

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (2\_1)
- Recertification Assessment (Choose an item.)
- Extension of Scope

<b>Client Company name (Parent Company):</b> <b>Sime Darby Plantation Berhad</b>
Client company Address: Level 3A, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia
Certification Unit: <b>Strategic Operating Unit (SOU 20) - Chaah Palm Oil Mill</b>
Location of Certification Unit: KM 16, Jalan Labis, 85400 Chaah, Johor, Malaysia
Date of Final Report: 24/04/2022

<b>TABLE of CONTENTS</b>	<b>Page No</b>
Section 1: Scope of the Assessment.....	3
1. Company Details .....	3
2. Certification Information .....	3
3. Other Certifications.....	4
4. Location(s) of Mill & Supply Bases .....	4
5. Description of Supply Base .....	4
6. Plantings & Cycle.....	4
7. Summary of Certified Tonnage of FFB (Own Certified Scope) .....	5
8. Summary of Certified Tonnage of FFB (from other certified unit(s)) .....	5
9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate).....	5
10. Summary of Certified Tonnage (not applicable for ISS) .....	6
11. Summary of Actual Volume sold .....	7
12. Independent Smallholders Certified Tonnage / Volume .....	9
13. Independent Smallholders Actual Sold Tonnage / Volume .....	9
Section 2: Assessment Process .....	10
2.1 Assessment Methodology, Programme, Site Visits.....	10
2.2 BSI Assessment Team .....	11
2.3 Assessment Plan.....	14
Section 3: Assessment Findings .....	17
3.1 Multiple Management Units and Time Bound Plan.....	17
3.2 Progress of scheme smallholders and/or outgrowers.....	22
3.3 Details of Nonconformities .....	41
3.3.1 Status of Nonconformities Previously Identified and Observations.....	46
3.3.2 Summary of the Nonconformities and Status .....	51
3.4 Stakeholders and previous land owner / user consultation.....	53
3.5 Impartiality and conflict of interest .....	54
Formal Signing-off of Assessment Conclusion and Recommendation .....	55
Appendix A: Summary of Findings .....	56
Appendix B: GHG Reporting Executive Summary .....	132
Appendix C: Location Map of Certification Unit and Supply bases.....	134
Appendix D: Estate Field Map.....	135
Appendix E: List of Smallholder Registered and sampled.....	138
Appendix F: List of Abbreviations.....	139

## Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	Sime Darby Plantation Berhad		
<b>RSPO Membership Number</b>	1-0008-04-000-00	<b>Membership Approval Date</b>	07/09/2004
<b>Address</b>	Level 3A, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Strategic Operating Unit (SOU 20) - Chaah Palm Oil Mill		
<b>Location / Address</b>	KM 16, Jalan Labis, 85400 Chaah, Johor, Malaysia		
<b>Website</b>	<a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a>		
<b>Management Representative</b>	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM)	<b>E-mail</b>	<a href="mailto:shylaja.vasudevan@simedarbyplantation.com">shylaja.vasudevan@simedarbyplantation.com</a>
<b>Telephone</b>	603-78484379 (Head Office)	<b>Facsimile</b>	603-78484356 (Head Office)

2. Certification Information			
<b>Certificate Number</b>	RSPO 548299	<b>Certificate Start Date</b>	18/11/2020
<b>Date of First Certification</b>	18/11/2010	<b>Certificate Expiry Date</b>	17/11/2025
<b>Scope of Certification</b>	Production of Palm Oil and Palm Kernel		
<b>Visit Objectives</b>	<ul style="list-style-type: none"> <li>Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> <li>Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</li> <li>70% onsite assessment as continuation to 30% remote assessment</li> </ul>		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	30 mt/hr
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 685287	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	27/12/2022
MSPO 692047	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3	BSI Services Malaysia Sdn Bhd	27/12/2022
MSPO 714134	MSPO Supply Chain Certification: 2018	BSI Services Malaysia Sdn Bhd	03/09/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Chaah POM	Kilang Kelapa Sawit Chaah, KM 16, Jalan Labis, 85400 Chaah, Johor, Malaysia	2° 10' 40.00" N	102° 59' 47.00" E
Chaah Estate	Pejabat Ladang Chaah 85400 Chaah, Johor, Malaysia	2° 10' 31.00" N	102° 59' 53.00" E
North Labis Estate	Ladang North Labis, 85300 Labis, Johor, Malaysia	2° 23' 00.00" N	103° 03' 00.00" E
Simpang Kiri Estate	Ladang Sg Simpang Kiri, 85400 Chaah, Johor, Malaysia	2° 08' 54.00" N	103° 00' 10.00" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Chaah Estate	2,730.83	0.47	<sup>1</sup> 64.53	2,795.83	97.68
North Labis Estate	3,225.23	40.80	266.88	3,532.91	91.29
Simpang Kiri Estate	2,095.25	29.42	246.99	2,371.66	88.35
<b>Total</b>	<b>8,051.31</b>	<b>70.69</b>	<b>578.40</b>	<b>8,700.40</b>	<b>92.54</b>

Note:  
<sup>1</sup>Last assessment was reported as 64.06 Ha due to error in data entry.

