul> <p>The chemical used in the estates among others as listed below;</p> <table border="1" data-bbox="1160 1214 1912 1378"> <thead> <tr> <th></th> <th>Chemical name</th> <th>Class</th> <th></th> <th>Chemical name</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Glyphosate</td> <td></td> <td>6</td> <td>Triclopyr butoxy ethyl ester</td> <td>III</td> </tr> <tr> <td></td> <td>isopropylamine</td> <td>II</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		Chemical name	Class		Chemical name	Class	1	Glyphosate		6	Triclopyr butoxy ethyl ester	III		isopropylamine	II				Complied
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		2	Thiram	II	7	Cypermethrin	III		
		3	Glufosinate ammonium	III	8	Canyon 20G	IV		
		4	Propineb	IV	9	Miracle	IV		
		5	Antracol	IV	10	Bayfolan	IV		
7.2.6	<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 Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the product.</p> <p>a) The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained and they had understood the hazards involved and how the chemicals should be handled in a safe method.</p> <p>b) The trade and generic names of the chemicals were made known to the workers through the SDS training. SDS was also displayed at all storage areas as observed during the audit.</p> <p>c) The training included the safety aspects and usage of PPE when handling with pesticides. Records of training are shown in 4.6.9 and verified.</p> <p>d) All workers involved in pesticide application were provided with appropriate PPE and replaced when worn-out. PPE issuance &amp; replacement records were verified by the auditors.</p> <p>e) From interviews conducted with workers and staffs in the field and stores clerks it was established that they had been trained and were aware of safe handling procedure.</p> <p>f) Training in relation to pesticides &amp; chemical handling among others as shown below.</p>						Complied	
			Subject	T Tan	Tunku	SPOM			
		1	SOP Weeding / HIRARC	-	22/2/20	24/6/20			



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		<table border="1"> <tr> <td>2</td> <td>Spraying SOP</td> <td>28/2/20</td> <td>20/1/20</td> <td>-</td> </tr> <tr> <td>3</td> <td>Nursery Operations</td> <td>-</td> <td>29/2/20</td> <td>-</td> </tr> <tr> <td>4</td> <td>Chemical spillage ERP</td> <td>-</td> <td>06/9/19</td> <td>17/7/20</td> </tr> <tr> <td>5</td> <td>First Aid - Refresher briefing</td> <td>13/3/20</td> <td>13/2/20</td> <td>21/2/20</td> </tr> <tr> <td>6</td> <td>Pesticides Handling</td> <td>-</td> <td>06/7/20</td> <td>-</td> </tr> <tr> <td>7</td> <td>Chemical spraying</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>8</td> <td>First Aid Kit &amp; ERP handling</td> <td>13/3/20</td> <td>13/2/20</td> <td>17/7/20</td> </tr> <tr> <td>9</td> <td>Spraying P&amp; D</td> <td>28/2/20</td> <td>-</td> <td>-</td> </tr> </table>	2	Spraying SOP	28/2/20	20/1/20	-	3	Nursery Operations	-	29/2/20	-	4	Chemical spillage ERP	-	06/9/19	17/7/20	5	First Aid - Refresher briefing	13/3/20	13/2/20	21/2/20	6	Pesticides Handling	-	06/7/20	-	7	Chemical spraying	-	-	-	8	First Aid Kit & ERP handling	13/3/20	13/2/20	17/7/20	9	Spraying P& D	28/2/20	-	-	
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9	Spraying P& D	28/2/20	-	-																																							
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.          - Critical (Major) compliance -</p>	<p>The chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149).</p> <ul style="list-style-type: none"> <li>a) Records of purchase, storage and use were maintained.</li> <li>b) All store buildings were equipped with exhaust fans with the door secured.</li> <li>c) Only authorized personnel are assigned to handle the chemicals.</li> <li>d) All the chemicals were segregated in storage accordingly.</li> </ul> <p>Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Thereafter disposal arrangement will follow accordingly as per procedures at to SW collector Lagenda Bumimas Sdn Bhd.</p>	Complied																																								
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.          - Minor compliance -</p>	<p>The procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established.</p>	Complied																																								

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		<p>a) Collection of SW is made by Lagenda Bumimas Sdn Bhd a licensed vendor registered with DOE.</p> <p>b) The clinical waste SW 404 is disposed to Sedafiat Sdn Bhd</p> <p>c) Empty containers were tripled rinsed, pierced and delivered to a registered recycler company M/s Lagenda Bumimas Sdn Bhd approved by DOE.</p>																	
7.2.9	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>Aerial application of agrochemicals is not practiced in SOU 26 Estates. This is confirmed through observation during the site visit, estate complex and interview with the employees. Such method is no longer in existence in the estates practices.</p>	Complied																
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>The CHRA for the estates and the mill in SOU 26 was conducted with details as shown below.</p> <table border="1" data-bbox="1153 986 1921 1235"> <thead> <tr> <th>OU</th> <th>Date</th> <th>Assessor</th> <th>DOSH no</th> </tr> </thead> <tbody> <tr> <td>Tun Tan</td> <td>20/6/17</td> <td>M/s Anthony Astral Chan</td> <td>127/171-2(364.</td> </tr> <tr> <td>Tunku</td> <td>19/6/17</td> <td>M/s Anthony Astral Chan</td> <td>127/171-2(364.</td> </tr> <tr> <td>SBPOM</td> <td>18/12/19</td> <td>DAB OH Sdn Bhd</td> <td>HQ/10/DOC/OO/167</td> </tr> </tbody> </table> <p>The recommendation from the CHRA is mainly on the training for operators working in laboratory, ETP, WTP, Boiler, workshop, scheduled waste and chemical store. In addition the assessor recommended medical surveillance be conducted for the categories</p>	OU	Date	Assessor	DOSH no	Tun Tan	20/6/17	M/s Anthony Astral Chan	127/171-2(364.	Tunku	19/6/17	M/s Anthony Astral Chan	127/171-2(364.	SBPOM	18/12/19	DAB OH Sdn Bhd	HQ/10/DOC/OO/167	Complied
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of employees in the workshop and laboratory and chemicals handlers. Similar CHRA was compiled for the estates with details provided therein. below. The CHRA report among others described requirement of medical surveillance to be made for the listed category of employees.

The medical surveillance was carried out on in the CU as follows;

	OU	Employees categories				
		Date	Workshop/st ore	Fertiliz er	sprayer s	WTP
1	Tun Tan	Dec 19	5	15	37	1
2	Tunku	12/12/ 19	4	-	21	3

	OU	Employees categories				
		Date	Workshop/st ore	Store	Operat or	WTP
3	SB POM	12/12/ 19	33	1	4	2

All medical surveillance was conducted an OHD Doctor of Mabello Group Of Clinic DOSH Rgn No. HQ/13/DOC/00/315. The results for the entire workers were positive and declared FIT to handle chemical. The mill held CHRA on 18/12/2019 with validity till 17/12/2024. Assessor DAB OH Sdn Bhd OHD: HQ/10/DOC/OO/167 to run effective 2019.

