

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

Client Company Name (Parent Company): Sime Darby Plantation Berhad
Client company Address: Level 5, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia
Certification Unit: Hadapan Palm Oil Mill and Supply Base (SOU 24) Batu 6, Jalan Bukit Permai, Bukit Permai, 81850 Layang-Layang, Johor, Malaysia
Date of Final Report: 29/05/2021

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Section 1: Scope of the Certification Assessment

1. Company Details			
Parent Company	Sime Darby Plantation Berhad		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Group Sustainability, Level 5, Main Block, Plantation Tower, No.2, Jalan PJU 1A/7 Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Hadapan Palm Oil Mill & Supply Base (SOU 24)		
Location / Address	KKS Hadapan, Batu 6, Jalan Bukit Permai, Bukit Permai, 81850 Layang-Layang, Johor, Malaysia.		
Website	http://www.simedarbyplantation.com/		
Management Representative	Mdm. Shylaja Devi Vasudevan Nair	E-mail	shylaja.vasudevan@simedarbyplantation.com
Telephone	603-78484379	Facsimile	+603 7848 4363

2. Certification Information			
Certificate Number	RSPO 739013	Date of First Certification	29/03/2011
		Certificate Start Date	29/03/2021
		Certificate Expiry Date	28/03/2026
Scope of Certification	Palm Oil and Palm Kernel Production		
Visit Objectives	<ul style="list-style-type: none"> Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Recertification Assessment (RA 2) <input type="checkbox"/> Annual Surveillance Assessment (RA Choose an item. ; ASA Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia 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		
Supply Chain Module	<input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 739513	MS 2530-4:2013 Malaysia Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills	BSI Services Malaysia Sdn. Bhd.	14/02/2023
MSPO 739514	MS 2530-3:2013 Malaysia Sustainable Palm Oil (MSPO) Part 3: General Principles for Oil Palm Plantations and Organized Smallholder		14/02/2023
MSPO 739515	MSPO Supply Chain Certification Standard: 2018		23/03/2025

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Hadapan Palm Oil Mill	Batu 6, Jalan Bukit Permai, Bukit Permai, 81850 Layang-Layang, Johor, Malaysia	1° 45' 44.00" N	103° 26' 51.00" E
Kulai Estate	Batu 25, Jalan JB Air Hitam, 81000, Kulai, Johor, Malaysia	1° 40' 05.14" N	103° 32' 28.21" E
Layang Estate	Jalan Ladang Layang, 81850 Layang-Layang, Johor, Malaysia	1° 46' 00.27" N	103° 27' 14.07" E
Seri Pulai Estate	Ladang Seri Pulai, 81000 Kulai, Johor, Malaysia	1° 35' 36.10" N	103° 30' 34.30" E
CEP Rengam Estate	Ladang CEP Rengam, 86300 Rengam, Johor, Malaysia	1° 52' 23.01" N	103° 22' 45.73" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Kulai Estate	2,603.88	0.77	418.77	3,023.42	86.34
Layang Estate	2,969.32	6.02	283.56	3,258.90	90.69
Seri Pulai Estate	1,929.65	51.17	69.05	2,049.87	94.28
CEP Rengam Estate	2,819.32	7.19	213.12	3,039.63	92.87
Total	10,322.17	65.15	984.50	11,371.82	90.77

*Total certified area changes due to resurvey conducted for replanting activities

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6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Kulai Estate	347.21	1,158.63	740.49	73.18	284.37	2,256.67	347.21
Layang Estate	93.25	561.25	1,955.12	359.70	-	2,876.07	93.25
Seri Pulai Estate	143.39	500.20	930.20	355.86	-	1,786.26	143.39
CEP Rengam Estate	466.68	572.91	983.36	773.88	22.49	2,352.64	466.68
Total (ha)	1,050.53	2,792.99	4,609.17	1,562.62	306.86	9,271.64	1,050.53

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (Mar 2020- Feb 2021)	Actual (Dec 2019 – Nov 2020)		Forecast (Mar 2021- Feb 2022)
		Previous license period (Dec 19 – Mar 20)	Current license period (Apr 20 - Nov 20)	
Kulai Estate	42,128.06	15,295.11	30,590.21	47,420.58
Layang Estate	55,059.06	21,315.43	42,630.86	73,752.61
Seri Pulai Estate	29,414.10	10,276.06	20,552.11	38,074.38
CEP Rengam Estate	44,907.55	15,342.63	30,685.27	54,058.01
Total	171,508.77	186,687.68		213,305.58

8. Certified Tonnage of FFB (from other certified unit(s))				
Estate	Tonnage / year			
	Estimated (Mar 2020- Feb 2021)	Actual (Dec 2019 – Nov 2020)		Forecast (Mar 2021- Feb 2022)
	N/A	Previous license period (Dec 19 – Mar 20)	Current license period (Apr 20 - Nov 20)	N/A
Bukit Badak		301.25	602.51	
Bukit Benut		554.90	1,109.79	
Cenas Ropel		215.06	430.11	
Lambak/Elaeis		484.37	968.74	
Pekan		1,683.91	3,367.82	
Sembrong		279.55	559.10	
Tun Dr Ismail		2,452.87	4,905.74	
Ulu Remis		118.05	236.09	

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Total		18,269.86	
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9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Independent FFB Supplier	Tonnage / year			
	Estimated (Mar 2020- Feb 2021)	Actual (Dec 2019 – Nov 2020)		Forecast (Mar 2021- Feb 2022)
	N/A	Previous license period (Dec 19 – Mar 20)	Current license period (Apr 20 - Nov 20)	N/A
External FFB suppliers & Smallholders		24,170.77	48,341.55	
Total		72,512.32		

10. Certified Tonnage				
	Estimated (Mar 2020- Feb 2021)	Actual (Dec 2019 – Nov 2020)		Forecast (Mar 2021- Feb 2022)
	FFB	FFB		FFB
Mill Capacity: 60 MT/hr	211,084.00	Previous license period (Dec 2019 – Feb 2020)	Current license period (Mar 2020 - Nov 2020)	213,305.58
		68,319.18	136,638.36	
		204,957.54		
	CPO (OER: 20.40 %)	CPO (OER: 20.31 %)		CPO (OER: 20.79 %)
	48,549.00	13,878.34	27,756.68	44,346.23
		41,635.02		
	PK (KER: 5.20 %)	PK (KER: 5.11 %)		PK (KER: 5.50 %)
	12,665.00	3,494.31	6,988.62	11,731.81
10,482.93				

11. Actual Sold Volume (CPO)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	500.00	-	-	26,582.14	27,082.14
Previous License period					
CPO (MT)	-	-	-	13,291.07	13,291.07

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Total	500.00			39,873.21	40,373.21
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12. Actual Sold Volume (PK)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	-	-	-	6,639.19	6,639.19
Previous License period					
PK (MT)	-	-	-	3,319.59	3,319.59
Total	-	-	-	9,958.78	9,958.78

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
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)
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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 7th – 11th December 2020. The audit programme is included as Section 2.3. The Public Stakeholder Consultation was conducted from 30th October 2020 prior to the on-site assessment as per BSI's global stakeholder notification invitation link as following:

<https://www.bsigroup.com/globalassets/localfiles/en-my/rspo/Public%20Notification/2020/11-01-rspo-public-notification-recertification-sou-24-sime-darby-hadapan-pom-english.pdf>.

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.

The Critical NC close out was conducted through off-site assessment on 10th March 2021 due to the COVID-19 pandemic Movement Control Order (MCO) enforced by the government.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 for RSPO Principles & Criteria 2018 for the Production of Sustainable Palm Oil 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.

- 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.

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)
Hadapan Palm Oil Mill	✓	✓	✓	✓	✓
Kulai Estate	✓	✓	✓	✓	✓
Layang Estate	✓	✓	✓	✓	✓
Seri Pulai Estate	✓	✓	✓	✓	✓
CEP Rengam Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: December 13, 2021 - December 17, 2021

Total No. of Mandays: 15 mandays

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2.2 BSI Assessment Team:

Team Member Name	Role	Qualifications
Hafriazhar Mohd. Mokhtar	Team Leader	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 9001, ISO 14001, ISO 45001 and ISO 50001 and has accumulated more than 1000 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards since 2011 and completed his RSPO P&C and SCCS Lead Assessor courses successfully. He has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands, Gabon, Nigeria and Pakistan. During this assessment, he assessed on the aspects of Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue and RSPO supply chain requirements. He is fluent in Bahasa Malaysia and English languages.
Vijay Kanna Pakirisamy	Team Member	He holds a bachelor's degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010. He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad. Throughout his 10 year tenure in the oil palm industry, he has been part of the operations team that implements standards within the estate such as RSPO, MSPO, ISCC and FINWATCH. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, endorsed RSPO P&C Lead Auditor Course in October 2019 and endorsed MSPO Lead Auditor Course in November 2019. During this assessment, he assessed on the aspects of Occupational, Health & Safety, Environment and Estate Best Practises. He is fluent in Bahasa Malaysia and English languages.
Mohamad Razin Bakal	Team Member	Graduate in Degree of Accountancy with University Putra Malaysia. Having 17 years of working experience in various field in Malaysia, Africa and Indonesia. Have enough knowledge and experiences in oil palm estate operation inclusive of estate administrative, budget preparation, jungle clearing, new planting, nursery establishment and management, harvesting, field upkeep and maintenance, safety and health, vehicle running and skills in Good Agricultural Practices (GAP) including Integrated Pest Management (IPM). Involved in RSPO auditing since 2018. Qualified as Lead Auditor/Auditor for RSPO ISO 14001 and ISO 9001. During this assessment, he assessed on the aspects of Mill best practices, Estate best practices, occupational safety & health and long-term economic viability. He is fluent in both verbal/written in Bahasa Malaysia and English.

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Accompanying Persons:

Name	Role
Nil	N/A

2.3 Assessment Plan

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

Date	Time	Subjects	HMM	VKP	MRB
Sunday, 6/12/2020	PM	Travel to Kulai	✓	✓	✓
Monday, 7/12/2020 Kulai Estate	0830 – 0900	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader • Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation) • Verification on previous audit findings 	✓	✓	✓
	0900 - 1230	Kulai Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill & etc.	✓	✓	✓
	1230 – 1330	Lunch break	✓	✓	✓
	1330 - 1630	Kulai Estate: Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 – 1700	Audit team discussion & interim briefing	✓	✓	✓

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Tuesday, 8/12/2020 Hadapan Palm Oil Mill	0830 – 1230	Hadapan Palm Oil Mill: Inspection of FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	✓	✓	✓
	1230 – 1330	Lunch break	✓	✓	✓
	1330 – 1630	Hadapan Palm Oil Mill: Lab, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation	✓	✓	✓
Wednesday, 9/12/2020 Seri Pulai Estate	0900 – 1230	Seri Pulai Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill & etc.	✓	✓	✓
	1000 – 1230	Stakeholder consultation	✓	-	-
	1230 – 1330	Lunch break	✓	✓	✓
	1330 – 1630	Seri Pulai Estate: Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 – 1700	Audit team discussion & interim briefing	✓	✓	✓

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Date	Time	Subjects	HMM	VKP	MRB
Thursday, 10/12/2020 Layang Estate	0900 - 1230	Layang Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill & etc.	✓	✓	✓
	1230 - 1330	Lunch break	✓	✓	✓
	1330 - 1630	Layang Estate: Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Audit team discussion & interim briefing	✓	✓	✓
Friday, 11/12/2020 CEP Rengam Estate	0900 - 1230	CEP Rengam Estate: Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill & etc.	✓	✓	✓
	1230 - 1330	Lunch break	✓	✓	✓
	1330 - 1630	CEP Rengam Estate: Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Audit team discussion & 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?	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. 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): https://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations .	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	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.	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No. There are no new acquisition.	Yes
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?	Yes. 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. 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	Yes

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	<p>responded to the legal reviewer report and submitted the comment to RSPO CP.</p> <p>Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public notification letter: https://www.rspo.org/certification/public-announcement.</p> <p>Malaysia - Pekaka Mill is being mothballed (at the time of SDP Annual Report 2018) and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang. Bintang Oil Mill: SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 1st Oct 2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public notification letter: https://www.rspo.org/certification/public-announcement.</p> <p>For Liberia operations: As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operation</p> <p>ACOP 2019 has been cross-referenced as below: https://document.rspo.org/Sime_Darby_Plantation_Berhad_ACOP2019.pdf.</p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>There are no lapses in implementation of the plan.</p>	<p>Yes</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation</p>	<p>There were no failures to proceed with implementation of the plan.</p>	<p>Yes</p>

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of the plan? If yes a Major non-compliance shall be raised	Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above.	
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).	Yes
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new plantings. As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): https://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operation .	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.	No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as mentioned above. Refer to the RaCP Tracker for details of RaCP-0356. https://www.rspo.org/certification/remediation-and-compensation/racp-tracker#growerTracker . Total 21 management units with potential liability and total 21 LUCA has been submitted. 7 out of 21 LUCA has been completed. 8 management units have submitted for compensation plan and 14 management units are required to submit for remediation plan.	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No stakeholder comments or complaints received.	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	None noted. No stakeholder comments or complaints received.	Yes
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes. The sustainability unit has conducted the internal audit for 9 units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 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.	Yes
Have there been any stakeholder (including NGO) consultation conducted?	None noted. No stakeholder comments or complaints received.	Yes

3.3 Progress of scheme smallholders and/or outgrowers

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

3.4 Details of Nonconformities

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

During this Assessment there were two (2) Critical and one (1) Minor nonconformities raised. The Sime Darby Plantation Berhad Strategic Operating Unit (SOU) 24 Hadapan Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	1997037-202012-M1	Clause & Category (Critical / Minor)	3.6.2 (Critical)
Date Issued	11/12/2020	Due Date	10/3/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	10/3/2021
Statement of Nonconformity:	Monitoring of the effectiveness of the H&S plan to address health and safety risks to people is not adequate		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	Kulai Estate: It was noted during the interview with the manuring workers travelled to the worksite/field in the Manuring tractor where they sit on the pile of fertiliser in the fertiliser trailer exposing themselves to possible risks and hazards. The practice was not in-line with the Pictorial Safety Standard (PSS); 12.0 Pengangkutan; 12.4 Pengangkutan Yang Membawa Peralatan dan Bahan (Kimia dan Baja); d. Dilarang membawa penumpang di kenderaan ini.		

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	<p>CEP Renggam Estate:</p> <ul style="list-style-type: none"> - The tractor TF 001 (Ford) used by the Spraying Gang at Field 2000 was noticed to be not in good working condition with oil leakage surrounding the engine and drops on the ground. Further clarification with the foreman and daily inspection record (Pejagaan Traktor: Penyelenggaraan Harian & Mingguan) indicated that the daily inspection was done last on 18th January 2020. - The action plan for CHRA recommendations were not adequately done for CHRA Report (DOSH Ref Number: HQ/15/ASS/00/363-2020-153) dated June 2020; Page Number 76; 5. Recommendation; 5.2 Recommendation On Organisational Controls (OC); Adoption of Safe Work Systems and Practices; b. Register of Chemical Hazardous to Health (USECHH 2000, Regulation 5); 3. Recommendation: Update welding rode and welding gas in chemical register. Visit to the workshop indicated that the welding works using welding rods, acetylene and oxygen tank are use on a regular basis. Reference done with the 'Register of Chemicals Hazardous to Health' dated 30.11.2020 indicated that the welding rod and welding gas were not included in the register.
<p>Corrections:</p>	<p>Kulai Estate:</p> <p>Immediate briefing has been given to the said workers and the rest of manuring workers on the seriousness of risks and hazards when travelling to the field by sitting on the pile of fertilizer in the fertilizer trailer dated 8/12/2020.</p> <p>CEP Renggam Estate:</p> <ul style="list-style-type: none"> - Pressure oil switch was replaced with a new part and leaking issues was solved. Daily inspection for TF001 was updated in (Penjagaan Traktor: Penyelenggaraan Harian & Mingguan). - Estate have registered the Welding Rod and Welding Gas in Chemical Register under Workshop Operation.
<p>Root Cause Analysis:</p>	<p>Kulai Estate:</p> <p>For the current practice, all the manuring workers travel to the field using motorcycle. On the said date, 2 extra workers were added to the team but they missed out the passenger trailer trip. Due to lack of monitoring since during that time the mandore in-charge has travelled to the field site, the said workers has decided to board at the back of trailer carrying fertilizer to the field.</p> <p>CEP Renggam Estate:</p> <ul style="list-style-type: none"> - Based on Estate investigation, tractor TF001 pressure oil switch was damage due to high pressure and temperature. This tractor was rarely used and has been used as backup tractor on that day. Thus, the inspection record was not updated in the Daily Inspection Record. - Estate have missed the registration of welding rod and Welding gas because those chemical just added in the latest CHRA. The person in charge to update chemical register (store clerk) was not yet briefed on the new chemical added in the CHRA.
<p>Corrective Actions:</p>	<p>Kulai Estate:</p>

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	<ul style="list-style-type: none"> - Briefing will be given to all the drivers not to allow any workers to travel in trailer load with fertilizer or premix chemical mounted to their tractor except in passenger trailer. - Monitoring will be done by Staff/mandore in charge of manuring by conducting head counting after morning muster to ensure no workers left or missed out the passenger trailer trip. <p>CEP Renggam Estate</p> <ul style="list-style-type: none"> - Estate management will conduct training to all tractors drivers and foreman regarding on the tractor maintenance and inspection. Daily inspection logbook will be updated by respective driver and checked by foreman on weekly basis. - Assistant manager will brief person in charge for updating chemical register (store clerk) on new chemical added in the CHRA.
Assessment Conclusion:	<p>Major NC close out verification:</p> <p>Corrective action plan taken was verified as per evidence submitted as following:</p> <ul style="list-style-type: none"> - Records of briefing on safety risks and hazards of travelling on fertilizer tractors to all manuring workers and tractor drivers dated on 8/12/2020 conducted by Kulai Estate management - Records of maintenance (oil pressure switch replacement) and daily inspections for December 2020, January 2021 and February 2021 of Ford Tractor Model # 6610; Asset # TF001 conducted by CEP Renggam Estate management - Records Register of Chemicals Hazardous to Health; Date: 30/12/2020 by CEP Renggam Estate - Records of manuring team movement and fertilizer monitoring books of Kulai Estate; sample latest dated 8/2/2021: Total fertilizer = 200 bags; Total workers: 8; Passenger trailer driver: Rajeva; Fertilizer mandore: Santhi - Records of Training Catalogue Template for TTMS Enrolment – Tractor Driver Training; Venue: CEP Renggam Estate Workshop; Date: 21/12/2020 - Records of Training Catalogue Template for TTMS Enrolment – Store Clerk Chemical Register Briefing; Venue: CEP Renggam Estate Store; Date: 28/12/2020 <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 10/3/2021. Continuous implementation will be further verified in the next audit.</p>

Non-conformity			
NCR Ref #	1997037-202012-M2	Clause & Category (Critical / Minor)	6.7.3 (Critical)
Date Issued	11/12/2020	Due Date	10/3/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	10/3/2021
Statement of Nonconformity:	<ol style="list-style-type: none"> 1. Evidence of PPE provision was insufficient. 2. PPE was not use appropriately by workers to cover potentially hazardous operations. 		

<p>Requirement Reference:</p>	<p>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>Objective Evidence:</p>	<p>1. Evidence of PPE provision was insufficient. CEP Rengam Estate: During visit to the field for manuring and spraying operations, it was sighted that the workers worn different type of rubber boots. Interview with the Manuring Gang and Spraying Gang workers revealed that they were provided with Wellington Boots every 4 to 6 months for free. However, the workers complained that the boots provided won't last long and worn out less than 4 months and they need to purchase on their own. Cross reference of PPE issuance records and clarification made with the store clerk confirmed that boots are provided to workers every 4 to 6 months on case to case basis. However there's no evidence of issuance for sample worker with Employee ID # 139754 while the PPE issuance records shown the boots was last issued on 16.10.2019 for sample worker with Employee ID # 17333.</p> <p>2. PPE was not use appropriately by workers to cover potentially hazardous operations. Kulai Estate: During the visit to the Spraying Gang, it was noted that the worker's understanding was to only wear safety goggles during P&D Spraying and were not required to wear safety goggles during herbicide spraying operations. Further clarification identified that for the day, only 1 out of 6 workers brought the safety goggles for the herbicide operations.</p> <p>Seri Pulai Estate: During the visit along Field 2000, it was sighted that 2 workers riding the Mechanical Buffalo (Badang) were not wearing appropriate PPE (Safety Helmet).</p>
<p>Corrections:</p>	<p>CEP Renggam Estate: Estate has issued new PPE (wellington boot) to both workers: - Employee ID # 139754 (Rampada Ghosh) - Employee ID # 17333 (Batu Malai A/L V.Rajoo)</p> <p>Kulai Estate: All the sprayer has been instructed to wear goggle immediately before continue the spraying work and Assistant Manager has briefed to the workers on PPE usage including goggle to be wear during all spraying activity on 7/12/2020.</p> <p>Seri Pulai Estate: The MB drivers has been immediately wear the PPE (safety helmet) before continue their work on the same day of audit visit after instructed by staff in-charge.</p>

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Root Cause Analysis:	<p>CEP Renggam Estate: From Estate investigation, estate management have agreed to provide the replacement of wellington boot for every 4 months if the boot are damage since 2019. However, the information was not briefed to the workers properly on the PPE replacement. The complaint on PPE (wellington boot) was not channelled accordingly to the estate management.</p> <p>Kulai Estate: During the spraying training, trainer did emphasize on the importance of PPE usage especially goggle during herbicide spraying operation. He mentioned that among all the spraying works, P&D is the most crucial activity that needed protection for workers' eye as the spraying work is done from higher point so workers were always reminded to ensure they do not forget to bring and use safety goggle during this activity. However, misunderstanding occurs as some workers take it as safety goggle only need to be used during P&D spraying activity only.</p> <p>Seri Pulai Estate: The 2 MB drivers was sometime refuse to wear PPE (safety helmet) due to inadequate awareness on importance of PPE usage.</p>
Corrective Actions:	<p>CEP Renggam Estate: Estate has conducted briefing to the workers regarding the procedure to replace the PPE (wellington boot) on 14/12/2020. Estate will conduct briefing on complaint and grievance procedure to the workers to ensure any complaints will be recorded accordingly for further action by estate management.</p> <p>Kulai Estate: Refresher training regarding PPE usage and its importance will be conducted periodically and included in the estate's training plan to ensure sprayer awareness and understanding on PPE usage is in place.</p> <p>Seri Pulai Estate: Refresher training for all MB drivers on importance of PPE wearing to be conducted periodically and included in the estate's training plan to ensure the awareness and understanding on PPE usage is in place.</p>
Assessment Conclusion:	<p>Major NC close out verification: Corrective action plan taken was verified as per evidence submitted as following:</p> <ul style="list-style-type: none"> - Records of PPE issuance to 2 workers (Employee ID # 139754 & Employee ID # 17333) dated on 14/12/2020 - Records of training on PPE usage to all Kulai Estate sprayers dated on 7/12/2020 - Records of training on Mechanical Buffalo – MB, PPE usage and its importance to all Seri Pulai Estate MB drivers dated on 25/1/2020 - Records of PPE usage monitoring book and Weekly PPE Order List by all estates latest dated on 1/3/2021

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	<p>- Records of Training Catalogue Template for TTMS Enrolment – PPE Replacement and Complaint/Grievance Procedure Briefing; Venue: CEP Renggam Estate Muster Ground; Date: 14/12/2020</p> <p>Evidence shown the CAP was found to be effective thus the major NC was closed on 10/3/2021. Continuous implementation will be further verified in the next audit.</p>
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Non-conformity			
NCR Ref #	1997037-202012-N1	Clause & Category (Critical / Minor)	7.3.2 (Minor)
Date Issued	11/12/2020	Due Date	Next assessment
Closed (Yes / No)	Yes	Date of nonconformity Closure	N/A
Statement of Nonconformity:	Disposal of wastes (Domestic waste & Schedule waste) according to the Waste Management Plan 2020 was not fully demonstrated.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<p>Layang Estate:</p> <p>According to the Waste Management Plan 2020, the disposal of wastes is through the following method;</p> <ul style="list-style-type: none"> - Domestic wastes to be disposed at the landfill area and through recycle collector - Schedule wastes is through a licensed contractor. <p>However, it was discovered the during the site visit to Block P2008 (2), a pile of mixed type of wastes consisted of Domestic waste & Scheduled waste such as plastic bottles, paper boxes, contaminated empty lubricant containers, safety helmet (yellow) and used wellington boots were found at the stacking area.</p>		
Corrections:	<p>Layang Estate:</p> <p>All rubbish (domestic waste mixed with other waste) at field OP 2008, block 2 has been removed to the landfill. The waste has been segregated accordingly with their category before dumped into landfill. The scheduled waste was collected and transferred to scheduled waste store for proper disposal.</p>		
Root Cause Analysis:	<p>Layang Estate:</p> <p>One of the tractor driver was not dumping the waste accordingly at designated landfill since he making shortcut way. He was not yet briefed on the waste management and effect of his action to the environment.</p>		
Corrective Actions:	<p>Layang Estate</p> <p>Estate will conduct training on waste management to all workers including the tractor’s driver. The training will be scheduled and included in the estate’s training plan. Monitoring on rubbish disposal will be conducted by staff/mandore in-charge on weekly basis.</p>		
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by		

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	auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.
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Opportunity for Improvements	
OFI #	Description
Nil	N/A

Positive Findings	
PF #	Description
Nil	N/A

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	N/A	Clause & Category (Critical / Minor)	N/A
Closed (Yes / No)	N/A	Date of nonconformity Closure	N/A
Statement of Nonconformity:	N/A		
Requirement Reference:	N/A		
Objective Evidence:	N/A		
Corrective Actions:	N/A		
Assessment Conclusion:	N/A		

Opportunity for Improvement	
OFI#	Description
OFI 1	Statement on "No use of fire for pest control" not clearly stated in the SOP for the plantation reference manual.
	Status during RC2: There was no evidence of use of fire for pest control in all the estates. Hence, OFI has been resolved.
OFI 2	Accurate reporting on certain information should be reported diligently (i.e., there a need for a cross checking work for a document entitle monitoring herbicide usage before final reporting).
	Status during RC2:

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	<p>Records of pesticides used (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) is maintained by the estate and submitted to the Head Quarters on a monthly basis. Sampled the chemicals used for the month Sept, Oct and Nov 2020 as below: -</p> <table border="1" data-bbox="240 495 1038 745"> <thead> <tr> <th>Operating Units</th> <th>Sept 2020</th> <th>Oct 2020</th> <th>Nov 2020</th> </tr> </thead> <tbody> <tr> <td>Kulai Estate</td> <td>1.12</td> <td>1.20</td> <td>1.05</td> </tr> <tr> <td>Seri Pulai Estate</td> <td>2.30</td> <td>2.03</td> <td>1.77</td> </tr> <tr> <td>Layang Estate</td> <td>1.07</td> <td>1.14</td> <td>0.96</td> </tr> <tr> <td>CEP Rengam Estate</td> <td>0.09</td> <td>1.39</td> <td>1.40</td> </tr> </tbody> </table> <p>Hence, OFI has been resolved.</p>	Operating Units	Sept 2020	Oct 2020	Nov 2020	Kulai Estate	1.12	1.20	1.05	Seri Pulai Estate	2.30	2.03	1.77	Layang Estate	1.07	1.14	0.96	CEP Rengam Estate	0.09	1.39	1.40
Operating Units	Sept 2020	Oct 2020	Nov 2020																		
Kulai Estate	1.12	1.20	1.05																		
Seri Pulai Estate	2.30	2.03	1.77																		
Layang Estate	1.07	1.14	0.96																		
CEP Rengam Estate	0.09	1.39	1.40																		
<p>OFI 3</p>	<p>The GAP or so-called SD-ARM is a source of field guidance & ground implementation. The company has published a copy of ARM for version 1 & 3. However, the document for ARM for version 2 is not kept for reference.</p> <p>Status during RC2: The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 01.07.2011. Selected products are specific to the target pest, weed and disease. Hence, OFI has been resolved.</p>																				
<p>OFI 4</p>	<p>Update reporting on certain information should be reported diligently (updated soil series map checking before final reporting).</p> <p>Status during RC2: Soil surveys and topographic information, including the identification of steep terrain, marginal and fragile soils were available. Sighted the soil series available in soil maps and there was no soil categorized as problematic or fragile soil in all sample Estates.</p> <table border="1" data-bbox="240 1400 1034 2024"> <thead> <tr> <th>No</th> <th>Estates</th> <th>Soil Series</th> <th>Reference</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kulai Estate</td> <td>Bukit Temiang – 0.39% Jerangau – 22.44% Kg. Kubur – 0.39% Kulai – 3.3% Lancahang – 2.98 Local Alluvium – 1.69% Masai – 2.2% Organic clay - 1.14% Pelepah – 0.46% Rengam 43.81% Tepus – 15.89 Yong Peng – 5.3% Jeranggau 68.14% Renggam 31.86%</td> <td>R & D – Prevision Agriculture Unit (NHS) dated Feb 2013</td> </tr> <tr> <td>2</td> <td>Seri Pulai Estate</td> <td>Batu Anam – 5.19% Bungor – 26.66% Durian – 12.97% Holyrood – 12.97%</td> <td>R & D – Prevision Agriculture Unit (NHS) dated</td> </tr> </tbody> </table>	No	Estates	Soil Series	Reference	1	Kulai Estate	Bukit Temiang – 0.39% Jerangau – 22.44% Kg. Kubur – 0.39% Kulai – 3.3% Lancahang – 2.98 Local Alluvium – 1.69% Masai – 2.2% Organic clay - 1.14% Pelepah – 0.46% Rengam 43.81% Tepus – 15.89 Yong Peng – 5.3% Jeranggau 68.14% Renggam 31.86%	R & D – Prevision Agriculture Unit (NHS) dated Feb 2013	2	Seri Pulai Estate	Batu Anam – 5.19% Bungor – 26.66% Durian – 12.97% Holyrood – 12.97%	R & D – Prevision Agriculture Unit (NHS) dated								
No	Estates	Soil Series	Reference																		
1	Kulai Estate	Bukit Temiang – 0.39% Jerangau – 22.44% Kg. Kubur – 0.39% Kulai – 3.3% Lancahang – 2.98 Local Alluvium – 1.69% Masai – 2.2% Organic clay - 1.14% Pelepah – 0.46% Rengam 43.81% Tepus – 15.89 Yong Peng – 5.3% Jeranggau 68.14% Renggam 31.86%	R & D – Prevision Agriculture Unit (NHS) dated Feb 2013																		
2	Seri Pulai Estate	Batu Anam – 5.19% Bungor – 26.66% Durian – 12.97% Holyrood – 12.97%	R & D – Prevision Agriculture Unit (NHS) dated																		

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		Kuah – 3.24% Kuala Berang – 0.49% Local Alluvium – 26.26% Masai – 9.43% Organic Clay – 9.43% Peat – 10.21% Rengam – 4.51%	Feb 2013
3	Layang Estate	Harimau – 56.51% Holyrood – 4.09% Jerneh – 1.47% Jitra – 1.14% Kawang – 0.42% Kelau – 3.71% Lanchang – 1.26% Local Alluvium – 20.58 Organic clay – 3.44% Organic sand – 0.23% Rengam – 5.96% Sunei Buloh – 0.41% Terap – 0.78%	R & D – Prevision Agriculture Unit (NHS) dated 17 th July 2019
4	CEP Rengam Estate	Rengam – 68.04% Local Alluvium 1 – 7.40% Jerangau – 6.80% Organic Clay / Muck – 5.06% Bungor – 3.41% Local Alluvium 11 – 3.27% Bukit Lunchu – 3.16% Tampin – 1.13% Masai – 0.77% Pelepah – 0.51% Munchong - Malacca – 0.26% Bukit Temiang – 0.19%	R & D – Prevision Agriculture Unit (NHS) dated 17 th July 2019

Hence, OFI has been resolved.

OFI 5

Last HCV re-assessment was conducted 5 years ago (June 2014). Based from document review & site visit, there is a need to re-assessment the HCV report due there some changes in HVC identification.