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

Chaah Estate	397.40	-	1,700.22	633.21	-	2,333.43	397.40
North Labis Estate	650.13	1,026.71	949.04	599.35	-	2,575.10	650.13
Simpang Kiri Estate	391.54	596.11	1,003.64	103.96	-	1,703.71	391.54
<b>Total (ha)</b>	<b>397.40</b>	<b>1,622.82</b>	<b>1,700.22</b>	<b>633.21</b>	<b>-</b>	<b>6,612.24</b>	<b>1,439.07</b>

**7. Summary of Certified Tonnage of FFB (Own Certified Scope)**

Estate / Smallholders	Tonnage / year			
	Estimated last year (Nov 2020 - Oct 2021)	Actual (Aug 2020 – Jul 2021)		Forecast (Nov 2021 - Oct 2022)
		Previous license period (Aug 2020 - Oct 2020)	Current license period (Nov 2020 - Jul 2021)	
Chaah Estate	57,258.42	14,567.46	32,908.67	50,000.00
North Labis Estate	56,259.57	9,022.10	10,669.88	56,672.20
Simpang Kiri Estate	38,461.95	9,437.64	20,222.74	36,252.03
<b>Total</b>	<b>151,979.94</b>	<b>96,828.49</b>		<b>142,924.23</b>

**8. Summary of Certified Tonnage of FFB (from other certified unit(s))**

Estate / Smallholders	Tonnage / year			
	Estimated last year (Nov 2020 - Oct 2021)	Actual (Aug 2020 – Jul 2021)		Forecast (Nov 2021 - Oct 2022)
		Previous license period (Aug 2020 - Oct 2020)	Current license period (Nov 2020 - Jul 2021)	
Yong Peng Estate		3,385.47	17,799.32	
<b>Total</b>		<b>21,184.79</b>		

**9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)**

Out growers / smallholders	Tonnage / year			
	Estimated last year (Nov 2020 - Oct 2021)	Actual (Aug 2020 – Jul 2021)		Forecast (Nov 2021 - Oct 2022)
		Previous license period (Aug 2020 - Oct 2020)	Current license period (Nov 2020 - Jul 2021)	
Nil				-
<b>Total</b>	<b>-</b>	<b>-</b>		<b>-</b>

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Aug-20	11491.15	-	11491.15
2	Sep-20	12,298.93	-	12,298.93
3	Oct-20	11557.12	-	11557.12
4	Nov-20	9966.89	-	9966.89
5	Dec-20	8346.29	-	8346.29
6	Jan-21	6184.31	-	6184.31
7	Feb-21	7,014.29	-	7,014.29
8	Mar-21	10148.72	-	10148.72
9	Apr-21	10796.34	-	10796.34
10	May-21	9234.82	-	9234.82
11	Jun-21	9,500.30	-	9,500.30
12	Jul-21	11474.12	-	11474.12
<b>TOTAL</b>		<b>118,013.28</b>	<b>-</b>	<b>118,013.28</b>

<b>10. Summary of Certified Tonnage (not applicable for ISH)</b>			
Estimated last year (Nov 2020 - Oct 2021)	Actual (Aug 2020 – Jul 2021)		Forecast (Nov 2021 - Oct 2022)
	Previous license period (Aug 2020 - Oct 2020)	Current license period (Nov 2020 - Jul 2021)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
151,979.94 mt	36,412.67 mt	81,600.61 mt	142,924.23 mt
	118,013.28 mt		
<b>CPO (OER: 21.30%)</b>	<b>CPO (OER: 20.10%)</b>		<b>CPO (OER: 21.50%)</b>
32,371.73 mt	7,314.61 mt	16,411.05 mt	30,728.71 mt
	23,725.66 mt		
<b>PK (KER: 5.50%)</b>	<b>PK (KER: 5.2%)</b>		<b>PK (KER: 5.50%)</b>
8,358.90 mt	2,007.81 mt	4,156.95 mt	7,860.83 mt
	6,164.76 mt		
<b>Note:</b>			

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	Aug-20	2,453.20	655.98
2	Sep-20	2,470.31	666.98
3	Oct-20	2,391.10	684.85
4	Nov-20	2,001.04	498.80
5	Dec-20	1,704.80	422.07
6	Jan-21	1,107.54	252.18
7	Feb-21	1,520.18	382.06
8	Mar-21	1,967.86	534.79
9	Apr-21	2,085.32	584.17
10	May-21	1,821.67	478.51
11	Jun-21	1,873.40	467.51
12	Jul-21	2,329.24	536.86
<b>TOTAL</b>		<b>23,725.66</b>	<b>6,164.76</b>

<b>11. Summary of Actual Volume sold</b>					
<b>Current License period (Nov 2020 – Jul 2021)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>Others</b>		
<b>CPO (MT)</b>	9,281.64	-	-	7,088.42	16,370.06
<b>PK (MT)</b>	3,024.28	-	-	-	3,024.28
<b>Credits</b>	-	-	-	-	-
<b>Previous License period (Aug 2020 – Oct 2020)</b>					
<b>CPO (MT)</b>	7,314.61	-	-	-	7,314.61
<b>PK (MT)</b>	600.00	-	-	1,407.81	2,007.81
<b>Credits</b>	-	-	-	-	-

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

<b>11A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Non-disclosure 1	-	2,840.00	-
2	Non-disclosure 2	-	5,239.28	-
3	Non-disclosure 3	-	8,516.97	-
4	Non-disclosure 4	-	-	3,624.28
<b>TOTAL</b>			<b>16,596.25</b>	<b>3,624.28</b>

<b>11B. Records of CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Nil			
<b>TOTAL</b>				

<b>11C. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	Non-disclosure 5	1,204.50	-	
2	Non-disclosure 6	4,455.36	-	
3	Non-disclosure 7	1,428.56	-	
4	Non-disclosure 8	-	1,407.81	
<b>TOTAL</b>		<b>7,088.42</b>	<b>1,407.81</b>	

<b>11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)</b>			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil		
<b>TOTAL</b>			