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7.2.11	<p><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.</p> <p>- Critical (Major) compliance -</p>	<p>All the estates and mill in the CU complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation whereby;</p> <p>No work with pesticides is given to pregnant or breast-feeding women. Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan)</p> <p>The estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.</p>	Complied
<b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance –</p> <p>The mill has established waste management plan base on the waste identified and documented in Types of Waste Products and Method of Disposal, Action Plan to Reduce Waste. Sighted the implementation of the management plan as follows:</p> <p>i. Dedicated workers were assigned to segregate the recyclable items and dispatch to waste managers. Sighted the waste disposal records as at May 2019 amounted RM 4422.00</p> <p>ii. EFB recycle and applied in the estate field as mulch. Sighted the records of EFB disposal FY 2018 at 49393 ton for 593 ha.</p>	<p>The waste management plan is established under Waste Management Plan dated 6/1/20. 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>	Choose an item.
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>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</p>	Complied

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		<p>the hazardous waste, disposal waste made by DOE's license contractor.</p> <p>Hazardous waste disposal summary:</p> <table border="1"> <thead> <tr> <th>Waste code</th> <th>Consignment no./ quantity</th> <th>Waste Contractor / Transporter</th> <th>Date of disposal</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>SW305 (used lubricant), SW410 (Used filter)</td> <td>110134100, SW305 - 13 L, SW410 - 3 pcs</td> <td>Lagenda Bumimas</td> <td>23/6/20</td> <td>Tun Tan Estate</td> </tr> <tr> <td>SW409 (</td> <td>via eSWiS 20200204 13XOAE4J, 0.0310 mt</td> <td>Lagenda Bumimas</td> <td>20/6/20</td> <td>Sandakan Bay POM</td> </tr> <tr> <td>SW109 (waste containing mercury or its compound )</td> <td>via eSWiS 20200204 13D6204U , 0.025 mt</td> <td>Lagenda Bumimas</td> <td>20/6/20</td> <td>Sandakan Bay POM</td> </tr> </tbody> </table>	Waste code	Consignment no./ quantity	Waste Contractor / Transporter	Date of disposal	Estate	SW305 (used lubricant), SW410 (Used filter)	110134100, SW305 - 13 L, SW410 - 3 pcs	Lagenda Bumimas	23/6/20	Tun Tan Estate	SW409 (	via eSWiS 20200204 13XOAE4J, 0.0310 mt	Lagenda Bumimas	20/6/20	Sandakan Bay POM	SW109 (waste containing mercury or its compound )	via eSWiS 20200204 13D6204U , 0.025 mt	Lagenda Bumimas	20/6/20	Sandakan Bay POM	
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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	Complied																				

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	- Minor compliance -	landfilled while other non-biodegradable and hazardous waste is disposed through licensed disposer.	
<b>Criterion 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	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>SOU 26 estates and mill continued to use and implement SOPs for each of the processes. Brief version of the SOPs was displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOPs.</p> <ul style="list-style-type: none"> <li>a) Agriculture Reference Manual (ARM) dated 01/07/2011,</li> <li>b) Estate Quality Management System (EQMS) Manual dated 01/11/2008,</li> <li>c) Safety Standard Operating Procedures (SSOP) dated 25/02/2015,</li> <li>d) Sustainable Plantation Management System Manual (SPMS),</li> <li>e) Guidelines On River Management Manual, ESH Management System Manual dated 01/07/2012,</li> <li>f) Occupational Safety and Health Manual dated 03/03/2008,</li> <li>g) Pictorial Safety Standards and Security Guidelines (PSS).</li> <li>h) Plantations/Mill Quality Management System (PQMS/MQMS) std operating manual</li> <li>i) Laboratory Process Control Manual</li> <li>j) Security Guidelines</li> </ul> <p>All the estates and mill operations were guided through the manuals and SOPs. The procedures as documented in the Agriculture Reference Manual were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main</p>	Choose an item.

		<p>office for references of employees particularly for the supervisory personnel. The ARM included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.</p>													
<p>7.4.2</p>	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -</p>	<p>Periodic tissue and soil sampling were carried out in the Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. For all the estates Agronomic assessment and fertiliser recommendation was conducted by Sime Darby Research Plant Nutrition &amp; Protection Unit PNP Northern Region to formulate the FY2020 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca &amp; B had been were carried out in all estates. The latest being :</p> <table border="1" data-bbox="1249 1107 1879 1241"> <thead> <tr> <th></th> <th><i>Estate</i></th> <th><i>Report Date</i></th> <th><i>Report No</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tun Tan</td> <td>20/11/19</td> <td>2019-20 Agr &amp; Fert</td> </tr> <tr> <td>2</td> <td>Tunku</td> <td>21/11/19</td> <td>2019-20 Ar &amp; Fert</td> </tr> </tbody> </table> <p>Soil analysis for PH, Org C, Total N, Total P, Avail P, exch K, exch Ca &amp; exch Mg was carried out on a 5 year cycle basis and last carried out as follows:</p>		<i>Estate</i>	<i>Report Date</i>	<i>Report No</i>	1	Tun Tan	20/11/19	2019-20 Agr & Fert	2	Tunku	21/11/19	2019-20 Ar & Fert	<p>Complied</p>
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7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>All the estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of compost. In addition, during replanting, palms were felled, chipped, windowed and left to decompose. Records showed that the estates had applied EFB at 20 tons/ha and records showed that EFB metric ton in 2019/20 was as follows:</p> <table border="1" data-bbox="1249 938 1834 1386"> <thead> <tr> <th></th> <th>Estate</th> <th>Field no</th> <th>Ha</th> <th>Mt</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tun Tan</td> <td>2011A</td> <td>51.20</td> <td>697.06</td> </tr> <tr> <td>2</td> <td>Tun Tan</td> <td>2020C</td> <td>58.15</td> <td>365.45</td> </tr> <tr> <td>3</td> <td>Tun Tan</td> <td>2030B</td> <td>67.65</td> <td>242.64</td> </tr> <tr> <td>4</td> <td>Tun Tan</td> <td>2020D</td> <td>6138</td> <td>75.56</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>1</td> <td>Tunku</td> <td>2014A</td> <td>75.26</td> <td>1716</td> </tr> <tr> <td>2</td> <td>Tunku</td> <td>2014B</td> <td>96.48</td> <td>2161.20</td> </tr> <tr> <td>3</td> <td>Tunku</td> <td>2012A</td> <td>74.81</td> <td>1451.0</td> </tr> </tbody> </table>		Estate	Field no	Ha	Mt	1	Tun Tan	2011A	51.20	697.06	2	Tun Tan	2020C	58.15	365.45	3	Tun Tan	2030B	67.65	242.64	4	Tun Tan	2020D	6138	75.56						1	Tunku	2014A	75.26	1716	2	Tunku	2014B	96.48	2161.20	3	Tunku	2012A	74.81	1451.0	Complied
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7.4.4	<p>Records of fertiliser inputs are maintained. - Minor compliance -</p>	<p>Fertiliser application program was monitored using records among others as described below;</p> <ul style="list-style-type: none"> <li>a) program sheets, bin cards,</li> <li>b) Field cost book, fertiliser application monitoring forms, etc.</li> <li>c) Reconciliation of empty bags versus the issuance.</li> </ul> <p>Records of programs and applications of fertilisers were reviewed by auditors. Review of the records revealed that the actual fertilizers applied in 2019/20 was in line with the program. The following fertilizers were applied in SOU 26 estates subject to the recommendation by the Agronomist.</p> <table border="1" data-bbox="1249 770 1843 1043"> <thead> <tr> <th></th> <th><i>Fertiizer</i></th> <th><i>Kg/palm</i></th> <th><i>application month</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>A chloride</td> <td>1.50-1.75</td> <td>Jan - Feb</td> </tr> <tr> <td>2</td> <td>MOP</td> <td>1.50-2.25</td> <td>Oct -Nov</td> </tr> <tr> <td>3</td> <td>Kieserite</td> <td>0.50-1.00</td> <td>Oct - Dec</td> </tr> <tr> <td>4</td> <td>Borate</td> <td>0.10</td> <td>Oct - Dec</td> </tr> <tr> <td>5</td> <td>COMP 44</td> <td>2.00</td> <td>Aug - Dec</td> </tr> </tbody> </table>		<i>Fertiizer</i>	<i>Kg/palm</i>	<i>application month</i>	1	A chloride	1.50-1.75	Jan - Feb	2	MOP	1.50-2.25	Oct -Nov	3	Kieserite	0.50-1.00	Oct - Dec	4	Borate	0.10	Oct - Dec	5	COMP 44	2.00	Aug - Dec	Complied
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<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.																											
7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance –</p>	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. The soil series in the estates were classified as follows:</p> <table border="1" data-bbox="1249 1257 1821 1393"> <thead> <tr> <th></th> <th>Soil series</th> <th>Tun Tan Estate</th> <th>Tunku Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kuah</td> <td>41.61</td> <td>1.80</td> </tr> <tr> <td>2</td> <td>Kumansi</td> <td>38.96</td> <td>16.30</td> </tr> </tbody> </table>		Soil series	Tun Tan Estate	Tunku Estate	1	Kuah	41.61	1.80	2	Kumansi	38.96	16.30	Complied												
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7.5.2	<p>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> <p>- Minor compliance -</p>	<p>Like all SDPB Estates, the estates visited in SOU 26 continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ul style="list-style-type: none"> <li>a) Slope &amp; River Protection Policy</li> <li>b) Buffer Zone &amp; 25-degree slope and in item 8 Section 4</li> </ul>	Complied																																																												