Status during RC2:

The management has planned to convert the area from ex- Palm Oil Mill including old CEP Renggam estate office and ex-linsite including R&D lab and fertilizer store approximately 5.86 Ha located in the vicinity. Both sites were planned to be converted into oil palm in October 2020. Since the area is less than 500.00 Ha (by new-planting projects per year) therefore the internal assessment using selected components of SEIA and HCV assessment was adopted.

The assessment was done by GSQM Department on 23rd October 2019. Based on the interview with Sustainability Executive, the convention was postponed by the management of Sime Darby Plantation Berhad until further notice.

Hence, OFI has been resolved.

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1997037-202012-M1	Critical	3.6.2	11/12/2020	Closed on 10/3/2021
1997037-202012-M2	Critical	6.7.3	11/12/2020	Closed on 10/3/2021
1997037-202012-N1	Minor	7.3.2	11/12/2020	Open

3.5 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Sime Darby Plantation Berhad Strategic Operating Unit (SOU) 24 Hadapan Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

List of Stakeholders contacted	
<p>Union/Internal Stakeholders</p> <p>Mill NUPW representative Estates’ NUPW representatives Gender committee representative General workers Mill operators Harvesters Sprayers</p>	<p>Local Communities/Neighbours/Vendors</p> <p>Head of Village - Kampung Sri Sempurna Penghulu Mukim Layang-Layang Boustead Kulai Young Estate Manager External FFB suppliers (OCP) Estate & mill vendors (Contractors & Suppliers)</p>
<p>Government Departments</p> <p>Department of Wildlife Johor (via email) DOSH Johor (via email) DOE Johor (via email) JTKSM Johor (via email) Headmaster, SJK(T) Ladang Kulai</p>	<p>NGO</p> <p>Tenaganita (via email) Sahabat Alam Malaysia (via email) WWF (via email) Amnesty International (via email)</p>

Headmaster, SJK(T) Ladang Layang	
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Stakeholders comment	
1	<p>Feedbacks: <u>NUPW Representatives</u></p> <p>The election for NUPW were made through vote. Most of the employee joined NUPW and no restriction from the company. No serious complaint from the workers, mainly for the housing maintenance.</p>
	<p>Management Responses: Noted on the information.</p>
	<p>Audit Team Findings: No further issue.</p>
2	<p>Feedbacks: <u>Gender Committee Representatives</u></p> <p>No case of sexual harassment reported in the certification unit. New mothers in the certification units were assessed on their needs and no restriction to have a breastfeeding time, check-up session, etc. the gender committee meeting was conducted regularly with active participation and activities among the female employees.</p>
	<p>Management Responses: Noted on the information.</p>
	<p>Audit Team Findings: No further issue.</p>
3	<p>Feedbacks: <u>External FFB suppliers</u></p> <p>Daily transactions of FFB still continue with no issue although company had implemented voluntary lockdown. Payments still received on time.</p>
	<p>Management Responses: Positive comments noted.</p>
	<p>Audit Team Findings: No further issue.</p>
4	<p>Feedbacks: <u>Mill & Estates vendors</u></p> <p>No issue in contractual works and supplied spare parts pricing and payment. Has long business relationship with company for more than 10 years.</p>
	<p>Management Responses: Positive comments noted.</p>
	<p>Audit Team Findings: No further issue.</p>
5	<p>Feedbacks: <u>Neighbouring estate (Boustead Kulai Young Estate)</u></p> <p>Managers been invited to latest stakeholder meeting and attended accordingly. Management of Sime Darby Kulai Estate communicated and explained well on RSPO sustainability requirements. Have good relationship with company management and no issues related to land and planting boundaries between both companies.</p>
	<p>Management Responses: Positive comments noted.</p>
	<p>Audit Team Findings: No further issue.</p>
6	<p>Feedbacks: <u>Schools (SJKT Ladang Kulai & Ladang Layang) representatives</u></p> <p>Estate managements always visits and contributes to school programs and activities. Company very cooperative to assist in school facilities maintenance.</p>
	<p>Management Responses: Positive comments noted.</p>
	<p>Audit Team Findings: No further issue.</p>

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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
China Engineers (Malaysia) Sdn. Bhd. (Sime Darby Plantation Berhad)	From 2008 until current	11,371.82	n/a	n/a	n/a
The Pataling Rubber Estates Limited (Golden Hope Plantation)	Until 2008	11,371.82	Yes	No	Yes, ownership changed due to company merging as Sime Darby



Previous land owner / user comment	
Nil	Feedbacks: n/a
	Management Responses: n/a
	Audit Team Findings: n/a

3.6 Impartiality and conflict of interest

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

Formal Sign-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Sime Darby Plantation Berhad Strategic Operating Unit (SOU) 24 Hadapan Palm Oil Mill has complied with the RSPO Principles and Criteria 2018 for Sustainable Palm Oil (Malaysia National Interpretation 2019) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Sime Darby Plantation Berhad Strategic Operating Unit (SOU) 24 Hadapan Palm Oil Mill is continued.

Report prepared by	Acceptance of Assessment Conclusion
Name: Hafriazhar Mohd. Mokhtar	Name: Azhari bin M Kalam
Company Name: BSI Services Malaysia Sdn. Bhd.	Company Name: Sime Darby Plantation Berhad
Title: Lead Auditor	Title: Manager (Chairman SOU 24)
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i>  SIME DARBY PLANTATION BERHAD LAYANG ESTATE (U. No. 647766-1) Azhari bin M. Kalam Manager

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	<i>with the contents of this report and accept the liability in execution of the procedure in the report.)</i>
Date: 10/5/2021	Date:

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Documents required for all unit of certification available in SOU 24 Certification Unit:</p> <ul style="list-style-type: none"> • Land titles/user rights • Occupational health and safety plans • Plans and impact assessments relating to environmental and social impacts • HCV documentation • Pollution prevention and reduction plans • Details of complaints and grievances • Continuous improvement plans • Public summary of certification assessment report • Group Sustainability Policy • Record of contributions to community development 	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Information available in appropriate languages and accessible to relevant stakeholders through sample meeting latest conducted for whole SOU 24 external stakeholder on 5/12/2019 at CEP Rengam Estate Innovation Hall. For Layang Estate and CEP Rengam Estate Stakeholder Meeting conducted on 3/12/2020 at Ulu Remis Jr. Club. Appointment Letter as Officer In-Charge on Social Issues in Layang Estate; Zahasri Bin Mohd. Zawawij; Date: 1/1/2020.</p>	Complied

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		Appointment Letter as Officer In-Charge on Social Issues in CEP Rengam Estate; Zamhasari Bin Muntaha; Date: 1/1/2020.	
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	Records of requests for information and responses are maintained as per sample sighted for Kulai Estate latest request received on 18/5/2020 from workers representative on contribution of house groceries for Hari Raya Aidilfitri festival. Other request by internal stakeholders among workers mainly on housing repairs which were recorded in Borang Kerosakan Bangunan & Borang Kerosakan Elektrik. Sighted latest request receive on 23/11/2020 by house # 202 occupant for building repair and on 3/12/2020 by house # E56 occupant for electrical repair.	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 24 adapting the established Sime Darby Plantation Sustainable Plantation Management System (SPMS) Appendix 5 Flowchart and Procedure on Handling Social Issues; Version 1; Issue # 1; Issue date: 1/4/2008 for the implementation of consultation and communication processes. Documented records including minutes of meeting with stakeholders, requests and response records including sample sighted as following:</p> <ul style="list-style-type: none"> - Request for school football field grass-cutting; Date: 1/7/2020 @ Kulai Estate - Request of table and chair for <i>kenduri</i> event at an employee house; Date: 24/7/2020 @ Layang Estate - Request of spraying at Indian cemetery; Date: 27/10/2020 @ Layang Estate 	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	Current stakeholders registered as List of Stakeholders Information Within Certification Unit which consists of stakeholders among Local Community Heads, Neighbours, Local Authorities, Vendors (Contractors & Suppliers) and Outside Crop Purchase (OCP) Suppliers (Mill only) per sample sighted as following:	Complied

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		<ul style="list-style-type: none"> - Hadapan POM; Updated: 13/11/2020 - Kulai Estate; Updated 1/12/2020 <p>Nominated representatives available as per sample sighted as following:</p> <ul style="list-style-type: none"> - Appointment Letter as Officer In-Charge on Social Issues in Layang Estate; Zahasri Bin Mohd. Zawawi; Date: 1/1/2020. - Appointment Letter as Officer In-Charge on Social Issues in CEP Rengam Estate; Zamhasari Bin Muntaha; Date: 1/1/2020. 	
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>SOU 24 implemented policy of code of ethical conduct and integrity (Code of Business Conduct - COBC) which covered all operations in the plantation operation. Briefing session was given to all workers at visited operating units.</p> <p>Sighted sample policy briefing conducted by Kulai Estate on 9/9/2020 during townhall event. Hadapan POM COBC briefing latest was conducted on 1/10/2020. Latest conducted by Layang Estate on 17/11/2020.</p> <p>For labour agent and contractors, Sime Darby has applied its Vendor COBC (30 May 2018), It includes the Fair Business practices-ensuring that we promote fair business practices and compete in an ethical manner, labour & human rights, ethics & management practices.</p> <p>The Vendor Integrity Pledge sighted available for sampled Kulai Estate transporter Pengangkutan Sutra Jaya; FFB transport service contract period: 1/3/2020 – 30/6/2020. Other sample also sighted for Agensi Pengangkutan Longwin; FFB transport service contract period: 1/10/2020 – 31/1/2021. Banli Construction & Enterprise; Machinery for replanting felling and chipping provision contract period: 1/10/2020 – 31/12/2020.</p>	Complied

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1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>There's also an inter-office memo; Ref. # CEOUM/054/11/2020; Date: 20/11/2020 on Subject: Sexual Harassment/Human Rights Violation & Exploitation from the Chief Executive Officer, Upstream Malaysia to all Senior Managers & Managers, Estates & Mill, All Regional HR Managers and All Regional SQM Managers. The memo referred to the Associated Press (AP) dated 18/11/2020 articles which responded in a strictly zero tolerance towards any forms of sexual or human rights violations, exploitation or any other criminal offences within company operations and supply chains as per No Deforestation, No Peat & No Exploitation (NDPE) commitments by Sime Darby Plantations. This include the following:</p> <ul style="list-style-type: none"> - Human Rights Charter - Group SQM Policy - Code of Business Conduct - Sexual Harassment Policy 	Complied
<p>Principle 2: Operate legally and respect rights</p>			
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>The SOU 24 Certification Unit continues its commitment in complying with the applicable requirements. Among permits and licences verified at the certification unit are:</p> <p>Hadapan POM</p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 510425004000; License Valid from 01.03.2020 till 28.02.2021. 2. Permit to Purchase, Store And Use Of Sodium Hydroxide; Maximum Purchase Volume: 4000 kg of Sodium Hydroxide; Registration Number: JC0009/2021; License Valid till 31.01.2021. 	Complied

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		<ol style="list-style-type: none"> 3. Energy Commission License; Serial Number: 006999/2020; Installation Number: ST(SJB)P/S/JHR/01516; License Valid for 1 year from 14.09.2020. 4. DOE Compliance Schedule; License Number: 003865; License Valid from 01.07.2020 till 30.06.2021. 5. BAKAJ License; License Number: 08/A/KJ/043; File Number: BAKAJ/334/300/05/02/08/03; Maximum Water Extraction Capacity: 1000m³/day; License Valid till 31 December 2020. <p>Kulai Estate</p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 508509102000; Estate Area: 2749.06 Ha; License Valid from 01.04.2020 till 31.03.2021. 2. Air Compressor License; License Number: PMT-JH/19 94612; License Valid from till 28.01.2021. 3. Air Compressor License (Kelan Division); License Number: PMT-JH/19 99209; License Valid till 17.03.2021. 4. Diesel Permit (Kulai Estate: Main Division); Reference Number: KPDNKK.J-JB/26/5A/11/107 (P/D)(P3); P Serial Number: J 002579; Diesel Storage Quantity: 8,000 Liter; License Valid from 26.07.2020 till 25.07.2021. 5. Diesel Permit (Kulai Estate: Kelan Division); Reference Number: KPDNHEP.J-JB/26/5A/11/553 (P/D)(P2); P Serial Number: J 002281; Diesel Storage Quantity: 10,000 Liter; License Valid from 30.05.2020 till 29.05.2021. 6. BAKAJ License; License Number: 07/A/KJ/041; File Number: BAKAJ/334/300/05/02/07/02; Maximum Water Extraction Capacity: 109m³/day; License Valid till 31 December 2020. 	
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		<p>Seri Pulai Estate</p> <ol style="list-style-type: none"> 1. MPOB license; License Number: 520195002000; License Valid from 01.05.2020 till 30.04.2021. 2. Energy Commission License; Installation Number: ST(SJB)P/S/JHR/00893; Serial Number: 002014/2020; Valid for 1 year from 27.04.2020. 3. SPAN License; Class License Number: SPAN/JKSP/PT/800-4(2)/7/17; License valid from 04 June 2020 till 03 June 2023. 4. Air Compressor License; Registration Number: JH PMT 3355; License valid till 17.09.2021. 5. Diesel License; License Reference Number: KPDNHEP.J-JB/26/5A/11/1424 (P/D) (B); License Serial Number: J 003501; Storage Capacity: 18,000 Litre. <p>Layang Estate</p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 50844340200; License Number: 24.02.2020 till 31.03.2021 2. Air Compressor License: License Number: JH PMT 2914; License valid from 05.03.2020 till 11.05.2021. 3. Air Compressor License: License Number: JH PMT 2915; License valid from 05.03.2020 till 11.05.2021. 4. Diesel License; Reference Number: BPGK JH (KLU) 2147 SK; P Serial Number: J 000914; Storage Quantity: 32, 760 Litre; License Valid from 27.03.2020 till 26.03.2021. <p>CEP Rengam Estate</p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 508444202000; License Number: 01.04.2020 till 31.03.2021. Total Ha: 3093.38 	
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		<p>2. Air Compressor License: License Number: PMT-JH/20 127072; License Valid till 28.02.2022.</p> <p>Diesel License: License Reference Number: BPGK JH (KLU) 0454 SK; P Serial Number: KLU000001; Storage Capacity: Diesel - 18,000 litre & Petrol – 200 Litre. License Valid from 28.11.2020 till 27.11.2021.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>As per records of Sime Darby Plantation Berhad Estate/Mill – Upstream Malaysia Legal & Other Requirements Register (LORR) by Group Sustainability & Quality Management; Updated June 2020. Sighted latest inclusion as follows:</p> <ul style="list-style-type: none"> - Workers Minimum Standards of Housing and Amenities (Amendment) Act 2019. - Perintah Pencegahan dan Pengawalan Penyakit Berjangkit Peraturan-peraturan Pencegahan dan Pengawalan Penyakit Berjangkit (Langkah-langkah di dalam Kawasan Tempatan) (No. 7). - Perintah Pencegahan dan Pengawalan Penyakit Berjangkit Peraturan-peraturan Pencegahan dan Pengawalan Penyakit Berjangkit (Pengkompaunan Kesalahan-kesalahan) (Pindaan) (No. 7) 2020. 	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>Based on site visit at boundary, methods used are security trenching, PVC pegs (coloured with red and white) roads and fences. The demarcations were visibly maintained as below.</p> <ol style="list-style-type: none"> 1. Hadapan POM is located within the Layang Estate’s Hadapan Division’s premises. The boundary of the mill compound is fenced. 2. Kulai Estates boundary with PLUS Highway Reserve land were clearly demarcated with fences. Boundary between Kulai Estate’s Field 13A and Kampung Sri Paya, Kulai were demarcated with security trenches. There were visible boundary 	Complied

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		<p>stone at the security trench at coordinate Lat: 001° 39'30" N, Lon: 103° 31'00" E.</p> <p>3. Sri Pulai Estate's Field 2016 C boundary with Kampung Melayu Raya were demarcated with security trenches. The boundary markers were well maintained with red and white poles at coordinate Lat: 001° 35'11" N, Lon: 103° 29'43" E.</p> <p>4. Layang Estate's Field P01A-2 boundary with Kampung Kenangan were demarcated with security trenches. The boundary markers were well maintained with red and white poles at coordinate Lat: 001° 48'48" N, Lon: 103° 28'37" E.</p> <p>5. CEP Rengam Estate's Field 2011 A Block 7 boundary with Smallholders were demarcated with security trenches. The boundary markers were well maintained with red and white poles at coordinate Lat: 001° 52'20" N, Lon: 103° 23'21" E.</p>	
Criterion 2.2: 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>A list of contracted parties maintained by all operating units within SOU 24 in their respective List of Stakeholders Information Within Certification Unit which consists of stakeholders among Local Community Heads, Neighbours, Local Authorities, Vendors (Contractors & Suppliers) and Outside Crop Purchase (OCP) Suppliers (Mill only) per sample sighted as following:</p> <ul style="list-style-type: none"> - Hadapan POM; Updated: 13/11/2020 - Kulai Estate; Updated 1/12/2020 <p>Hadapan POM currently has a total of 14 direct and indirect OCP suppliers as per following samples:</p> <ul style="list-style-type: none"> - Felcra Berhad - Peladang Rengit 	Complied

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		<ul style="list-style-type: none"> - Abidin Maju Enterprise - Bukit Siput Resources Sdn. Bhd. - Choon Guan Oil Palm Sdn. Bhd. - Tradewinds Plantation Berhad (Ladang Air Manis) 	
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>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>Contracts contain specific clauses on meeting applicable legal requirements available for OCP suppliers as per sample FFB purchase agreements as following:</p> <ul style="list-style-type: none"> - OCP: Hong Hui Trading; Agreement # P/P/0420/FFB01722L; Contract period: 14/4/2020 – 31/12/2020 - OCP: Bukit Siput Resources Sdn. Bhd.; Agreement # P/P/0220/FFB01638L; Contract period: 1/2/2020 – 31/12/2020 - OCP: Felcra Berhad; Agreement # P/P/0220/FFB01642L; Contract period: 1/1/2020 – 31/12/2020 - OCP: Choon Guan Oil Palm Sdn. Bhd.; Agreement # P/P/0220/FFB01636L; Contract period: 1/2/2020 – 31/12/2020 <p>Other contracts contain specific clauses on meeting applicable legal requirements available in the Vendor Integrity Pledge records for sampled Hadapan POM contractors i.e. Maju Mech Engineering (M) Sdn. Bhd. and Ecoscience Manufacturing & Engineering Sdn. Bhd., Choon Guan Oil Palm Sdn. Bhd. and CPO transporter as per sighted as following:</p> <ul style="list-style-type: none"> - Appendix 3; Terms & Conditions Transporter’s Obligations and Undertakings in sample agreements -Ad-hoc Contract for the Transportation of Crude Palm Oil (“Contract”) Transporter: Sing Rubber & Transport Sdn. Bhd.; Contract Ref. # T/PEN/CPO/0215/001; Contract period: 1/5/2020 – 30/4/2021 	Complied

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		<p>Also available in the agreement of "Proposed Design, Fabricate, Deliver, Install, Test, Commission and Guarantee for Twelve (12) Months, An Electrostatic Precipitators (ESP) Dust Collection System That Meets The Requirements of Environmental Quality (Clean Air) Regulation 2014 for Biomass Boilers at KKS Hadapan"; Contractor: Ecoscience Manufacturing & Engineering Sdn. Bhd.; Contract # ED/135/095/17-18/SP.</p> <p>Due diligence for OCP available as per records of Outside Crop Purchase (OCP) Assessment Report for sample OCP suppliers as following:</p> <ul style="list-style-type: none"> - OCP: Hong Hui Trading; MPOB license # 508163015000; Assessment Date: 11/3/2020 - OCP: Perniagaan Sri Misan; MPOB license # 537918015000; Assessment Date: 11/3/2020 - OCP: Ladang Ayer Baloi; MPOB license # 568178002000; Assessment Date: 11/3/2020 <p>Due diligence (Vendor Integrity Pledge) also done for recruitment agency as per sample as following:</p> <ul style="list-style-type: none"> - PT. Cahaya Lombok; Indonesian workers recruitment agency; Contract agreement dated 22/4/2019 - Amoza Travels; Indian workers recruitment agency; Contract agreement dated 22/4/2019 	
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>The contract documents and Vendor Integrity Pledge (VIP) records sighted in the indicator 2.2.2 above also contain clauses disallowing child, forced and trafficked labour. No young workers are employed by contractors and vendors.</p>	Complied

Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.

2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>Hadapan POM receives FFB from its own certification unit and also uncertified FFB from 8 FFB Traders and 3 Outgrowers. Hadapan POM has a complete documented evidence of information on geo-location of FFB origins, evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder, supporting documents for claims and valid MPOB license for all the FFB suppliers.</p>	Complied
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 Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>There were 8 indirectly sourced FFB and the mill is in the process of collecting the info described in 2.3.1.</p>	Complied
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Annual business plan in the form of annual budget and the projection for 5 years (2020 – 2024) prepared as guidance for future planning. The business plan contains FFB yield, CPO, FFB mill intake (Group and OCP crop), OER and KER, Processing Cost, Checkroll and contract labour, Maintenance (EXT-Contract Hiring and SI-Internal i.e Spareparts), Consumables - Fuel and lubricants, general store and chemicals, EVIT (Vehicles running, TNB and Power supply), Fix Cost, Admin and Labour Cost, Mill Cost (Processing + Fix Cost) OPEX, CAPEX etc.</p>	Complied
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>A 5-year replanting program was available at all the estates visited. The data collected is as below:</p>	Complied

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		Year	Kulai Estate	CEP Rengam Estate	Layang Estate	Seri Pulai Estate	
		2021	-	92.65	68.24	111.27	
		2022	-	233.19	-	69.65	
		2023	73.62	199.79	53.79	73.37	
		2024	-	218.03	-	-	
		2025	-	-	63.07	-	
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>The management review 2020 was conducted as below:</p> <p>Hadapan POM: 20.11.2020</p> <p>Kulai Estate: 17.11.2020</p> <p>Sri Pulai Estate: 25.11.2020</p> <p>Layang Estate: 27.11.2020</p> <p>CEP Rengam: 27.11.2020</p> <p>Among the issue discussed are internal audit findings, operations, changes that could affect the management systems, recommendation for improvement and other matters.</p>				Complied	
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>							
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The action plan for continual improvement is based on a consideration of the main social and environmental impact and opportunities for the company. The company has established key objectives to be accomplished which derives the continual improvement in the area of quality, social, environment, health & safety.</p>				Complied	

		<p>Hadapan Palm Oil Mill</p> <p>Following are the key objectives established and signed by the Palm Oil Mill as below:</p> <ul style="list-style-type: none"> - Achieve annual OER> 20.50% and annual KER> 6.00% - Achieve FFA production CPO <4.00% - Achieving Zero Accident inside and outside the Palm Oil Mill and Estates - Maintain Health Implementation for the staff - Control black ASAP emissions not exceeding limits - Control BOD level <100ppm, SS <400ppm - Minimize the use of pesticide - Maximizing recycle waste. - Upgrade workers quarters and kindergarten. - Monitoring non-compliances by key personnel at the workplace. <p>Kulai Estate / Seri Pulai Estate / Layang Estate / CEP Renggam Estate</p> <p>The respective estate has established a system to improve practices in line with new information and techniques, and for disseminating this information throughout the workforce by implementing an internal audit plan to assess effective implementation of RSPO P&C, and corrective actions are planned when gaps are identified. The improvement practices in line with a new information and techniques by six sigma implementations. The action plan for continual improvement was based on a consideration of the main social and environmental impact and opportunities for the company. The continuous improvement plan was sighted and related to:</p> <ul style="list-style-type: none"> - Harvesting 	
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		<ul style="list-style-type: none"> - Loose fruit recovery - EFB application - KPI (FFB Transport) - SEMUA 2.0 - Rapid4 IT System - Raking - Soil conservation (PaTL grass cutting) 	
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>PROCEDURAL NOTE: 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>There's no submission made by Sime Darby of RSPO metrics template yet, pending its availability by RSPO secretariat. Latest submission of Annual Communications of Progress (ACOP) done for year 2019 available as in RSPO website link as following: https://document.rspo.org/Sime_Darby_Plantation_Berhad_ACOP_2019.pdf</p>	Complied
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>SOP available in place for the Palm Oil Mill and Estates. For Palm Oil Mill holds two SOPs: Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1st November 2008) includes Palm Oil Mill SOP and Palm Oil Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the Palm Oil Mill.</p> <p>For Estate daily operations, the estate is referring to Standard Operating Procedure (Issue No. 1, date 1st November 2018) and Sime Darby Agricultural Reference Manual (Issue: 2011/1). The SOP includes:</p>	Complied

		<ul style="list-style-type: none"> - Planting Material - Nursery Techniques - Replanting - Land Preparation - Planting Density - Maturity Age - Field Upkeep - Manuring - Canopy Management - Water Management in coastal/ peat plantings <p>Others SOP as follows;</p> <ul style="list-style-type: none"> - Quality Management Manual (QMM) effective April 2008 - Standard Operating Manual (SOM) effective April 2008 - SOP Estate Quality Management System effective April 2008 - PSQM (Environment, Safety and Health) effective February 2008 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>The mechanism for checking the implementation procedure as following:</p> <ul style="list-style-type: none"> - Sustainable internal audit - Plantation Advisor visit. - Plantation Management unit <p>Follow up the action from management review all PIC has been designated to close the NC. The internal audit is planned to be conducted once a year. This was sighted from the internal audit program by the sustainability personnel. Internal audit is planned and conducted regularly to determine the strong and weak points and potential areas for further improvement.</p> <p>The internal audit procedures and audit results are documented</p>	Complied

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		and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action as stated in the closure column.	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<p>As mentioned, all estates' management has conducted a management review meeting in the estate to discuss the issues that have been raised during the internal audit for RSPO and agronomist visit. Actions taken from RSPO internal audit have been taken and recorded in the report. Action that needs to be taken has been recorded and the status of the issue also has been maintained.</p> <p>The Palm Oil Mill management is monitoring all the records about the operations which can be found through the Workplace Inspection Checklist, OSH Department Safety Audit Report as well as Internal Audit conducted by the sustainability department.</p> <p>Monitoring record sighted in the Palm Oil Mill such as:</p> <ul style="list-style-type: none"> - FFB receiving - CPO Outgoing - Electricity consumption - Water Consumption - CPO (DOBI, FFA, Impurity, Dirt), PK quality (Moisture, Dirt) - JKKP visit logbook 	Complied
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	Except for CEP Renggam Estate, no new planting in other estates within SOU 24. For existing planting and operations, there's Internal Social & Environment Impact Assessment (SEIA) Report; SOU 24 CEP Renggam Estate Conversion of Infrastructure to Oil Palm Plantation; Prepared by Group Sustainability & Quality	Complied

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		<p>Management Department, Sime Darby Plantation Berhad; January 2020.</p> <p>- Assessment done on 23/10/2020</p> <table border="1" data-bbox="1151 475 1924 722"> <thead> <tr> <th>Field</th> <th>Estimated area (Ha)</th> <th>Previous area</th> <th>Year of conversion</th> </tr> </thead> <tbody> <tr> <td>P05-5</td> <td rowspan="2">5.86</td> <td>Ex-mill & CEP Rengam Old Office</td> <td rowspan="2">October 2020</td> </tr> <tr> <td>P05-5</td> <td>Ex-linesite, R&D Lab & Fertilizer Store</td> </tr> </tbody> </table> <p>These areas are already registered in the certified areas as part of other areas which now converted into planted areas.</p>	Field	Estimated area (Ha)	Previous area	Year of conversion	P05-5	5.86	Ex-mill & CEP Rengam Old Office	October 2020	P05-5	Ex-linesite, R&D Lab & Fertilizer Store	
Field	Estimated area (Ha)	Previous area	Year of conversion										
P05-5	5.86	Ex-mill & CEP Rengam Old Office	October 2020										
P05-5		Ex-linesite, R&D Lab & Fertilizer Store											
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>CEP Renggam Estate:</p> <p>The management has planned to convert the area from ex- Palm Oil Mill including old CEP Renggam estate office and ex-linsite including R&D lab and fertilizer store approximately 5.86 Ha located in the vicinity. Both sites were planned to be converted into oil palm in October 2020. Since the area is less than 500.00 Ha (by new-planting projects per year) therefore the internal assessment using selected components of SEIA and HCV assessment was adopted.</p> <p>The assessment was done by GSQM Department on 23rd October 2019. Based on the interview with Sustainability Executive, the convention was postponed by the management of Sime Darby Plantation Berhad until further notice.</p> <p>The environmental aspect and impact (EAI) for the last FY has been reviewed during the OSH Meeting on 28th November 2020. There are no changes have been done for every issue in Environmental Aspect and Impact (EAI). Also no changes for the</p>	Complied										

		<p>person-in-charge for review Environmental Aspect and Impact (EAI)</p> <p>For the rest of SOU 24, the objective of the Environment Management Plan is Planning, Organizing and Implementation the systematic ESH activities as a safeguard of the estate's environment and our employees with adequate training to be provided to all levels of employees.</p> <p>The company has established Environmental Impact Evaluation (EIE) and Environmental Aspect Impact (EAI) to evaluate the "Environmental aspect and Impact Form".</p> <p>The Environment Assessment is consists of Environment Aspect, Environment Load Items and Environment Impact. The assessment of the Estate's and Palm Oil Mill environmental aspect and impact are recorded in "Environmental aspect and Impact Form". For each of the activities identified the Operating units has stated its Environmental load item (environmental aspect), environmental impact numbering and classification and legislation impact.</p> <p>Environmental Impact :</p> <ul style="list-style-type: none"> 1 – Ozone Layer Depletion 2 – Global Warming 3 – Air Pollution 4 – Water Pollution 5 – Land Contamination 6 – Unpleasant working Environment 7 – Depletion of Natural Resources 8 – Community Impact 9 – Business Impact 	
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		<p>Classification C – Create an impact R – Reduce Impact - Not Applicable</p> <p>The respective operating units management has conducted and prepared the environmental aspect and impact assessment (EAIA) for all its’ activities in the year 2020. The environmental assessment findings are recorded in the document titled “Environmental Aspect & Impact Assessment (EAIA) Report”, prepared and approved by the following personnel;</p> <table border="1" data-bbox="1151 762 1924 1319"> <thead> <tr> <th>Estate / POM</th> <th>Prepared by</th> <th>Approved by</th> <th>Updated</th> </tr> </thead> <tbody> <tr> <td>Kulai Estate</td> <td>Mr. Syaiful Bahri Mohamed Yusof (Asst. Manager)</td> <td>Mr. Amir Hassan (Estate Manager)</td> <td>31.10.2019</td> </tr> <tr> <td>Seri Pulai Estate</td> <td>Mr. Janathenan Nair Chandran (Asst. Manager)</td> <td>Mr. Shuhaimi bin Dollah (Senior Estate Manager)</td> <td>01.07.2020</td> </tr> <tr> <td>Layang Estate</td> <td>Mr. Muhammad Najehah bin Jamaluddin (Medical Assistant)</td> <td>Mr. Nazri bin Ab. Aziz (Estate Manager)</td> <td>01.01.2016</td> </tr> </tbody> </table>	Estate / POM	Prepared by	Approved by	Updated	Kulai Estate	Mr. Syaiful Bahri Mohamed Yusof (Asst. Manager)	Mr. Amir Hassan (Estate Manager)	31.10.2019	Seri Pulai Estate	Mr. Janathenan Nair Chandran (Asst. Manager)	Mr. Shuhaimi bin Dollah (Senior Estate Manager)	01.07.2020	Layang Estate	Mr. Muhammad Najehah bin Jamaluddin (Medical Assistant)	Mr. Nazri bin Ab. Aziz (Estate Manager)	01.01.2016	
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		CEP Renggam Estate	Mr. Muhammad Mohd Ridzuan (Asst. Manager)	Mr. Syed Muhammad Syed Abu Bakar (Estate Manager)	01.07.2020					
		Hadapan Palm Oil Mill	Mohd Fakrurrazi Al Mansor bin Mohd Daud (Asst. Manager)	Mr. Zulaffandi bin Samad (Palm Oil Mill Manager)	2020					
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Layang Estate :</p> <p>The environmental aspect and impact (EAI) for the last FY has been reviewed during the OSH Meeting on 25th September 2020. There are no changes that have been done for every issue in Environmental Aspect and Impact (EAI). Also no changes for the person-in-charge for review Environmental Aspect and Impact (EAI).</p> <p>Specific for OP conversion plan in CEP Renggam Estate, the plan has been implemented as following:</p> <table border="1" data-bbox="1151 1098 1926 1321"> <thead> <tr> <th data-bbox="1151 1098 1541 1177">Areas of Concerns/Key Findings</th> <th data-bbox="1541 1098 1926 1177">Action Plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="1151 1177 1541 1321">Cattle intrusion into estate fields (from stakeholder minute meeting 11/7/2020)</td> <td data-bbox="1541 1177 1926 1321">Estate give timeline until 31/8/2020 for the cattle owner move out their cattle from estate</td> </tr> </tbody> </table>				Areas of Concerns/Key Findings	Action Plan	Cattle intrusion into estate fields (from stakeholder minute meeting 11/7/2020)	Estate give timeline until 31/8/2020 for the cattle owner move out their cattle from estate	Complied
Areas of Concerns/Key Findings	Action Plan									
Cattle intrusion into estate fields (from stakeholder minute meeting 11/7/2020)	Estate give timeline until 31/8/2020 for the cattle owner move out their cattle from estate									