<b>12. Independent Smallholders Certified Tonnage / Volume - NA</b>									
	<b>Estimated last year (Nov 2020 - Oct 2021)</b>			<b>Actual (Aug 2020 – Jul 2021)</b>			<b>Forecast (Nov 2021 - Oct 2022)</b>		
<b>Phase</b>	<b>Eligibility</b>	<b>MS A</b>	<b>MS B</b>	<b>Eligibility</b>	<b>MS A</b>	<b>MS B</b>	<b>Eligibility</b>	<b>MS A</b>	<b>MS B</b>
	<b>40%</b>	<b>70%</b>	<b>100%</b>	<b>40%</b>	<b>70%</b>	<b>100%</b>	<b>40%</b>	<b>70%</b>	<b>100%</b>
<b>FFB</b>									
<b>IS-CSPO</b>									
<b>IS-CSPKO</b>									
<b>IS-CSPKE</b>									

<b>13. Independent Smallholders Actual Sold Tonnage / Volume - NA</b>						
	<b>FFB</b>	<b>FFB Conventional</b>	<b>FFB Other schemes</b>	<b>IS-CSPO</b>	<b>IS-CSPK</b>	<b>IS-CSPKE</b>
<b>Current License period</b>						
<b>Credits</b>						
<b>Physical</b>						

## Section 2: Assessment Process

### Certification Body:

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

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI 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 19-21/01/2022. The audit programme is included as Section 2.3. With regards to the extension of scope, due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24<sup>th</sup> March 2020. The remote audit was conducted on 23-24/08/2021.

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 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 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula  $(\sqrt{y}) \times (z)$ ; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification)</b>	<b>Year 2 (ASA 2_1)</b>	<b>Year 3 (ASA 2_2)</b>	<b>Year 4 (ASA 2_3)</b>	<b>Year 5 (ASA 2_4)</b>
Chaah POM	✓	✓	✓	✓	✓
Chaah Estate	✓	✓	✓	✓	✓
North Labis Estate	✓	✓	✓	✓	✓
Simpang Kiri Estate	✓	✓	✓	✓	✓

**Tentative Date of Next Visit: July 11, 2022 - July 14, 2022**

**Total Number of Mandays: 12**

**2.2 BSI Assessment Team**

<b>Name</b>	<b>Role</b>	<b>Competency</b>
Valence Shem (VSH)	Team Leader	<p><b>Education:</b> BTech (Hons) Bachelor Degree in Industrial Technology, University of Science Malaysia</p> <p><b>Work Experience:</b></p> <ol style="list-style-type: none"> <li>1) 9 years working experience in oil palm plantation industry</li> <li>2) Management system auditing since 2009 for various standards such as ISO 140001, RSPO P&amp;C, RSPO SCCS, MSPO and SMETA</li> </ol> <p><b>Training attended:</b></p> <ol style="list-style-type: none"> <li>1) ISO 14001 Lead Auditor Course</li> <li>2) ISO 9001 Lead Auditor Course</li> <li>3) Endorsed RSPO P&amp;C Lead Auditor Course</li> <li>4) Endorsed RSPO SCCS Lead Assessor Course</li> <li>5) MSPO Awareness Training</li> <li>6) ISO 45000 Lead Auditor Course</li> <li>7) SMETA Auditor training</li> <li>8) HCV-HCS training</li> <li>9) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course</li> </ol>

		<p><b>Aspect covered in this audit:</b>  Legal requirements, natural and HCV conservation, water &amp; wastes management, environmental aspects, occupational health and safety, GAP, mill best practices, training, economic management plan, and supply chain.</p> <p><b>Language proficiency:</b>  English and Bahasa Malaysia</p>
Hafriazhar Mohd Mokhtar (HMM)	Team Member	<p><b>Education:</b>  Bachelor Degree in Chemical Engineering, University of Technology Malaysia</p> <p><b>Work Experience:</b></p> <ol style="list-style-type: none"> <li>1) More than 5 years of direct work experience in the upstream processes of palm oil within the plantation industry</li> <li>2) Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days as auditor for multiple disciplines covering Malaysia, Indonesia and Thailand</li> </ol> <p><b>Training attended:</b></p> <ol style="list-style-type: none"> <li>1) ISO 14001 Lead Auditor Course</li> <li>2) ISO 9001 Lead Auditor Course</li> <li>3) Endorsed RSPO P&amp;C Lead Auditor Course</li> <li>4) Endorsed RSPO SCCS Lead Assessor Course</li> <li>5) MSPO Awareness Training</li> <li>6) ISO 45000 Lead Auditor Course</li> <li>7) SMETA Auditor training</li> <li>8) HCV-HCS training</li> <li>9) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course</li> </ol> <p><b>Aspect covered in this audit:</b>  Legal requirements, policies and commitment, social aspects, contract agreement, human rights, land use rights, workers' welfare, and supply chain.</p> <p><b>Language proficiency:</b>  English and Bahasa Malaysia</p>
Muhamad Naquiuddin Mazeli (MNM)	Team Member	<p><b>Education:</b>  Bachelor of Science Horticulture at University Putra Malaysia.</p> <p><b>Work Experience:</b>  11 years working experience in oil palm plantation industry as sustainability team – managing, implementing and monitoring of RSPO, ISCC, MSPO and</p>

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		<p>ISO9001 and ISO 18001 certification requirements for estates, mills, refineries and smallholders.</p> <p>He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company. He is a trained as , ISO 9001, ISO 45001 and already attend HCV training with Proforest. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation.</p> <p><b>Training attended:</b></p> <ol style="list-style-type: none"> <li>1) Safety and Health Officer</li> <li>2) Food Safety System (FSSC and ISO 22000) for mill and refineries</li> <li>3) ISO 9001 Lead Auditor Course</li> <li>4) ISO 45000 Lead Auditor Course</li> <li>5) Endorsed RSPO P&amp;C Lead Auditor Course</li> <li>6) Endorsed RSPO SCCS Lead Assessor Course</li> <li>7) MSPO Awareness Training</li> <li>8) SMETA Auditor training</li> <li>9) HCV-HCS training</li> <li>10) RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course</li> </ol> <p><b>Aspect covered in this audit:</b></p> <p>Legal requirements, natural and HCV conservation, water &amp; wastes management, environmental aspects, GAP, mill best practices, training, and economic management plan.</p> <p><b>Language proficiency:</b></p> <p>English and Bahasa Malaysia</p>
--	--	--

**Accompanying Persons:**

Name	Role
Nil	

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

**1.3 Assessment Plan**

The Assessment plan was sent to the client prior to the assessment.