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		<p>c) Land Preparation for Terracing in ARM Manual.</p> <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in various mature areas. The cover crop <i>Mucuna bracteata</i> had been planted along some slopes by management. Large areas with <i>Neprolepis biserrata</i> in the inter rows were sighted during the visit. The slope maps were provided by the R&amp;D Precision Agriculture Unit with details as follows:</p> <table border="1" data-bbox="1189 767 1816 991"> <thead> <tr> <th>No</th> <th>Topography</th> <th>Tunku Estate</th> <th>Tun Tan Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0-2</td> <td>12.94</td> <td>8.16</td> </tr> <tr> <td>2</td> <td>2-6</td> <td>52.80</td> <td>0.91</td> </tr> <tr> <td>3</td> <td>6-12</td> <td>29.76</td> <td>62.57</td> </tr> <tr> <td>4</td> <td>12-20</td> <td>0.28</td> <td>27.96</td> </tr> <tr> <td>5</td> <td>20-25</td> <td>0.10</td> <td>0.39</td> </tr> <tr> <td>6</td> <td>&gt;25</td> <td>4.12</td> <td>0.01</td> </tr> </tbody> </table>	No	Topography	Tunku Estate	Tun Tan Estate	1	0-2	12.94	8.16	2	2-6	52.80	0.91	3	6-12	29.76	62.57	4	12-20	0.28	27.96	5	20-25	0.10	0.39	6	>25	4.12	0.01	
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7.5.3	<p>There is no new planting of oil palm on steep terrain.                      - Minor compliance -</p>	<p>This compliance being addressed in the "<i>Slope and River Protection</i>" signed by the CEO dated Jan 2015 stating the following among others;                      Slope of &gt;25 degree to be excluded from any new plantation development and replanting program. For slope &lt;25 degree the existing crop all vegetative shall be maintained accordingly".</p>	Complied																												
<p><b>Criterion 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>																															

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7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 26. The entire estates of SOU 26 had no new planting program during the audit period and forthcoming as recorded.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 26. The entire estates of SOU 26 had no new planting program during the audit period and forthcoming as recorded.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys are done and available in a soil map at all estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.	Complied
<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
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. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 26. The entire estates of SOU 26 had no new planting program during the audit period and forthcoming as recorded.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. <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 (see Procedural Note for 7.7.5 below). - Minor compliance -	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 26. The entire estates of SOU 26 had no new planting program during the audit period and forthcoming as recorded.	Not Applicable
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 26. The entire estates of SOU 26 had no new	Not Applicable

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		planting program during the audit period and forthcoming as recorded.	
7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 26. The entire estates of SOU 26 had no new planting program during the audit period and forthcoming as recorded.	Not Applicable
7.7.5	<p><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.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 26. The entire estates of SOU 26 had no new planting program during the audit period and forthcoming as recorded.	Not Applicable
7.7.6	<p><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 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 26. The entire estates of SOU 26 had no new planting program during the audit period and forthcoming as recorded.	Complied
7.7.7	<p><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</p>	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 26. The entire estates of SOU 26 had no new planting program during the audit period and forthcoming as recorded.	Complied

	<p>Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.          - Critical (Major) compliance -</p>																
<p><b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.</p>																	
<p>7.8.1</p>	<p>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:</p> <ul style="list-style-type: none"> <li>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</li> <li>b) Workers have adequate access to clean water.</li> </ul> <p>- Minor compliance –</p>	<p>SOU 26 Mill /estates had established its Water Management Plan for year 2020 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <ul style="list-style-type: none"> <li>a) Implementation of rain water harvest,</li> <li>b) Construction of water gate and scheduled water pumping for effective management of field drains and field water level.</li> <li>c) daily monitoring of bund / scheduled maintenance</li> <li>d) Establishment of <i>mucuna bracteata</i> to prevent erosion,</li> <li>e) Side drain at field road to control water, frond stacking,</li> <li>f) Enhancement of ground vegetation at bare ground area.</li> </ul> <p>The water sources are as shown below:</p> <table border="1" data-bbox="1137 1107 1921 1315"> <thead> <tr> <th></th> <th>Water sources</th> <th>Usage</th> <th>Monitoring &amp; measurement</th> <th>Freq</th> <th>PIC</th> <th>Review status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water catchment</td> <td>domestic consumption &amp; mill processing</td> <td>Monitoring water supply</td> <td>Monthly</td> <td>AM Mgr</td> <td>Liaison with Authority</td> </tr> </tbody> </table>		Water sources	Usage	Monitoring & measurement	Freq	PIC	Review status	1	Water catchment	domestic consumption & mill processing	Monitoring water supply	Monthly	AM Mgr	Liaison with Authority	<p>Complied</p>
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2	Rain water	Domestic use Workshop Chemical mixing	Rain fall data	On-going	AM Mgr	Water harvesting for general purposes
	3	Water tank	Emergency water supply	-	-	AM Mgr Request water supply from other estates
The contingency plan during water shortage						
	Area/ incident	Action steps		PIC	Status	
1	Water shortage/ prolonged dry season	To obtain water from local authority /estate catchment To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP		Manager AM/Mill Engineer	As and when required	
2	Severe water pollution/ Contamination	To obtain water from local authority To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP		Manager AM//Mill Engineer	As and when required	