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		<p>Unpleasant smell from EFB (from site visit 24/10/2020)</p>	<p>Based on visit dated 11/11/2020 by Mr. Faris, smell gone. Estate plan not to apply near housing area</p>		
		<p>Issuance of pole to workers (from OSH Meeting Minutes)</p>	<p>Estate management agree to issue 2 sickles for harvester use</p>		
		<p>For the rest of SOU 24, sighted the aspects and impacts analysis for all operations has been documented in the EIE (Environmental Impact Evaluation) and EAI (Environmental Aspect Impact) as following:</p> <p>Estate: Kulai Estate Date updated: 31st October 2019 Activity: Pesticide spraying Environmental Aspect: Spillage Environmental Load Items: Chemical Environmental Impact :</p> <ol style="list-style-type: none"> 1 – Ozone Layer Depletion - 2 – Global Warming - 3 – Air Pollution - Create Impact (C) 4 – Water Pollution - Create Impact (C) 5 – Land Contamination Create Impact (C) 6 – Unpleasant working Environment - 7 – Depletion of Natural Resources - 8 – Community Impact - 9 – Business Impact Create Impact (C) <p>Legislation: Environment Quality Act 1974</p>			

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		<p>Estate: Seri Pulai Estate Date updated: 1st July 2020 Activity: Field – FFB Transportation Environmental Aspect: Release to air Environmental Load Items: Exhaust gas Environmental Impact : 1 – Ozone Layer Depletion - 2 – Global Warming - Create Impact (C) 3 – Air Pollution - Create Impact (C) 4 – Water Pollution - 5 – Land Contamination - 6 – Unpleasant working Environment - 7 – Depletion of Natural Resources - 8 – Community Impact - 9 – Business Impact – Legislation: EQ (Control of emission from diesel engines) Reg. 1996</p> <p>Estate: Layang Estate Date updated: 1st January 2016 Activity: Field – Receiving storage & issuing fuel Environmental Aspect: Spillage Environmental Load Items: Petrol / Diesoline Environmental Impact : 1 – Ozone Layer Depletion - 2 – Global Warming - 3 – Air Pollution – 4 – Water Pollution - Create Impact (C) 5 – Land Contamination - Create Impact (C) 6 – Unpleasant working Environment - 7 – Depletion of Natural Resources - 8 – Community Impact -</p>	
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		<p>9 – Business Impact - Create Impact (C) Legislation : EQA 1974 & (Schedule waste) Regulation 2005</p> <p>Estate: CEP Renggam Estate Date updated: 1st July 2018 Activity: Zenoah Blower Activity. Blowing palm base Environmental Aspect: Fuel consumption Environmental Load Items: Petrol Environmental Impact : 1 – Ozone Layer Depletion - 2 – Global Warming - 3 – Air Pollution – 4 – Water Pollution - Create Impact (C) 5 – Land Contamination - 6 – Unpleasant working Environment - 7 – Depletion of Natural Resources - Create Impact (C) 8 – Community Impact - 9 – Business Impact - Create Impact (C)</p> <p>POM: Hadapan Palm Oil Mill Date updated: 2020 Activity: Sterilizer Environmental Aspect : Electric power consumption / Spillage Environmental Load Items: Electric / Condensate Water /Loose Fruit Environmental Impact : 1 – Ozone Layer Depletion - 2 – Global Warming - 3 – Air Pollution - Create Impact - 4 – Water Pollution - Create Impact - 5 – Land Contamination - Create Impact - 6 – Unpleasant working Environment -</p>	
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		<p>7 – Depletion of Natural Resources - 8 – Community Impact - 9 – Business Impact - Create Impact (C) Legislation: Factories & Machinery Act of 1967</p> <p>Based on the scoring matrix from Environmental Aspect and Impact Identification, the respective Operation Units (Estate & Palm Oil Mill) will address all the issues through the Environmental management plan.</p>	
<p>Criterion 3.5: A system for managing human resources is in place.</p>			
3.5.1	<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>SOU 24 has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2nd December 2019, where the management is committed to contributing to a better society includes respecting, upholding & no-exploitation of fundamental human rights, providing safe and healthy workplaces and protecting workers’ welfare and engaging and empowering communities.</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 (WMC) Sua Betong, Careline and estate are available upon request.</p>	Complied
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) Sua Betong, Careline and estate are available upon</p>	Complied

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		<p>request. This procedure been explained to worker during the induction training on their first time arrival.</p> <p>Seen the training certificates for the workers who has attended the induction training/records during early employment.</p>	
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>All operations were risk assessed to identify all Health and Safety issues. Mitigation plans, and procedures were available, documented and implemented as below.</p> <p>Hadapan POM</p> <ol style="list-style-type: none"> 1. HIRARC was available to cover all risk identified at the mill. Among the HIRARC sighted was Reception Station, Sterilization, Threshing Station, Power Generation Station and Weighbridge. HIRARC was reviewed on 17.11.2020 for all operation stations. 2. CHRA Report (HQ/04/ASS/00/193-2018/079) was available for verification. The CHRA assessment was conducted on 28.11.2018 by Dosh Registered Assessor (Reg Number: JH/07/01/3175). 3. Medical Surveillance was conducted on 9 and 10 November 2020 for 14 workers exposed to manganese. The results have not been available as of the audit date. The 2019 medical surveillance was conducted on 27th November 2020 for 17 workers exposed to Hexane, Manganese and Organophosphate. The results obtained concluded that all workers were fit to work. 4. Noise Risk Assessment was conducted on 09.10.2020 by ETOSH Consult & Engineering Plt. The report has not been finalised as of the audit date. Verified the letter from the 	Complied

		<p>assessor indicating the status of the report dated 24th Sept 2020.</p> <p>Kulai Estate</p> <ol style="list-style-type: none"> 1. HIRARC was available to cover all risk that had been identified in the estate. Among the HIRARC sighted was Boundary Marking, Census, Drain, FFB External Transport, Machine Operation, Fertilizer Sampling and Insecticide Spraying. The HIRARC was recently reviewed for Cutting FFB & Fronds and Stacking Fronds dated 17.11.2020 due to an accident that occurred involving the mentioned operations. 2. CHRA was conducted on 29th June 2020 by registered assessor Nor Khairunnisa Liyana Binti Ahmid. (HQ/15/ASS/00/363). The CHRA Report (HQ/15/ASS/00/363-2020-155) was available together with the action plan to address the action plans provided by the assessor. <p>Seri Pulai Estate</p> <ol style="list-style-type: none"> 1. HIRARC was available to cover all risk that had been identified in the estate. Among the HIRARC sighted was Harvesting, FFB Evacuation, Security, Covid-19 and General Work. 2. CHRA was conducted on 29th June 2020 by Nisafety Consultancy (Dosh Reg Number: HQ/15/ASS/00/363). The Report was available for verification. The CHRA action plan was available and done according to the recommendation. <p>Layang Estate</p> <ol style="list-style-type: none"> 1. HIRARC was available to identify all risks and hazards in the estate. The CHRA was reviewed for all operations on 30.10.2020 by the estate. Among the HIRARC sighted was Security, Pest and Disease, Census, Drainage and Pruning 	
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		<p>Station.</p> <p>2. CHRA was conducted on 26th June 2020 by Nisafety Consultancy (Dosh Reg Number: HQ/15/ASS/00/363). The CHRA Report (Report Number: HQ/15/ASS/00/363-2020-154) was available for verification. The CHRA action plan was available and done according to the recommendation.</p> <p>CEP Rengam Estate</p> <p>1. HIRARC was available for all operations where the risks and hazard has been identified and mitigations plans effectively implemented. The latest HIRARC review as conducted on 26.11.2020 for the manuring operation due to an accident that occurred.</p> <p>2. CHRA was conducted on 26th June 2020 by Nisafety Consultancy (Dosh Reg Number: HQ/15/ASS/00/363). The CHRA Report (Report Number: HQ/15/ASS/00/363-2020-153) was available for verification. The CHRA action plan was available and done according to the recommendation.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The effectiveness of the Health and Safety Plan is monitored through the implementation of SOPs, HIRARC & CHRA recommendations, among others. Nevertheless, the monitoring of some operations was not fully implemented.</p> <p>Kulai Estate</p> <p><i>Sime Darby Plantations Sdn. Bhd.; Pictorial Safety Standard (PSS); 12.0 Pengangkutan; 12.4 Pengangkutan Yang Membawa Peralatan dan Bahan (Kimia dan Baja); d. Dilarang membawa penumpang di kenderaan ini.</i> It was noted during the interview with the manuring workers that those without their own motorcycles travel to the worksite/field with the Manuring tractor where they sit on the pile</p>	Non-compliance

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		<p>of fertiliser in the fertiliser trailer exposing themselves to possible risks and hazards.</p> <p>CEP Renggam Estate</p> <p>The tractor TF 001 (Ford) used by the Spraying Gang at Field 2000 was noticed to be in poor working condition (oil leakage surrounding the engine). Further clarification with the foreman and daily inspection record (Penjagaan Traktor: Penyelenggaraan Harian & Mingguan) indicated that the daily tractor inspection for tractor TF 001 was done last on 18th January 2020.</p> <p>The action plan for CHRA recommendations were not adequately done. The CHRA Report (DOSH Ref Number: HQ/15/ASS/00/363-2020-153) dated June 2020; Page Number 76; 5. Recommendation; 5.2 Recommendation On Organisational Controls (OC); Adoption of Safe Work Systems and Practices; b. Register of Chemical Hazardous to Health (USECHH 2000, Regulation 5); 3. Recommendation: Update welding rode and welding gas in chemical register. Visit to the workshop indicated that the welding works using welding rods, acetylene and oxygen tank are done on a regular basis. Reference done with the 'Register of Chemicals Hazardous to Health' dated 30.11.2020 indicated that the welding rod and welding gas were not added into the register. Based on the lapses found, hence Critical NC has been raised.</p>	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
3.7.1	<p>(C) 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&C, in a form they understand, and which includes assessments of training.</p>	<p>The respective Estate and Palm Oil Mill has prepared Training Need Analysis and documented in Training Requirement for respective Operating Units (Estate & Palm Oil Mill). A yearly training plan is created based on Training Needs Analysis for workers involved in the operations. Sighted the Training Need</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>Analysis of all workers, staff and Executives which is based on their competencies and job description.</p> <p>A training program that includes regular assessment of training needs and documentation, including records of training were kept in the estates. The needs of training are variable and subject to the nature of work for a specific task. The list of training and assessment for the selected sample as below:-</p> <p>Kulai Estate</p> <ul style="list-style-type: none"> - Factories & Machinery Act 1967 - Environmental, Safety & health policy - Understanding of Group Policy & Authority (GPA B4) & - Whistleblowing - Use & Standard Exposure of chemical hazardous to health (USECHH) 2000 - HIRARC - Harvesting induction training - Chemical & Spraying safe operating procedures - First aid training - Safe driving technique - Guideline (highly toxic pesticides) Regulation 1996 - Emergency Respond Plan (e.g. Chemical spill, poisoning, fire, lighting) - Schedule wastes management - Inventory, labeling, disposal and handling. - What is MSDS / CSDS 	
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		<ul style="list-style-type: none"> - Environmental responsibility & biodiversity HCV - Fire fighting - Effective workplace inspection/audit - Human right - 5S housekeeping - RSPO / MSPO training - Reproductive right / Gender committee - Waste management 3R program – Reduce, Reuse and Recycle. <p>Sighted the Training evaluation form conducted for the "P&D Training dated 24th August 2020, which attended by 15 estate workers. The evaluation prepared by Clerk and approved by the Estate Manager. The assessment of training was conducted on 17th November 2020 which all the participant obtained result 10 over 10 which fall under the category knowledgeable and competent.</p> <p>Hadapan Palm Oil Mill</p> <ul style="list-style-type: none"> - OSH Act & Regulations 1994 - Environment Quality Acct & Regulation 1974 - Factories & Machinery Act 1967 - Environmental, Safety & health policy - Understanding of Group Policy & Authority (GPA B4) & - Whistleblowing - Use & Standard Exposure of chemical hazardous to health (USECHH) 2000 - HIRARC - Notification of accidents and dangerous occurrence 	
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		<ul style="list-style-type: none"> - OSH committee function & responsibility - Accident investigation technique - First aid training - Safe electrical handling - 12.Safe machine operator technique - Safe driving technique - Guideline (highly toxic pesticides) Regulation 1996 - Emergency Respond Plan (e.g. Chemical spill, poisoning, fire, lighting) - Schedule wastes management - Inventory, labelling, disposal and handling. - What is MSDS / CSDS - Environmental responsibility & biodiversity HCV - Effective workplace inspection/audit - Personal hygiene and health - LO-TO system - OHSAS 18001 - Fire fighting - Safe work procedure for all stations - Working at height - Working in a confined space - 5S housekeeping - OHSAS Internal Audit training - RSPO / MSPO training - Reproductive right / Gender committee 	
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		<p>- Waste management 3R program – Reduce, Reuse and Recycle.</p> <p>Sighted the Training evaluation form conducted for the “SCCS (RSPO/MSPO)” Training dated 3rd December 2020, which attended by 12 Executive and Staff. The competency passing mark is above 50. Based on the quiz paper all the participant was scored above the passing mark.</p>																									
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>All employees, contractors and relevant OCP are appropriately trained. A training program that includes regular assessment of training needs and documentation, including records of training were kept in the estates. Sighted the training record sample for Estates and Palm Oil Mill as following:</p> <p>Kulai Estate</p> <table border="1" data-bbox="1151 855 1924 1378"> <thead> <tr> <th>No</th> <th>Training</th> <th>Date of Training</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Environmental, Safety & health policy</td> <td>September 2020</td> <td>Completed</td> </tr> <tr> <td>2</td> <td>Use & Standard Exposure of chemical hazardous to health (USECHH) 2000</td> <td>September 2020</td> <td>Completed</td> </tr> <tr> <td>3</td> <td>Harvesting induction training</td> <td>July 2020</td> <td>Completed</td> </tr> <tr> <td>4</td> <td>Chemical & Spraying safe operating procedures</td> <td>February 2020</td> <td>Completed</td> </tr> <tr> <td>5</td> <td>First aid training</td> <td>September 2020</td> <td>Completed</td> </tr> </tbody> </table>	No	Training	Date of Training	Status	1	Environmental, Safety & health policy	September 2020	Completed	2	Use & Standard Exposure of chemical hazardous to health (USECHH) 2000	September 2020	Completed	3	Harvesting induction training	July 2020	Completed	4	Chemical & Spraying safe operating procedures	February 2020	Completed	5	First aid training	September 2020	Completed	Complied
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		6	Safe driving technique	September 2020	Completed
		7	Schedule wastes management - Inventory, labelling, disposal and handling.	September 2020	Completed
		8	What is MSDS / CSDS	September 2020	Completed
		9	Fire fighting	June 2020	Completed
		10	Reproductive right / Gender committee	September 2020	Completed
		11	Waste management 3R program - Reduce, Reuse and Recycle.	June 2020	Completed
		Seri Pulai Estate			
		No	Training	Date of Training	Status
		1	Tractor / MB Training	February 2020	Completed
		2	Environmental, Safety & Health Campaign	February 2020	Completed
		3	Understanding of Group Policy & Authority (GPA B4) & Whistleblowing	January 2020	Completed
		4	Chemical training	February 2020	Completed
		5	HIRARC	June 2020	Completed

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		6	Notification of Accidents and Dangerous Occurrence	November 2020	Completed	
		7	OSH Committee function & Responsibility	January 2020 July 2020 October 2020	Completed	
		8	OSH Coordinator function & Responsibility	January 2020 July 2020 October 2020	Completed	
		9	Foreign workers induction program	January 2020	Completed	
		10	Harvesting induction training	November 2020	Completed	
		11	Accident investigation technique	November 2020	Completed	
		12	Chemical & Spraying safe operating procedures	February 2020	Completed	
		13	First aid training	September 2020	Completed	
		14	Guidelines (highly toxic pesticides) Reg 1996	February 2020	Completed	
		15	Emergency response plan (e.g. chemical spill, poisoning, fire and lighting)	September 2020	Completed	

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		16	Fire fighting	February 2020	Completed
		17	Effective workplace inspection/audit	June 2020	Completed
		18	RSPO / MSPO training	November 2020	Completed
		19	Maintenance of spray equipment & calibration	February 2020	Completed
		20	Preventive maintenance vehicle training	November 2020	Completed
		21	RB Spraying method	February 2020	Completed
		22	Human rights & reproductive right policy training	November 2020	Completed
Estate: Layang					
		No	Training	Date of Training	Status
		1	Environmental, Safety & health policy	January 2020	Completed
		2	Understanding of Group Policy & Authority (GPA B4) & Whistleblowing	January 2020	Completed
		3	COBC	February 2020	Completed
		4	HIRARC	June 2020	Completed

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		5	Notification of Accidents and Dangerous Occurrence	June 2020	Completed	
		6	OSH committee function & responsibility	January 2020	Completed	
		7	Foreign workers induction program	February 2020	Completed	
		8	Harvesting induction training	January 2020	Completed	
		9	Accident investigation technique	March 2020	Completed	
		10	Chemical & Spraying safe operating procedures	January 2020	Completed	
		11	First aid training	January 2020	Completed	
		12	Safe driving technique	January 2020	Completed	
		13	Emergency Respond Plan (e.g. Chemical spill, poisoning, fire, lighting)	March 2020	Completed	
		14	Schedule wastes management - Inventory, labeling, disposal and handling.	March 2020	Completed	

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		15	What is MSDS / CSDS	March 2020	Completed
		16	Environmental Responsibility & Biodiversity HCV	May 2020	Completed
		17	Fire fighting	May 2020	Completed
		18	Effective workplace inspection/audit	March 2020 June 2020 September 2020	Completed
		19	Personal hygiene and health	June 2020 December 2020	Completed
		20	5S housekeeping	February 2020	Completed
		21	Maintenance of spray equipment & calibration	January 2020	Completed
		22	PPE Training & Demonstration	January 2020	Completed
		23	Preventive maintenance vehicle training	January 2020	Completed
		24	IPM Training	March 2020	Completed
		25	Triple Rinsing Training and Demonstration	June 2020	Completed
		26	RSPO / MSPO training	June 2020	Completed

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		27	HCV Awareness training	March 2020	Completed
		28	Gender committee training	March 2020	Completed
CEP Renggam					
		No	Training	Date of Training	Status
		1	RSPO / MSPO training	November 2020	Completed
		2	COBC	November 2020	Completed
		3	Chemical & Spraying safe operating procedures	February 2020 September 2020	Completed
		4	Maintenance of spray equipment & calibration	February 2020 September 2020	Completed
		5	PPE Training & Demonstration	October 2020	Completed
		6	Schedule wastes management - Inventory, labeling, disposal and handling.	November 2020	Completed

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		7	ERP – Chemical spillage	November 2020	Completed																
		8	First aid training	November 2020	Completed																
		9	RB Spraying method	November 2020	Completed																
		10	Pest & Disease training	November 2020	Completed																
		11	Triple rinsing training and demonstration	November 2020	Completed																
		12	Zenoah blower training	January 2020	Completed																
		13	Manuring training	January 2020	Completed																
<p>POM : Hadapan Palm Oil Mill</p> <table border="1"> <thead> <tr> <th>No</th> <th>Training</th> <th>Date of Training</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>OSH Act & Regulations 1994</td> <td>07.09.2020</td> <td>Completed</td> </tr> <tr> <td>2</td> <td>Environment Quality Acct & Regulation 1974 Factories & Machinery Act 1967</td> <td>07.09.2020</td> <td>Completed</td> </tr> <tr> <td>3</td> <td>Environmental, Safety & health policy</td> <td>07.09.2020</td> <td>Completed</td> </tr> </tbody> </table>						No	Training	Date of Training	Status	1	OSH Act & Regulations 1994	07.09.2020	Completed	2	Environment Quality Acct & Regulation 1974 Factories & Machinery Act 1967	07.09.2020	Completed	3	Environmental, Safety & health policy	07.09.2020	Completed
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		4	Understanding of Group Policy & Authority (GPA B4) & Whistleblowing	07.09.2020	Completed	
		5	First aid training	22.10.2020	Completed	
		6	Firefighting	10.02.2020	Completed	
		7	Safe work procedure for all stations	May / July and Oct 2020	Completed	
		8	RSPO / MSPO training	07.09.2020	Completed	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Training for SCCS is sighted dated 3rd December 2020 that been include 28 personnel for the implementation of SCCS in Hadapan Palm Oil Mill.</p> <p>The job description has been sighted in the appointment letter. A presentation slide has been provided for evidence. Presentation by Group Sustainability Quality Management.</p> <p>Interview conducted with weighbridge clerk confirmed that they understand the requirement.</p>				Complied
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>						
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&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</p>	<p>Not applicable as Hadapan POM applied Mass Balance (MB) supply chain module.</p>				Complied

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	RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is 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>	Hadapan POM received and processed both certified and noncertified FFB hence applied Mass Balance (MB) supply chain module. Only certified volume of palm products extracts registered in the RSPO MB certification.	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 produced shall then be recorded in each subsequent annual surveillance report.	Estimated tonnage of CPO and PK products available in Table 10 – Certified Tonnage of this Public Summary Report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>The mill meet registration and reporting requirements for MB supply chain through the RSPO IT platform as following:</p> <ul style="list-style-type: none"> - Member Name: Hadapan Oil Mill - Commodity: Palm Oil - PalmTrace Account ID: RSPO_AC1000000310 - PalmTrace Member ID: RSPO_PO1000000301 - RSPO Membership No.: 1-0008-04-000-00 	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>	Procedure namely Sime Darby Plantation – Plantation Quality Management System – Sustainable Plantation Management System; Appendix 15; Standard Operating Procedure (SOP) for	Complied

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	<ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 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. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>Sustainability Supply Chain and Traceability; Version 2; Issue no.: 3; Issue date: Feb 2018.</p> <p>The procedure was established which covers responsibility, reporting of certified CPO/PK, non-conformance material, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint Communication and Claim and etc.</p> <p>Training on Summary of New Changes in Sustainability Supply Chain and Traceability SOP: Sustainable Plantation Management System (SPMS) – Appendix 15; Plantation Sustainability and Quality Management Department date: 14/5/2018 by PSQM HQ personnel.</p> <p>The Mill Manager as Head of Operating Unit has the overall responsibility for the implementation of SOP and he may assign roles to relevant personnel or invite personnel from various departments necessary to assist in the SOP implementation. Sighted the identified and assigned suitable employees to implement and maintain the traceability system by management is En. Mohd Fakrurazzi AlMansor Bin Mohd Daud (Assistant Manager) – PIC for Environmental and Quality Management Systems dated 1st January 2020.</p>	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. 	<p>Internal audit conducted based on the SOP for Sustainable Supply Chain and Traceability of SPMS Appendix 15 (18: Internal Audit); Version 2; Issue # 5; Date: April 2019. The procedure conforms to the requirements in the RSPO SCCS.</p> <p>The latest Internal Audit for RSPO SCCS was done on 13th November 2020 conducted by Sustainability Unit, GSQM</p>	Complied

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	<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>Department & RSQM. There were 3 Major non-conformances raised by the audit team on SCCS requirements. The mill management produced the root cause analysis, corrections and corrective improvement plans and successfully closed the non-conformances on 27th November 2020. The non-conformities were discussed in the management review conducted on 20th November 2020.</p>	
<p>3.8.7</p>	<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>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>The daily records are prepared at the entry point at the weighbridge. 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. The mill weighbridge clerk checks on the Certified Status of the incoming FFB. Daily summary and monthly summary documented for all the certified FFB.</p> <p>The mill received FFB from sister estate with RSPO certified and purchased from outside FFB suppliers. The records of FFB received was recorded in FFB delivery/consignment note, FFB weighbridge ticket and summarize in Mass Balance sheet.</p> <p>The management will inform CB if there is any overproduction of certified tonnage. They aware on the overproduction as per stated in the procedure. Based on last review period, no overproduction recorded.</p> <p>Addressed in the SOP clause 11.0 Non-conforming Products and/or Documents. Based on the procedure, where there is contamination of RSPO certified material during receiving, processing, storage</p>	<p>Complied</p>

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		<p>and dispatch, the mill shall downgrade the materials in such order: IP to MB to conventional.</p> <p>Material received with insufficient information shall be treated as non-conforming documents. The documents shall be investigated, verified and corrected to allow processing of material. Authorization for release shall be by the mill manager.</p> <p>E.g. of information available in the mill's weighbridge tickets is as follows:</p> <ol style="list-style-type: none"> 1. FFB Supplier: Kulai Estate (RSPO Certified) <ul style="list-style-type: none"> • Date: 04.12.2020 • Product: FFB A Crop • Delivery Ticket Number: 050968 • RSPO Cert No: CU-RSPO-863075 • Vehicle Number: JSR 9996 • Tonnage: 11.00 Mt 2. FFB Supplier: Bukit Siput Resources Sdn Bhd (Non-Certified) <ul style="list-style-type: none"> • Transporter: Bukit Siput Resources Sdn Bhd • Date: 04.12.2020 • Product: FFB B Crop • Delivery Ticket Number: 30778 • Vehicle Number: JRY 4766 • Tonnage: 27.91 Mt 	
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<p>3.8.8</p>	<p>Sales and Goods Out</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"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>Hadapan POM ensured the required information is available in document form. Verified the sampled Dispatch Delivery Notes as following:</p> <p>Sales of CPO as RSPO Certified Product</p> <ul style="list-style-type: none"> a) The name and address of the buyer: <ul style="list-style-type: none"> • XXX b) The name and address of the seller; <ul style="list-style-type: none"> • Sime Darby Plantation Berhad, KKS Hadapan, P.O Box 109, Batu 6, Jln Bkt Permai, Bkt Permai, 81850 Layang-Layang, Johor. c) The loading or shipment / delivery date: <ul style="list-style-type: none"> • 21.10.2020 d) The date on which the documents were issued: <ul style="list-style-type: none"> • 21.10.2020 e) RSPO certificate number; <ul style="list-style-type: none"> • CU-RSPO-863075 f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); <ul style="list-style-type: none"> • Crude Palm Oil (CPO) – RSPO MB g) The quantity of the products delivered; <ul style="list-style-type: none"> • 39,290 mt h) Any related transport documentation; <ul style="list-style-type: none"> • Collection Note, Details on Transporting of Palm Oil. i) A unique identification numbers. 	<p>Complied</p>
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		<ul style="list-style-type: none"> • 020184 <p>e.g. Sales of Kernel as Conventional Product</p> <p>a) The name and address of the buyer:</p> <ul style="list-style-type: none"> • XXX <p>b) The name and address of the seller;</p> <ul style="list-style-type: none"> • Sime Darby Plantation Berhad, KKS Hadapan, P.O Box 109, Batu 6, Jln Bkt Permai, Bkt Permai, 81850 Layang-Layang, Johor. <p>c) The loading or shipment / delivery date:</p> <ul style="list-style-type: none"> • 05.12.2020 <p>d) The date on which the documents were issued:</p> <ul style="list-style-type: none"> • 05.12.2020 <p>e) RSPO certificate number;</p> <ul style="list-style-type: none"> • Not Applicable – Product sold as conventional <p>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <ul style="list-style-type: none"> • Not Applicable – Product sold as conventional <p>g) The quantity of the products delivered;</p> <ul style="list-style-type: none"> • 37.32 mt <p>h) Any related transport documentation;</p> <ul style="list-style-type: none"> • Security Dispatch Note (Seal Number) <p>i) A unique identification numbers.</p> <ul style="list-style-type: none"> • 020362 	
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<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>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</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>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.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>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.</p>	<p>No FFB and/or oil palm products processing outsource by Hadapan mill except for CPO delivery transportation only. The mill adapted Sime Darby established Standard Operating procedure for outsourced activities as per Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019, Section 13.0: Outsourced Contractors.</p> <p>In the SOP under section 13.1 stated that CPO Mill cannot outsourced processing activities like refining or crushing.</p> <p>The list of outsourced contractor was registered in List of Stakeholder records that CPO transporter as per sighted contract agreement as following:</p> <ul style="list-style-type: none"> - Appendix 3; Terms & Conditions Transporter’s Obligations and Undertakings in sample agreements -Ad-hoc Contract for the Transportation of Crude Palm Oil (“Contract”) Transporter: Sing Rubber & Transport Sdn. Bhd.; Contract Ref. # T/PEN/CPO/0215/001; Contract period: 1/5/2020 – 30/4/2021 <p>The mill ensured transporter to comply with their contractual agreements through signing of Vendor Integrity Pledge (VIP) which enable accredited CB to audit them.</p>	<p>Complied</p>
<p>3.8.10</p>	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>No FFB and/or oil palm products processing outsource by Hadapan mill except for CPO delivery transportation only. The list of outsourced contractor was registered in List of Stakeholder records that included the CPO transporter.</p>	<p>Complied</p>
<p>3.8.11</p>	<p>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.</p>	<p>Sime Darby has issued Memorandum to all contractors dated 26/6/2019. In the memorandum stated the contractors have to comply as follows;</p>	<p>Complied</p>

		<ul style="list-style-type: none"> i. Comply with local legal requirements ii. Attend the RSPO/ISCC/MSPO/SCCS briefing or training organized by the company iii. Having signed and enforceable agreement with the company iv. Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary v. Having related working permits vi. Ensure PPE utilization by contractors' employee while being in the company premise. <p>Sighted memorandum acknowledgement by Sing Rubber & Transport Sdn. Bhd. signed by company representative dated 3/6/2020.</p>	
<p>3.8.12</p>	<p>Record keeping</p> <ul style="list-style-type: none"> - 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. - 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. - 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. - For Mass Balance Module, the mill: <ul style="list-style-type: none"> i) 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. 	<ul style="list-style-type: none"> i) Sime Darby has established Standard Operating Procedure to maintain all records of evidence on the implementation of MSPO SCCS. The SOP was documented in Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records. ii) As stated in SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records all traceability records should be maintained at minimum period of 3 years. iii) Hadapan POM receives and process both certified and noncertified FFB. Hence, it uses the Mass Balance (MB) supply chain system and module. iv) i) Hadapan POM has established the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified 	<p>Complied</p>

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	<ul style="list-style-type: none"> ii) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. iii) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 	<p>FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <ul style="list-style-type: none"> ii) All volumes of certified CPO and PK that were delivered were deducted from the material accounting system according to conversion ratios of OER and KER as per sample records of Mill production report Dec 2019 – Nov 2020 and FFB summary Dec 2019 – Nov 2020. iii) Positive stock deliveries maintained through the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. No short selling made by Hadapan POM. 	
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>	<p>Addressed in the Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 17.0 Conversion Factor.</p> <p>Extraction rates were derived from actual production output that were measured daily by the mill and recorded in the daily production report. Actual rates for the period since last audit were available in the Mill production report Dec 2019 – Nov 2020.</p> <p>Volume estimates for next period were based on historical extractions and FFB projection from estates.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Extraction rates updated daily based on actual measurement of production output. Projected rates were based on historical extractions and FFB projection from estates.</p>	Complied
3.8.15	<p>Processing</p>	<p>Addressed in the Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15:</p>	Complied