**Remote assessment plan (30%)**

Date	Time	Subjects	VSH	HMM	ICT Planned	
Tuesday 17/08/2021	1530	Preparatory/test call between client and BSI auditors Communication on document preparation for remote/ICT audit	✓ Room 1		MS Teams	
Monday 23/08/2021	0900-0930	Opening meeting <ul style="list-style-type: none"> <li>• Opening presentation by audit team leader</li> <li>• Confirmation of assessment scope and finalize audit plan</li> </ul>	✓ Room 1		MS Teams, share drive, Whatsapp, email, etc.	
	0930-1030	<b><u>Chaah POM</u></b> Assessment and documentation review on legal requirements, mill best practices, economic management plan, OSH, environment, water management, GHG, HCV and continual improvement	✓ Room 1	-		
		<b><u>Chaah POM</u></b> Assessment and documentation review on social aspects, SIA, land use right, legal requirements, employees' welfare, complaint & grievance, and contractors & stakeholder management	-	✓ Room 2		
	1030-1040	10-minute break				
	1040-1230	Continue assessment and documentation review	✓ Room 1	✓ Room 2		
	1230-1330	Lunch break				
	1330-1500	Continue assessment and documentation review	✓ Room 1	✓ Room 2		
	1500-1510	10-minute break				
	1510-1630	Continue assessment and documentation review	✓ Room 1	✓ Room 2		
	1630-1700	Interim closing	✓ (Room 1)			
Tuesday 24/08/2021	0900-1030	<b><u>Chaah Estate, North Labis Estate &amp; Simpang Kiri Estate</u></b> Assessment and documentation review on legal requirements, good agriculture practice, economic management plan, OSH, environment, water management, GHG, HCV and continual improvement	✓ Room 1	-		
		<b><u>Chaah Estate, North Labis Estate &amp; Simpang Kiri Estate</u></b> Assessment and documentation review on social aspects, SIA, land use right, legal requirements, employees' welfare, complaint & grievance, and contractors & stakeholder management	-	✓ Room 2		

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

Date	Time	Subjects	VSH	HMM	ICT Planned	
	1030-1040	10-minute break				
	1040-1230	Continue assessment and documentation review	✓ Room 1	✓ Room 2		
	1230-1330	Lunch break				
	1330-1500	Continue assessment and documentation review	✓ Room 1	✓ Room 2		
	1500-1510	10-minute break				
	1510-1600	Continue assessment and documentation review	✓ Room 1	✓ Room 2		
	1600-1630	Assessment team discussion and preparation of closing meeting	✓ (Room 1)			
	1630-1700	Closing meeting	✓ (Room 1)			

**On-site assessment plan (70%)**

Date	Time	Subjects	VSH	HMM	MNM
Wednesday 19/01/2022	0830-0900	<b><u>Chaah Estate</u></b> Opening meeting: <ul style="list-style-type: none"> <li>• Opening presentation by audit team leader</li> <li>• Confirmation of assessment scope and finalize audit plan (including stakeholder’s consultation)</li> </ul>	✓	✓	✓
	0900-1245	<b><u>Chaah Estate</u></b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc. and Document review P1 – P7	✓	✓	✓
	1245-1300	Interim closing briefing	✓	✓	✓
	1300-1400	Lunch break and travel to Simpang Kiri Estate	✓	✓	✓
	1300-1645	<b><u>Simpang Kiri Estate</u></b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc. and Document review P1 – P7	✓	✓	✓
	1645-1700	Interim closing briefing	✓	✓	✓

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

Thursday 20/01/2022	0900-1300	<b><u>North Labis Estate</u></b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc. and Document review P1 – P7	✓	✓	✓
	1300-1400	Lunch break			
	1400-1630	<b><u>North Labis Estate</u></b> Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓
	1630-1700	Interim closing briefing	✓	✓	✓
Friday 21/01/2022	0900-1230	<b><u>Chaah POM</u></b> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	✓	✓	✓
	1000-1200	<b><u>Stakeholder consultation</u></b> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-
	1230-1430	Lunch break and Friday prayer			
	1430-1530	<b><u>Chaah POM</u></b> Document Review P1 – P7: SOPs, Supply chain, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓
	1530-1600	Interim closing briefing	✓	✓	✓
	1600-1630	Audit team discussion & preparation for closing meeting	✓	✓	✓
	1630-1700	Closing meeting	✓	✓	✓



### Section 3: Assessment Findings

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

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	<p>Yes. Sime Darby Plantation Berhad TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>On 16/01/2020, Sime Darby Plantation Berhad under its subsidiary Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation – Liberia) to Mano Palm Oil Industries Ltd (MPOI): <a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations">http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</a></p>	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	<p>Yes. Generally all estates and mills excepted stated below or in the TBP are certified with RSPO.</p> <p>Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 01/10/2018, the mill has completed the selling off transaction.</p> <p>In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently Sime Darby Plantation Berhad have no control in the management.</p>	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	No. There is no new acquisitions as at latest TBP 2022.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Although there are deviation has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.	Complied
Have there been any changes to the time-bound plan since the last audit (both new	Yes. Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to	Complied

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

<p>acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification.</p> <p>PT Mitral Austral Sejahtera: The properties was sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019.</p> <p>Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad 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 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public notification letter: <a href="http://www.rspo.org/certification/public-announcement">www.rspo.org/certification/public-announcement</a></p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): <a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations">www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</a></p> <p>ACOP 2019 has been cross-referenced as below: <a href="http://www.rspo.org/members/29">www.rspo.org/members/29</a></p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised</p>	<p>Although there has been lapses identified at those Indonesia management units, it has been justified that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>	<p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as these 2 assets were disposed.</p>	<p>Complied</p>