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		<p>The Estates had implemented water managements plans which covered:</p> <ul style="list-style-type: none"> <li>a) Water shortage contingencies</li> <li>b) Water pollution prevention</li> <li>c) Reduce wastage</li> <li>d) Identification &amp; management of waste waters</li> <li>e) Monitoring rainfall</li> <li>f) Regular water quality analysis.</li> </ul> <p>Water management plan reviewed annually. The management plan was sighted and verified. The water reduction plan is shown below;</p> <table border="1" data-bbox="1137 898 1912 1326"> <thead> <tr> <th></th> <th>Issues/Areas</th> <th>Action Steps</th> <th>PIC</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Rain water collection</td> <td>Large containers are to be placed at strategic locations to collect rain water The rainwater shall be recycled for washing heavy machinery</td> <td>AM/Field staff</td> <td>On-going</td> </tr> <tr> <td>2</td> <td>Leakage on plumbing system</td> <td>Frequent inspection to detect leakage Fix any leakage</td> <td>AM/Field staff</td> <td>On-going</td> </tr> <tr> <td>3</td> <td>Water compartmentalization</td> <td>To conserve level of soil moisture To minimize water stress during dry season</td> <td>AM/Field staff</td> <td>On-going</td> </tr> </tbody> </table>		Issues/Areas	Action Steps	PIC	Status	1	Rain water collection	Large containers are to be placed at strategic locations to collect rain water The rainwater shall be recycled for washing heavy machinery	AM/Field staff	On-going	2	Leakage on plumbing system	Frequent inspection to detect leakage Fix any leakage	AM/Field staff	On-going	3	Water compartmentalization	To conserve level of soil moisture To minimize water stress during dry season	AM/Field staff	On-going	
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		4	Handling of chemicals	To recycle water spillage while mixing of chemical at mixing area	AM/Field staff	On-going	
		5	education	Avoid excessive usage during cleaning Close pipe to prevent water dripping	AM/Field staff	On-going	
		5	Re-streaming	Re stream from sterilizer condensate pit for dilution	Mill engineer	On-going	
		6	Water saving in nursery	To cease watering if rainfall recorded 8mm	AM/field staff	As necessary	
		The Mill Identification & Management of Waste Water					
			location	Waste water produced	Treatment/containment	Reuse/recycle/disposal method	
		1	Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system	
		2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain	
		3	Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain	
		4	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain	
5	Lab	Cleaning water	Process drain	Monsoon drain			

		6	Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.																																						
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) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>The Estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The buffer zones established are as follows:</p> <table border="1" data-bbox="1189 834 1816 1034"> <thead> <tr> <th>No</th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>&gt; 40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>&lt; 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the GSQM Unit with latest revision dated on 13/06/2011. During the field visit there was no spraying activities or signs left in such an area. The buffer zones identified at the estates are as follows:</p> <table border="1" data-bbox="1173 1230 1816 1358"> <thead> <tr> <th></th> <th>Estate</th> <th>Buffer zone area</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tun Tan Estate</td> <td>Sg Korek /Sg Marapulut</td> </tr> <tr> <td>2</td> <td>Tunku Estate</td> <td>Sg Dumundong</td> </tr> </tbody> </table> <table border="1" data-bbox="1173 1358 1816 1390"> <thead> <tr> <th></th> <th>Estate</th> <th>HCV area</th> <th>Area</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					No	River width	Buffer zone	1	> 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters		Estate	Buffer zone area	1	Tun Tan Estate	Sg Korek /Sg Marapulut	2	Tunku Estate	Sg Dumundong		Estate	HCV area	Area	HCV						Complied
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1	Tun Tan	River buffer zone	42.37	4
2	Tun Tan	Water catchment area	4.74	4
3	Tun Tan	Swamps	18.61	4
1	Tunku	River buffer zone	35.24	4
2	Tunku	Water catchment area	9.20	4
3	Tunku	Swamps	13.55	4
4	Tunku	> 25degree slopes	20.80	4

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

Among others management plan taken:

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

Water sampling was taken quarterly to test against the industrial effluent water analysis and pesticide analysis. Among others parameters as shown below. Sighted results of Tun Tan Estate dated 13/7/20 ref. PL311/2020. The sampling sites taken at the estates as follows;

No	Estate	Sampling sites River /Stream
1	Tun Tan	Sg Korek /Sg Marapulut 3 points

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		<table border="1"> <tr> <td>2</td> <td>Tunku</td> <td>Sg Dumundong</td> </tr> <tr> <td>3</td> <td>S Bay POM</td> <td>Sg Matahari hulu &amp; hilir</td> </tr> </table>	2	Tunku	Sg Dumundong	3	S Bay POM	Sg Matahari hulu & hilir																																																								
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		<p>Samples for drinking water are taken form the line sites and the treatment plant taken monthly. There were no issues on the water quality for the sampling points for the sample taken in Jan and April 2020.</p>																																																														
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>- Minor compliance -</p>	<p>Based on "<i>Compliance Schedule</i>" SBPOM disposed effluent on land application P 2014 Tun Tan Estate. Sighted quarterly report has been submitted to DOE by quarterly basis. Latest submission for to DOE on 10/6/20 for period April to June 2020. Among others the indicators were:</p>		Complied																																																												
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.          - Minor compliance -</p>	<p>The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis with the latest recording detailed sampled (water usage per MT in 2019/20 of fresh fruit bunches (FFB) below;</p> <table border="1" data-bbox="1227 858 1839 1367"> <thead> <tr> <th>No</th> <th>Month</th> <th>2018</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jan</td> <td>1.63</td> <td>1.80</td> <td>2.36</td> </tr> <tr> <td>2</td> <td>Feb</td> <td>1.25</td> <td>1.71</td> <td>1.78</td> </tr> <tr> <td>3</td> <td>Mac</td> <td>1.38</td> <td>1.62</td> <td>1.76</td> </tr> <tr> <td>4</td> <td>Apr</td> <td>1.31</td> <td>1.74</td> <td>1.69</td> </tr> <tr> <td>5</td> <td>May</td> <td>1.46</td> <td>1.83</td> <td>1.59</td> </tr> <tr> <td>6</td> <td>June</td> <td>1.42</td> <td>1.89</td> <td>1.42</td> </tr> <tr> <td>7</td> <td>July</td> <td>1.33</td> <td>1.85</td> <td>1.75</td> </tr> <tr> <td>8</td> <td>Aug</td> <td>1.96</td> <td>1.36</td> <td>-</td> </tr> <tr> <td>9</td> <td>Sep</td> <td>1.69</td> <td>1.51</td> <td>-</td> </tr> <tr> <td>10</td> <td>Oct</td> <td>1.47</td> <td>1.55</td> <td>-</td> </tr> </tbody> </table>	No	Month	2018	2019	2020	1	Jan	1.63	1.80	2.36	2	Feb	1.25	1.71	1.78	3	Mac	1.38	1.62	1.76	4	Apr	1.31	1.74	1.69	5	May	1.46	1.83	1.59	6	June	1.42	1.89	1.42	7	July	1.33	1.85	1.75	8	Aug	1.96	1.36	-	9	Sep	1.69	1.51	-	10	Oct	1.47	1.55	-	Complied
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11	Nov	1.56	1.68	-											
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<b>Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</b>															
7.9.1	<p data-bbox="255 730 1108 831">A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.                      - Minor compliance -</p>	<p data-bbox="1144 730 1921 887">A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2020. The document was reviewed/updated on Jan 2020. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1" data-bbox="1137 935 1921 1361"> <thead> <tr> <th>No</th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Backhoe tractor</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel</td> </tr> <tr> <td>2</td> <td>Van / Supervisory vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.</td> </tr> </tbody> </table>	No	Target	Objective	Action plan	1	Backhoe tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel	2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.	Choose an item.
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3	Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources
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The utilization of fossil fuel in 2019/20 is being monitored with records shown below:

Mth	<i>Tun Tan Estate 2019/20</i>			<i>Tunku Estate 2019/20</i>		
	FFB mt	Diesel L	Diesel/FFB	FFB	Diesel L	Diesel FFB
July	2955	9959	3.37	2670	33040	12.37
Aug	3058	5038	1.65	2848	34181	12.00
Sep	3410	10018	2.94	2988	31576	10.57
Oct	3685	10070	2.92	3562	32635	9.16
Nov	2893	9928	3.43	2681	30881	11.51
Dec	2466	7712	3.13	2630	29402	11.18
Jan	2117	6778	3.20	2704	32857	13.17
Feb	2507	9307	4.40	2505	30456	0.00
Mac	3166	9313	2.94	2822	28006	12.53
Apr	4279	6759	1.58	2489	29302	12.86
May	3995	5931	1.48	2489	27589	