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	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.	Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 7.0 receiving FFB at the mill and 9.0 Process Monitoring. Hadapan POM receives and process both certified and noncertified FFB. Hence, it uses the Mass Balance (MB) supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	
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>	<p>i) Based on the downloaded transactions register from the certification unit's Palmtrace, the company was able to demonstrate that it has been registering its transactions in the Palmtrace accordingly.</p> <p>ii) Based on the announcement (transaction) summary, all the registrations were found to be in order.</p>	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>	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Hadapan POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	Complied

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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 Hadapan POM as to date.	Not Applicable
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 Hadapan POM as to date.	Not Applicable
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 Hadapan POM as to date.	Not Applicable
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 Hadapan POM as verified through documentations and websites.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e. product/commodity with SCC model (CPO/Palm Kernel RSPO MB) and RSPO certificate number; CU-RSPO-863075	Complied

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		(Previous Cert. Number under CU). Current Transferred Cert. Number RSPO 739013 (BSI).	
5.3	<p>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:</p> <p>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.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Hadapan POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not Applicable
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.	Business to Business communication were made through the CSPO and CSPK trading contractual and transactions documentations between the mill and buyers. No further communications made by Hadapan POM for its raw products beyond its refinery and oleochemical plants buyers.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	No business to consumer communication on product specific claim made. Hadapan POM only producing crude and unfinished product. This is not applicable for Hadapan POM.	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.	No business to consumer communication on product specific claim made. Hadapan POM only producing crude and unfinished product. This is not applicable for Hadapan POM.	Not Applicable

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6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made. Hadapan POM only producing crude and unfinished product. This is not applicable for Hadapan POM.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made. Hadapan POM only producing crude and unfinished product. This is not applicable for Hadapan POM.	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.	No business to consumer communication on product specific claim made. Hadapan POM only producing crude and unfinished product. This is not applicable for Hadapan POM.	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.	No business to consumer communication on product specific claim made. Hadapan POM only producing crude and unfinished product. This is not applicable for Hadapan POM.	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 RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rsपो.org .	No business to consumer communication on product specific claim made. Hadapan POM only producing crude and unfinished product. This is not applicable for Hadapan POM.	Not Applicable

MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Hadapan POM is producing crude palm product and does not involved in any labelling of end product.	Not Applicable
	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.	Hadapan POM is producing crude palm product and does not involved in any labelling of end product.	Not Applicable
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> Surrounded by the text: 'Certified sustainable palm oil'. 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. The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is 	Hadapan POM is producing crude palm product and does not involved in any labelling of end product.	Not Applicable

	provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document.		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [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. • 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. <p>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.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	Hadapan POM is producing crude palm product and does not involved in any labelling of end product.	Not Applicable
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	Regional Sustainability & Quality Mangement (RSQM) team has conducted briefing on Protection of Human Right Defender Policy, Whistleblowing Response Procedure and Company Policies & Charter to all Managers, Senior Assistants, Assistant Managers and Chief Clerks of SOU 24 operating units as per Attendance Record # 00051. Training also done for contractors as per Attendance Record # 00052 on 3/7/2020 as well.	Complied

		Mill conducted additional briefing on 18/7/2020 for its workers. COVID-19 training and info on 28/4/2020.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	SOU 24 has implemented Group Sustainability and Quality Policy Statement dated 02 Dec 2019 where the management is committed to contributing to a better society: - Respecting, upholding & no-exploitation of fundamental human rights. - Providing safe and healthy workplaces, and protecting workers' welfare. - Engaging and empowering communities. This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers.	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Implementation procedures includes briefing, trainings and consultation meetings with various level of stakeholders. The on-site verification through consultation among internal and external stakeholders confirmed that system is understood.	Complied

4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>The on-site verification through consultation among internal and external stakeholders and documented records reviewed shown that SOU 24 keeps parties to a grievance informed of progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders in addressing issues raised by stakeholders. Furthermore, neither any complaints nor land dispute occurred in the SOU 24 Certification Unit at the time of audit as verified through stakeholder consultation.</p>	Complied
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
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
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>As a group, the CSR was demonstrated in the company's website as per link as following: http://www.yayasansimedarby.com/our-projects/community-health</p> <p>Other local contributions made by SOU 24 based on the results of consultation with local communities as following:</p> <ul style="list-style-type: none"> - Donation for Temple Festival @ Layang Estate; Date: 25/10/2020 - Contribution of gifts for estate sports day @ CEP Rengam; Date: 1/10/2020 	Complied

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		<ul style="list-style-type: none"> - Donation of palm seedlings to Simpang Rengam Prison for inmate skill training by CEP Rengam Estate; Date: 24/12/2019 	
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Document showing ownership available in all estates within SOU 24. Kulai Estate has a total of 24 land titles from 22 Main Division and 2 Kelan Division as per sample as following:</p> <ul style="list-style-type: none"> - Title # 235963; Lot # 3199; District: Kulaijaya; Sub-district: Kulai; Area: 245.3403 ha; Division: Main - Title # 236123; Lot # 5032; District: Kulaijaya; Sub-district: Kulai; Area: 545.581 ha; Division: Main - Title # 229702; Lot # 5570; District: Kulaijaya; Sub-district: Kulai; Area: 349.2432 ha; Division: Main - Title # 237467; Lot # 3570; District: Kulaijaya; Sub-district: Senai; Area: 243.0133 ha; Division: Kelan - Title # 237360; Lot # 3632; District: Kulaijaya; Sub-district: Senai; Area: 772.5437 ha; Division: Kelan <p>Latest quit rent 2020 payment sample:</p> <ul style="list-style-type: none"> - Receipt # D0061182; Lot # 48051; Assessment year: 2020 <p>Seri Pulai Estate has a total of 7 land titles as per sample as following:</p> <ul style="list-style-type: none"> - Title # 319847; Lot # 3606; District: Kulaijaya; Sub-district: Kulai; Area: 56.5547 ha - Title # 238097; Lot # 3850; District: Kulaijaya; Sub-district: Kulai; Area: 1.3784 ha - Title # 326460; Lot # 3818; District: Kulaijaya; Sub-district: Kulai; Area: 38.0657 ha 	Complied

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		<ul style="list-style-type: none"> - Title # 326459; Lot # 3817; District: Kulaijaya; Sub-district: Kulai; Area: 165.0103 ha - Title # 326462; Lot # 2940; District: Kulaijaya; Sub-district: Kulai; Area: 370.4891 ha <p>Latest quit rent 2020 payment sample: Receipt # D0057828; Ref. # P21/289720/01/0781/0063; Assessment year: 2020</p> <p>Layang Estate has a total of 13 land titles as per sample as following:</p> <ul style="list-style-type: none"> - Title # 87119; Lot # 923; District: Kluang; Sub-district: Layang-layang; Area: 11.2553 ha - Title # 87131; Lot # 2075; District: Kluang; Sub-district: Layang-layang; Area: 4.8233 ha - Title # 87146; Lot # 2076; District: Kluang; Sub-district: Layang-layang; Area: 4.4313 ha - Title # 291420; Lot # 220; District: Kluang; Sub-district: Layang-layang; Area: 58.7805 ha - Title # 39413; Lot # MLO 6529; District: Kulaijaya; Sub-district: Sedenak; Area: 1133.1198 ha <p>Latest quit rent 2020 payment sample: Receipt # D0057828; Ref. # P21/289720/01/0781/0063; Assessment year: 2020</p> <p>CEP Rengam Estate has a total of 59 land titles as per sample as following:</p> <ul style="list-style-type: none"> - Title # 96593; Lot # 1918; District: Kluang; Sub-district: Rengam; Area: 1.1660 ha 	
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		<ul style="list-style-type: none"> - Title # 530157; Lot # 4933; District: Kluang; Sub-district: Rengam; Area: 412.9 ha - Title # 734; Lot # 1465; District: Kluang; Sub-district: Rengam; Area: 1.4113 ha - Title # 737; Lot # 571; District: Kluang; Sub-district: Rengam; Area: 1.4063 ha - Title # 747; Lot # 569; District: Kluang; Sub-district: Rengam; Area: 0.6778 ha 	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	On-site verification through stakeholders' consultation confirmed that there is no land dispute recorded within SOU 22 operating units.	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 -	In case of any arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
4.4.2b	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 -	On-site verification through stakeholders' consultation confirmed that there is no land dispute recorded within SOU 22 operating units. In case of any arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal	On-site verification through stakeholders' consultation confirmed that there is no land dispute recorded within SOU 22 operating units.	Complied

	<p>status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	<p>In case of any arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>	
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>Maps available as per sighted Location of Sime Darby Estates in Southern Region (Johor) maps and individual estates' field maps as well as boundary maps. Initial remote assessment reveal that there is no land dispute recorded. In case of any, dispute handling will be based on the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>On-site verification through stakeholders' consultation confirmed that there is no land dispute recorded within SOU 22 operating units.</p> <p>In case of any arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>	Complied
4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>On-site verification through stakeholders' consultation confirmed that there is no land dispute recorded within SOU 22 operating units.</p> <p>In case of any arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>On-site verification through stakeholders' consultation confirmed that there is no land dispute recorded within SOU 22 operating units.</p>	Complied

		In case of any arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	
<p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	It has been verified during documentation review, interviews held with management and local stakeholders as well as field observations, that there is no evidence of any new planting within the Hadapan SOU 24. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	It has been verified during documentation review, interviews held with management and local stakeholders as well as field observations, that there is no evidence of any new planting within the Hadapan SOU 24. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.3	<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>	It has been verified during documentation review, interviews held with management and local stakeholders as well as field observations, that there is no evidence of any new planting within the Hadapan SOU 24. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied

4.5.4	<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>	<p>It has been verified during documentation review, interviews held with management and local stakeholders as well as field observations, that there is no evidence of any new planting within the Hadapan SOU 24. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	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>	<p>It has been verified during documentation review, interviews held with management and local stakeholders as well as field observations, that there is no evidence of any new planting within the Hadapan SOU 24. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	Complied
4.5.6	<p>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.</p> <p>- Minor compliance -</p>	<p>It has been verified during documentation review, interviews held with management and local stakeholders as well as field observations, that there is no evidence of any new planting within the Hadapan SOU 24. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	Complied
4.5.7	<p>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.</p> <p>- Minor compliance -</p>	<p>It has been verified during documentation review, interviews held with management and local stakeholders as well as field observations, that there is no evidence of any new planting within the Hadapan SOU 24. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	Complied

4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>It has been verified during documentation review, interviews held with management and local stakeholders as well as field observations, that there is no evidence of any new planting within the Hadapan SOU 24. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	Complied
<p>Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>It has been verified during documentation review, interviews held with management and local stakeholders as well as field observations, that there is no evidence of any new planting within the Hadapan SOU 24. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	Complied
4.6.2	<p>(C) 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>It has been verified during documentation review, interviews held with management and local stakeholders as well as field observations, that there is no evidence of any new planting within the Hadapan SOU 24. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	Complied
4.6.3	<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>It has been verified during documentation review, interviews held with management and local stakeholders as well as field observations, that there is no evidence of any new planting within the Hadapan SOU 24. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered</p>	Complied

		by any legal, customary and user rights. Land titles and ownerships of the lands were available.	
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	It has been verified during documentation review, interviews held with management and local stakeholders as well as field observations, that there is no evidence of any new planting within the Hadapan SOU 24. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	SOU 24 adapted the company's established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	SOU 24 adapted the company's established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	SOU 24 adapted the company's established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Complied

		There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	
Criterion 4.8: 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 -	SOU 24 adapted the company's established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	SOU 24 adapted the company's established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.8.3	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 -	SOU 24 adapted the company's established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	SOU 24 adapted the company's established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Complied

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		There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary By Region (RM/Tonne); November 2020; Southern Region; Grade A (OER 20%). The price being displayed in front of the weighbridge counter in Hadapan POM for view by external suppliers among Outside Crop Purchase (OCP).	Complied
5.1.2	(C) 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). - Critical (Major) compliance -	Evidence that Hadapan POM explains the FFB pricing available as per records of Outside Crop Purchase (OCP) Meeting latest conducted on 22/10/2020 attended by sample external FFB suppliers/OCP as following: - PPK Rengit - Choon Guan Oil Palm Sdn. Bhd. - Felcra Johor - Hong Hu - Bukit Siput - FB Simpang Renggam	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Fair pricing, calculated as a portion of the international CPO price less costs is provided to OCP suppliers as per sample FFB purchase agreements as following: - OCP: Hong Hui Trading; Agreement # P/P/0420/FFB01722L; Contract period: 14/4/2020 – 31/12/2020 - OCP: Bukit Siput Resources Sdn. Bhd.; Agreement # P/P/0220/FFB01638L; Contract period: 1/2/2020 – 31/12/2020	Complied

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		<ul style="list-style-type: none"> - OCP: Felcra Berhad; Agreement # P/P/0220/FFB01642L; Contract period: 1/1/2020 – 31/12/2020 - OCP: Choon Guan Oil Palm Sdn. Bhd.; Agreement # P/P/0220/FFB01636L; Contract period: 1/2/2020 – 31/12/2020 	
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence available as per records of due diligence for Outside Crop Purchase (OCP) Assessment Report for sample OCP suppliers as following:</p> <ul style="list-style-type: none"> - OCP: Hong Hui Trading; MPOB license # 508163015000; Assessment Date: 11/3/2020 - OCP: Perniagaan Sri Misan; MPOB license # 537918015000; Assessment Date: 11/3/2020 - OCP: Ladang Ayer Baloi; MPOB license # 568178002000; Assessment Date: 11/3/2020 	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Contracts for all OCPs are fair, legal and transparent and have an agreed timeframe as per sample sighted in indicator 5.1.3 and 5.1.4 above.</p>	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Payment OCP supplier's FFB made on monthly basis within 7 days from end of the month date. Payment was made through the financial department at head office. Summary records of payment voucher specified each OCP's price, weight, deductions and amount paid.</p>	Complied
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Weighbridges used for determining payment to OCPs are verified by an independent third party on a regular basis as per records of Calibration Stamping "<i>Laporan Pemeriksaan Alat Timbang Dan Sukat Di Bawah Peraturan-Peraturan Timbang Dan Sukat, 1981</i>" by Metrology Corporation Malaysia Sdn. Bhd.; Calibration Stamping Date: 14/7/2020; Stamping Certificate # B1500733; Weighbridge Serial # 195050377; Capacity: 60,000 kg.</p>	Complied

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5.1.8	<p>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.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation as a group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers as of the case of Hadapan POM.</p> <p>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p>	Complied
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>The grievance mechanism addressed in Standard Operation Manual; Date: 1/11/2008 that documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2) for grievance handling. As of the audit date, no grievance receive by SOU 24 from OCPs since the last audit.</p>	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<p>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.</p> <p>- Minor compliance -</p>	<p>There are no smallholders among OCPs supplying FFB to Hadapan POM as their estates are more than 50 Ha as defined RSPO MYNI 2019.</p>	Not Applicable
5.2.2	<p>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 competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).</p> <p>- Minor compliance -</p>	<p>There are no smallholders among OCPs supplying FFB to Hadapan POM as their estates are more than 50 Ha as defined RSPO MYNI 2019.</p>	Not Applicable

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5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallholders among OCPs supplying FFB to Hadapan POM as their estates are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There are no smallholders among OCPs supplying FFB to Hadapan POM as their estates are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There are no smallholders among OCPs supplying FFB to Hadapan POM as their estates are more than 50 Ha as defined RSPO MYNI 2019.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	SOU 24 has implemented the Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02 nd 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	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - 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 free housing, subsidized water and electric supplier (connect to national water and electricity supply) and medical care (panel clinic) are given to all employees without discrimination.	Complied

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		<p>Foreign migrant workers. Refer to Letter of Employment, Employment Contract para" 14 – Annual leave: 14 days for < 5 years and 16 days for > 5 years.</p> <p>Overtime paid as per Employment Act 1995 (EA). Sampled workers are as 6.5.1.</p>	
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>There is no any discrimination for selection based on religion, gender and/or nationality. during their recruitment. The recruitment process mostly based on skills, capabilities and medical fitness necessary. 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 and/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>There is no pregnancy test conducted in Bukit Benut SOU 22 Certification Unit. Confirmed through the interview session to workers, Medical Assistant and Gender Committee Minute of Meeting.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Gender committee is in place with functions to raise awareness and address issues of concerns as well as opportunities and improvements for women which was spelt out in the company’s Gender Committee Handbook First Edition 2014.</p> <p>Implementation involved appointment of committee members and meetings among the women employees as per sample sighted as following:</p> <ul style="list-style-type: none"> - Letter of Appointment as Gender Committee member of Barathi A/P Ramachandran; Chief Clerk; Date: 1/1/2020 - Kulai Estate Gender Committee Meeting; Date: 21/9/2020 	Complied

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		<ul style="list-style-type: none"> - Seri Pulai Estate Gender Committee Meeting date: 4/9/2020; Chairman K. Sujata Chief Clerk. - Layang Estate Gender Committee Meeting; Date: 21/11/2020 - CEP Rengam Estate Gender Committee Meeting; Date: 24/11/2020 	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	Evidence of equal pay for the same work scope available based on the payroll system and workers' payslip listing (detail payslip with piece-rate work price) as per sample sighted in indicator 6.2.2 below.	Complied
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	All the workers are under direct employment and some workshops are under contracts workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary etc. as per employment contract. The Malaya Agricultural Producers Association; MAPA Circular No. 11/2020; Minimum Wages Order 2020 (MWO 2020) were explained to workers through the NUPW meeting.	Complied
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Payments and conditions of employments found in compliance with MAPA and MWO 2020 requirements.</p> <p>Sample agreements for Kulai Estate were sighted as per following:</p> <ul style="list-style-type: none"> - Employee ID # 14897; Date joined: 1/2/1986; Post: General Workers; Nationality: Malaysian - Employee ID # 37812; Date joined: 1/2/2010; Post: General Workers; Nationality: Malaysian - Employee ID # 16979; Date joined: 1/10/1998; Post: Harvesters; Nationality: Malaysian 	Complied

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		<ul style="list-style-type: none"> - Employee ID # 160056; Date joined: 1/10/2020; Post: Harvesters; Nationality: Malaysian - Employee ID # 16979; Date joined: 1/10/1998; Post: Harvesters; Nationality: Malaysian - Employee ID # 100189; Date joined: 5/3/2014; Post: Harvesters; Nationality: Indonesian - Employee ID # 110618; Date joined: 29/1/2015; Post: General Workers; Nationality: Bangladeshi - Employee ID # 154008; Date joined: 29/8/2019; Post: General Workers; Nationality: Indian <p>Hadapan POM sample as per following:</p> <ul style="list-style-type: none"> - Employee ID # 160236; Date joined: 1/10/2020; Post: Lab Sampler; Nationality: Malaysian - Employee ID # 150347; Date joined: 9/5/2019; Post: General Workers; Nationality: Indonesian - Employee ID # 017575; Date joined: 1/9/2007; Post: Auxiliary Police; Nationality: Malaysian - Employee ID # 0175751; Date joined: 22/3/1996; Post: FFB Checker; Nationality: Malaysian - Employee ID # 156318; Date joined: 13/11/2019; Post: General Worker; Nationality: Indonesian - Employee ID # 017630; Date joined: 6/4/2009; Post: Despatch Attendant; Nationality: Malaysian 	
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		<ul style="list-style-type: none"> - Employee ID # 080376; Date joined: 7/6/2012; Post: Workshop Helper; Nationality: Indian - Employee ID # 133154; Date joined: 2/5/2017; Post: Machine Operator; Nationality: Malaysian <p>Seri Pulai Estate sample as per following:</p> <ul style="list-style-type: none"> - Employee ID # 88800; Date joined: 8/3/2013; Post: General Workers; Nationality: Indonesian - Employee ID # 92225; Date joined: 20/6/2013; Post: Harvester; Nationality: Indonesian - Employee ID # 112910; Date joined: 4/4/2015; Post: Harvesters; Nationality: Nepali - Employee ID # 117430; Date joined: 18/9/2015; Post: General Workers; Nationality: Bangladeshi - Employee ID # 117283; Date joined: 12/10/2015; Post: Harvester; Nationality: Bangladeshi - Employee ID # 121008; Date joined: 27/4/2016; Post: Harvesters; Nationality: Indonesian - Employee ID # 127099; Date joined: 24/10/2016; Post: Harvester; Nationality: Indian - Employee ID # 136100; Date joined: 22/8/2017; Post: Sprayer; Nationality: Indian <p>Layang Estate sample as per following:</p>	
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		<ul style="list-style-type: none"> - Employee ID # 047725; Date joined: 5/1/2010; Post: General Worker; Nationality: Malaysian - Employee ID # 134668; Date joined: 7/10/2017; Post: Harvester; Nationality: Malaysian - Employee ID # 109180; Date joined: 12/12/2014; Post: Sprayer; Nationality: Nepali - Employee ID # 105166; Date joined: 11/9/2014; Post: General Worker; Nationality: Nepali - Employee ID # 109209; Date joined: 3/12/2014; Post: General Worker; Nationality: Bangladeshi - Employee ID # 122838; Date joined: 11/6/2016; Post: General Workers; Nationality: Indonesian - Employee ID # 058650; Date joined: 11/12/2013; Post: General Workers; Nationality: Indian - Employee ID # 125451; Date joined: 5/9/2016; Post: Harvester; Nationality: Sri Lankan <p>CEP Rengam Estate sample as per following:</p> <ul style="list-style-type: none"> - Employee ID # 17222; Date joined: 1/10/1977; Post: General Worker; Nationality: Malaysian - Employee ID # 17241; Date joined: 1/11/2006; Post: Watchman; Nationality: Malaysian - Employee ID # 17343; Date joined: 15/1/1999; Post: Creche Ayah; Nationality: Malaysian 	
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		<ul style="list-style-type: none"> - Employee ID # 86067; Date joined: 19/12/2012; Post: Harvester; Nationality: Indonesian - Employee ID # 88880; Date joined: 28/3/2013; Post: Loose Fruit Collector; Nationality: Myanmar - Employee ID # 93090; Date joined: 24/7/2013; Post: Sprayer; Nationality: Indian - Employee ID # 117053; Date joined: 21/9/2015; Post: FFB Carrier; Nationality: Bangladeshi - Employee ID # 107807; Date joined: 25/11/2014; Post: Harvesting Mandore; Nationality: Indonesian 	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.2.2 above shown 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.	Complied
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities in compliance with the Workers Minimum Housing and Amenities Standard Act 1990 provided by the company as evidence from the site visit. Regular monitoring also conducted as per sample records of following:</p> <ul style="list-style-type: none"> - Kulai Estate Housing Complex/Nest/Community Hall Inspections; Date: 30/11/2020. Latest inspection visit was conducted on 17/11/2020 by Visiting Medical Officer Dr. Helen Tan Kwai Rengam Clinic; DOSH OHD Reg. # HQ/08/DOC/00/597. - Seri Pulai Estate Housing Complex/Nest/Community Hall Inspections; Date: 5/12/2020. Visiting Medical Officer inspection 	Complied

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		<p>recorded in VMO Report Book – Latest visit date: 1/12/2020 by Dr. Helen Tan Kwai Rengam Clinic; DOSH OHD Reg. # HQ/08/DOC/00/597.</p> <ul style="list-style-type: none"> - Layang Estate Housing Complex/Nest/Community Hall Inspections; Date: 5/11/2020. Latest inspection visit was conducted on 10/12/2020 by Visiting Medical Officer Dr. Helen Tan Kwai Rengam Clinic; DOSH OHD Reg. # HQ/08/DOC/00/597. 	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>The housing area for operating units within SOU 24 located nearby Kulai, Simpang Renggam and Layang-Layang town where the accessibility to the grocery store and shops is easily available. Nevertheless, the management still monitors the price of sundries shops operating within the estates.</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>PROCEDURAL NOTE:</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>All SOU 24 employees received decent living wages based on the company's Prevailing Wage Assessment (RM) results. The assessments made on consideration of following:</p> <ul style="list-style-type: none"> - Checkroll – Worker for period of August 2020 - Checkroll – SOU 24 for period of Jan – Dec 2019 (calculated as RM xx/12) - HR – fixed - Denominator of total headcount (workforce 1064, worker 954, local worker 194, foreign worker 760) <p>The report, Prevailing Wage Assessment (RM) by SDP HQ HRD based on salary paid to workers within SOU 24 for period of August 2020 resulted the average total received per month salary as following:</p> <ul style="list-style-type: none"> - Local RM 1,629.15/month - Local RM 1,679.34/month 	Complied

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	<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 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"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>	<p>Assessment confirmed that Sime Darby Plantation SOU 24 operating units paid decent wage which is higher than national Minimum Wage Order itself.</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 by operating units within SOU 22. All employees are permanent employee (for locals) and contracted employee (for foreign workers). All permanent and full-time employment used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2.</p>	Complied

<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Social Policy established since 2015 covers the commitment of the company towards respecting the rights of all personnel to form and join trade unions of their choice to bargain collectively. It was communicated during workers general assembly, muster briefing and meetings.</p> <p>During the interview with workers, there are no evidence received that there is no restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union. It was also confirmed during the on-site internal stakeholder's consultation session.</p>	Complied
6.3.2	<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>Minutes of meeting available as per sample sighted for NUPW representatives meeting with Kulai Estate management; Date: 25/11/2020. Layang Estate NUPW representative meeting with management; Date: 14/9/2020. CEP Rengam Estate NUPW representative meeting with estate management as per minutes of meeting record dated 16/10/2020.</p>	Complied
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>Evidence based on minutes of meeting records and interview shown that the selection of NUPW representative made from the election among the NUPW member without management interference. Foreign workers included in the committee formation through selection also based on the election meeting.</p>	Complied
<p>Criterion 6.4: Children are not employed or exploited.</p>			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p>	Complied

	<p>- Minor compliance -</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"> • Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. • Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. • Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations. • 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. • 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. • Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees. • Protecting the Rights of Children: We seek to promote the wellbeing of children and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography. <p>Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired.</p>	
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		<p>For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children as per sample sighted as following:</p> <ul style="list-style-type: none"> - Agreement of "Proposed Design, Fabricate, Deliver, Install, Test, Commission and Guarantee for Twelve (12) Months, An Electrostatic Precipitators (ESP) Dust Collection System That Meets The Requirements of Environmental Quality (Clean Air) Regulation 2014 for Biomass Boilers at KKS Hadapan"; Contractor: Ecoscience Manufacturing & Engineering Sdn. Bhd.; Contract # ED/135/095/17-18/SP. 	
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- 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 & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There is no young worker employed by operating units within SOU 24.</p>	Complied
6.4.4	<p>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.</p> <p>- Minor compliance -</p>	<p>The unit of certification has communicated the Human Right Charter, Social Policy and Vendor COBC through the stakeholder meeting and muster briefing.</p>	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			

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6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>The Group Sustainability & 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"> - Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims. - Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation. <p>The policy was communicated through the Gender Committee meeting conducted quarterly.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>SOU 24 has implemented the company's Social Policy, Gender Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Briefing of the policies was conducted during morning muster and the policies was displayed at the notice board outside the office.</p>	Complied
6.5.3	<p>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.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>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 as per sample in CEP Rengam Estate, New Mothers Assessment conducted on 24/11/2020 with questionnaire checklists as following:</p> <ul style="list-style-type: none"> - Are there new mothers in the operating unit (workers & staff)? - If yes how many new mothers in the operating unit? - Is maternity leave (3 months) given to new mothers? 	Complied

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		<ul style="list-style-type: none"> - Does a New Mother who has returned to work need dedicated space to breastfeed or storing milk? - Does the New Mother who returns to work need a break outside the break time allotted by the employer (for the purpose of breastfeeding)? - If yes, this need should be submitted to employer for further consideration and approval? 	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Gender committee has been formed in each operating unit for the anonymity reporting medium in case of sexual harassment grievances by female employees.</p>	Complied
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>The recruitment cost was declared by the labour agent from source country for the applicable fees. Sampled for Tenaga Kerja Indonesia (TKI) Kepada Agensi (PL) Dan Sponsor (PL) for Indonesia effective date on 01/06/2017 (IDR 6,150,000) and Amozza Travels for India (INR 50000) for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent. Passport was kept by the management voluntarily. There is agreement letter signed by worker and employer on the safekeeping passport at office. If the workers want to obtain the passport for own usage, they can anytime request for it.</p> <p>There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia and India was same with the employment contract signed between worker and estate/mill.</p> <p>Based on sampled (refer indicator 6.2.2) agreement sighted</p>	Complied

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		<ul style="list-style-type: none"> - Overtime was given voluntarily - The termination of service clearly stated that the termination of employment if: <ul style="list-style-type: none"> • The company is not satisfied with your performance • You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term. • You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime. • You have breached any express or implied terms of your employment. • Fail medical examination based on FOMEMA result. • Involved in any act that will affect the reputation of the company. <p>No penalty, debt bondage and withholding of wages been imposed to worker if they want to resign. This has been confirmed through the interview and employment contract signed.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedure 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> <ul style="list-style-type: none"> • Providing equal opportunity • Respecting freedom of association • Eradicating any form of exploitation • Ensuring favorable working conditions • Enhancing Safety and Health <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. For e.g.: All the workers have provided with induction training in Sua Betong Estate or based estate during their arrival to Malaysia.</p>	Complied

Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The OSH Committee Members were appointed with the appointment letters available for verification together with the OSH Organisation Chart for the mill and estates.</p> <p>Hadapan POM</p> <ol style="list-style-type: none"> 1. The management have appointed the Mill Manager Mr. Zulffandi Bin Samad as the Chairman of the JKKP for Harapan POM. 2. Regular meetings were conducted to discuss Health and Safety Issues. Sighted JKKP Meeting Minutes dated 14.08.2020. <p>Kulai Estate</p> <ol style="list-style-type: none"> 1. The management have appointed the Estate Manager Mr. Amir Hassan Bin Ashaari as the Chairman of the JKKP for Kulai Estate. Sighted the appointment letter dated 25.09.2019 undersigned by the Regional General Manager (Johor South) Southern Region. 2. Regular meetings were conducted every 3 months to discuss Health and Safety Issues. Sighted JKKP Meeting Minutes dated 13.11.2020 (04/04), 14.08.2020 (03/04), 09.05.2020 (02/04) and 10.02.2020 (01.04). <p>Seri Pulau Estate</p> <ol style="list-style-type: none"> 1. The management has appointed En. Zulkifli Bin Mohammed Hashim as the Chairman of the JKKP for Seri Pulau Estate. Sighted the appointment letter dated 09.10.2020 undersigned by the Regional General Manager (Johor South) Southern Region. 	Complied

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		<p>2. Regular OSH Meetings were conducted to discuss Health and Safety issues in the estate. Sighted JKKP Meeting Minutes dated 07.10.2020, 01.07.2020 and 02.01.2020.</p> <p>Layang Estate</p> <p>1. The management has appointed En. Azhari Bin M Kalam as the Chairman of the JKKP for Layang Estate. Sighted the appointment letter dated 09.10.2020 undersigned by the Regional General Manager, Southern.</p> <p>1. Regular OSH Meetings were conducted every 3 months to discuss Health and Safety issues in the estate. Sighted JKKP Meeting Minutes dated 25.09.2020 (03/2020) and 27.06.2020 (02/2020).</p> <p>CEP Rengam Estate</p> <p>1. The management has appointed En. Mohd Mahyudin Bin Mohd Yunus as the Chairman of the JKKP for CEP Rengam Estate. Sighted the appointment letter dated 25.11.2019 undersigned by the Regional General Manager, Southern.</p> <p>2. Regular OSH Meetings were conducted to discuss Health and Safety issues in the estate. Sighted JKKP Meeting Minutes dated 28.11.2020.</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Hadapan POM</p> <p>1. Accident and emergency procedures were available and sighted at the Estate Office. There is a formation of ERP Team & ERP for all the identified incidences (Evacuation, Fire Fighting & Spillage or Overflow). The ERP Team was appointed, and the organizational chart was displayed at the notice board together with the emergency contacts.</p> <p>2. Workers trained in First Aid were present in the Mill Stations</p>	Complied