<b>Un-Certified Units or Holdings</b>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&amp;C criterion 7.12.</p>	<p>Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units.</p>	<p>Complied</p>
<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification</p> <ol style="list-style-type: none"> <li>1. NBPOL (Poliamba Limited) 23/05/2020 – no comments  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-plantation-berhad-nbpol-poliamba-limited">https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-plantation-berhad-nbpol-poliamba-limited</a></li> <li>2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd</a></li> <li>3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-ramu-agri-industries-ltd">https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-ramu-agri-industries-ltd</a></li> <li>4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd-ramu-agri-industries-limited">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd-ramu-agri-industries-limited</a></li> <li>5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd-higaturu-oil-palms">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd-higaturu-oil-palms</a></li> <li>6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-poliamba-limited-lamawan-png">https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-poliamba-limited-lamawan-png</a></li> <li>7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-poliamba-limited-lamendauen-png">https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-poliamba-limited-lamendauen-png</a></li> <li>8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website</li> </ol>	<p>Complied</p>

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

	<p><a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-roka-mini-estate">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-roka-mini-estate</a></p> <p>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-j-estate">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-j-estate</a></p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-limited-higaturu-oil-palm">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-limited-higaturu-oil-palm</a></p> <p>11. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc-new-planting-assessment">https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc-new-planting-assessment</a></p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc.-new-planting-assessment-1">https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc.-new-planting-assessment-1</a></p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc.-new-planting-assessment">https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc.-new-planting-assessment</a></p> <p>Management units for 11 – 13 above were disposed.</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) were excluded in the latest TBP as both sites have been disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancy between RaCP tracker and actual scenario possibly due to of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of 14/07/2021, 10 LUCAs were approved with 0 conservation liability and remaining 9 are still pending from RSPO.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 4.2</p>	<p>No stakeholder comments or complaints received.</p>	<p>Complied</p>

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

<p>Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>There is no legal non-compliance found in Chaah Certification Unit. This is further confirmed through the stakeholder consultation held, legal documentation review and interview with</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>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. The issue are mainly awaiting for Land Titles. The last audit was conducted between July 2020 – August 2020.</p> <p>The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance</p>	<p>Complied</p>
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>No any critical (Major) non-compliance raised.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>None noted. No stakeholder comments or complaints received.</p>	<p>Complied</p>

**3.2 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	<p>Not applicable as there is no smallholder scheme under Chaah Certification Unit.</p>	<p>Complied</p>

**Approved Time Bound Plan**

**1) SDP - RSPO Certification for Time Bound Plan - Malaysia Operations**

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
1	Sungai Dingin	Sungai Dingin Oil Mill	-	Karangan, Kedah	Certified	12/08/2011	-
		Anak Kulim Estate					
		Sungai Dingin Estate					
		Somme Estate					
		Bukit Selarong Estate					
		Padang Buluh Estate					
		Bukit Hijau Estate					
		Jentayu Estate					
2	Chersonese	Chersonese Oil Mill	-	Kuala Kurau, Perak	Certified	05/10/2011	-
		Chersonese Estate					
		Kalumpong Estate					
		Tali Ayer Estate					
		Holyrood Estate					
3	Elphil	Elphil Oil Mill	-	Sungai Siput, Perak	Certified	16/08/2011	-
		Kamuning Estate					
		Elphil Estate					
		Kinta Kellas Estate					
4	Flemington	Flemington Oil Mill	-	Teluk Intan, Perak	Certified	05/10/2011	-
		Flemington Estate					

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
		Bagan Datoh Estate					
		Sabak Bernam Estate					
		Sg. Samak Estate					
5	Seri Intan/Selaba	Seri Intan Oil Mill	-	Teluk Intan, Perak	Certified	03/03/2011	-
		Selaba Oil Mill					
		Seri Intan (+ Selaba) Estate					
		Sabrang Estate					
		Sogomana Estate					
		Sg. Wangi Estate					
		Bikam Estate					
		Cluny (+ Bedford) Estate					
6	Tennamaram	Tennamaram Oil Mill	-	Bestari Jaya, Selangor	Certified	03/03/2011	-
		Tennamaram Estate					
		Sungai Buluh Estate					
		Bukit Talang Estate					
7	Bukit Kerayong	Bukit Kerayong Oil Mill	-	Kapar Selangor	Certified	15/04/2011	-
		Bukit Kerayong Estate					
		Bukit Cheraka Estate					
		Elmina Estate					
8	East	East Oil Mill	-	Carey Island, Selangor	Certified	19/05/2011	-
		East Estate					
		Sepang Estate					



**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
		Dusun Durian Estate					
9	West	West Oil Mill West Estate	-	Carey Island, Selangor	Certified	19/05/2011	-
10	Bukit Puteri	Bukit Puteri Oil Mill Bukit Puteri Estate	-	Raub, Pahang	Certified	07/07/2011	Jentar Estate has merged with Kerdu Estate and reported to the CB in March/April 2021.
11	Kerdau	Kerdau Oil Mill Kerdau Estate Jentar Estate Mentakab Estate Chenor Estate Sg Mai Estate	-	Temerloh, Pahang	Certified	07/07/2011	-
12	Jabor	Jabor Oil Mill Jabor Estate	-	Kuantan, Pahang	Certified	07/07/2011	-
13	Labu	Labu Oil Mill Labu Estate	-	Nilai, Negeri Sembilan	Certified	30/12/2011	New Labu Estate has become a division of Labu Estate.
14	Tanah Merah	Tanah Merah Oil Mill Tanah Merah Estate Bukit Pelandok Estate	-	Port Dickson, Negeri Sembilan	Certified	19/05/2010	-
15	Sua Betong	Sua Betong Oil Mill Sua Betong Estate Sengkang Estate Bradwall Estate	-	Port Dickson, Negeri Sembilan	Certified	18/02/2014	Siliau Estate has now been merged into Salak Estate and Bradwall Estate.