Site	<i>Sandakan Bay Mill 2019/20</i>		
Mth	FFB mt	Diesel L	Diesel/FFB
Jun	17225	78824	4.58

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		July	17967	74308	4.14	
		Aug	19620	62149	3.17	
		Sep	21684	59688	2.75	
		Oct	24804	47497	1.91	
		Nov	20057	45256	2.26	
		Dec	17331	53559	3.09	
		Jan	13982	48826	3.49	
		Feb	13098	46604	3.56	
		Mac	17005	49327	2.90	
		Apr	22525	34624	1.54	
		May	22479	37735	1.68	
		<p>The estates and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running.</p> <p>Performance variation in view of several factors i.e.</p> <ul style="list-style-type: none"> <li>a) Infrastructure of estates,</li> <li>b) Community size / no of gen-sets,</li> <li>c) No. of vehicles / age of machine.</li> <li>d) Weather interference / crop production volume</li> </ul> <p>There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p>				



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		<p>A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2019/20 identified in the following</p> <ul style="list-style-type: none"> <li>a) Environmental Aspect Identification Summary FY 2020 reviewed accordingly.</li> <li>b) Environmental Impact Evaluation Summary FY 2020 reviewed accordingly.</li> </ul> <p>Renewable energy usage &amp; diesel consumption 2019/20 was established and monitored by monthly basis. Among others effort to reduce diesel usage includes the following;</p> <ul style="list-style-type: none"> <li>a) By maintenance of the boiler &amp; machinery to ensure at optimum level,</li> <li>b) to monitor diesel usage,</li> <li>c) provide training to workers regarding reduce fuel and diesel usage for boiler.</li> <li>d) Reduction application of in organic fertiliser option and substitute with EFB.</li> </ul>	
<p><b>Criterion 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	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 26 Mill and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <ul style="list-style-type: none"> <li>a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for</li> </ul>	Complied

their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment.

- b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.
- c) SOU 26 has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. Below is the summary of result:

Summary of net GHG emissions from PalmGHG calculator

PalmGHG calculation option used: Option 1

Summary of Net GHG Emissions

Emissions per Product	tCO2e/tProduct
CPO	1.40
PK	1.40

Extraction	%
OER	22.42
KER	5.06

Production	t/yr
FFB Processed	229613.717
CPO Produced	51476.24
PK Produced	11624.76

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Land Use	ha
OP planted area	15008.00
OP planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>15008.00</b>

**Summary of Field Emissions and Sinks**

	Own Crop		Group	
	tCO2e	tCO2e/ffb	tCO2e	tCO2e/tFFB
<b>Emissions</b>				
Land Conversion	123272.08	0.64	0.00	0.00
*CO2 Emissions from Fertiliser	14032.00	0.07	0.00	0.00
**N2O Emissions	7752.85	0.04	0.00	0.00
Fuel Consumption	3784.23	0.02	0.00	0.00
Peat Oxidation	0.00	0.00	0.00	0.00
<b>Sinks</b>				
Crop Sequestration	-113838.95	-0.59	0.00	0.00
Conservation Sequestration	0.00	0.00	0.00	0.00
<b>Total</b>	<b>35002.20</b>	<b>0.18</b>	<b>0.00</b>	<b>0.00</b>

**Summary of Mill Emissions and Credits**

	tCO2e	tCo2e/tFFB
<b>Emissions</b>		
POME	45008.18	0.20
Fuel Consumption	2325.06	0.01
Grid Electricity Utilisation	0.00	0.00
<b>Credits</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	47333.24	0.21

**Palm Oil Mill Effluent (POME) Treatment**

Divert to compost	%
Divert to anaerobic digestion	100%

**POME Diverted to Anaerobic Digestion:**

Divert to anaerobic pond	100%
Divert to methane capture (flaring)	0%
Divert to methane capture (electricity generation)	0%

7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting in the entire SOU 26. This is verified through interviews and site visit. The statement area and total planted ha recorded NIL changes since the last audit. The 5 year financial plan also revealed no new planting taking place in the 2 estates.</p>	Not Applicable									
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. (SM/5.2/EAI) and (SM/5.2/EIE) which covers estates and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1137 976 1912 1327"> <thead> <tr> <th>No</th> <th>Environmental Receptors</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Air emissions –from boiler stack (smoke &amp; particulate), vehicle &amp; generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) &amp; boiler quenching water and blow down</td> </tr> </tbody> </table>	No	Environmental Receptors	Source	1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).	2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down	Complied
No	Environmental Receptors	Source										
1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).										
2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down										

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		3	land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.	<p>S Bay Mill has conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS during the audit. Other action taken by CU were:</p> <ul style="list-style-type: none"> <li>a) Scheduled wastes – were disposed through Lagenda Bumimas Sdn Bhd and Sedafiat Sdn Bhd (clinical waste).</li> <li>b) Domestic wastes are disposed at respective estates landfill twice/thrice weekly at designated area located far from housing complexes and waterways.</li> <li>c) Full compliance to zero burning practices.</li> </ul>
<b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area					
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.          - Critical (Major) compliance -</p>	<p>There was no land preparation of existence or new planting in SOU 26 and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> <li>a) EQMS-SOP-SectionB2 - Under felling/clearing &amp; land preparation</li> <li>b) Carbon Policy</li> </ul> <p>SDP has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for the OP cultivation.</p>			Complied

7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>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. Latest hotspot detected was on 17<sup>th</sup> November 2019 at Merotai Estate (SDP group estate).</p>	Complied												
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Both the estates and the mill in SOU 26 held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure <i>Kertas Kerja Program Simulasi Kebakaran</i> dated 12/9/2019 and Fire Prevention and Control Measure. Therein containing</p> <ul style="list-style-type: none"> <li>a) Objective</li> <li>b) Activity and prevention.</li> <li>c) Function of Fire and Rescue Team</li> <li>d) Emergency Evacuation Plan / Drill</li> </ul> <p>All stakeholders being briefed in the respective stakeholders meetings</p> <table border="1" data-bbox="1198 1230 1783 1369"> <thead> <tr> <th>No</th> <th>Estate / mill</th> <th colspan="2">Date of meeting</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tun Tan Estate</td> <td>18/6/20</td> <td>-</td> </tr> <tr> <td>2</td> <td>Tunku Estate</td> <td>06/3/20</td> <td>14/7/20</td> </tr> </tbody> </table>	No	Estate / mill	Date of meeting		1	Tun Tan Estate	18/6/20	-	2	Tunku Estate	06/3/20	14/7/20	Complied
No	Estate / mill	Date of meeting													
1	Tun Tan Estate	18/6/20	-												
2	Tunku Estate	06/3/20	14/7/20												

		3	S Bay POM	27/7/20	26/8/20	
<b>Criterion 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 protect or 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> <p>- Critical (Major) compliance -</p>	No development within Sandakan Bay 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><b>PROCEDURAL NOTE:</b>            Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>HCV Assessment for Strategic Operating Unit (SOU 26) has been conducted on May 2013 by Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Sdn. Bhd. Final Report (Version 1.0) dated May 2013 was sighted. Summary of HCV area within Sandakan Bay POM certification unit as per the following:</p> <p>i) Water Catchment area – category HCV 4 (Tun Tan Estate, Tunku Estate, Segaluid Estate and Tigowis Estate)</p> <p>ii) &gt; 25 degree slope – category HCV 4 (Tunku Estate, Sentosa Estate and Segaluid Estate)</p> <p>iii) Isolated patch of forest – category HCV 4 (Tigowis Estate and Sentosa Estate)</p> <p>iv) Cemetery – category HCV 6 (Segaluid and Sentosa Estate)</p> <p>Total HCV area identified: 147.26 ha</p>				Complied