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		<p>such as Workshop, Stores and Mill Office. The First Aid Training was conducted in the mill on 23.10.2020.</p> <p>3. There were no accident cases reported for the year 2019 in Hadapan Oil Mill. The JKPP 8 form was submitted to JKPP for the year ending 2019. There were no accident cases for the year 2020 as well as of to date.</p> <p>Kulai POM</p> <p>1. Accident and emergency procedures were available and sighted at the Estate Office, Stores and Workshop. There is a formation of ERP Team & ERP for all the identified incidences (Evacuation, Fire Fighting & Spillage or Overflow). The ERP Team was appointed, and the organizational chart was displayed at the notice board together with the emergency contacts. Fire Fighting Training was conducted on 29.06.2020.</p> <p>2. Workers trained in First Aid were present in the Estate operations such as Manuring Gang, Spraying Gang and Workshop. The estate has 17 trained First Aid Box Holders. All holders have been trained on Basic Occupational First Aid Box handling on 18.09.2020.</p> <p>3. The records of all injuries and accidents were maintained by the estate. There were 7 accident cases and 3 poisoning cases (Welders - Manganese) reported for the year 2019. The JKPP 8 has been submitted to JKPP accordingly with the report available for verification. There were 8 accident case reported for the year 2020 as of to date. 1 case were reported to JKPP due to the length of the days not worked. The JKPP 6 form was available for verification.</p>	
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		<p>Seri Pulai Estate</p> <ol style="list-style-type: none"> 1. Emergency procedures were available in the Estate Office, Workshop and Stores. There is a formation of ERP Team & ERP for all the identified incidences (Evacuation, Fire Fighting & Spillage or Overflow). The ERP Team was appointed, and the organizational chart was displayed at the notice board together with the emergency contacts. Interview with the workers indicated that they are aware on the emergency procedures available in the estate. The ERP Training was conducted on 29.09.2020 and the Fire Training was conducted on 07.02.2020. 2. Workers trained in First Aid were present in the Estate operations such as Spraying Gang, Harvesting Gang and Workshop. The First Aid Training was conducted on 29.09.2020. 3. Accident records were recorded and maintained and available for verification. The JKKP 8 form was submitted for the year 2019. There was a total of 18 cases reported for the year 2019. <p>Layang Estate</p> <ol style="list-style-type: none"> 1. Emergency procedures were available in the Estate Office, workshop and stores. There is a formation of ERP Team & Plan for all the identified incidences. The ERP team appointment letter and the organizational chart were available for verification. Interview with workers indicated that they were all aware of the emergency procedures in the estate. Fire Fighting training was conducted on 04.12.2020. 2. Workers trained in first aid were present in the estate as sighted at the Spraying team, Harvesting team and Workshop. First Aid Training was conducted on 20th and 21st January 2020 and 04.12.2020 	
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		<p>3. Accident records were available and maintained by the estate. There were 11 accidents reported for the year 2019 in the estate. The JKKP 6 forms were available and submitted to JKKP. The JKKP form 8 was also submitted for the year ending 2019 and available for verification. For the year 2020, there were 5 accidents reported. The JKKP 6 forms were submitted and available for verification.</p> <p>CEP Rengam</p> <p>1. Emergency procedures were available in the Estate Office, workshop and stores. There is a formation of ERP Team & Plan for all the identified incidences. The ERP team appointment letter and the organizational chart were available for verification. Interview with workers indicated that they were all aware of the emergency procedures in the estate.</p> <p>2. Workers trained in first aid were present in the estate as sighted at the Spraying team, Manuring team and Workshop.</p> <p>3. Accident records were available and maintained by the estate. There were 6 accident cases reported for the year 2019. The JKKP 6 forms were available and submitted to JKKP. The JKKP form 8 was also submitted for the year ending 2019 and available for verification. For the year 2020, there were 8 accidents reported. The JKKP 6 forms were submitted and available for verification.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>CEP Rengam Estate</p> <p>During the interview with the Manuring Gang and Spraying Gang workers, they raised their concern on the management's procedure to only provide Wellington Boots every 6 months to the workers. The workers mentioned that if the boots provided were to be damaged within 6 months, they will have to purchase boots by</p>	<p>Non-compliance</p>

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	<p>- Critical (Major) compliance -</p>	<p>themselves elsewhere. The workers claimed that the quality of boots provided does not last for 6 months. Verified with the workers with the employee ID 139754 and 17333, they had purchased the boots by themselves because the previous boots provided had been damaged within the 6 months previously provided to them. Further clarification with the store clerk confirmed that boots are provided to workers after 4 to 6 months on case to case basis. Verified the PPE Issuance records showed Employee ID 17333 – Boots last issued on 16.10.2019. The records for worker ID 139754 was unable to be traced.</p> <p>Kulai Estate During the visit to the Spraying Gang, it was noted that the worker’s understanding was to only wear safety goggles during P&D Spraying and were not required to wear safety goggles during herbicide spraying operations. Further clarification identified that for the day, only 1 out of 6 workers brought the safety goggles for the herbicide operations.</p> <p>Seri Pulai Estate During the visit along Field 2000, it was sighted that 2 workers riding the Mechanical Buffalo (Badang) were not wearing appropriate PPE (Safety Helmet).</p> <p>Based on the lapses found, hence Critical NC has been raised.</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>- Minor compliance -</p>	<p>Medical care is provided to all the employees. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for all estate visited as below.</p>	<p>Complied</p>

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		Operating Units	Month	Total Workers	Amount (RM)	
		Hadapan POM	Sep 2020	102	RM 4,281.50	
			Oct 2020	103	RM 4,904.30	
			Nov 2020	104	RM 4,104.70	
		Kulai Estate	Mar 2020	240	RM 5,839.00	
			Jun 2020	238	RM 6,443.60	
			Oct 2020	231	RM 6,808.30	
		Seri Pulai Estate	Aug 2020	165	RM 4,417.00	
			Sep 2020	157	RM 4,652.60	
			Oct 2020	155	RM 4,866.70	
		Layang Estate	Sep 2020	236	RM 8,133.50	
			Oct 2020	234	RM 8,328.00	
			Nov 2020	231	RM 7,326.10	
		CEP Rengam	Aug 2020	288	RM 8,186.30	
			Sep 2020	293	RM 8,432.60	
			Oct 2020	281	RM 9,273.60	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	The Operating units recorded all injuries and accidents in the LTA format as below:				Complied
		Operating Unit	2019	2020		

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		Cases	LTA	Cases	LTA
		Hadapan POM	nil	nil	nil
		Kulai Estate	7	72	8
		Seri Pulai Estate	16	235	14
		Layang Estate	11	236	5
		CEP Rengam Estate	6	14	8
Principle 7: Protect, conserve and enhance ecosystems and the environment					
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.					
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Barn owls Tyto Alba has been introduced for biological control of rats. Barn owl boxes are constructed at the rate of 1 box to 10ha. Census records show that there was minimal outbreak of leaf eating pest. Although there have been minimal outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators and further reduce the outbreak. The estates have planted beneficial plants such as Cassia cobanensis and Turnera subulata and Antigonon leptopus.</p> <p>Yearly specific plans were available for the year 2020 by the estate. Sighted the IPM Plan for each estate as below:</p> <p>Kulai Estate</p> <p>1. Oryctes Rhinoceros Beetle</p>			Complied

		<ul style="list-style-type: none"> • Establishment of thick cover crop. • Less than 10cm chipping trunk thickness. • Apply EFB in single layer • Construct Close Ended Conservation Trenches <p>2. Rodents</p> <ul style="list-style-type: none"> • Natural Predator (Tyto Alba) <p>3. Bagworm & Nettle Caterpillar</p> <ul style="list-style-type: none"> • Planting Beneficial Plant (E-CAT, euphorbia, cassia, antigonon, turnera • Parasitoids • Natural predator <p>Seri Pulai Estate & CEP Rengam Estate</p> <p>1. Rat</p> <ul style="list-style-type: none"> • Predator – Tyro Alba <p>2. Oryctes Rhinoceros Beetle</p> <ul style="list-style-type: none"> • Pathogen – Kulat Metarhizium anisopliae, Baculovirus • Cultural Control – less than 10cm thickness for chipping, establishment of cover crop. Close ended conservation trenches (CECT). Application of EFB in single layers. <p>3. Bagworm & Nettle Caterpillar</p> <ul style="list-style-type: none"> • Predator – Sycanus dichotomus, Cantheconidae furcellata, Spinaria spinator • Planting beneficial plant – Eurphobia heterophylla, Casia cobanensis, Antigonon leptopus, Turnera subulate. • Parasitoid – Paraphylax varius, Eupelmus cathoxanthae 	
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		<ul style="list-style-type: none"> • Pathogen – Nuclear Polyhedrosis Virus (NPV), Cordyceps sp. <p>Layang Estate</p> <ol style="list-style-type: none"> 1. To achieve planting beneficial plant of 2dm/ha 2. Type of beneficial plant to be planted: <ul style="list-style-type: none"> • Turnera subulate • Antigonon leptopus • Euphorbia heterophylla 3. Instalment of new barn owl box (BOB) <ul style="list-style-type: none"> • To achieve ratio 5Ha: 1 BOB in Ladang Layang to decrease the population of rat. • To replace the old BOB with poor condition. 	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	Species referenced in the Global Invasive Species Database and CABI.org are not used in the estates.	Complied
7.1.3	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. - Minor compliance -	There was no evidence of use of fire for pest control in all the estates.	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference	Complied

		Manual, issue:1 version:3 dated 01.07.2011. Selected products are specific to the target pest, weed and disease.																					
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides used (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) is maintained by the estate and submitted to the Head Quarters on a monthly basis. Sampled the chemicals used for the month Sept, Oct and Nov 2020 as below: -</p> <table border="1"> <thead> <tr> <th>Operating Units</th> <th>Sept 2020</th> <th>Oct 2020</th> <th>Nov 2020</th> </tr> </thead> <tbody> <tr> <td>Kulai Estate</td> <td>1.12</td> <td>1.20</td> <td>1.05</td> </tr> <tr> <td>Seri Pulai Estate</td> <td>2.30</td> <td>2.03</td> <td>1.77</td> </tr> <tr> <td>Layang Estate</td> <td>1.07</td> <td>1.14</td> <td>0.96</td> </tr> <tr> <td>CEP Rengam Estate</td> <td>0.09</td> <td>1.39</td> <td>1.40</td> </tr> </tbody> </table>	Operating Units	Sept 2020	Oct 2020	Nov 2020	Kulai Estate	1.12	1.20	1.05	Seri Pulai Estate	2.30	2.03	1.77	Layang Estate	1.07	1.14	0.96	CEP Rengam Estate	0.09	1.39	1.40	Complied
Operating Units	Sept 2020	Oct 2020	Nov 2020																				
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Layang Estate	1.07	1.14	0.96																				
CEP Rengam Estate	0.09	1.39	1.40																				
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p> <p>Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas.</p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.</p>	Complied																				
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	There is no evidence of prophylactic use of pesticides in all estates visited.	Complied																				

	- Minor compliance -								
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> <ol style="list-style-type: none"> Judgment of the threat and verify why this is a major threat Why there is no other alternative which can be used Which process was applied to verify why there is no other less hazardous alternative What is the process to limit the negative impacts of the application Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>Sighted in the Chemical Registers showed that only class III & IV chemicals were used at all the estates visited. During the site visit to the chemical store it was justified that there were only class II, III and IV chemicals being used. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead. Monocrotophos was eliminated and in its place, Acephate is used.</p>	Complied						
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see 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>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers in the estate and mill.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Kulai Estate</td> <td>P&D Training</td> <td>24.08.2020</td> </tr> </tbody> </table>	Estate	Training	Date	Kulai Estate	P&D Training	24.08.2020	Complied
Estate	Training	Date							
Kulai Estate	P&D Training	24.08.2020							

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			Chemical, Scheduled Waste, USECHH Training	23.09.2020	
			PPE Spraying & Chemical Handling Training	19.12.2019	
		Seri Pulai Estate	Blower Training	09.10.2020	
			Herbicides & Spraying Training	14.02.2020	
			Chemical Handling Management (MyCROP)	23.01.2020	
		Layang Estate	Chemical Handling Training	04.12.2020	
			Weed Spraying using Inter 16 Training	22.01.2020	
			Training on Safety and P&D Spraying	03.12.2020	
		CEP Rengam Estate	CDA Training	27.10.2020	
			Chemical handling Training	11.11.2020	
			Triple Rinsing Training	11.11.2020	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with</p>			Complied

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		adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.																																		
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	Sighted the unused empty chemical containers that were triple rinsed and pierced 3 holes at the bottom and kept at Empty Chemical Container Store in the respective estate. The empty pesticide container has been used for premix of chemical or disposed as Recycle waste to third party as listed below;	Complied																																	
		<table border="1"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Quantity Disposed</th> <th>Disposed Item</th> <th>Date Collected</th> <th>Collector</th> </tr> </thead> <tbody> <tr> <td rowspan="3">1</td> <td rowspan="3">Kulai Estate</td> <td>125 pc</td> <td>Empty Pesticide Container</td> <td rowspan="3">04.12.2020</td> <td rowspan="3">SS Setia Technology Enterprise</td> </tr> <tr> <td>24 pcs</td> <td>Empty Pesticide Container (Tin)</td> </tr> <tr> <td>35 pc</td> <td>Bottle pesticide</td> </tr> <tr> <td rowspan="6">2</td> <td rowspan="6">Seri Pulai Estate</td> <td>457 pc</td> <td>Empty Pesticide Container</td> <td rowspan="4">05.11.2020</td> <td rowspan="6">SS Setia Technology Enterprise</td> </tr> <tr> <td>7 pcs</td> <td>Empty Pesticide Container (Tin)</td> </tr> <tr> <td>10 kg</td> <td>Bottle pesticide</td> </tr> <tr> <td>87 kg</td> <td>Bottle</td> </tr> <tr> <td>756</td> <td>Fertilizer bag</td> <td rowspan="2">06.11.2020</td> </tr> <tr> <td>249</td> <td>Paper</td> </tr> </tbody> </table>	No	Estate	Quantity Disposed	Disposed Item	Date Collected	Collector	1	Kulai Estate	125 pc	Empty Pesticide Container	04.12.2020	SS Setia Technology Enterprise	24 pcs	Empty Pesticide Container (Tin)	35 pc	Bottle pesticide	2	Seri Pulai Estate	457 pc	Empty Pesticide Container	05.11.2020	SS Setia Technology Enterprise	7 pcs	Empty Pesticide Container (Tin)	10 kg	Bottle pesticide	87 kg	Bottle	756	Fertilizer bag	06.11.2020	249	Paper	
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			23 kg	Empty Mineral bottle		
			11kg	Empty Pesticide Container (Ally)		
	3	Layang Estate	2370 pc	Fertilizer bag	03.12.2020	SS Setia Technology Enterprise
			38 pc	Empty Pesticide Container		
			15pc	Empty Pesticide Container (Tin)		
			45	Empty Mineral bottle		
			2kg	Empty Pesticide Container (Ally)		
			1660	Fertilizer bag		
	4	CEP Renggam	2.27 MT	Fertilizer bag	22.05.2020	SS Setia Technology Enterprise
			260 PC	Empty Pesticide Container		
			201 KG	Paper		
			1.480 MT	Fertilizer bag	08.12.2020	SS Setia Technology

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				94 PC	Empty Pesticide Container			Enterprise	
				7 PC	Empty Pesticide Container (Tin)				
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	No aerial spraying for pesticide were done in all the estates.						Complied	
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Specific Annual Medical Surveillance was conducted for all workers exposed to chemicals including sprayers, mandores,</p> <ol style="list-style-type: none"> 1. Kulai Estate - 20 workers (1 Premixer, 17 Field Sprayers and 2 Workshop Operators) were sent for medical surveillance on 27th October 2020. The results have not been obtained as of the audit date. Previously the medical surveillance was conducted on 21.10.2019. A total of 30 workers were sent for medical surveillance where all workers were declared fit to work. 2. Seri Pulai Estate - 17 workers were sent for medical surveillance on 08.09.2020. The results indicated that all workers had no chemical contaminations in the test conducted and were fit to work. 3. Layang Estate - 22 workers were sent for medical surveillance on 03.08.2020 for all workers exposed to hazardous chemicals. The results obtained indicated that all workers were fit to work with no chemical contamination in the blood samples taken. 						Complied	

		CEP Rengam Estate – 28 workers exposed to hazardous chemicals were sent for medical surveillance on the 08.10.2020. The results indicated that 26 workers were fit to work with no evidence of chemical contamination in the blood samples. 2 workers were tested to have “restricted lung volume disorder”. The 2 workers were removed from works involving hazardous chemicals as stated in the letter dated 19.11.2020.											
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>All estates visited have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Gender Policy and Occupational Safety and Health Policy signed by the Managing Director on January 2015.</p> <p>It was sighted during the visit to the stores there were signages stating that pregnant and breast-feeding women are not allowed to enter the chemical stores. Furthermore, the estates did not engage any female sprayers.</p>	Complied										
Criterion 7.3: 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>Sighted the Waste Management plan year 2020 incorporated in the Environment Management Plan prepared by Assistant Manager and verified by Estate and Palm Oil Mill Manager respectively. Sources of pollution and waste have been adequately identified by all sample Estates and Palm Oil Mill. Generally, the wastes identified were of general, recyclable and scheduled wastes.</p> <p>It had listed the waste product, sources of pollution, mitigation measures, target, and the person responsible. Among the wastes that were identified include domestic wastes from the household, scrap iron, empty chemical containers, scheduled wastes as listed below;</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Objective</th> <th style="width: 25%;">Category</th> <th style="width: 25%;">Type / Location</th> <th style="width: 25%;">Actions</th> <th style="width: 25%;">Frequency</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Objective	Category	Type / Location	Actions	Frequency						Complied
Objective	Category	Type / Location	Actions	Frequency									

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		Proper disposal of waste in accordance with SOP and legal requirement	Domestic waste	Rubbish (Workers housing complex, Office, Workshop, Store and Shop)	To segregate recyclable material and to dispose of through recycling contractor/collectors	As and when needed	
					Create further awareness of recycling among workers through training and recycling campaigns	As and when needed	
					Monitoring of estate quarters by HA/MA?PIC	Weekly	
			sewage (Septic tank at workers housing complex & office)	To monitor during housing inspection / from residents' complaints	Weekly / As and when necessary		
				To engagement with a licensed contractor for sewage management	As and when necessary		
			Industry Waste	Scrap Metal	Labeling permanent signage	As and when necessary	
		Proper storage of scrap yards					

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					before tendering out		
				Schedule Waste	Used lubricant container/pesticide/ chemical container (SW409)	To record of disposal to appointed contractors	As and when necessary
					Spent oil (SW305)	To record inventory in e-Swiss or manual documentation (5 th schedule)	Monthly
					Contaminated rags & PPE (SW410)	To dispose through licensed vendor and to check the validity of a license	As and when necessary
					/ fertilizer bag (inner)		
					Clinical waste (SW404)	To dispose of the item to the licensed contractor (including VMO with approval letter)	As and when needed

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		Towards waste utilization (where possible)	Recyclable waste	Empty pesticide container	Store items under lock and key	As and when necessary											
				Re-use empty container	Dispose through registered purchaser and check frequently	As and when necessary											
					Labelling of reuse empty container for premixing activity	As and when necessary											
					EFB	Monitoring and collection of EFB		Daily									
				POME	Monitoring of treated POME BOD level (POMM)	Monthly											
Monitoring of POME application	Daily																
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	<p>The Estates and Palm Oil Mill have properly designated stores for the storage of all types of chemicals to ensure proper segregation and disposal. Training and briefing on scheduled waste have been planned and conducted to Internal and External stakeholders by the respective Estate and Palm Oil Mill as follow;</p> <table border="1"> <thead> <tr> <th>The subject of Training / Briefing</th> <th>Estate Name</th> <th>Date of Training</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Training on Chemical, USECHH and Schedule waste</td> <td>Kulai</td> <td>23.09.2020</td> </tr> <tr> <td>Seri Pulai</td> <td>17.07.2020</td> </tr> <tr> <td>Layang</td> <td>04.12.2020</td> </tr> </tbody> </table>					The subject of Training / Briefing	Estate Name	Date of Training	Training on Chemical, USECHH and Schedule waste	Kulai	23.09.2020	Seri Pulai	17.07.2020	Layang	04.12.2020	Non-compliance
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	Layang	04.12.2020															

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		CEP Renggam	22.10.2020		
<p>All the training was attended by the worker, staff and executive. Sighted the training material with attendance.</p> <p>Sighted the Fifth Schedule (Regulation 11) Inventory of Scheduled waste, all the estate have shown their compliance toward the Environmental Quality Act 1974 (Scheduled Wastes) Regulations 2005.</p> <p>Summary record of the waste disposed of as below: -</p> <p>1. Estate: Kulai</p>					
SW Code	SW Items	Date Generated	Quantity (mt)	Date Disposed	Remarks
305	Lubricating Oil	09.06.2020	0.180	05.12.2020	Perniagaan Saudagar Baru CN No: 2238
404	Clinical waste	01.10.2020	0.044	02.10.2020	Perniagaan Saudagar Baru CN No: 0383280
410	Filter contaminated	09.06.2020	0.075	05.12.2020	Perniagaan Saudagar Baru CN No: 2239
410	Contamination rag	09.06.2020	0.017	05.12.2020	Perniagaan Saudagar Baru CN No: 2240

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2. Estate: Seri Pulau					
SW Code	SW Items	Date Generated	Quantity (mt)	Date Disposed	Remarks
305	Lubricating Oil	Jan 2020	0.750	02.11.2020	Perniagaan Saudagar Baru CN No: 19457
404	Clinical	Jan 2020	0.013	07.09.2020	Cenviro CN No: 0372695
3. Estate: Layang					
SW Code	SW Items	Date Generated	Quantity (mt)	Date Disposed	Remarks
305	Lubricating Oil	June 2020	0.950	26.06.2020	Perniagaan Saudagar Baru CN No: 20402
404	Clinical	May 2020	0.02	19.10.2020	Cenviro CN No: 0382680
4. Estate: CEP Renggam					
SW Code	SW Items	Date Generated	Quantity (mt)	Date Disposed	Remarks

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		305	Lubricating Oil	July 2020	0.180	25.11.2020	Perniagaan Saudagar Baru CN No: 2230
		404	Clinical	September 2020	0.036	06.11.2020	Future Nrg Sdn. Bhd CN No: FNRG/STV/ 94746
		5. POM: Hadapan Palm Oil Mill					
		SW Code	SW Items	Date Generated	Quantity (mt)	Date Disposed	Remarks
		101	E-Waste	December 2020			
		306	Hydraulic Oil	August 2020			
		322	Spent Non-Holagen	August 2020			
		410	Spent rags	August 2020			
		Disposal of wastes (Domestic waste & Schedule waste) was not according to the Waste Management Plan 2020 signed by Estate Manager.					
		According to the Waste Management Plan 2020, the disposal of wastes is through the following method;					

		<ul style="list-style-type: none"> • Domestic wastes to be disposed at the landfill area and through recycle collector • Schedule wastes is through a licensed contractor. <p>However, during the site visit to Block P2008 (2), the Auditor have been discovered the wastes (Domestic waste & Schedule waste) such as plastic, paper box, empty lubricant container, empty water bottle, yellow helmet and wellington boot was found at the stacking area.</p> <p>Based on the lapses found, hence Minor NC has been raised.</p>	
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Group Sustainability & Quality Policy Statement signed by Mohamad Helmy Othman Bash, Group Managing Director dated 2nd December 2019.</p> <p>We recognize the inherent value of forests and the ecosystem services they provide as well as the scarcity of natural resources and threats from climate change. All our activities will be guided by a precautionary approach and a no-deforestation objective. We recognize the limitation of individual company commitments in this area and seek to work with all stakeholders including competitors in delivering positive long term conservation results.</p> <p>(ix) Zero tolerance of the use of fire within our land boundaries and conservation area and the establishment of effective monitoring and prevention systems as well as proactive firefighting measure in and around our operations.</p> <p>It was confirmed through a site visit to the respective Operating Units (Estates & Palm Oil Mill), that no use of fire for domestic waste disposal. The domestic waste generated at worker housing has been collected by the estate team and disposed of at the Landfill located at Block 2006B (Kulai Estate), Block 2000 (Seri Pulai Estate), Block</p>	Complied

		2002B1 (Layang Estate & Hadapan Palm Oil Mill) and 1996A (CEP Renggam Estate).	
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<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>All sample Estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices are consistently monitored by estate operation management and the regional office. The recommendations for improvements are given to maintain sustainable practices. Leaf analysis and foliar sampling will be monitored on yearly basis. Variable dosage recommendation was given by the agronomist for fertilizer input for all sample Estates.</p> <p>Sighted annual record Soil and Leaf Analysis for the year 2020 covered under Agronomist report for all sample Estates. Nutrients assessed were pH, Org.C(%), N(%), Total P (ppm), Available P (ppm), Exch. K (me%), Exch.Mg (me%) and C.E.C (me%). Soil analysis test report as follows;</p> <p>Estate : Kulai Sample Ref : RSPO_OP1991A-Sample Point SS1 (1) Depth : 0 – 15cm pH : 4.3 Org C (%) : 2.82 Total N (%) : 0.193 Total P(ppm) : 443.00 Total Avail P (ppm) : 4.24 Exch K (me%) : 0.40 Exch Ca (me%) : 1.34 Exch Mg (me%) : 0.38 C.E.C (me%) : 6.43</p>	Complied

		<p>Estate : Seri Pulai Sample Ref : Block 7 / Point 1 Depth : 0 – 15cm pH : 4.2 Org C (%) : 1.04 Total N (%) : 0.063 Total P(ppm) : 143.90 Total Avail P (ppm) : 1.30 Exch K (me%) : 0.19 Exch Ca (me%) : 0.39 Exch Mg (me%) : 0.04 C.E.C (me%) : -</p> <p>Estate : Layang Sample Ref : 2005B S1(RSPO) Sample 1 Depth : 0 – 15cm pH : 4.9 Org C (%) : 2.08 Total N (%) : 0.284 Total P(ppm) : 541.11 Total Avail P (ppm) : 7.44 Exch K (me%) : 0.15 Exch Ca (me%) : 0.59 Exch Mg (me%) : 0.15 C.E.C (me%) : 1.96</p> <p>Estate : CEP Renggam Sample Ref : C-S-SL-201402-000022 Depth : 0 – 16cm pH : 4.5 Org C (%) : 2.12</p>	
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		<p>Total N (%) : 0.146 Total P(ppm) : 171.90 Total Avail P (ppm) : 3.90 Exch K (me%) : 0.09 Exch Ca (me%) : 0.64 Exch Mg (me%) : 0.10 C.E.C (me%) : -</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>Leaf nutrient analysis is commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf analysis and leaf sampling is conducted annually. The foliar sampling and soil analysis reports by the company's agronomist were available at the estates during the audit assessment.</p> <p>Sighted the Agronomist report for the year 2020 prepared by R&D Department Sime Darby Plantation Berhad for all sample Estates. The report covers the following aspect:</p> <ol style="list-style-type: none"> 1. Introduction 2. Rainfall 3. FFB Yield 4. Palm Nutritional Status / Observation 5. Field observation / Comments 6. Manuring history 7. Fertilizer recommendation 8. Fertilizer Analysis 9. Field observation and Agronomic matters <p>The agronomist report also emphasized on-field best practices and physical conditions such as palm appearance, canopy size and vigor, canopy color and vigor, palm circle and inter-row condition. Nutrients assessed were Na, N, P, K, Ca, Mg, B (PPM). The leaf</p>	<p>Complied</p>

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sampling was carried out in all sample Estates and the result obtained as follows;

Estate : Kulai Estate

Nutrient / Field	1998 (mean) Kelan Div	2001 (mean) Kulai Estate
N %	2.59	2.66
P %	0.155	0.16
K %	1.07	1.10
Mg %	0.23	0.24
B (%DM)	16	16

Estate : Seri Pulai Estate

Nutrient / Field	2001B (mean)	2002 (mean)
N %	2.57	2.60
P %	0.150	0.156
K %	1.15	1.20
Mg %	0.21	0.22
B (%DM)	21	16

Estate: Layang

Nutrient / Field	C-P-OP-201906-006152	C-P-OP-201906-006152
N %	2.61	2.52
P %	0.162	0.156
K %	0.82	0.88
Mg %	0.25	0.22
B (%DM)	19	19
Ca	0.77	0.78

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		<table border="1"> <tr> <td>Ash</td> <td>7.32</td> <td>6.81</td> </tr> <tr> <td colspan="3">Estate: CEP Renggam</td> </tr> <tr> <td>Nutrient / Field</td> <td>2011A(1)</td> <td>2005(1)</td> </tr> <tr> <td>N %</td> <td>2.69</td> <td>2.47</td> </tr> <tr> <td>P %</td> <td>0.162</td> <td>0.156</td> </tr> <tr> <td>K %</td> <td>0.81</td> <td>0.80</td> </tr> <tr> <td>Mg %</td> <td>0.27</td> <td>0.26</td> </tr> <tr> <td>B (%DM)</td> <td>15</td> <td>15</td> </tr> </table>	Ash	7.32	6.81	Estate: CEP Renggam			Nutrient / Field	2011A(1)	2005(1)	N %	2.69	2.47	P %	0.162	0.156	K %	0.81	0.80	Mg %	0.27	0.26	B (%DM)	15	15	
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Mg %	0.27	0.26																									
B (%DM)	15	15																									
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>The Palm Oil Mill does have a plan for nutrient recycling strategy by sending the Palm Oil Mill waste such as POME and EFB to the estate. Sighted the records for EFB distribution to the estate. The record EFB / POME discharge to the estates as below;</p> <table border="1"> <thead> <tr> <th>Inorganic Fertilizer</th> <th>Actual application (to date November 2020)</th> </tr> </thead> <tbody> <tr> <td>Empty Fruit Bunch (MT)</td> <td> Renggam – 9,093.19 Kulai - 6,339.00 Kelan - 2,188.49 Sri Pulai - 6,740.30 Layang - 28,326.93 TDI - 1,971.31 Pekan - 655.71 Cenas - 42.68 </td> </tr> <tr> <td>POME (Litre)</td> <td>Layang - 18,689.95</td> </tr> </tbody> </table>	Inorganic Fertilizer	Actual application (to date November 2020)	Empty Fruit Bunch (MT)	Renggam – 9,093.19 Kulai - 6,339.00 Kelan - 2,188.49 Sri Pulai - 6,740.30 Layang - 28,326.93 TDI - 1,971.31 Pekan - 655.71 Cenas - 42.68	POME (Litre)	Layang - 18,689.95	Complied																		
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7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizers in all sample Estates were applied according to agronomist recommendation. The records have the information about application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. Types of fertilizer applied</p>	Complied																								