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
		PD Lukut Estate					
		Tampin Linggi Estate					
		Sg. Bahru Estate					
		Salak Estate					
16	Kok Foh	Kok Foh Oil Mill	-	Bahau, Negeri Sembilan	Certified	07/07/2011	Sg. Gemas Estate has now been merged into Sg. Senarut Estate.
		Muar River Estate					
		Sg. Senarut Estate					
		Sg. Gemas Estate					
		Kok Foh Estate					
		Bukit Pilah Estate					
		St. Helier Estate					
		Sungai Sabaling Estate					
		Pertang Estate					
17	Kempas	Kempas Oil Mill	-	Jasin, Melaka	Certified	19/05/2010	Serkam Estate, previously from SOU18 (Diamond Jubilee) is now part of SOU 17 (Kempas)
		Kempas Estate					
		Tangkah Estate					
		Kemuning Estate					
		Serkam Estate					
18	Diamond Jubilee	Diamond Jubilee Palm Oil Mill	-	Jasin, Melaka	Certified	05/10/2011	Serkam Estate, previously from SOU18 (Diamond Jubilee) is now part of SOU 17 (Kempas)
		Diamond Jubilee Estate					
		Bukit Asahan Estate					
		Welch Estate					

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
							Welch Estate, previously from SOU 19 (Pagoh) is now part of SOU 18 (Diamond Jubilee)
19	Pagoh	Pagoh Oil Mill	-	Muar, Johor	Certified	28/1/2014	
		Pagoh Estate					
		Lanadron Estate					
		Pengkalan Bukit Estate					
20	Chaah	Chaah Oil Mill	-	Chaah, Johor	Certified	18/11/2010	-
		Chaah Estate					
		Sg. Simpang Kiri Estate					
		North Labis Estate					
21	Gunung Mas	Gunung Mas Oil Mill	-	Kluang, Johor	Certified	19/05/2010	* SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bkt Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018.
		Gunung Mas Estate					
		Kempas Klebang Estate					
		Bukit Paloh Estate					
		Yong Peng Estate					
22	Bukut Benut	Bukit Benut Oil Mill	-	Kluang, Johor	Certified	05/11/2011	* SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2018.
		Bukit Benut Estate					
		Lambak Elaeis Estate					
		CEP Nyior Estate					
23	Ulu Remis	Ulu Remis Oil Mill	-	Layang-Layang, Johor	Certified	11/04/2011	-
		Ulu Remis Estate					
		Cenas Estate					

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
		Bukit Badak Estate					
		Tun Dr. Ismail Estate					
		Pekan Estate					
		Sembrong Estate					
24	Hadapan	Hadapan Oil Mill	-	Layang-Layang, Johor	Certified	29/3/2011	-
		Sri Pulai Estate					
		Kulai Estate					
		Layang Estate					
		CEP Renggam Estate					
26	Sandakan Bay	Sandakan Bay	-	Sandakan, Sabah	Certified	01/10/2008	-
		Tun Tan Siew Sin					
		Tunku Estate					
		Tigowis Estate					
		Sentosa Estate					
		Segaliud Estate					
27	Melalap	Melalap Oil Mill	-	Tenom, Sabah	Certified	21/1/2011	-
		Melalap Estate					
		Sapong Estate					
28	Binuang	Binuang Oil Mill	-	Kunak, Sabah	Certified	16/1/2009	-
		Binuang Estate					
		Sungang Estate					
		Tingkayu Estate					
		Jeleta Bumi Estate					

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
29	Giram	Giram Oil Mill	-	Kunak, Sabah	Certified	16/1/2009	-
		Giram Estate					
		Mostyn Estate					
30	Merotai	Merotai Oil Mill	-	Tawau, Sabah	Certified	16/1/2009	-
		Merotai Estate					
		Imam Estate					
		Tiger Estate					
		Table Estate					
31	Layang	Layang Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Layang Estate					
		Rasan Estate					
		Belian Estate					
		Kelida Estate					
		Layang (Special) Estate					
		Pekaka Estate					
		Ruai Estate					
		Dulang Estate					
		Charquest Estate					
		Paroh Estate					
32	Rajawali	Rajawali Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Rajawali Estate					
		Samudera Estate					
		Semarak Estate					

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
		Bayu Estate					
33	Derawan	Derawan Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Derawan Estate					
		Sahua Estate					
		Takau Estate					
		Damai Estate					
34	Pekaka	Pekaka Mill	-	Bintulu, Sarawak	Withdrawn	NA	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	Bintang Oil Mill	-	Johor	NA	NA	* 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.