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7.12.3	<i>Indicator is not applicable in Malaysia context</i>	No new planting after 15 November 2018 within Sandakan Bay POM certification unit.	Not Applicable						
7.12.4	<p><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).</p> <p>- Critical (Major) compliance -</p>	No new planting after 15 November 2018 within Sandakan Bay POM certification unit	Complied						
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land 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.</p> <p>- Minor compliance -</p>	No local communities have been identified in HCV areas, HCS forest after 15 November 2018 within Sandakan Bay POM certification unit	Complied						
7.12.6	<p>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> <p>- Minor compliance -</p>	<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="1137 1305 1930 1362"> <thead> <tr> <th data-bbox="1137 1305 1420 1337">Estate</th> <th data-bbox="1426 1305 1697 1337">Training</th> <th data-bbox="1704 1305 1930 1337">Date of training</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 1337 1420 1362">Tun Tan Estate</td> <td data-bbox="1426 1337 1697 1362">HCV training</td> <td data-bbox="1704 1337 1930 1362">4/8/20</td> </tr> </tbody> </table>	Estate	Training	Date of training	Tun Tan Estate	HCV training	4/8/20	Complied
Estate	Training	Date of training							
Tun Tan Estate	HCV training	4/8/20							

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		Tunku Estate	Protection of HCV and riparian	17/10/19	
7.12.7	<p>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> <p>- Minor compliance -</p>	<p>No new planting after 15 November 2018 within Sandakan Bay 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 2019/2020 (July 2019 – June 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>			Complied
7.12.8	<p><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> <p>- Critical (Major) compliance -</p>	<p>No land clearing since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Sandakan Bay POM certification unit. Thus, this indicator is not available.</p>			Complied

**Appendix B: Approved Time Bound Plan**

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

Financial year (July – June)	Targeted	Achieved/Status	Attachments
Jun-08	5 SOUs	<p><b>Achievement of Timebound Plan</b></p> <p>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>    iia) 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)		

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**Table 2: Details of RSPO Certification Status**

Status	Malaysia	Indonesia	Liberia	Total	Remarks
<b>RSPO Certified</b>	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>
<b>Planned for Certification / Undergoing Stage 1 or Stage 2 Assessment/ RSPO EB Review</b>	0	1	1	2	<p>SDP is progressively undergoing the RSPO Certification process towards 100% RSPO certification of estates/mills.</p> <p>Indonesia            PT Mitral Austral Sejahtera: The properties was sold and currently SDP have no control in the management. The property was disposed on 25 June 2019 and an official letter on disposal of PT Mas was sent to RSPO Secretariat on 27 June 2019. Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019. Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP.</p> <p>As at Dec 2017, a total of 28,712 Ha of smallholders have been certified. The entire KKPA (1-5) in Sebampan, KKPA Sg. Cengal, and Plasma TGK and SIA (East and West Plasma) are now RSPO certified with a production capacity of 465,602 mt of FFB. Total scheme smallholders hectares are 51,353 and total communities are 22,613.</p> <p>Certification process for the remaining associated smallholders areas is on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and outgrowers by end 2020.</p> <p>Liberia            As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p>

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					<a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations">http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</a>
<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.

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

SOU No.	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '11	11-Aug-20	SPO 550179	
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	
5a	Sg Samak	Teluk Intan, Perak	3 Mar '11	NA	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
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	

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9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
10	Bukit Puteri	Raub, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020	
11	Kerdau	Temerloh, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019	
12	Jabor	Kuantan, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049	
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-21	CU-RSPO-819163, SGRSPO/PM/MY13/01284, 824 502 16039, SGS-RSPO/PC17-00004, CURSPO-855480	
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-20	SPO 541905	
15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-24	SGS-RSPOPM-MY14/01364, 824 502 16032	Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill with Certificate No: CU-RSPO-819165, certification date: 30 Dec 2011.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '11	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051	
17	Kempas	Jasin, Melaka	20 May '15	19-May-20	RSPO-PC 00101	
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-24	RSPO 600305	Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.

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19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-20	RSPO 548299	
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042	
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	SGS-RSPO/PM-00715, 824 502 16040, BVC-RSPO20170623-01	
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
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	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	Sg Samak, Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down.
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	

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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

Pending Certification by RSPO	Mill closed down/Mothballed	NA - NOT APPLICABLE
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**SDP- RSPO Certification Status for Indonesia Operations**

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanah Putih, Pujud, Rokan Hilir, Riau	16-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	Pamakan 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	



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7	PT BAHARI GEMBIRA RIA	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 PARI PURNA SWAKARSA	PONDOK LABU	Pamakan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	19-Jul-22	MUTU-RSPO/016	Recertification of Pondok Labu POM is in progress.
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	19-Nov-22	MUTU-RSPO/017	Recertification of Rantau Panjang POM is in progress.
12 13	PT LAGUNA MANDIRI	RANTAU BETUNG	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11 1-April-14	05-Feb-22 31-Mar-24	MUTU-RSPO/009 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 19	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU MANDAH	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16 1-April-14	30-Nov-21 31-Mar-24	MUTU-RSPO/008 MUTU-RSPO/036	
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	

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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	PT Mitral Austral Sejahtera: The properties was sold and currently SDP have no control in the management. The property was disposed on 25 June 2019 and an official letter on disposal of PT Mas was sent to RSPO Secretariat on 27 June 2019. Last meeting with all relevant stakeholders was done with RSPO CP during recent RT in Bangkok last November 2019.Both parties have responded to the legal reviewer report and submitted the comment to RSPO CP.

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 **Sandakan Bay Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0. 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 **[Sandakan Bay Palm Oil Mill]** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.40
PKO	0

Extraction	%
OER	22.42
KER	5.06

Production	t/yr
FFB Process	229,613.717
CPO Produced	51,476.24
PKO Produced	0

Land Use	Ha
OP Planted Area	15,008.00
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>15,008.00</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	123,272.08	0.64	0	0	0	0	123,272.08	0.64
CO <sub>2</sub> Emission from fertilizer	14,032.00	0.07	0	0	0	0	14,032.00	0.07
NO <sub>2</sub> Emission	7,752.85	0.04	0	0	0	0	7,752.85	0.04
Fuel Consumption	3,784.23	0.02	0	0	0	0	3,784.23	0.02
Peat Oxidation	0.00	0.00	0	0	0	0	0.00	0.00
<b>Sink</b>								
Crop Sequestration	-113,838.95	-0.59	0	0	0	0	-113,838.95	-0.59

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Conservation Sequestration	0.00	0.00	0	0	0	0	0.00	0.00
<b>Total</b>	35,002.20	0.18	0	0	0	0	35,002.20	0.18

\*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	45,008.18	0.20
Fuel Consumption	2,325.06	0.01
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	47,333.24	0.21

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

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

\*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**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	June 2019	14,572.16	2,787.60	17,359.76
2	July 2019	15,155.05	2,804.87	17,959.92
3	Aug 2019	16,668.15	2,900.88	19,569.03
4	Sept 2019	18,711.17	3,226.98	21,938.15
5	Oct 2019	21,250.61	3,480.43	24,731.04
6	Nov 2019	17,169.44	3,133.16	20,302.60
7	Dec 2019	14,099.88	2,725.26	16,825.14
8	Jan 2020	11,323.38	2,666.72	13,990.10
9	Feb 2020	10,928.09	2,171.34	13,099.43
10	Mar 2020	13,895.66	3,098.92	16,994.58
11	Apr 2020	17,562.89	4,944.73	22,507.62
12	May 2020	18,866.63	3,613.27	22,479.90
13	June 2020	20,288.36	5,540.44	25,828.80
14	July 2020	17,890.96	3,615.68	21,506.64
	<b>Total</b>	<b>228,382.43</b>	<b>46,710.28</b>	<b>275,092.71</b>