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		<p>were straight and mixture. The records were maintained and updated accordingly.</p> <p>Verification of various documents in all sample Estates such as agronomist report, annual manuring program and store issuance records shown that the inputs of fertilizers to the field were accurate. Sighted the recommendation and application data for all estates as below;</p> <p>Estate: Kulai Estate Sample Block : PM 2014D, 5.39Ha – 136 palm / Ha</p> <table border="1" data-bbox="1137 726 1921 1117"> <tr> <td data-bbox="1137 726 1350 922">Recommendation from Agronomist</td> <td data-bbox="1350 726 1921 922"> Fertilizer Type : AC – 1.75kg / palm – Feb 2020 MOP – 1.50kg / palm – March 2020 Kieserite – 1.00 kg/palm – May 2020 Rp – 3.00kg / Oct 2020 NKC – 3.00 / palm – Sept 2020 </td> </tr> <tr> <td data-bbox="1137 922 1350 1117">Actual Application by estate operation</td> <td data-bbox="1350 922 1921 1117"> Fertilizer Type : AC – 1.75kg / palm – Feb 2020 MOP – 1.50kg / palm – March 2020 Kieserite – 1.00 kg/palm – May 2020 Rp – 3.00kg / Nov 2020 NKC – 3.00 / palm – Oct 2020 </td> </tr> </table> <p>Estate: Seri Pulai Estate Sample Block : PM 2013A (Block 3) , 23.38Ha – 132 palm / Ha</p> <table border="1" data-bbox="1137 1212 1921 1375"> <tr> <td data-bbox="1137 1212 1350 1375">Recommendation from Agronomist</td> <td data-bbox="1350 1212 1921 1375"> Fertilizer Type : Borate – 0.10kg / palm – Jan 2020 AC – 2.00kg / palm – Feb / March 2020 MOP – 1.50kg / palm – Feb / March 2020 Kieserite – 0.90 kg/palm – May 2020 </td> </tr> </table>	Recommendation from Agronomist	Fertilizer Type : AC – 1.75kg / palm – Feb 2020 MOP – 1.50kg / palm – March 2020 Kieserite – 1.00 kg/palm – May 2020 Rp – 3.00kg / Oct 2020 NKC – 3.00 / palm – Sept 2020	Actual Application by estate operation	Fertilizer Type : AC – 1.75kg / palm – Feb 2020 MOP – 1.50kg / palm – March 2020 Kieserite – 1.00 kg/palm – May 2020 Rp – 3.00kg / Nov 2020 NKC – 3.00 / palm – Oct 2020	Recommendation from Agronomist	Fertilizer Type : Borate – 0.10kg / palm – Jan 2020 AC – 2.00kg / palm – Feb / March 2020 MOP – 1.50kg / palm – Feb / March 2020 Kieserite – 0.90 kg/palm – May 2020	
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			NKC – 3.50 / palm – Sept 2020 Rp – 2.20kg / Oct 2020	
	Actual Application by estate operation		Fertilizer Type : Borate – 0.10kg / palm – Jan 2020 AC – 2.00kg / palm – March 2020 MOP – 1.50kg / palm – March 2020 Kieserite – 0.90 kg/palm – August 2020 NKC – 3.2 / palm – in progress 2020 Rp – 2.20kg / not yet apply	
	Estate : Layang Estate Sample Block : PM 2002B (Block 1) , 26.72Ha – 139 palm / Ha			
	Recommendation from Agronomist		Fertilizer Type : AC – 1.90kg / palm – Feb / March 2020 MOP – 1.50kg / palm – Feb / March 2020 Kieserite – 0.80 kg/palm – May 2020 NKC1 – 3.25 / palm – Sept 2020 Rp – 2.00kg / Oct 2020	
	Actual Application by estate operation		Fertilizer Type : AC – 1.90 kg/palm – March 2020 MOP – 1.50kg / palm – May 2020 Kieserite – 0.80 kg/palm – July 2020 NKC1 – 3.25 / palm – October 2020 Rp – 2.00kg / December 2020	
	Estate : CEP Renggam Estate Sample Block : PM 1995A1 (Block 1) , 29.86Ha – 145 palm / Ha			
	Recommendation from Agronomist		Fertilizer Type : AC – 1.90kg / palm – Jan / Feb 2020 MOP – 1.50kg / palm – Jan / Feb 2020 Borate – 0.10kg / palm – April 2020	

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		<table border="1"> <tr> <td data-bbox="1133 363 1350 427"></td> <td data-bbox="1350 363 1933 427">Kieserite – 0.80 kg/palm – May 2020 NKC1 – 3.25kg / palm – Sept 2020</td> </tr> <tr> <td data-bbox="1133 427 1350 624">Actual Application by estate operation</td> <td data-bbox="1350 427 1933 624"> Fertilizer Type : AC – 1.90 kg/palm – August 2020 MOP – 1.50kg / palm – May 2020 Borate – 0.10 kg/palm – July 2020 Kieserite – 0.80 kg/palm – August 2020 NKC1 – 3.25 kg/palm – November 2020 </td> </tr> </table> <p>Fertilizers in all sampled estates were applied according to agronomist recommendations. The records have the information about application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. Types of fertilizer applied were straight and mixture. The records maintained and update accordingly</p>		Kieserite – 0.80 kg/palm – May 2020 NKC1 – 3.25kg / palm – Sept 2020	Actual Application by estate operation	Fertilizer Type : AC – 1.90 kg/palm – August 2020 MOP – 1.50kg / palm – May 2020 Borate – 0.10 kg/palm – July 2020 Kieserite – 0.80 kg/palm – August 2020 NKC1 – 3.25 kg/palm – November 2020					
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Criterion 7.5: Practices minimise and control erosion and degradation of soils.											
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -</p>	<p>Soil surveys and topographic information, including the identification of steep terrain, marginal and fragile soils were available. Sighted the soil series available in soil maps and there was no soil categorized as problematic or fragile soil in all sample Estates.</p> <table border="1"> <thead> <tr> <th data-bbox="1133 1114 1182 1177">No</th> <th data-bbox="1182 1114 1305 1177">Estates</th> <th data-bbox="1305 1114 1693 1177">Soil Series</th> <th data-bbox="1693 1114 1933 1177">Reference</th> </tr> </thead> <tbody> <tr> <td data-bbox="1133 1177 1182 1372">1</td> <td data-bbox="1182 1177 1305 1372">Kulai Estate</td> <td data-bbox="1305 1177 1693 1372"> Bukit Temiang – 0.39% Jerangau – 22.44% Kg. Kubur – 0.39% Kulai – 3.3% Lancahang – 2.98 Local Alluvium – 1.69% </td> <td data-bbox="1693 1177 1933 1372"> R & D – Prevision Agriculture Unit (NHS) dated Feb 2013 </td> </tr> </tbody> </table>	No	Estates	Soil Series	Reference	1	Kulai Estate	Bukit Temiang – 0.39% Jerangau – 22.44% Kg. Kubur – 0.39% Kulai – 3.3% Lancahang – 2.98 Local Alluvium – 1.69%	R & D – Prevision Agriculture Unit (NHS) dated Feb 2013	Complied
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			<p>Masai – 2.2% Organic clay - 1.14% Pelepah – 0.46% Rengam 43.81% Tepus – 15.89 Yong Peng – 5.3% Jeranggau 68.14% Renggam 31.86%</p>		
	2	Seri Pulai Estate	<p>Batu Anam – 5.19% Bungor – 26.66% Durian – 12.97% Holyrood – 12.97% Kuah – 3.24% Kuala Berang – 0.49% Local Alluvium – 26.26% Masai – 9.43% Organic Clay – 9.43% Peat – 10.21% Rengam – 4.51%</p>	<p>R & D – Prevision Agriculture Unit (NHS) dated Feb 2013</p>	
	3	Layang Estate	<p>Harimau – 56.51% Holyrood – 4.09% Jerneh – 1.47% Jitra – 1.14% Kawang – 0.42% Kelau – 3.71% Lanchang – 1.26% Local Alluvium – 20.58 Organic clay – 3.44% Organic sand – 0.23% Rengam – 5.96% Sunei Buloh – 0.41% Terap – 0.78%</p>	<p>R & D – Prevision Agriculture Unit (NHS) dated 17th July 2019</p>	

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		4	CEP Rengam Estate	Rengam – 68.04% Local Alluvium 1 – 7.40% Jerangau – 6.80% Organic Clay / Muck – 5.06% Bungor – 3.41% Local Alluvium 11 – 3.27% Bukit Lunchu – 3.16% Tampin – 1.13% Masai – 0.77% Pelepah – 0.51% Munchong - Malacca – 0.26% Bukit Temiang – 0.19%	R & D – Prevision Agriculture Unit (NHS) dated 17 th July 2019	
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -			Group Sustainability & Quality Policy Statement signed by Mohamad Helmy Othman Bash, Group Managing Director dated 2 nd December 2019. The policy stated the commitment to conserve biodiversity and protect ecosystems as follows : 3.1.1 – Adoption of integrated HCS-HCV using HCVRN and HCSA tools assessment to identify the area to be protected before new land clearing. 3.1.2 – Management of erosion by the protection of steep slopes and river reserves within our operations and promote restoration programs. 3.1.3 – Implementation and enhancement of evidence-based practices for the maintenance and management of all identified conservation areas and to enhance where possible, the value of such areas. 3.1.4 – Addressing human-wildlife conflicts within plantation boundaries including the prohibition of illegal hunting through the		Complied

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		<p>implementation of evidence-based practices and building to promoting coexisting.</p> <p>Sighted Slope & Manuring Block Map has been prepared by R&D – Precision Agriculture Unit (EIM). It's confirmed that all the planted area is below 25 degrees and this was sighted during the field visit at all sample Estates.</p> <p>Update: R & D – Plantation Research and Advisory Dept. Precision Agriculture Unit (SBMH).</p> <table border="1" data-bbox="1137 730 1928 1118"> <thead> <tr> <th rowspan="2">Slope (°)</th> <th colspan="5">Estate</th> </tr> <tr> <th>Kulai %</th> <th>Kulai (Kelan Div) %</th> <th>Seri Pulai %</th> <th>Layang & Hadapan Division %</th> <th>CEP Renggam %</th> </tr> </thead> <tbody> <tr> <td>0 – 2</td> <td>30.23</td> <td>12.45</td> <td>40.75</td> <td>41.85</td> <td>16.46</td> </tr> <tr> <td>2 – 6</td> <td>55.19</td> <td>53.91</td> <td>37.98</td> <td>52.03</td> <td>53.83</td> </tr> <tr> <td>6 – 12</td> <td>13.16</td> <td>29.98</td> <td>15.82</td> <td>5.75</td> <td>29.19</td> </tr> <tr> <td>12 – 20</td> <td>1.27</td> <td>3.61</td> <td>4.40</td> <td>0.27</td> <td>2.51</td> </tr> <tr> <td>20 – 25</td> <td>0.14</td> <td>0.05</td> <td>0.84</td> <td>0</td> <td>0.01</td> </tr> <tr> <td>> 25</td> <td>0</td> <td>0.00</td> <td>0.2</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p>Remarks for Seri Kulai > 25°: This area is a ravine area that fluvial slope and has been conserved for soil protection. Due to the slope more than > 25°, therefore, the area was left and unplanted area.</p>	Slope (°)	Estate					Kulai %	Kulai (Kelan Div) %	Seri Pulai %	Layang & Hadapan Division %	CEP Renggam %	0 – 2	30.23	12.45	40.75	41.85	16.46	2 – 6	55.19	53.91	37.98	52.03	53.83	6 – 12	13.16	29.98	15.82	5.75	29.19	12 – 20	1.27	3.61	4.40	0.27	2.51	20 – 25	0.14	0.05	0.84	0	0.01	> 25	0	0.00	0.2	0	0	
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7.5.3	<p>There is no new planting of oil palm on steep terrain. - Minor compliance -</p>	<p>Based on the site visit to all sample Estates, no new planting was observed at the steep terrain in all Estates.</p>	Complied																																															

Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>Sighted annual soil and leaf analysis record for the year 2020 in Agronomist report which covered soil and leaf analysis for all sample Estates.</p> <p>Based on the report the soil use to plant Palm oil is suitable and rich in nutrients. The monitoring of soil is done annually by R&D Development, Sime Darby Plantation Berhad.</p> <p>This survey is among determining the long term suitability of land for oil palm cultivation for the next 25 years. The soil condition in all field found suitable for OP cultivation</p>	Complied
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>During the field visit, there is no evidence of fragile soils found in all sample Estates.</p>	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>Soil and Slope maps were available in all sample Estates and used to address the planning of infrastructure in all sample estates. No establishment of new planting in all sample Estates thus far.</p>	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting on peat was carried out but Peat soil is available. Refer to the Peat soil verification at Seri Pulai Estate prepared by PRA_RGSA (Soil Unit) dated 15th May 2019</p>	Complied
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p>	<p>Existing palms were planted for a total area of 205.6 ha (10.20%) of peat soil. Based on the survey area, the area was classified as flat terrain & predominantly with a slope class of < 2°. Map of peat soil was prepared on 24th May 2019 (scale 1:22,000) by R&D</p>	Complied

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	<p>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).</p> <p>- Minor compliance -</p>	<p>– Precision Agriculture Unit. The locality of peat was found in the northern & west part of the estate. Peat depth varies from moderately deep to deep (sapric condition). A layer of organic matter is more than 50cm.</p> <p>Sighted email submission from Sime Darby Plantation Berhad dated 21st April 2020 to GHG Unit, RSPO. The purpose of the email is to notify the RSPO Unit about the Peat inventory for the entire Sime Darby Estates in Malaysia. The peat soil was found in the Seri Pulai Estate specifically in the northern and west part of the estate area approximate about 205.619Ha</p>											
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>Map of subsidence poles are available in Seri Pulai Estate. Estate management has complied with the recommendation made by PSQM Department and RSPO requirement about the monitoring of subsidence at peat area. During the site visit to the peat area at Block 2005, the Auditor found the subsidence pole was well maintained and the reading of subsidence is updated yearly as below:</p> <table border="1" data-bbox="1137 1018 1675 1270"> <thead> <tr> <th>Year</th> <th>Subsidence Record (cm)</th> </tr> </thead> <tbody> <tr> <td>2017</td> <td>3</td> </tr> <tr> <td>2018</td> <td>5</td> </tr> <tr> <td>2019</td> <td>2</td> </tr> <tr> <td>2020</td> <td>5</td> </tr> </tbody> </table>	Year	Subsidence Record (cm)	2017	3	2018	5	2019	2	2020	5	Complied
Year	Subsidence Record (cm)												
2017	3												
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7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Refer to the Peat soil verification at Seri Pulai Estate prepared by PRA_RGSA (Soil Unit) dated 15th May 2019, a recommendation has made to the estate management to install both piezometer and peat</p>	Complied										

		<p>subsidence pole in the field. For water level monitoring, a water level marker needs to be installed at the outlet and to maintain water at 40 – 60 cm from the soil surface.</p> <p>Estate management has installed the piezometer at the collection drain and the monitoring of the water level is made on monthly basis. Sighted the record of water table monitoring for the year 2020 which was prepared by the Assistant Manager and verified by Estate Manager. The reading of water level is within the optimum level of 60 – 90 cm.</p> <p>Block: 2005</p> <table border="1" data-bbox="1137 762 1930 1236"> <thead> <tr> <th rowspan="2">Month</th> <th rowspan="2">Field / Block</th> <th colspan="3">Water level (cm)</th> </tr> <tr> <th>Point 1</th> <th>Point 2</th> <th>Point 3</th> </tr> </thead> <tbody> <tr><td>January</td><td>2005</td><td>65</td><td>64</td><td>63</td></tr> <tr><td>February</td><td>2005</td><td>78</td><td>77</td><td>76</td></tr> <tr><td>March</td><td>2005</td><td>65</td><td>64</td><td>63</td></tr> <tr><td>April</td><td>2005</td><td>73</td><td>72</td><td>71</td></tr> <tr><td>May</td><td>2005</td><td>70</td><td>70</td><td>69</td></tr> <tr><td>June</td><td>2005</td><td>65</td><td>64</td><td>63</td></tr> <tr><td>July</td><td>2005</td><td>75</td><td>74</td><td>73</td></tr> <tr><td>August</td><td>2005</td><td>73</td><td>72</td><td>71</td></tr> <tr><td>September</td><td>2005</td><td>84</td><td>83</td><td>81</td></tr> <tr><td>October</td><td>2005</td><td>69</td><td>68</td><td>67</td></tr> <tr><td>November</td><td>2005</td><td>69</td><td>68</td><td>67</td></tr> <tr><td>December</td><td>2005</td><td></td><td></td><td></td></tr> </tbody> </table>	Month	Field / Block	Water level (cm)			Point 1	Point 2	Point 3	January	2005	65	64	63	February	2005	78	77	76	March	2005	65	64	63	April	2005	73	72	71	May	2005	70	70	69	June	2005	65	64	63	July	2005	75	74	73	August	2005	73	72	71	September	2005	84	83	81	October	2005	69	68	67	November	2005	69	68	67	December	2005				
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7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting,</p>	<p>There is no drainability assessment been conducted due to there is no replanting program in the coming 5 years for this estate.</p>	Complied																																																																				

	<p>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>		
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>The estate has installed both "Piezometer" & "Peat Subsidence Pole" in the field in accordance with RSPO requirements. These instruments (Piezometer & Subsidence Pole) were visibly marked & placed within an accessible distance (3 palms away from the main road). The estate has erected a water level marker at the field outlet & keeps maintaining the water level at 40 - 60cm from the soil surface.</p>	Complied
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>Peatland conservation areas are absent in said estate. The peat moisture has been maintained & natural water regimes were monitored accordingly. Rehabilitation measures were demonstrated whereby the fire prevention plan & natural revegetation of both secondary/indigenous plants were sighted in this block.</p>	Complied
<p>Criterion 7.8: 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"> a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water. <p>- Minor compliance -</p>	<p>Sighted Water Management Plan established by all sample Estates and Palm Oil Mill for the year 2020. The plan consists of the management of quality and availability of water which inclusive of identifying the source of water used, the efficiency of water usage, identifying of renewable water source and impact to the water catchment area and stakeholders as well as an action plan of water shortage in employee’s housing area. Implementation can be seen with the availability of records on the monitoring of water usage, monitoring of rainfall and water shortage contingency plan.</p> <p>Estate : Kulai</p> <p>Water Management Plan for year 2020</p> <table border="1" data-bbox="1137 807 1930 1386"> <thead> <tr> <th>Objective</th> <th>Category</th> <th>Type / Location</th> <th>Action</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>To monitor the quality of the main water inlet/outlet from estate operation pollution</td> <td>River / Stream</td> <td>-</td> <td>Quarterly. Every 3 months water sampling will be sent to R & D</td> <td>Quarterly</td> </tr> <tr> <td>Contingency during the water shortage</td> <td>Water shortage Dry spell Severe water pollution</td> <td>-</td> <td>Purchasing water from a vendor License for obtaining from the river</td> <td>As and when needed Annually</td> </tr> </tbody> </table>	Objective	Category	Type / Location	Action	Frequency	To monitor the quality of the main water inlet/outlet from estate operation pollution	River / Stream	-	Quarterly. Every 3 months water sampling will be sent to R & D	Quarterly	Contingency during the water shortage	Water shortage Dry spell Severe water pollution	-	Purchasing water from a vendor License for obtaining from the river	As and when needed Annually	<p>Complied</p>
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		To monitor the usage of treated water every month	Daily consumption	SAJ	Awareness to workers on water consumption with care	As and when necessary
			Pond/Reservoir/Wetland	Rainwater	To use for general cleaning, operation, gardening, etc	As and when necessary
		Protection of watercourse and pond	Pond/Reservoir/Wetland	Replanting pond / Processing water for Palm Oil Mill	Water analysis result by R & D	Quarterly
<p>i. Sighted Final report river quality analysis conducted by Sime Darby Research Sdn. Bhd. as follows;</p> <p>Sample Number: IE572/2020 Client: Kulai Estate Date sampled: 8th July 2020 Date received: 13th July 2020 Date Tested: 13th July 2020 Date Issued: 10th August 2020</p> <p>1. Location: Kulai River – Upstream 1</p>						

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		Lab Code: C-W-IE-202007-001664																										
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		<p>2. Location: Kulai River – Midstream 1 Lab Code: C-W-IE-202007-001664</p> <table border="1"> <thead> <tr> <th>Analysis Test</th> <th>Actual Result</th> <th>Standard Quality</th> </tr> </thead> <tbody> <tr> <td>pH (25°C)</td> <td>6.4</td> <td>6.0 – 9.0</td> </tr> <tr> <td>BOD (mg/l)</td> <td>5</td> <td>3</td> </tr> <tr> <td>COD (mg/l)</td> <td>48</td> <td>25</td> </tr> <tr> <td>SS (mg/l)</td> <td>14</td> <td>50</td> </tr> <tr> <td>AN (mg/l)</td> <td>< 1</td> <td>0.3</td> </tr> <tr> <td>DO (mg/l)</td> <td>4.07</td> <td>5.0 – 7.0</td> </tr> <tr> <td>P (mg/l)</td> <td>0.476</td> <td>0.2</td> </tr> </tbody> </table>			Analysis Test	Actual Result	Standard Quality	pH (25°C)	6.4	6.0 – 9.0	BOD (mg/l)	5	3	COD (mg/l)	48	25	SS (mg/l)	14	50	AN (mg/l)	< 1	0.3	DO (mg/l)	4.07	5.0 – 7.0	P (mg/l)	0.476	0.2
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		<p>3. Location: Kulai River – Downstream 10 Lab Code: C-W-IE-202007-001673</p> <table border="1"> <thead> <tr> <th>Analysis Test</th> <th>Actual Result</th> <th>Standard Quality</th> </tr> </thead> <tbody> </tbody> </table>			Analysis Test	Actual Result	Standard Quality																					
Analysis Test	Actual Result	Standard Quality																										

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			pH (25°C)	6.3	6.0 – 9.0															
			BOD (mg/l)	4	3															
			COD (mg/l)	16	25															
			SS (mg/l)	22	50															
			AN (mg/l)	< 1	0.3															
			DO (mg/l)	4.74	5.0 – 7.0															
			P (mg/l)	0.509	0.2															
<p>POM: Hadapan Palm Oil Mill</p> <p>Water Management Plan for the year 2020</p> <table border="1"> <thead> <tr> <th>Objective</th> <th>Category</th> <th>Type / Location</th> <th>Action</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>To monitor the quality of the main water inlet/outlet for pollution from Palm Oil Mill's operations</td> <td>River / Stream</td> <td>Water sampling point</td> <td>Quarterly. Every 3 months water sampling will be sent to R & D</td> <td>Quarterly</td> </tr> <tr> <td>Contingency during the water shortage</td> <td>Water shortage Dry spell Severe water pollution</td> <td>Estate water treatment plant/government</td> <td>Purchasing water from SAJ License for obtaining from the river</td> <td>As and when needed Annually</td> </tr> </tbody> </table>						Objective	Category	Type / Location	Action	Frequency	To monitor the quality of the main water inlet/outlet for pollution from Palm Oil Mill's operations	River / Stream	Water sampling point	Quarterly. Every 3 months water sampling will be sent to R & D	Quarterly	Contingency during the water shortage	Water shortage Dry spell Severe water pollution	Estate water treatment plant/government	Purchasing water from SAJ License for obtaining from the river	As and when needed Annually
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To monitor the usage of treated water on a monthly basis	Daily consumption	SAJ Treated water	Awareness to workers on water consumption with care	Annually
	Rainwater harvesting	Workshop, store, office, Palm Oil Mill Compound, Palm Oil Mill processing	To use for general cleaning, operation, gardening, etc	As and when necessary
Sighted latest microbiology water samples analysis for 2 nd quarters				
Sample Ref	E. Coli (MPN/100mL)	Total		
Quarter Executive – ES No. 2	ND (<2)	ND(<2)		
Quarterstaff – MS No. 1	ND (<2)	ND(<2)		
Quarter worker. No. 38	ND (<2)	ND(<2)		
Estate: Seri Pulai				

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Water Management Plan for the year 2020				
Objective	Category	Type / Location	Action	Frequency
To monitor the quality of the main water inlet/outlet from estate operation pollution	River / Stream		Quarterly. Every 3 months water sampling will be sent to R & D	Quarterly
Contingency during the water shortage	Water shortage	-	Purchasing water from a vendor	As and when needed
	Dry spell Severe water pollution		License for obtaining from the river	Annually
To monitor the usage of treated water on a monthly basis	Daily consumption	SAJ	Awareness to workers on water consumption with care	As and when necessary
	Pond/Reservoir/Wetland	Rainwater	To use for general cleaning, operation, gardening, etc	As and when necessary

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Protection of watercourse and pond	Pond/Reservoir/Wetland	Replanting pond / Processing water for Palm Oil Mill	Water analysis result by R & D	Quarterly
<p>i. Sighted Final report river quality analysis conducted by Sime Darby Research Sdn. Bhd. as follows;</p> <p>Sample Number: IE920/2020 Client: Seri Pulai Estate Date sampled: 28th October 2020 Date received: 3rd November 2020 Date Tested: 3rd November 2020 Date Issued: 19th November 2020</p> <p>1. Location: Upstream 1 (Sample 1) Lab Code: C-W-IE-202011-002954</p>				
Analysis Test		Actual Result	Standard Quality	
pH (25°C)		6.6	6.0 – 9.0	
BOD (mg/l)		10	3	
COD (mg/l)		92	25	
SS (mg/l)		6	50	
AN (mg/l)		< 1	0.3	
DO (mg/l)		3.80	5.0 – 7.0	

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		P (mg/l)	ND	0.2																																																
<p>2. Location: Midstream 1 (Sample 3) Lab Code: C-W-IE-202011-002958</p> <table border="1"> <thead> <tr> <th>Analysis Test</th> <th>Actual Result</th> <th>Standard Quality</th> </tr> </thead> <tbody> <tr> <td>pH (25°C)</td> <td>6.0</td> <td>6.0 – 9.0</td> </tr> <tr> <td>BOD (mg/l)</td> <td>6</td> <td>3</td> </tr> <tr> <td>COD (mg/l)</td> <td>72</td> <td>25</td> </tr> <tr> <td>SS (mg/l)</td> <td>132</td> <td>50</td> </tr> <tr> <td>AN (mg/l)</td> <td>< 1</td> <td>0.3</td> </tr> <tr> <td>DO (mg/l)</td> <td>3.22</td> <td>5.0 – 7.0</td> </tr> <tr> <td>P (mg/l)</td> <td>ND</td> <td>0.2</td> </tr> </tbody> </table> <p>3. Location: Downstream 1 (Sample 6) Lab Code: C-W-IE-202011-002959</p> <table border="1"> <thead> <tr> <th>Analysis Test</th> <th>Actual Result</th> <th>Standard Quality</th> </tr> </thead> <tbody> <tr> <td>pH (25°C)</td> <td>3.8</td> <td>6.0 – 9.0</td> </tr> <tr> <td>BOD (mg/l)</td> <td>3</td> <td>3</td> </tr> <tr> <td>COD (mg/l)</td> <td>40</td> <td>25</td> </tr> <tr> <td>SS (mg/l)</td> <td>2</td> <td>50</td> </tr> <tr> <td>AN (mg/l)</td> <td>5</td> <td>0.3</td> </tr> <tr> <td>DO (mg/l)</td> <td>4.30</td> <td>5.0 – 7.0</td> </tr> <tr> <td>P (mg/l)</td> <td>ND</td> <td>0.2</td> </tr> </tbody> </table> <p>Based on the analysis at Downstream 1 (Sample 6), the analysis test for pH (25°C), COD(mg/l), AN(mg/l) and DO(mg/l) is above the standard quality, therefore estate management has established the</p>					Analysis Test	Actual Result	Standard Quality	pH (25°C)	6.0	6.0 – 9.0	BOD (mg/l)	6	3	COD (mg/l)	72	25	SS (mg/l)	132	50	AN (mg/l)	< 1	0.3	DO (mg/l)	3.22	5.0 – 7.0	P (mg/l)	ND	0.2	Analysis Test	Actual Result	Standard Quality	pH (25°C)	3.8	6.0 – 9.0	BOD (mg/l)	3	3	COD (mg/l)	40	25	SS (mg/l)	2	50	AN (mg/l)	5	0.3	DO (mg/l)	4.30	5.0 – 7.0	P (mg/l)	ND	0.2
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		<p>Corrective / Preventive action plan for Non-conforming water analysis result dated 25th November 2020. The details of the investigation as follows;</p> <p>Root cause: Daily estate operation which involves usage of chemical</p> <p>Corrective action plan:</p> <ul style="list-style-type: none"> - To monitor closely the quantity of chemical usage - To monitor the chemical application by the a worker during work operations. <p>i. Sighted Final report Domestic water analysis conducted by Sime Darby Research Sdn. Bhd. as follows;</p> <p>Sample Number: IE922/2020 Client: Seri Pulai Estate Date sampled: 28th October 2020 Date received: 3rd November 2020 Date Tested: 3rd November 2020 Date Issued: 19th November 2020</p> <p>1. Location: Upstream 1 (Sample 1) Lab Code: C-W-IE-202011-002954</p> <table border="1" data-bbox="1137 1168 1937 1372"> <thead> <tr> <th>Analysis Test</th> <th>Actual Result</th> <th>Standard Quality</th> </tr> </thead> <tbody> <tr> <td>pH (25°C)</td> <td>6.0</td> <td>6.0 – 9.0</td> </tr> <tr> <td>TDS (mg/l)</td> <td>64</td> <td>5</td> </tr> <tr> <td>Turbi. (NTU)</td> <td>11.4</td> <td>1000</td> </tr> <tr> <td>Chloride (mg/l)</td> <td>5</td> <td>250</td> </tr> <tr> <td>AI (mg/l)</td> <td>0.101</td> <td>0.2</td> </tr> </tbody> </table>	Analysis Test	Actual Result	Standard Quality	pH (25°C)	6.0	6.0 – 9.0	TDS (mg/l)	64	5	Turbi. (NTU)	11.4	1000	Chloride (mg/l)	5	250	AI (mg/l)	0.101	0.2	
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		<p>Based on the analysis for the domestic used, the analysis test for TDS(mg/l) is above the standard quality, therefore estate management has established the Corrective / Preventive action plan for Non-conforming water analysis result dated 25th November 2020. The details of the investigation as follows;</p> <p>Root cause: Sample taken during training session</p> <p>Corrective action plan: Will take a sample of water in good weather and improve the water handling during sampling</p> <p>Estate: Layang</p> <p>Water Management Plan for the year 2020</p> <table border="1" data-bbox="1137 911 1939 1236"> <thead> <tr> <th>Objective</th> <th>Category</th> <th>Type / Location</th> <th>Action</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>To monitor the quality of the main water inlet/outlet from estate operation pollution</td> <td>River / Stream</td> <td></td> <td>Quarterly. Every 3 months water sampling will be sent to R & D</td> <td>Quarterly</td> </tr> </tbody> </table>	Objective	Category	Type / Location	Action	Frequency	To monitor the quality of the main water inlet/outlet from estate operation pollution	River / Stream		Quarterly. Every 3 months water sampling will be sent to R & D	Quarterly	
Objective	Category	Type / Location	Action	Frequency									
To monitor the quality of the main water inlet/outlet from estate operation pollution	River / Stream		Quarterly. Every 3 months water sampling will be sent to R & D	Quarterly									

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		Contingency during the water shortage	Water shortage Dry spell Severe water pollution	-	Purchasing water from a vendor License for obtaining from the river	As and when needed Annually	
		To monitor the usage of treated water every month	Daily consumption	SAJ	Awareness to workers on water consumption with care	As and when necessary	
			Pond/Reservoir/Wetland	Rainwater	To use for general cleaning, operation, gardening, etc	As and when necessary	
		Protection of watercourse and pond	Pond/Reservoir/Wetland	Replanting pond / Processing water for Palm Oil Mill	Water analysis result by R & D	Quarterly	
		i. Sighted Final report river quality analysis conducted by Sime Darby Research Sdn. Bhd. as follows;					

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Sample Number: IE926/2020
 Client: Layang Estate
 Date sampled: 27th October 2020
 Date received: 5th November 2020
 Date Tested: 5th November 2020
 Date Issued: 23rd November 2020

1. Location: Upstream – 1998A/3
 Lab Code: C-W-IE-202011-002987

Analysis Test	Actual Result	Standard Quality
pH (25°C)	4.4	6.0 – 9.0
BOD (mg/l)	4	3
COD (mg/l)	40	25
SS (mg/l)	24	50
AN (mg/l)	< 1	0.3
DO (mg/l)	5.34	5.0 – 7.0
P (mg/l)	ND	0.2

2. Location: Midstream – 2010A/6
 Lab Code: C-W-IE-202011-002989

Analysis Test	Actual Result	Standard Quality
pH (25°C)	5.5	6.0 – 9.0
BOD (mg/l)	4	3
COD (mg/l)	48	25
SS (mg/l)	6	50
AN (mg/l)	< 1	0.3
DO (mg/l)	4.5	5.0 – 7.0
P (mg/l)	ND	0.2

3. Location: Downstream – 2001A/4

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Lab Code:C-W-IE-202011-002992				
Analysis Test		Actual Result	Standard Quality	
pH (25°C)		4.5	6.0 – 9.0	
BOD (mg/l)		5	3	
COD (mg/l)		40	25	
SS (mg/l)		20	50	
AN (mg/l)		< 1	0.3	
DO (mg/l)		4.84	5.0 – 7.0	
P (mg/l)		ND	0.2	
<p>Based on the analysis at Downstream – 2001A/4 (Final flow), the analysis test for pH (25°C), BOD (mg/l), COD(mg/l), and DO(mg/l) is above the standard quality, therefore estate management has established the Corrective / Preventive action plan for Nonconforming water analysis result dated 25th November 2020. The details of the investigation as follows;</p> <p>Root cause: Sample taken during raining season</p> <p>Corrective action plan: Will take a sample of water in good weather and improve the water handling during sampling</p> <p>Estate : CEP Renggam</p> <p>Water Management Plan for the year 2020</p>				
Objective	Category	Type / Location	Action	Frequenc y