**2) SDP - RSPO Certification for Time Bound Plan - Indonesia Operations**

No	Management Unit	Mill and Supply Base	Time Bound Plan	Latest Internal / External	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name			Audit Date				
1	PT Lahan Tani Sakti	Alur Dumai Mill	-	-	Rokan Hilir District – Riau	Certified	16/01/2012	-
		Alur Dumai Estate						
2	PT Sajang Heulang	Mustika Mill	-	-	Tanah Bumbu District – South Kalimantan	Certified	03/07/2013	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Mustika Estate						
		KKPA-2 PT.SHE Estate						
		KKPA-3 PT.SHE Estate						
		KKPA-5 PT.SHE Estate						
		Pantai Bonati Estate					06/07/2011	
3	PT Ladangrumpun Suburabadi	Angsana Mill	-	-	Tanah Bumbu District – South Kalimantan	Certified	06/07/2021	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Angsana Estate						
		Pantai Bonati Estate						
		Gunung Sari Estate						
		KKPA-1 PT.SHE Estate						
		KKPA-4 PT.SHE Estate						
		Subur Abadi Plasma 1 Estate	TBC	TBC				
4	PT Langgeng Muaramakmur	Bebunga Mill	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Bebunga Estate						
		Sungai Cengal Estate						
		Bakau Estate						

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		KKPA LMR	TBC	TBC		TBC	TBC	
5	PT Kridatama Lancar	Sukamandang Mill	-	-	Seruyan and East-Kotawaringin District Central Kalimantan	Certified	05/07/2011	-
		Sukamandang Estate						
		Sapiri Estate						
		Barasdanum Estate						
		Kuala Kuayan Estate						
6	PT Bahari Gembira Ria	Ladang Panjang Mill	-		Muaro Jambi District - Jambi	Certified	09/07/2012	Only Division 3 is certified (1,202 Ha). Total Areas of Division 1 and 2 (1,796.19 ha) HGU still in process  KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Ladang Panjang Estate						
		Plasma BGR Estate	TBC	TBC		TBC	TBC	
7	PT Tunggal Mitra Plantations	Manggala Mill	-	-	Rokan Hilir District – Riau	Certified	25/11/2010	-
		Manggala 1 Estate						
		Manggala 2 Estate						
		Manggala 3 Estate						
8	PT Paripurna Swakarsa	Pondok Labu Mill	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	-
		Pondok Labu Estate	-	-				
		Binturung Estate						
		Rampa Estate						
		Sesulung Estate						
9	PT Bersama Sejahtera Sakti	Gunung Aru Mill	-		Kotabaru District – South Kalimantan	Certified	05/07/2011	-
		Gunung Aru Estate						
		Gunung Kemasan Estate						
		Laut Timur Estate						



**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		Pantai Timur Estate						
		KKPA MBP	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
10	PT Guthrie Pecconina	Rantau Panjang Mill	-	-	Musu Banyuasin District – South Sumatera	Certified	16/03/2012	Remarks: Land legalisation process for 4152.70 ha is still in process.
		Rantau Panjang Estate						
		Bumi Ayu Estate						
		Karang Ringin Estate						
		Napal Estate						
		Mangun Jaya Estate						
		Sungai Jernih Estate and GPI KKPA Estate	2023	-	-	-	890.98 Ha – Still under Land legalisation process - Process Kadastral. Sg Jernih estate and KKPA was separated in 2022 and recorded separately. KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.	
11	PT Laguna Mandiri	Rantau Mill	-	-	Kotabaru District – South Kalimantan	Certified	30/12/2011	
		Rantau Estate						
		Matalok Estate						
		Betung Mill						
		Betung Estate						
		Sekayu Estate						
				01/04/2014				
12	PT Indotruba Tengah	Sekunyir Mill	-	-	Seruyan and West Kotawaringin	Certified	23/11/2010	-
		Sekunyir						
		Seruyan Estate						

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

					District – Central Kalimantan			
13	PT Swadaya Andika	Selabak Mill	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	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.
		Selabak Estate						
		Randi Estate						
		Sangkoh Estate						
		Lanting Estate						
14	PT Bina Sains Cemerlang	Sungai Pinang Mill	-	-	Musi Rawas District – South Sumatera	Certified	11/09/2012	Remarks: Land legalisation process for 308.35 ha is still in process.
		Sungai Pinang Estate	-	-				
		Bukit Pinang Estate						
15	PT Teguh Sempurna	Pemantang Mill	-	-	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	05/07/2011	-
		Pemantang Estate	-	-				
		Kawan Batu Estate						
		Hatan Tiring Estate						
		Batang Garing Estate						
16	PT Bhumireksa Nusa Sejati	Teluk Bakau Mill	-	-	Indra Giri Hilir District – Riau	Certified	11/10/2011	-
		Teluk Bakau Estate						
		Nusa Lestari Estate						
		Nusa Perkasa Estate						
		Mandah Mill						
		Mandah Estate						
		Rotan Semelur Estate						
						01/04/2014		
17	PT Intipersada Aneka	Teluk Siak Mill	-	-	Pekanbaru, Siak District – Riau	Certified	11/10/2011	-
		Teluk Siak Estate						

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		Pinang Sebatang Estate						
		Aneka Persada Estate						
18	PT Tamaco Graha Krida	Ungkaya Mill	-	-	Morowali District – Sulawesi Tengah	Certified	10/7/2012	-
		Ungkaya Estate						
		Plasma TGK Estate	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
19	PT SIME Indo Agro	Bukit Ajong Mill	-	-	Sanggau District – West Kalimantan	Certified	18/10/2010	Land legalisation process for East Est for 5815.64 ha is still in process.
		West Estate						
		East Estate						
		East* Estate /Sei Mawang Estate	2023	-		-		Land legalisation for Sei Mawang is still in process
		East Plasma Estate	-	-		Certified	18/7/2016	-
		West Plasma Estate						
20	PT Padang Palma Permai /PT Perkasa Subur Sakti	Blang Simpo Mill	-	-	Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam	Certified	03/05/2013	-
		Tamiang (PT PPP) Estate	-	-				
		Batang Ara (PT PSK) Estate						
		Blang Simpo-01 Estate						
		Blang Simpo-02 Estate						
21	PT Sandika Natapalma	Lembiru Mill	-	-	Ketapang District – West Kalimantan	Certified	03/07/2014	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru Mill.
		Lembiru Estate						
		Awatan Estate						
		Karya Palma Estate	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		KKPA SNP Estate	TBC	TBC		TBC	TBC	