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	June 2019	3,169.44	702.79
2	July 2019	3,293.19	795.98
3	Aug 2019	3,917.02	912.37
4	Sept 2019	4,402.74	1,207.82
5	Oct 2019	4,798.39	1,389.08
6	Nov 2019	3,864.84	1,012.90
7	Dec 2019	2,968.02	792.05
8	Jan 2020	2,360.92	695.83
9	Feb 2020	2,318.94	712.28
10	Mar 2020	3,129.07	851.27
11	Apr 2020	3,851.54	1,111.71
12	May 2020	4,156.32	1,031.03
13	June 2020	4,266.64	1,119.01

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14	July 2020	3,567.78	699.14
	Total	50,064.85	13,033.26

<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Palmtrace Trading License Number</b>	<b>Certified CPO Sold (mt)</b>	<b>Certified PK Sold (mt)</b>
1	ABC	TR-e2fab921-b479	0	10,799.00
		TR-c1a2ac3f-e616		
		TR-463be54e-dac2		
		TR-3a3d9efe-35dd		
		TR-58fb9b5e-ffa7		
		TR-6c811223-da22		
		TR-73eb7f8a-4c11		
		TR-9448e5b7-284f		
		TR-8e55f2df-4aff		
		TR-db4b0ab9-73ff		
		TR-15011534-80a7		
		TR-3fa94741-d15d		
		TR-a801a88a-23fd		
		TR-2391f6c1-1555		
		TR-7e9bf152-ae12		
		TR-7cc83916-5f02		
		TR-244bd231-56b5		
		TR-ec4df7c9-23c3		
		TR-29fad21b-128a		
		TR-7dbc1ae5-9475		
		TR-c4328eff-9039		
		TR-48099003-3377		
		TR-945e259d-279a		
		TR-4ad2cb8d-4fae		
		TR-3b8106eb-3908		
		TR-26325370-21cf		
		TR-794288b6-b743		
		TR-258fa9f0-8299		
		TR-fa18f769-e044		
		TR-2902b7cc-0fd0		
	TR-269540e0-3818			

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		TR-30dacd27-7ff4 TR-460b9fad-af29 TR-cfa4e4d0-add2 TR-56c157fb-51a4 TR-d2a2adee-c43e TR-07a7a0df-8775 TR-f5bf3ac3-0893 TR-2d2cf578-710c TR-15b8a3ea-fa95 TR-e766809e-93a7 TR-f4036084-4803 TR-f3a79e22-642a TR-5c787ae7-6ff6 TR-c0db73df-d136 TR-75ec4820-35cb TR-242fcf90-2e01 TR-96188339-3146 TR-4649975a-fe0a TR-6ed50521-7a45 TR-3502c1f3-3b60 TR-d607539d-4de0 TR-4259f5a0-d8f0 TR-f8acdb4d-1654 TR-6200bfa3-0524 TR-680458de-4102 TR-59e3c558-9496 TR-9b12be73-14b2 TR-388f2d7c-7d98 TR-8972a4ce-9aa0 TR-988fd91d-5b22 TR-345c2273-8b51 TR-1b9a31d6-a047		
	Total		0	10,799.00

<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)

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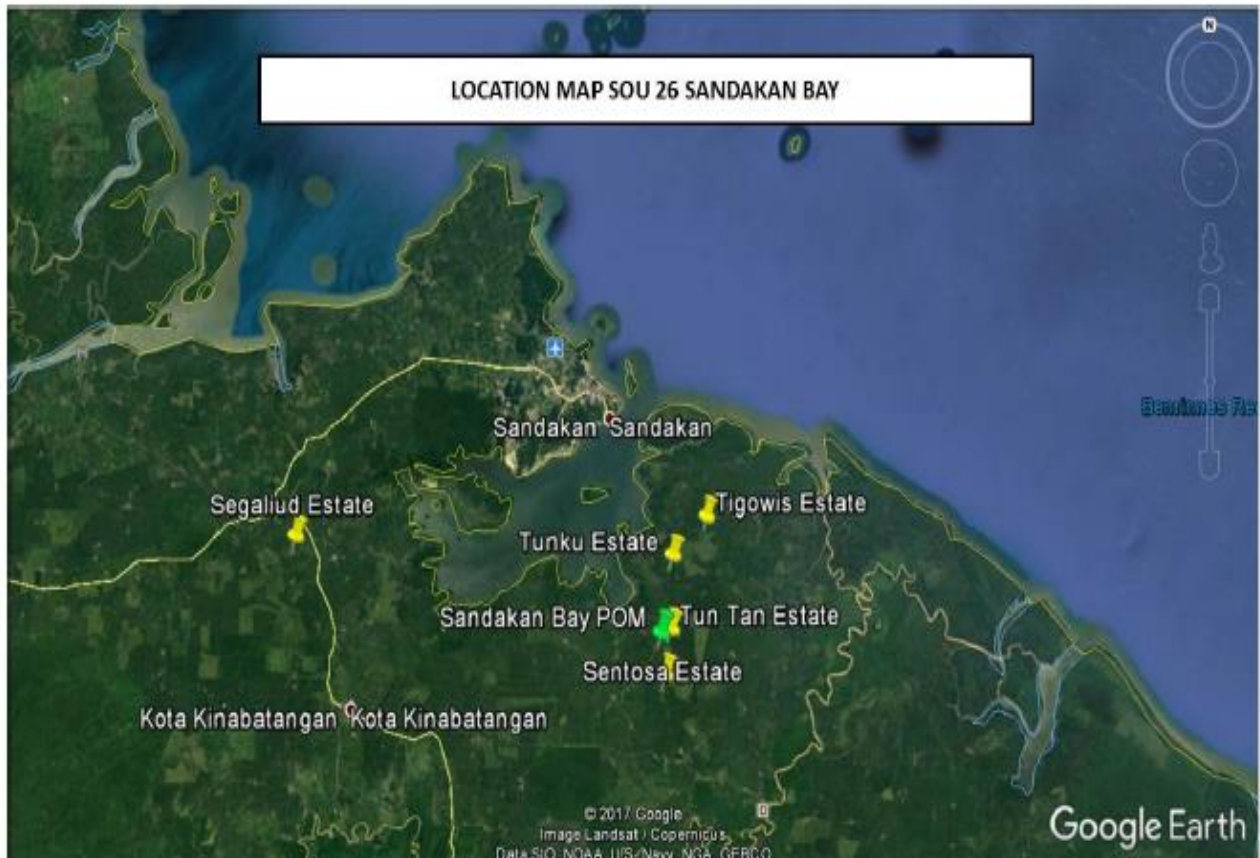
	Nil			

<b>E. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>
1	A	22,162.97	-
2	B	-	1,364.66
	Total	22,162.97	1,364.66