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		Contingency during the water shortage	Water shortage Dry spell Severe water pollution	-	Purchasing water from a vendor License for obtaining from the river	As and when needed Annually		
		To monitor the usage of treated water every month	Daily consumption	SAJ	Awareness to workers on water consumption with care	As and when necessary		
			Pond/Reservoir/Wetland	Rainwater	To use for general cleaning, operation, gardening, etc	As and when necessary		
		Protection of watercourse and pond	Pond/Reservoir/Wetland	Replanting pond / Processing water for Palm Oil Mill	Water analysis result by R & D	Quarterly		
		No river quality analysis requires as the estate does not have a river or stream flowing in and out from the estate area						

<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) 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>Sime Darby Plantation Berhad has established a Guideline on Riparian Reserve Management in Sime Darby Plantations. Revision in July 2020, Version No: 2. The procedure has outlined the monitoring and management plan to ensure water is protected.</p> <p>The several definitions of landscape elements associated with rivers;</p> <p>1.1.1 – A river is a natural flowing watercourse, usually freshwater, flowing towards an ocean, sea, lake or another river. In some cases, a river flows into the ground and become dry at the end of its course without reaching another body of water.</p> <p>1.1.2 – According to National Land Code 1965, a river is any river, stream, creek or other natural watercourse and any tributary, distributary, or artificial deviation thereof.</p> <p>1.1.3 – Riparian reserves are strips of natural vegetation located along rivers, streams and lakes, surrounded by areas of non – natural vegetation like plantations. The terms riparian is derived from the Latin for "riverbank" is used to refer to land located next to natural lakes, as well as streams and rivers.</p> <p>Sighted the Water Management Plan for watercourses in all sample Estates as below;</p> <p>1. To set aside a minimum of a riparian zone as tabulated below;</p> <table border="1" data-bbox="1176 1220 1937 1380"> <thead> <tr> <th>Width of water channel between banks</th> <th>River reserve width requirements for both banks</th> </tr> </thead> <tbody> <tr> <td>> 40 m</td> <td>50 m</td> </tr> <tr> <td>20 – 40 m</td> <td>40 m</td> </tr> <tr> <td>10 – 20 m</td> <td>20 m</td> </tr> </tbody> </table>	Width of water channel between banks	River reserve width requirements for both banks	> 40 m	50 m	20 – 40 m	40 m	10 – 20 m	20 m	<p>Complied</p>
Width of water channel between banks	River reserve width requirements for both banks										
> 40 m	50 m										
20 – 40 m	40 m										
10 – 20 m	20 m										

		<table border="1" data-bbox="1176 363 1942 464"> <tr> <td>5 – 10 m</td> <td>10 m</td> </tr> <tr> <td>< 5 m</td> <td>5 m</td> </tr> <tr> <td>* > 3 m</td> <td>20 m</td> </tr> </table> <p data-bbox="1137 501 1935 834"> 2. To erect proper signboard at strategic points along the boundary to riparian zones 3. To erect riparian Zone signboard. 4. To identify the location of river/stream in the Estate map 5. To paint with red & white bands on frond butt/trunk of every alternate palm bordering the riparian zone. 6. Fertilizers and herbicides are prohibited. 7. To monitor rainfall data. </p> <p data-bbox="1137 903 1935 1094"> The hydrology map was sighted. The management has identified water hydrology namely upper stream, middle stream and downstream. These areas were classified as a riparian & buffer zone area. The area that gazetted as a riparian & buffer zones to be marked with white & red paint. No field activities involving chemicals such as spraying and manuring are allowed in this area. </p>	5 – 10 m	10 m	< 5 m	5 m	* > 3 m	20 m	
5 – 10 m	10 m								
< 5 m	5 m								
* > 3 m	20 m								
7.8.3	<p data-bbox="255 1121 1111 1217"> 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 data-bbox="255 1225 501 1257"> - Minor compliance - </p>	<p data-bbox="1137 1121 1935 1345"> The Palm Oil Mill applies the biological system with an anaerobic lagoon and tertiary plant (membrane plant) in series for its treatment of effluent. The quality of the land application and composting was analyzed every month and the parameters are pH, BOD3, SS, OG, AN and TN. Based on the quarterly report to the Department of Environment, generally, the Palm Oil Mill has complied with the regulated limit. </p>	Complied						

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Sighted latest Palm Oil Mill effluent analysis as below;

Lab reference: EP372/2020
 Date received: 9th October 2020
 Date sampled: 7th October 2020
 Date tested: 9th October 2020
 Date issued: 19th October 2020
 Sample: Effluent analysis test report
 Result :

No	Analysis	Result	Parameter as per Department of Environment 1974 (Act 127)
1	pH	7.9	5 – 9
2	BOD	322	Less 2500
5	SS	520	N/A
6	OG	6	N/A
7	AN	191	400 max
8	TN	250	5 max

The result at the final discharge is according to Akta Kualiti Alam Sekitar 1974 and compliance with Jadual Pematuhan issued by Department of Environmental, valid from 1st July 2020 – 30th June 2021. No Jadual Pematuhan : AS(B)J31/152/000/084Jld10(04). Based on the result the conforms to parameter limits for land application.

Sighted latest the stack emission monitoring as below;

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Stack emission monitoring – boiler no. 1
 Lab No: E/SE/2007/25615A
 Our reference : ETD/SE/HPOM/2020/07/20666
 Date Monitored: 14th July 2020
 Date Reported: 23rd July 2020

Parameter		Methods	Boiler No.1	Regulation
Total particulate matter@12 % CO2	Mg/m3	Malaysia standard 1596:2003	16.47	150
Carbon Monoxide as CO	mg/m3	In house method No. 29 based on manufacturer Method	408.057	1000

Stack emission monitoring - Fume Hood Chimney 4
 Lab No: E/SE/2007/25615B
 Our reference : ETD/SE/HPOM/2020/07/20666
 Date Monitored: 14th July 2020
 Date Reported: 23rd July 2020

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Parameter		Methods	Boiler No.1	Regulation
Total particulate matter	mg/m3	Malaysia standard 1596:2003	4.52	50
<p>Stack emission monitoring – Fume Hood Chimney 4 Lab No: E/SE/2007/25615C Our reference : ETD/SE/HPOM/2020/07/20666 Date Monitored: 14th July 2020 Date Reported: 23rd July 2020</p>				
Parameter		Methods	Boiler No.1	Regulation
Concentration of halogenated hydrocarbons as TOC	mg/m3	EPA TO17	0.9466	20
The concentration of Non-halogenated	mg/m3	EPA TO17	2.1413	150

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		hydrocarbons as TOC													
		<p>The result at the final discharge is according to Akta Kualiti Alam Sekitar 1974 and compliance with Jadual Pematuhan issued by Department of Environmental, valid from 1st July 2020 – 30th June 2021. No Jadual Pematuhan : AS(B)J31/152/000/084Jld10(04). Based on the result the conforms to parameter limits for land application.</p>													
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>Water for FFB processing was sourced waterway. Water from the waterway was pumping into a water holding pond plant and used by Palm Oil Mill for FFB processing. The consumption was measured by a flowmeter and recorded in "Summary of Consumption Water/MT FFB".</p>					Complied								
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised															
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -</p>	<p>Sighted the plan for improving the efficiency of the use of fossil fuels and to optimize renewable which was incorporated in the Environmental Management Plan in the respective estate. Monthly records of energy consumption for non-renewable and sources were kept and documented. It is monitored to optimize the use of renewable energy. Record for Diesel consumption for the respective estate for the year 2020 as tabulated below;</p> <p>Estate: Kulai Estate</p> <table border="1" data-bbox="1137 1332 1899 1396"> <thead> <tr> <th>Month</th> <th>Diesel (litre)</th> <th>FFB Production</th> <th>Litre /MT</th> </tr> </thead> <tbody> <tr> <td>Jan 2020</td> <td>2,886.45</td> <td>6,460.00</td> <td>0.45</td> </tr> </tbody> </table>					Month	Diesel (litre)	FFB Production	Litre /MT	Jan 2020	2,886.45	6,460.00	0.45	Complied
Month	Diesel (litre)	FFB Production	Litre /MT												
Jan 2020	2,886.45	6,460.00	0.45												

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Feb 2020	3,450.64	6,870.00	0.50
March 2020	3,352.73	5,123.00	0.65
April 2020	3,449.84	5,539.00	0.62
May 2020	3,965.10	5,701.00	0.70
June 2020	4,890.78	6,844.00	0.71
July 2020	4,897.92	7,265.00	0.67
August 2020	4,215.17	5,918.00	0.71
September	4,243.37	6,744.00	0.63
October	3,757.65	6,363.00	0.59
Total	39,109.65	62,827.00	0.62

Estate : Seri Pulai

Month	Diesel (Liter)	FFB Production	Liter /MT
Jan 2020	3,151.00	1,808.91	1.74
Feb 2020	3,752.00	2,347.12	1.60
March 2020	3,660.00	2,096.04	1.75
April 2020	2,781.00	2,295.83	1.21
May 2020	2,788.00	2,091.22	1.33
June 2020	3,417.00	2,523.03	1.35
July 2020	3,809.00	3,014.38	1.26
August 2020	3,725.00	3,315.00	1.12
September	3,828.00	3,700.00	1.03
October	4,352.00	3,900.00	1.12
November	4,034.00	2,568.30	1.57
Total	39,297.00	29,659.83	1.32

Estate: Layang

Month	Diesel (Liter)	FFB Production	Liter /MT
Jan 2020	9,144.00	3,926.08	2.33
Feb 2020	9,541.00	3,934.57	2.42

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March 2020	10,103.00	3,835.41	2.63
April 2020	7,430.00	4,440.41	1.67
May 2020	6,163.00	4,741.79	1.30
June 2020	10,039.00	6,865.36	1.46
July 2020	10,549.00	6,783.76	1.56
August 2020	9,431.00	6,714.03	1.40
September	25,655.00	7,051.98	3.64
October	9,544.00	6,346.98	1.50
November	10,269.00	5,400.73	1.90
Total	117,868.00	60,041.10	1.96

Estate: CEP Renggam

Month	Diesel (Liter)	FFB Production	Liter /MT
Jan 2020	6,344.00	3,045.95	2.08
Feb 2020	5,443.00	3,336.48	1.63
March 2020	6,556.00	3,529.20	1.86
April 2020	5,258.00	4,051.31	1.30
May 2020	5,991.00	3,592.20	1.67
June 2020	7,327.00	5,190.55	1.41
July 2020	7,060.00	4,836.08	1.46
August 2020	8,357.00	4,706.93	1.78
September	8,059.00	4,814.30	1.67
October	8,781.00	4,761.40	1.84
November	7,841.00	4,357.70	1.80
Total	77,017.00	46,222.10	1.67

POM : Hadapan Palm Oil Mill

Month	Diesel Liter /MT
Jan 2020	2.48
Feb 2020	1.90

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		March 2020	1.98																		
		April 2020	1.81																		
		May 2020	1.61																		
		June 2020	1.65																		
		July 2020	1.89																		
		August 2020	1.75																		
		September	2.08																		
		Total	1.90																		
		Data is being compiled for comparison and control for future improvement. To-date consumption was recorded as follows;																			
		<table border="1"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Liter / FFB</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kulai Estate</td> <td>0.62</td> </tr> <tr> <td>2</td> <td>Seri Pulai Estate</td> <td>1.32</td> </tr> <tr> <td>3</td> <td>Layang Estate</td> <td>1.96</td> </tr> <tr> <td>4</td> <td>CEP Renggam</td> <td>1.67</td> </tr> <tr> <td>5</td> <td>Hadapan Palm Oil Mill</td> <td>1.90</td> </tr> </tbody> </table>				No	Estate	Liter / FFB	1	Kulai Estate	0.62	2	Seri Pulai Estate	1.32	3	Layang Estate	1.96	4	CEP Renggam	1.67	5
No	Estate	Liter / FFB																			
1	Kulai Estate	0.62																			
2	Seri Pulai Estate	1.32																			
3	Layang Estate	1.96																			
4	CEP Renggam	1.67																			
5	Hadapan Palm Oil Mill	1.90																			
Sighted the action plan prepared by the respective estate for improving the efficiency of use of non-renewable and renewable energy as below;																					
Estate / POM : Kulai Estate / Seri Pulai Estate / Layang Estate / CEP Renggam																					
Estate / Hadapan Palm Oil Mill																					
Objective	Category	Types / Location	Actions																		

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		Optimizing the efficiency of the usage of non-renewable and renewable energy	Electricity	Workers housing complex, office, Palm Oil Mill compound	Worker housing inspection to ensure no illegal wiring To educate on electricity saving practices	
			Diesel	Transport Machineries	Preventive maintenance program for estate / Palm Oil Mill vehicle Educate workers on fuel-saving practices To reduce/minimize of diesel used	
			Reduction of GHG emission	Palm Oil Mill compound	Recording of the data on the process GHG volume based on the potential source of gaseous	
			Fiber and Shell	Palm Oil Mill compound	Fuel ratio of 90% and 10% dry shell	
<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>						
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Estates polluting activities are identified and evaluated in its EIA and EIE and pollution prevention plans are in place. Sighted palm GHG SOU 24 Hadapan Report 2019 prepared using GHG calculator version by the company's sustainability department. The calculation involves the Palm Oil Mill and all its supply bases. Land conversion, CO2 emission from fertilizer, N2O emission, fuel consumption, crop sequestration, etc.</p>	Complied			

Identification of significant pollutants and greenhouse gas (GHG) emissions has been done e.g. Land conversion, Emissions from Fertilizer, Emissions from peat, Fuel Consumption, and crop sequestration. Their usage has been recorded and documented at each of the operating units. Approved GHG calculator, Palm GHG was used for the calculation during the implementation period.

Identification of significant pollutants and greenhouse gas (GHG) emissions has been conducted for the followings;

1. Land conversion,
2. CO2 Emissions from Fertilizer,
3. N2O Emissions from peat,
4. N2O Emissions from Fertilizer
5. Fuel Consumption
6. Peat Oxidation
7. Crop sequestration.

Summary Emission in 2019 for SOU 24 Hadapan Palm Oil Mill as below: -

1. Emission per product

Emission per product	tCO ₂ e/tProduct
CPO	0.91
PKO	0.00

2. Extraction

Extraction	%
OER	20.63

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KER	5.23
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3. Production

Production	t/yr
FFB Process	223,513.59
CPO Produced	46,102.97
PKO Produced	11,689.79

4. Land Use

Land Use	Ha
OP Planted on mineral soil	29,465.17
OP Planted on peat	205.60
Conservation (forested)	0
Conservation (non-forested)	0
Total	29,670.77

5. Summary of field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tC O ₂ e / FF B	tCO ₂ e	tC O ₂ e / FF B	tCO ₂ e	tC O ₂ e / FF B	tCO ₂ e	tCO ₂ e / FFB
Emission & Sink								
Total	38633.83	0.22	1811.34	0.18	7323.11	0.00	47768.28	

6. Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	4556.49	0.02
Fuel Consumption	125.70	0.00
Grid Electricity Utilization	0	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	4682.19	0.02

All the sample Estates and Palm Oil Mill have been identified all the process/area of activity in the daily operation and documented the other significant pollutants in Environmental Management Plan Year 2020. The plan has been prepared by the respective Assistant Manager and approved by Estate and Palm Oil Mill Manager. The Environmental Management Plan include:

1. Environmental Risk Management Plan
2. Waste Management Plan
3. Water Management Plan
4. HCV Management Plan
5. Pollution Prevention Plan

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		<p>6. Chemical Reduction Plan 7. Energy Management Plan</p> <p>Sighted the action plan prepared by the respective estate for improving the efficiency of use of non-renewable and renewable energy as below;</p> <p style="text-align: center;">Hadapan Palm Oil Mill</p> <table border="1" data-bbox="1137 635 1928 1353"> <thead> <tr> <th>Objective</th> <th>Category</th> <th>Types / Location</th> <th>Actions</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Optimizing the efficiency of the usage of non-renewable and renewable energy</td> <td>Electricity</td> <td>Workers housing complex, office, Palm Oil Mill compound</td> <td>Worker housing inspection to ensure no illegal wiring To educate on electricity saving practices</td> </tr> <tr> <td>Diesel</td> <td>Transport Machineries</td> <td>Preventive maintenance program for estate / Palm Oil Mill vehicle Educate workers on fuel-saving practices To reduce/minimize of diesel used</td> </tr> <tr> <td></td> <td>Reduction of GHG emission</td> <td>Palm Oil Mill compound</td> <td>Recording of the data on the process GHG volume based</td> </tr> </tbody> </table>	Objective	Category	Types / Location	Actions	Optimizing the efficiency of the usage of non-renewable and renewable energy	Electricity	Workers housing complex, office, Palm Oil Mill compound	Worker housing inspection to ensure no illegal wiring To educate on electricity saving practices	Diesel	Transport Machineries	Preventive maintenance program for estate / Palm Oil Mill vehicle Educate workers on fuel-saving practices To reduce/minimize of diesel used		Reduction of GHG emission	Palm Oil Mill compound	Recording of the data on the process GHG volume based	
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				on the potential source of gaseous	
			Fibre and Shell	Palm Oil Mill compound	Fuel ratio of 90% and 10% dry shell
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	Not applicable as this subject is only established for new plantings / proposed development area.			Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	Refer to indicator 7.10.1.			Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area					
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>SOP for land preparation was established in the Sime Darby Agricultural Reference Manual – Oil Palm Planting; Version 3; Section 15 (Plant Protection); Issue date: 1st July 2011)</p> <p>Clause 1.1.3 (iii) - Replanting activities as stated in Section 4 clause 3 & sub -</p> <p>Clause 3.20 Shredding of felled trunk, bole & root mass</p> <p>Open burning concerning new planting, re-planting, or other development is not allowed and this was communicated to the employees and stakeholders.</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>Group Sustainability & Quality Policy Statement signed by Mohamad Helmy Othman Basha, Group Managing Director dated 2nd December 2019.</p>			Complied

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		<p>We recognize the inherent value of forests and the ecosystem services they provide as well as the scarcity of natural resources and threats from climate change. All our activities will be guided by a precautionary approach and a no-deforestation objective. We recognize the limitation of individual company commitments in this area and seek to work with all stakeholders including competitors in delivering positive long term conservation results.</p> <p>(ix) Zero tolerance of the use of fire within our land boundaries and conservation area and the establishment of effective monitoring and prevention systems as well as proactive firefighting measure in and around our operations.</p> <p>Seen Fire Drill with Emergency Rescue Procedure (ERP) and Fire Fighting organization in all sample Estates and Palm Oil Mill. Emergency Response Procedure (ERP) is available in the local language (Malay and English). The Emergency Response Procedure (ERP) has been explained to all workers and staff during training. Emergency Response Procedure (ERP) include the emergency contact number, and also have Guidelines on Accident, Emergency Procedures and Exit routes as well as assembly point was displayed on the notice board in the estates and Palm Oil Mill respectively.</p>	
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Sighted Emergency Response Team (ERT) Organization Year 2020 in all sample Estates. The chairman of ERT organization is the Estate and Palm Oil Mill Manager. The sub-community register under ERT organizations such as Fire and Rescue, Flooding, First Aids and Accident Investigation & Rescue.</p> <p>The Emergency Response Procedure (ERP) has been explained to all workers and staff during training. Emergency Response Procedure (ERP) include the emergency contact number, and also have Guidelines on Accident, Emergency Procedures and Exit routes</p>	Complied

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		<p>as well as assembly point was displayed on the notice board in the estates and Palm Oil Mill respectively.</p> <p>Sighted a letter issue form the respective operating units (Estate and Palm Oil Mill) to all stakeholders regarding fire prevention and control measure;</p> <table border="1" data-bbox="1137 555 1930 801"> <thead> <tr> <th>Estate</th> <th>Issuance Date</th> <th>Highlighted issue</th> </tr> </thead> <tbody> <tr> <td>Kulai Estate</td> <td>4th December 2020</td> <td rowspan="3">Protection of human rights defender / whistleblowing response procedure / fire prevention method. (Internal and External Stakeholder)</td> </tr> <tr> <td>Seri Pulai Esatate</td> <td>24th November 2020</td> </tr> <tr> <td>CEP Renggam</td> <td>1st December 2020</td> </tr> </tbody> </table>	Estate	Issuance Date	Highlighted issue	Kulai Estate	4 th December 2020	Protection of human rights defender / whistleblowing response procedure / fire prevention method. (Internal and External Stakeholder)	Seri Pulai Esatate	24 th November 2020	CEP Renggam	1 st December 2020	
Estate	Issuance Date	Highlighted issue											
Kulai Estate	4 th December 2020	Protection of human rights defender / whistleblowing response procedure / fire prevention method. (Internal and External Stakeholder)											
Seri Pulai Esatate	24 th November 2020												
CEP Renggam	1 st December 2020												
<p>Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>													
<p>7.12.1</p>	<p>(C) 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>	<p>Sighted In-House High Conservation Value (HCV) Assessment carried out for SOU 24 Hadapan by PSQM Department In-House HCV Assessor i.e. Siti Norralakman Yahya, Nur Aida Ab. Gani, Norsyamimi Saifuliizam and Briony Octovia Homer Mum on 16th – 20th December 2013 and re-verification visit on 13th December 2020 (New addendum).</p>	<p>Complied</p>										
<p>7.12.2</p>	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the</p>	<p>Sighted In-House High Conservation Value (HCV) Assessment carried out for SOU 24 Hadapan by PSQM Department In-House HCV Assessor i.e. Siti Norralakman Yahya, Nur Aida Ab. Gani, Norsyamimi Saifuliizam, Briony Octovia Homer Mum on 16th – 20th December 2013 and re-verification visit on 13th December 2020 (New addendum).</p>	<p>Complied</p>										

	<p>HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: 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>The Methodology and participatory used in the assessment process comprise of the following steps:</p> <ul style="list-style-type: none"> - Team formation and briefing on project scope. - Compilation of secondary and available primary data, including preliminary Stakeholders consultation. - Fieldwork and primary data collection – physical inspection, site observation, Internal and External stakeholder consultation. - Data analysis and interpretation. - Preparation of full report and maps - Critical review of draft report between team members - Revise report and finalize (final) <p>The study covers the HCV 1-6 allotted area of concern and the mapping /GIS specialist input.</p> <ol style="list-style-type: none"> 1. HCV 1 – There are no significant concentrations of HCV 1 species (RTE or endemic), or which contains habitat critical to the survival of these species in the area of interest. 2. HCV 2 - The Palm Oil Mill had developed with oil palm and there was no large landscape ecosystem (more than 50,000ha) 3. HCV 3 – There is no RTE ecosystem and habitat in the Palm Oil Mill. 4. HCV 4 – There is a water catchment area that hold a conservation value for daily basic needs or emergency water use. 5. HCV 5 – There was no natural sites or resources in the Palm Oil Mill that local communities are dependent on. 6. HCV 6 - There are no custom ceremonies or rituals, which require a cultural, religious, or sacred site, being practiced by locals. 	
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Sighted the In – House High Conservation Value Assessment for SOU 24 Hadapan prepared by PSQM Department, Sime Darby Plantation Sdn. Bhd., as follows;

Estate	Assessment area	Ha	Present HCV	Remarks
Seri Pulai Estate	> 25° slope	86.0 2	HCV 4	Promote soil conservation and prevent erosion
Kulai Estate	Ravine – Fluvial slope	14.5 3	HCV 4	Promote soil conservation and prevent erosion
	Water catchment	0.77	HCV 4	Provide basic service (water resources) for critical situations
Layang Estate	Palm Oil Mill pond	6.02	HCV 4	Provide basic service (water resources) for critical situations
CEP Renggam Estate	Water catchment	7.19	HCV 4	Provide basic service (water resources) for critical situations

The assessment concluded with a recommendation that incorporated basic conservation planning principles for consideration into management regimes of preserving the HCV and conservation areas. The proposed management and monitoring for HCVA possible threats in SOU 24 Hadapan is tabled in Table 2:

No.	HCV Area (HCVA)	Possible threats	Management & Monitoring of HCVA
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		1	<p>> 25 slope Ravine – Fluvial slope</p>	<p>Soil erosion (the steeper the slope, the greater the erosion power) Eroded soil deposited downslope can cause road damage</p>	<p>Education and awareness for workers Marking of slope on the map and in the field Monitoring by photo (with date) of terracing in the field Monitoring of sedimentation and siltation Soil/ground cover measurement Waterway sedimentation measurements</p>	
		2	<p>Water bodies</p>	<p>Riverbanks erosion Sedimentation Eutrophication of aquatic environments and vegetation overgrowth due to fertilizer applications Interruption on aquatic biological health Degradation of catchment areas</p>	<p>Education and awareness for workers Monitoring of water sampling results (where applicable) Ensure no agrochemical activities are carried out bordering the water bodies Cover any bare soil with the planting of vetiver grasses, groundcovers, etc to reduce soil erosion Analysis of water quality, water flow and surface run-off measurements Floods occurrence records Fish stock surveys</p>	

7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable.	Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or 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>	Based on the report mentioned in Indicator 7.12.2, there is a water catchment area that hold a conservation value for daily basic needs or emergency water use, > 25° slope, Ravine – Fluvial slope and Palm Oil Mill pond. Due to the presence of HCV 4 in the area of control, therefore the management plan is still addressed in Monitoring of Biodiversity and HCV areas.	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>	Based on the report mentioned in Indicator 7.12.2, There were no natural sites or resources in the Palm Oil Mill that local communities are dependent on. Nonetheless, employees are educated through morning briefing and awareness about HCV	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>	Based on the report mentioned in Indicator 7.12.2, There are no significant concentrations of HCV 1 species (RTE or endemic), or which contains habitat critical to the survival of these species in the area of interest. Nonetheless, employees are educated through morning briefing and signage about the restriction of hunting wildlife.	Complied

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<p>7.12.7</p>	<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. - Minor compliance -</p>	<p>Based on the report mentioned in Indicator 7.12.2, there is a water catchment area that holds a conservation value for daily basic needs or emergency water use, > 25° slope, Ravine – Fluvial slope and Palm Oil Mill pond. Due to the presence of HCV 4 in the area of control, therefore the management plan is still addressed in Monitoring of Biodiversity and HCV areas.</p> <p>The monitoring program shall be designed to evaluate impacts resulting from the Estates operational activities to the respective identified conservations areas. Continuous monitoring of the HCV and others conservation areas will be an integral part of all phases of the conservation area status. Sighted sample of Monitoring of HCV Management plan in the Layang estate as below;</p> <table border="1" data-bbox="1137 815 1930 1168"> <thead> <tr> <th>No.</th> <th>Scope</th> <th>Objective</th> <th>Program</th> <th>Status Todate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Forest Border</td> <td>To ensure no hunting or trespassing on the site</td> <td>Periodic patrolling will be done by AP's and staff to ensure no hunting or trespassing occur on the site</td> <td>Fortnightly patrolling by AP and Staff</td> </tr> </tbody> </table>	No.	Scope	Objective	Program	Status Todate	1	Forest Border	To ensure no hunting or trespassing on the site	Periodic patrolling will be done by AP's and staff to ensure no hunting or trespassing occur on the site	Fortnightly patrolling by AP and Staff	<p>Complied</p>
No.	Scope	Objective	Program	Status Todate									
1	Forest Border	To ensure no hunting or trespassing on the site	Periodic patrolling will be done by AP's and staff to ensure no hunting or trespassing occur on the site	Fortnightly patrolling by AP and Staff									

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		2	Palm Oil Mill Pond	To ensure no chemical/fertilizer application activity on the site. To liaise with Hadapan Palm Oil Mill Management on the program	Re-demarcation of buffer zone area around the Palm Oil Mill pond Monitoring any activity on the site	To re-demarcate the 5M buffer zone in Marc 2018 No agrochemical application allowed near any water bodies	
		3	RTE Species	To ensure no hunting of RTE species occur in the estate	Conduct training about the endangered species to increase awareness among the estate worker	To conduct HCV training to all Layang's estate workers and APs during muster	
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	There is no land clearing after November 2005 in all sample estates.					Complied

Appendix B: Approved Time Bound Plan

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 '10	11-Aug-25	RSPO 550179	N.A
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	N.A
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	N.A
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	N.A
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	N.A
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	N.A
5a	Sg Samak		3 Mar '11	NA	NA	Mill was closed down.
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	N.A
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	N.A
8	East	Carey Island, Selangor	19 May '10	18-May-25	RSPO 543543	N.A
9	West	Carey Island, Selangor	19 May '10	18-May-25	RSPO 543594	N.A

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SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	Mill was closed down.
10	Bukit Puteri	Raub, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020, MUTU – RSPO/091	N.A
11	Kerdau	Temerloh, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019, MUTU-RSPO/094	N.A
12	Jabor	Kuantan, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049, MUTU-RSPO/092	N.A
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-21	CU-RSPO-855480	N.A
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-21	CU-RSPO-855720	
15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-24	CU-RSPO-855718	N.A
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '11	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051, MUTU-RSPO/093	N.A
17	Kempas	Jasin, Melaka	19 May '10	18-May-25	RSPO-PC-00101	N.A
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	N.A
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-24	RSPO 600305	N.A

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SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	RSPO 550182	Mill was closed down.
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-25	RSPO 548299	N.A
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-25	CU-RSPO-863078	N.A
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	N.A
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042, BV-RSPO-20170705-01	N.A
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	RSPO 739013	Re-certification conducted on 11/12/2020.
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	RSPO 547123	Mill was closed down.
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-23	RSPO 537872	N.A
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	N.A
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-25	RSPO-PC-00116	N.A
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-25	RSPO-PC-00115	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-25	RSPO-PC-00117	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	Mill was closed down.
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	Mill was closed down.
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	N.A
32	Rajawali	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819167, RSPO 0020	N.A
33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	N.A

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34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-815150, MUTU-RSPO/054	Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang.
35	Bintang	Johor	N/A	N/A	N/A	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.

Legends

Certification Withdrawal

NA - NOT APPLICABLE

Note: There are 2 certificate numbers for some SOUs due to transfer of CB.

SDP- RSPO Certification Status for Indonesia Operations

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	SGS-RSPO/PC17-00005	N.A
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	N.A
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	N.A

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NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	3-Aug-22	MUTU-RSPO/014	N.A
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	N.A
7	PT BAHARI GEMBIRA RIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	28-Nov-22	MUTU-RSPO/019	N.A
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	24-Nov-20	RSPO 744708	Re-certification remote audit conducted on 22/02/2021. License end date 24-May-2021.
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	19-Jul-22	MUTU-RSPO/016	N.A
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	N.A
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	19-Nov-22	MUTU-RSPO/017	N.A
12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11	29-Dec-21	MUTU-RSPO/009	N.A
13		BETUNG		1-April-14	31-Mar-24	MUTU-RSPO/035	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	RSPO 744702	Re-certification remote audit conducted on 20/02/2021. License end date 22-May-2021.
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	15-Mar-17	MUTU-RSPO/015	Cert. discontinued – supply bases extended to Rantau POM
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	28-Nov-22	MUTU-RSPO/020	N.A

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NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU-RSPO/004	N.A
18	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16	30-Nov-21	MUTU-RSPO/008	N.A
19		MANDAH		1 April 2014	31/03/24	MUTU-RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU-RSPO/007	N.A
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	28-Dec-22	MUTU-RSPO/018	N.A
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	N.A
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	N.A
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	N.A
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab.Sanggau, Kalimantan Barat	NA	NA	NA	The property was disposed on 25 June 2019 and a 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

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NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
							report and submitted the comment to RSPO CP.