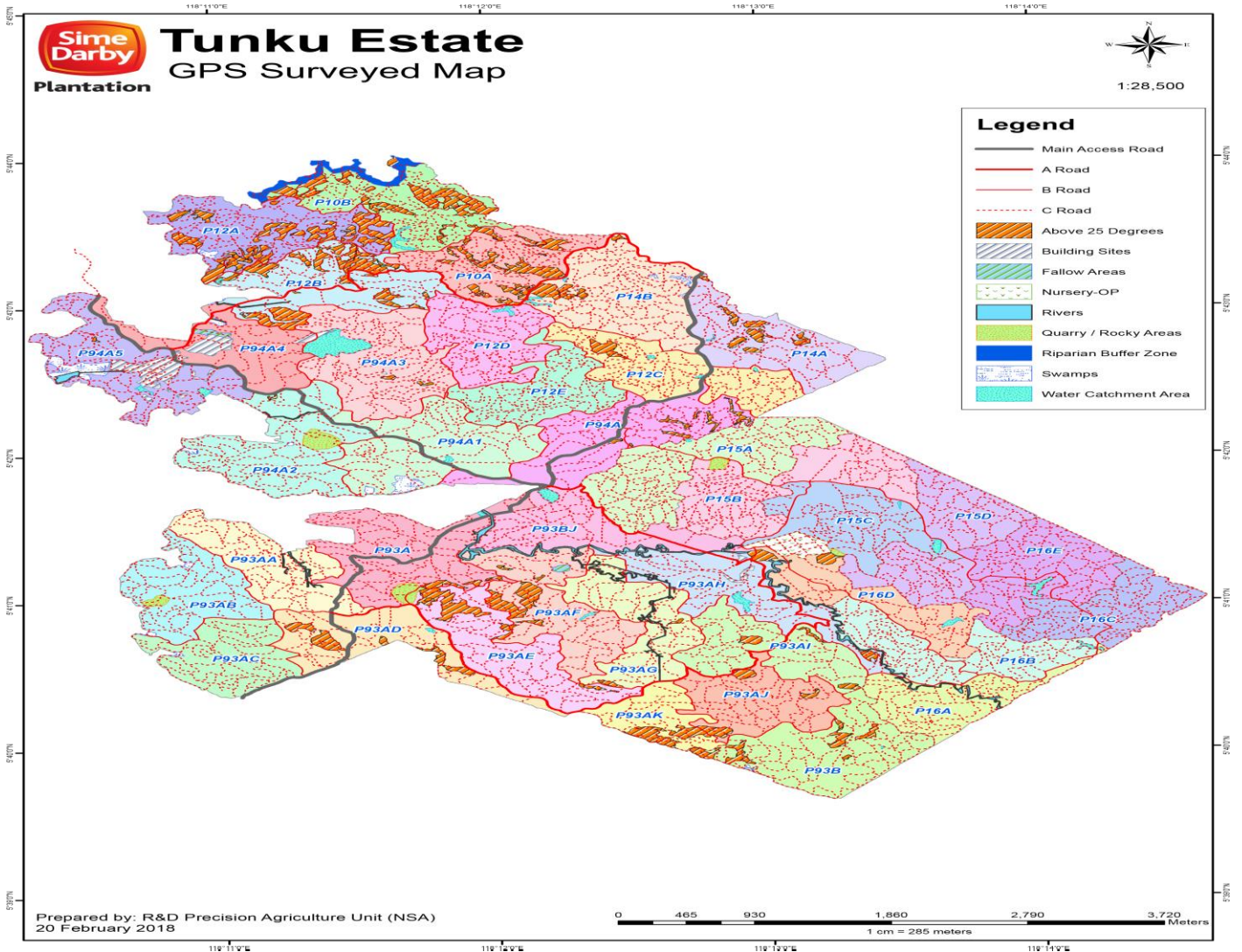
<b>F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>PalmTrace Trading License Number</b>	<b>RSPO Credits of Certified CPO Sold (mt)</b>
	ABC	ST-TR-881af754-668e	10,000
			10,000

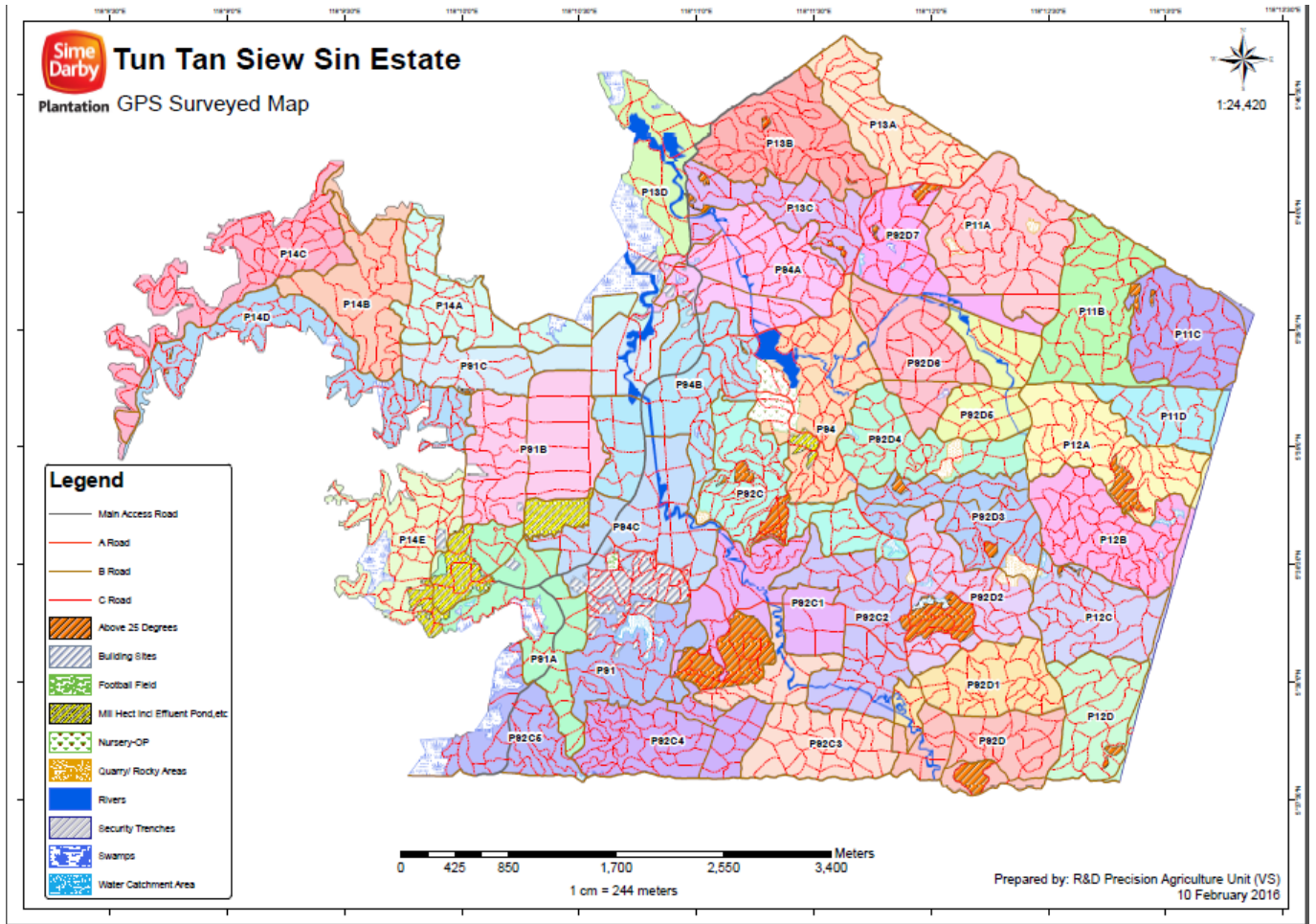


**Appendix E: Location Map of Certification Unit and Supply bases**



**Appendix F: Tunku and Tun Tan Estate Field Map**





**Appendix G: List of Smallholder Sampled**

*Not Applicable*

## 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