Legends

Pending Certification by RSPO EB	Mill closed down
----------------------------------	------------------

NA - NOT APPLICABLE

SDP - RSPO Certification for Time Bound Plan - NBPOL Operations

As at end Apr 2020

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date
	SOU Name					
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	NA	Guadalcanal Province, Solomon Islands	Certified	18-Mar-11
		Tetere Estate				
		Ngalimbiu Estate				
		Mbalisuna Estate				
		Smallholders – West Zone (83)				
		Smallholders – Central Zone (53)				
		Smallholders – MBA East Zone (59)				
Smallholders – MBE East Zone (37)						
2		Hagita Oil Mill	NA	Milne Bay Province, Papua New Guinea	Certified	15-Feb-18

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	Milne Bay Estates (MBE)	Giligili Estate Hagita Estate Waigani Estate Sagarai Estate Padipadi Estate Mariawatte Estate Smallholders - East Gurney Estate (264) Smallholders - West Gurney Estate (229) Smallholders - East Sagarai Estate (157) Smallholders - West Sagarai Estate (221)				
3	Poliamba (POL)	Poliamba Oil Mill Kara Estate Nalik Estate West Coast Estate Noatsi Estate Madak Estate Smallholders -North Division (615) Smallholders- South Division (868) Smallholders -West Division (309)		New Ireland Province, Papua New Guinea	Certified	19-Mar-12
4	Ramu Agricultural Industries Ltd (RAIL)	Gusap Mill Gusap East (Gusap) Estate Gusap West (Paddock) Estate Surinam Estate Dumpu Estate Ngaru Estate	NA	Morobe Province, Papua New Guinea	Certified	5-Aug-10

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		J Estate (Jephcott) Estate				
		Smallholders - Madang VOPs (71)				
		Smallholders - Morobe VOPs (253)				
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	NA	Oro Bay Province, Papua New Guinea	Certified	1-Feb-13
		Mamba Oil Mill				
		Embi Estate				
		Ambogo Estate				
		Sangara Estate				
		Sumbiripa Estate				
		Mamba Estate				
		Sambogo Estate				
		Scheme Smallholder Sorovi Division(2019)				
		Scheme Smallholder Saiho Division(842)				
		Scheme Smallholder Aeka Division (911)				
		Scheme Smallholder Igora Division (1367)				
		Scheme Smallholder Ilimo Division (671)				
6	West New Britain (WNB)	Mosa Oil Mill	NA	Kimbe, West New Britain, Papua New Guinea	Certified	10-Sep-08
		Kumbango Oil Mill				
		Kapiura Mill				
		Numundo Mill				
		Waraston Mill				
		Bebere Estate				
		Kumbango Estate				
		Togulo Estate				

Dami Estate
Waisisi Estate
Kautu Estate
Karaisu Estate
Moroa Estate
Bilomi Estate
Loata Estate
Haella Estate
Garu Estate
Daliavu Estate
Sapuri Estate
Malilimi Estate
Rigula Estate
Nomundo Estate
Navarai / Karato ME /KDC EU Estate Volupai / Lotomgam / Natupi / Goruru Estate
Lolokoru Estate
Ove Estate
Tamare Estate
Smallholders LSS Mosa (1822)
Smallholders VOP East (1817)
Smallholders VOP Central (1964)
Smallholders VOP West (1279)
Smallholders LSS Kapiura (551)
Smallholders VOP Kapiura (850)

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7	Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Smallholders Kaulong/Akami/Pushiki/Repamira/Sakapei (20)		Markham Farms		Certified on 27 March 2020. There is total area for NPP: 710.30 ha which is currently excluded from the certification scope until the NPP is approved.
		Erap Mill	Sep-20		Certified	
		Munum Estate	Sep-20		Certified	
		Maralumi Estate	Sep-20		Certified	
		Erap Estate	Sep-20		Certified	

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2019** for **Hadapan Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

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

Emission per product	tCO ₂ e/tProduct
CPO	0.91
PKO	0.91

Extraction	%
OER	20.63
KER	5.23

Production	t/yr
FFB Process	223,513.59
CPO Produced	46,102.97
PKO Produced	11,689.79

Land Use	Ha
OP Planted Area	29,465.17
OP Planted on peat	205.60
Conservation (forested)	-
Conservation (non-forested)	-
Total	29,670.77

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion								
CO ₂ Emission from fertilizer								
NO ₂ Emission								
Fuel Consumption								
Peat Oxidation								
Sink								
Crop Sequestration								

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Conservation Sequestration								
Total	38,633.83	0.22	1,811.34	0.18	7,323.11	0.00	47,768.28	0.23

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	4,556.49	0.02
Fuel Consumption	125.70	-
Grid Electricity Utilization	-	-
Credit		
Export of Grid Electricity	-	-
Sales of PKS	-	-
Sales of EFB	-	-
Total	4,682.19	0.02

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	-
Divert to anaerobic diversion (%)	100.00

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100.00
Divert to methane captured (flaring) (%)	-
Divert to methane captured (energy generation) (%)	-

Appendix D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	December 2019	13,610.180	3,712.661	17,322.841
2	January 2020	10,659.460	3,149.896	13,809.356
3	February 2020	12,208.190	4,005.110	16,213.300
4	March 2020	12,931.380	4,416.224	17,347.604
5	April 2020	14,441.080	4,721.422	19,162.502
6	May 2020	16,049.550	4,644.906	20,694.456
7	June 2020	20,831.550	3,026.053	23,857.603
8	July 2020	21,922.080	300.012	22,222.092
9	August 2020	23,178.910	323.525	23,502.435
10	September 2020	24,074.770	850.248	24,925.018
11	October 2020	20,436.270	467.980	20,904.250
12	November 2020	14,614.120	957.257	15,571.377
	Total	204,957.54	30,575.29	235,532.83

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	December 2019	2740.04	670.14
2	January 2020	2246.57	572.25
3	February 2020	2506.67	652.83
4	March 2020	2762.06	673.61
5	April 2020	2966.71	712.10
6	May 2020	3227.81	756.01
7	June 2020	4118.58	1002.53
8	July 2020	4350.08	1021.95
9	August 2020	4690.82	1219.28
10	September 2020	4792.54	1327.98
11	October 2020	4281.87	1105.37
12	November 2020	2951.27	768.88
	Total	41635.02	10482.93

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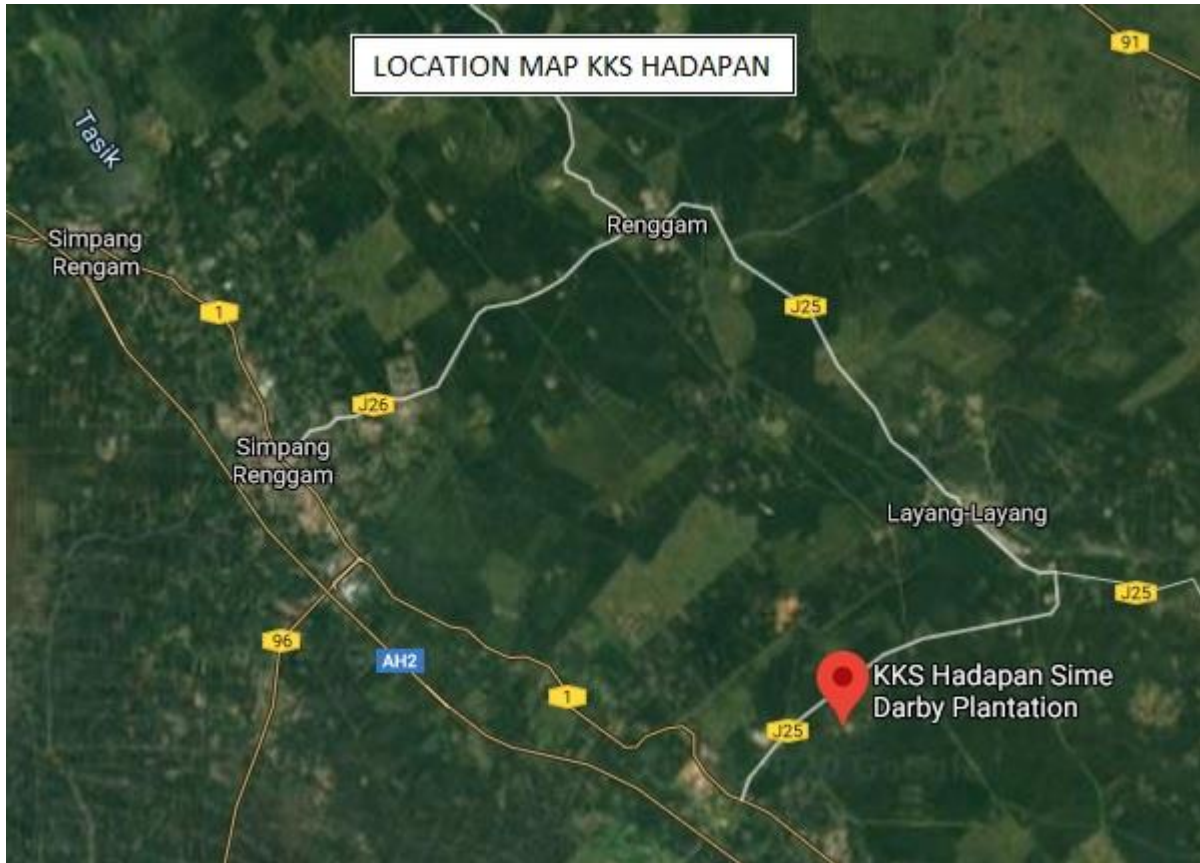
C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	XXX	TR-4f9ff91e-247c	500.00	-
Total			500.00	-

D. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
Nil	n/a	n/a	n/a	n/a

E. Records of CPO & PK Sold as conventional since the last audit (if any)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	XXX	39,873.21	-	
2	YYY	-	9,958.78	

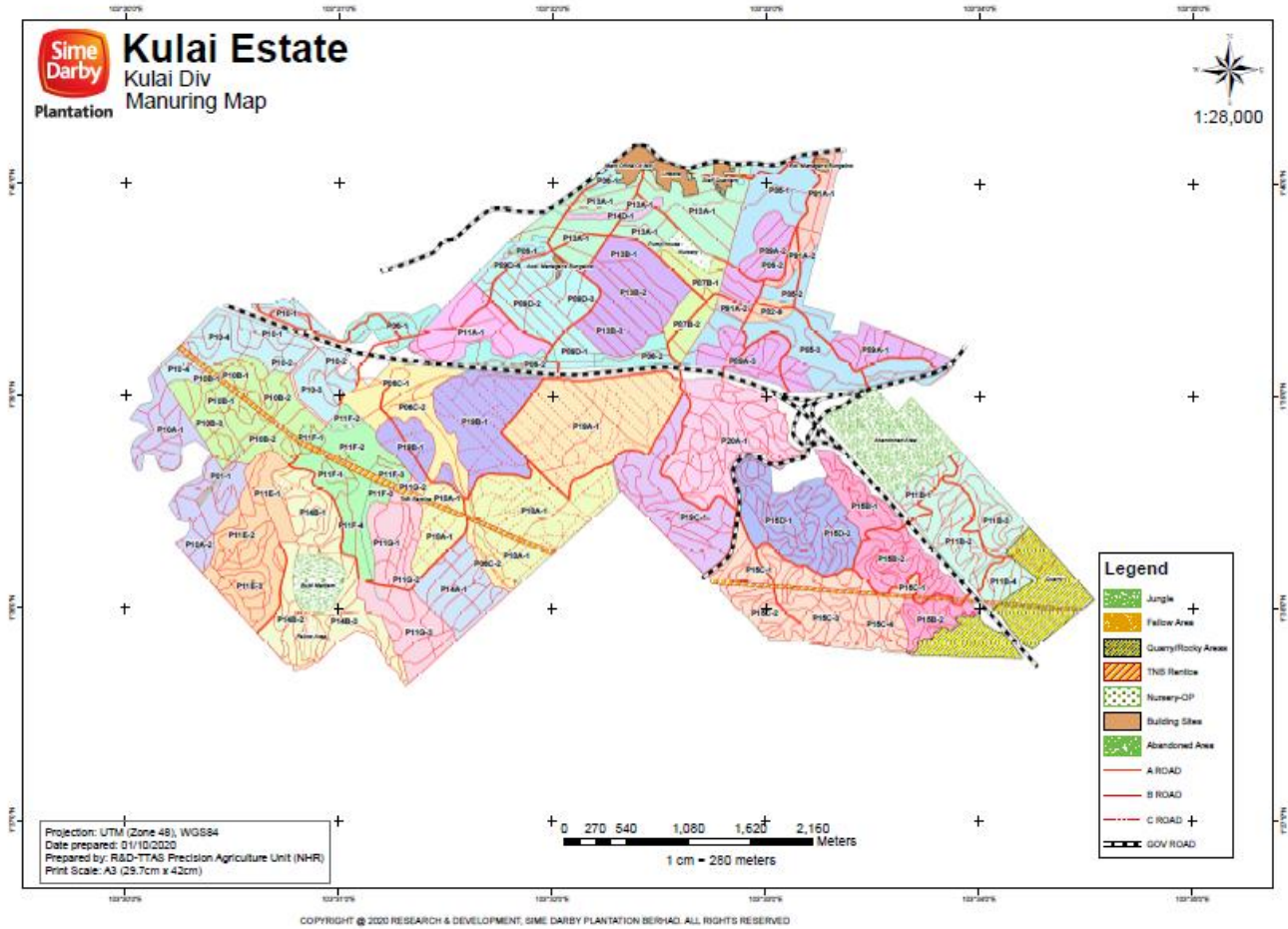
F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
Nil	n/a	n/a	n/a

Appendix E: Location Map of Certification Unit and Supply bases

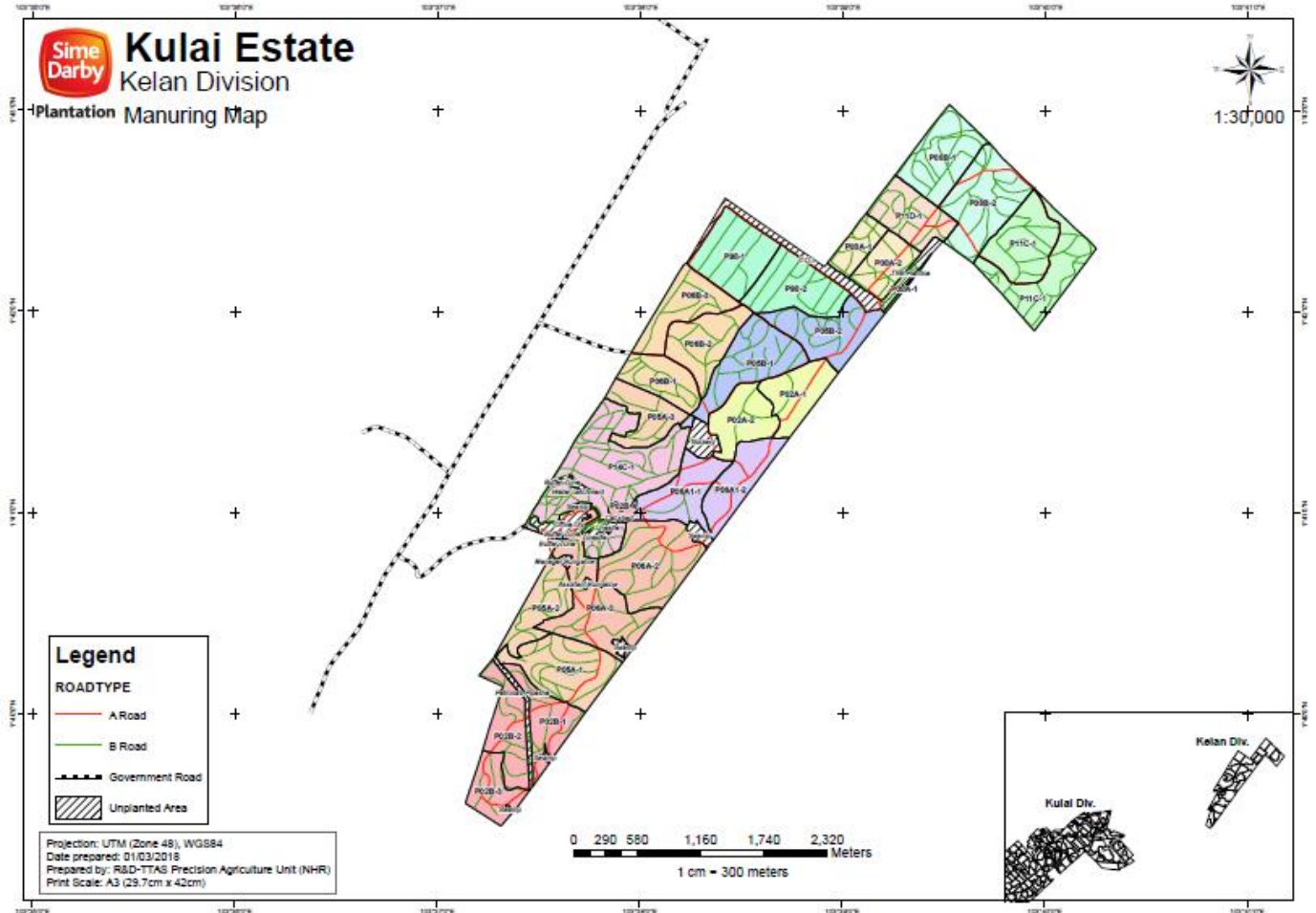


Appendix F: Estate Field Map

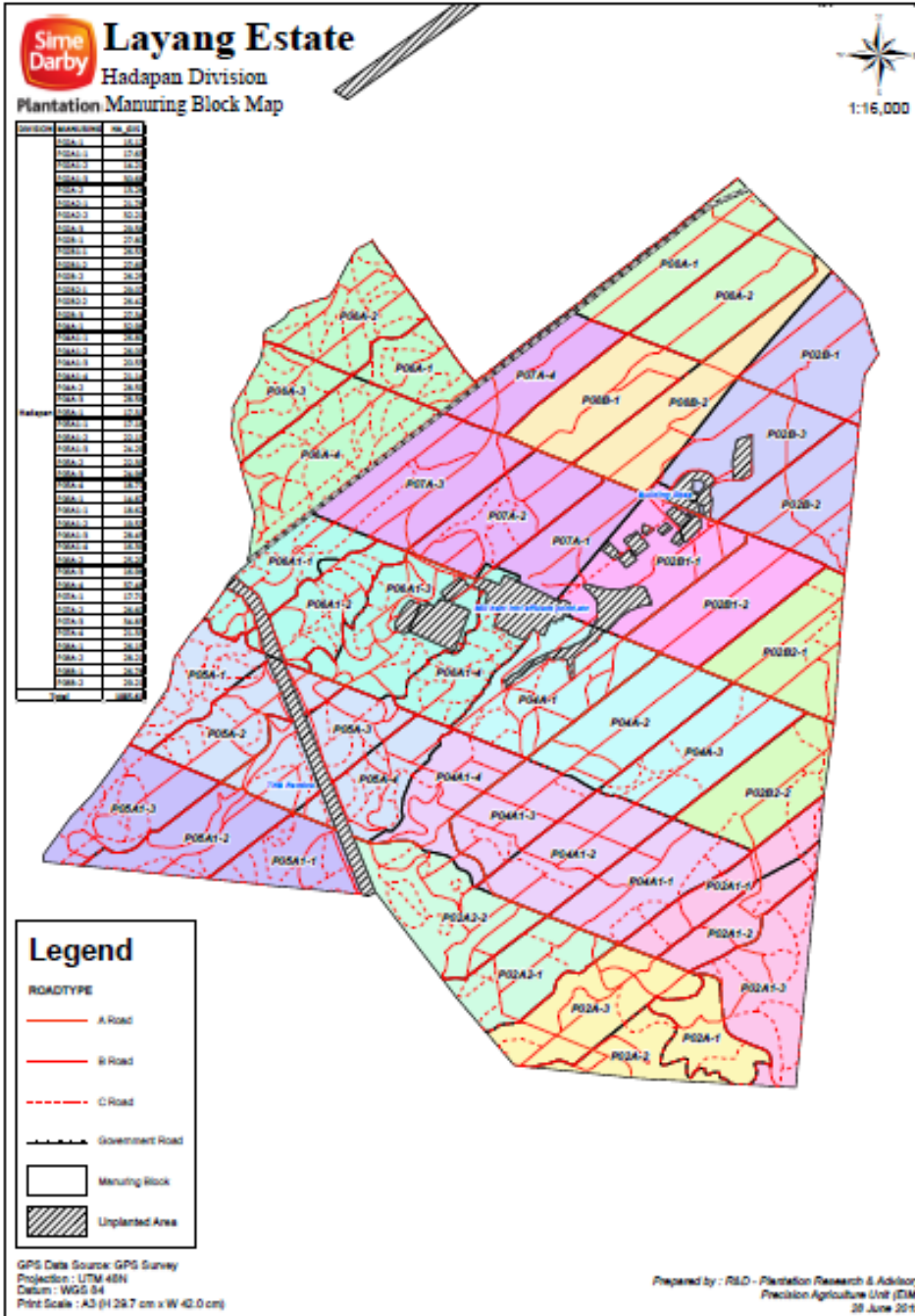
Kulai Estate: Kulai Division



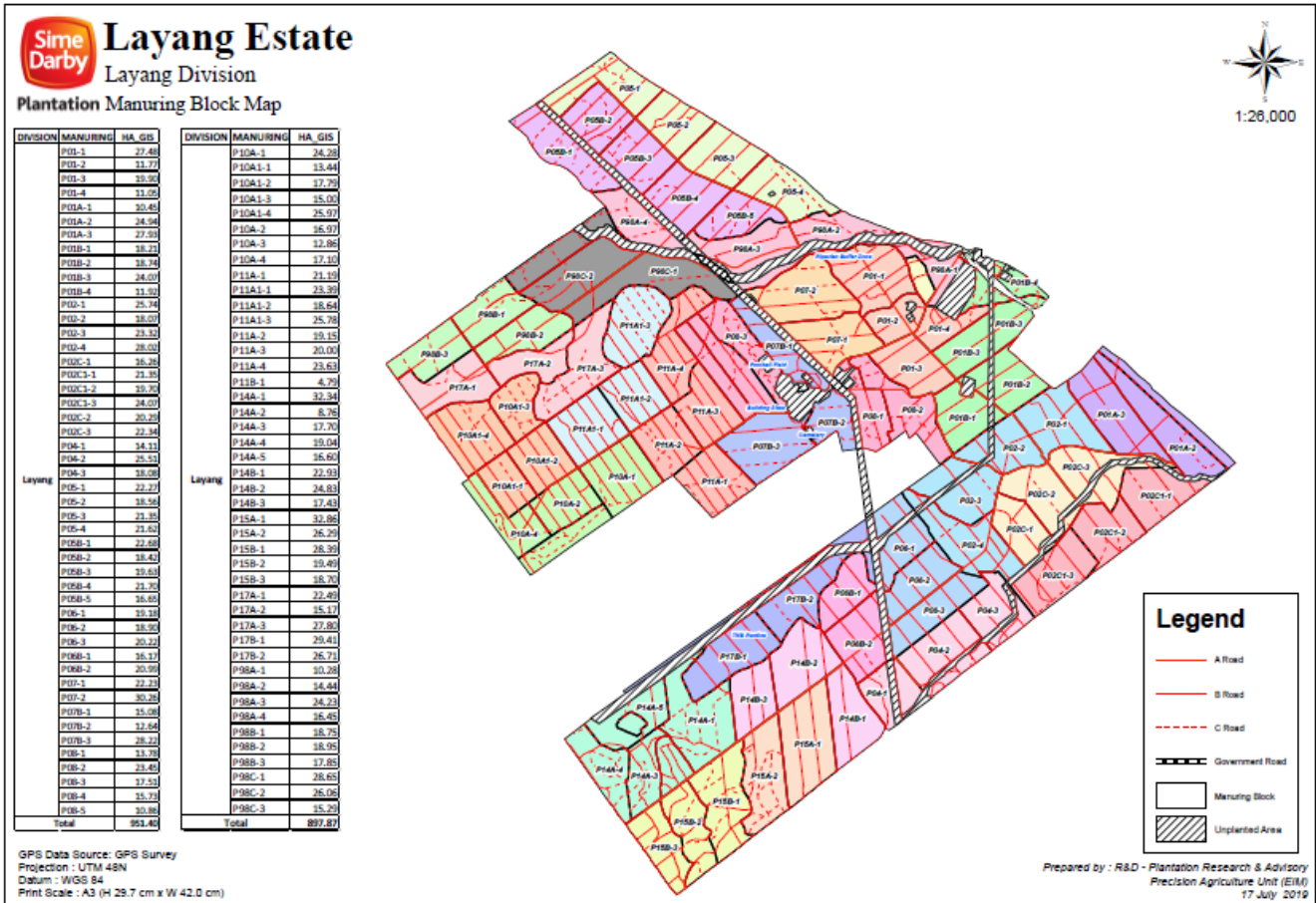
Kulai Estate: Kelan Division



Layang Estate: Hadapan Division

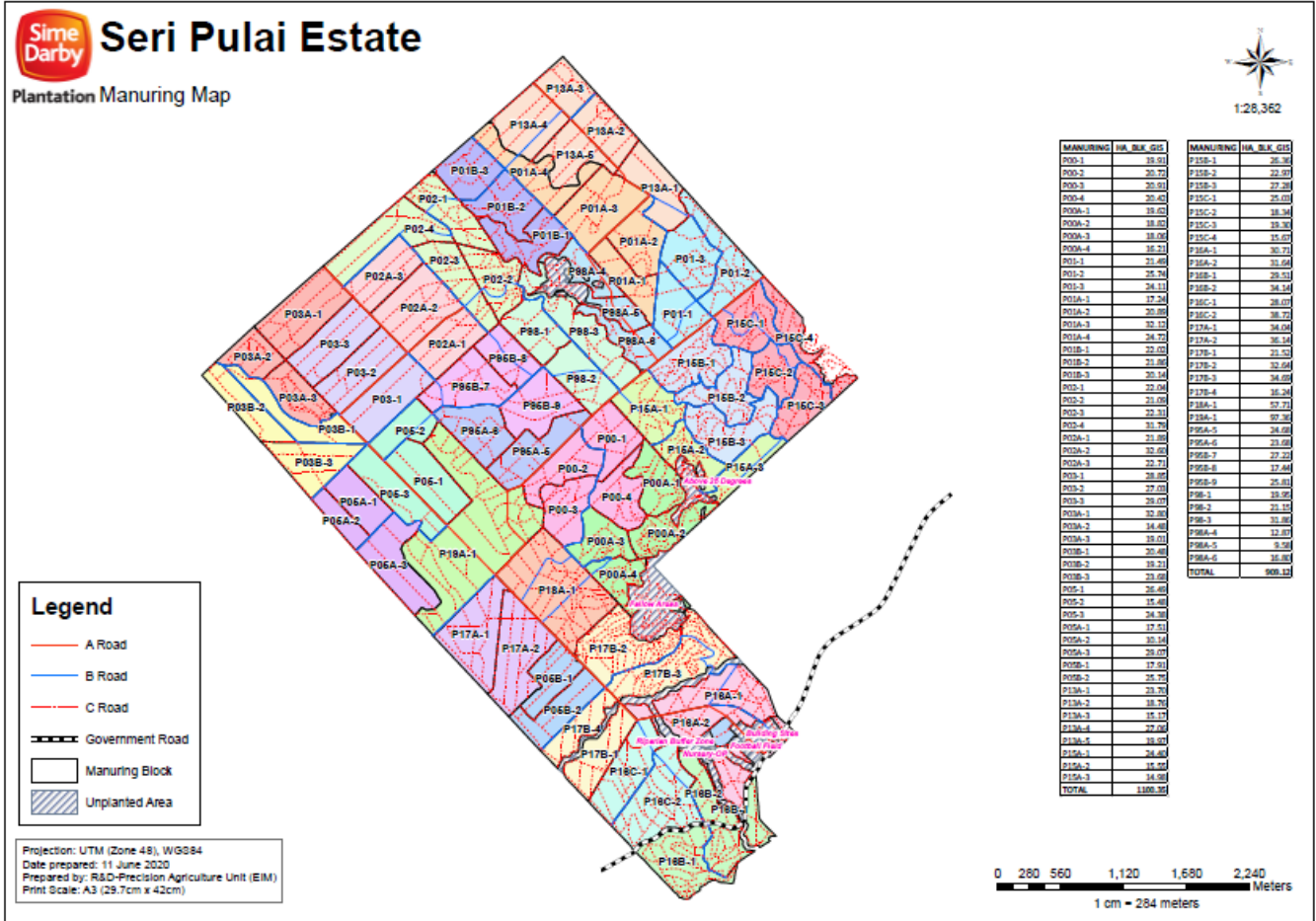


Layang Estate: Layang Division

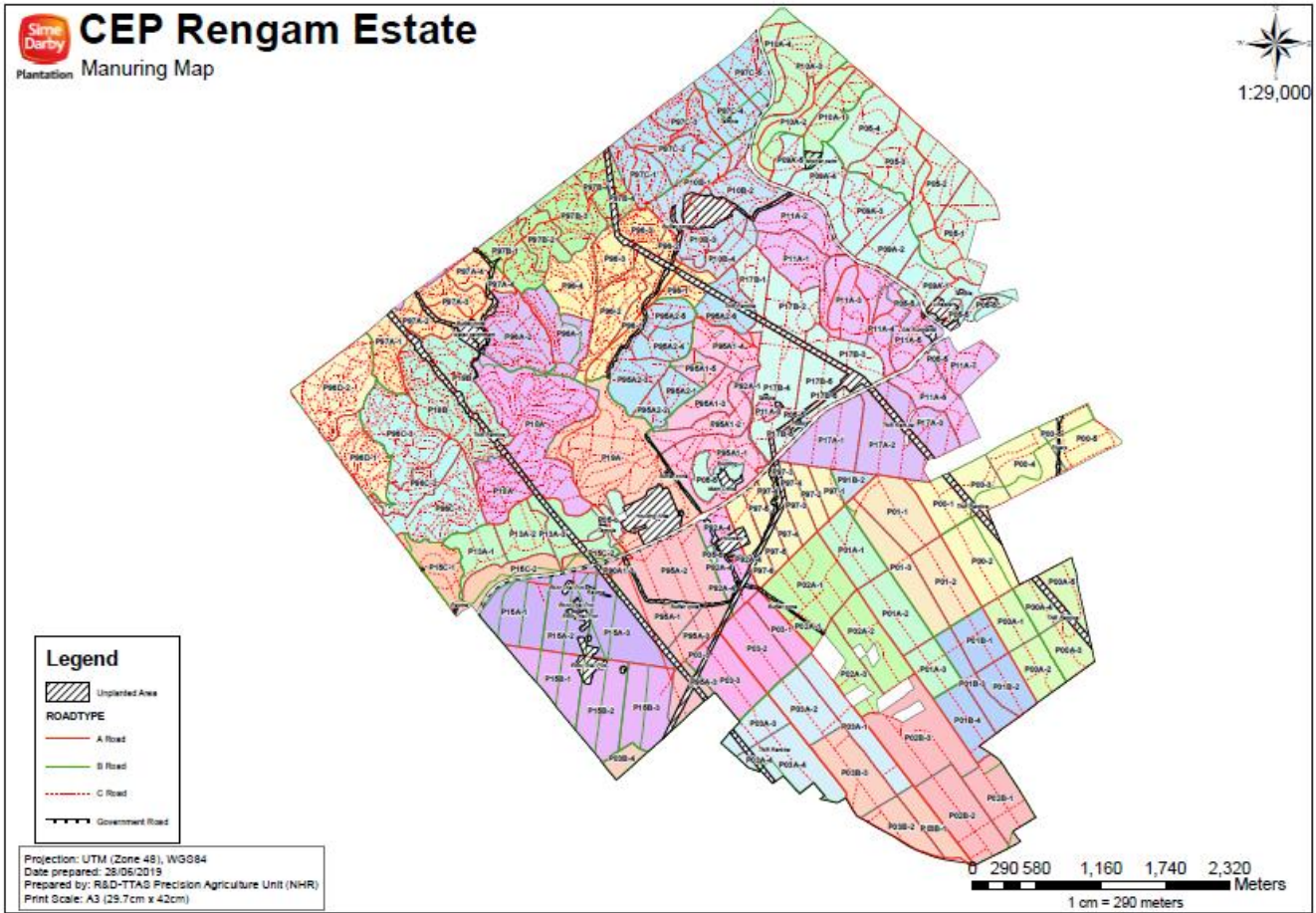


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Seri Pulai Estate



CEP Rengam Estate



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