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

22	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Estate	-	-	Ketapang District – West Kalimantan	Certified	03/07/2019	-
		Sungai Putih (PT BAL) Estate	2023	-		-		Land Approval is obtained in 2015 while the other approvals are still in processing HGU obtained as per May 2018 KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Beturus (PT BAL) Estate	2023	-		-		
		KKPA BAL Estate	TBC	TBC		TBC	TBC	
23	PT Mitral Austral Sejahtera	MAS Mill	NA	NA	Sanggau District – West Kalimantan	NA	NA	
		MAS 1 Estate						
		MAS 2 Estate						
		MAS 4 Estate						
		Plasma MAS Estate						

**3) SDP - RSPO Certification for Time Bound Plan – New Britain Palm Oil (NBPOL) Operations**

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name						
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	-	Guadalcanal Province, Solomon Islands	Certified	18/03/2011	-
		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	Milne Bay Estate (MEB)	Hagita Oil Mill	-	Milne Bay Province, PNG	Certified	15/02/2018	-
		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					
Kara Estate							
Nalik Estate							

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name						
		West Coast Estate					
		Noatsi Estate					
		Madak Estate					
		Smallholders -North Division (615)					
		Smallholders- South Division (868)					
		Smallholders -West Division (309)					
4	Ramu Agricultural Industrial Ltd (RAIL)	Gusap Mill	-	Morobe Province, PNG	Certified	05/08/2010	-
		Gusap East (Gusap) Estate					
		Gusap West (Paddock) Estate					
		Surinam Estate					
		Dumpu Estate					
		Ngaru Estate					
		J Estate (Jephcott) Estate					
		Smallholders - Madang VOPs (71)					
		Smallholders - Morobe VOPs (253)					
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	-	Oro Bay Province, PNG	Certified	01/02/2013	-
		Mamba Oil Mill					
		Embi Estate					
		Ambogo Estate					
		Sangara Estate					
		Sumbiripa Estate					
		Mamba Estate					
		Sambogo Estate					

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name						
		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	-	Kimbe, West New Britain, PNG	Certified	10/09/2008	-
		Kumbango Oil Mill					
		Kapiura Mill					
		Numundo Mill					
		Waraston Mill					
		Bebere Estate					
		Kumbango Estate					
		Togulo Estate					
		Dami Estate					
		Waisisi Estate					
		Kautu Estate					
		Karaus Estate					
		Moroa Estate					
		Bilomi Estate					
		Loata Estate					
		Haella Estate					
Garu Estate							

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name						
		Daliavu Estate					
		Sapuri Estate					
		Malilimi Estate					
		Rigula Estate					
		Numundo 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)							
Smallholder Kaulong / Akami / Pushiki / Repamira / Sakapei							
7	Markham Farms Company Limited (MFCL) / Markham Agro Pte Ltd	Erap Mill	-	Markham Farms	Certified	27/3/2020	There is total area NPP: 710.30ha which is currently excluded from the certification scope until the NPP is approved
		Munum Estate					
		Maralumi Estate					
		Erap Estate					



### 3.3 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 was no (0) Critical; two (5) Minor nonconformities [2 from remote audit (# 2095494-202108-N1 and 2095494-202108-N2) and 3 from on-site audit (# 2155450-202201-N1, 2155450-202201-N2 and 2155450-202201-N3)] and three (3) Opportunity For Improvement (all from on-site audit) raised. The Strategic Operating Unit (SOU 20) – Chaah 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 its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
<b>NCR Ref #</b>	2095494-202108-N1	<b>Date Issued</b>	23/08/2021
<b>Due Date</b>	Next assessment visit	<b>Date of nonconformity Closure</b>	Open
<b>Clause &amp; Category (Critical (Major) / Minor)</b>	2.2.2 Minor		
<b>Statement of Nonconformity:</b>	Not all contractors able to demonstrate meeting applicable legal requirements.		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
<b>Objective Evidence:</b>	Based on sampled contractor worker's pay documents verified at Simpang Kiri Estate as follows: <ul style="list-style-type: none"> <li>- Contractor: RSKP Brothers</li> <li>- Workers ID #: 000728-0X-XXXX, 880919-0X-XXXX and 810805-0X-XXXX</li> <li>- Pay documents month: Jan 2021 - May 2021,</li> </ul> the compliance against requirement under Section 16(1) of Employment Insurance System Act 2017, was not satisfactorily demonstrated		
<b>Corrections:</b>	Estate will send reminder letter to the contractor regarding on the non-compliance and request monthly submission of their worker's copy of payslip for monitoring purpose.		
<b>Root Cause Analysis:</b>	The issue happened due to inconsistent submission of the contractor's workers copy of payslip which stated the related contribution, resulting estate not able to monitor accordingly.		
<b>Corrective Actions:</b>	Estate will conduct briefing to the contractor on related sustainability certification requirements which include on the EIS contribution requirement and contractor will submit the copy of their worker's copy of payslip to estate management on monthly basis for monitoring purpose.		

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

<b>Assessment Conclusion:</b>	The correction and corrective action plan are accepted. The evidence of implementation shall be verified in the next assessment visit.
-------------------------------	--

Non-conformity			
<b>NCR Ref #</b>	2095494-202108-N2	<b>Date Issued</b>	23/08/2021
<b>Due Date</b>	Next assessment visit	<b>Date of nonconformity Closure</b>	Open
<b>Clause &amp; Category (Critical (Major) / Minor)</b>	7.3.1 Minor		
<b>Statement of Nonconformity:</b>	The implementation of wastes management plan was not satisfactorily demonstrated.		
<b>Requirement Reference:</b>	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
<b>Objective Evidence:</b>	<p>Based on verification through Google Earth, the wastes landfill at Chaah Estate (GPS: 2° 9'33.51"N 102°59'10.73"E), North Labis Estate (GPS: 2°22'30.22"N 103° 3'24.25"E) and Simpang Kiri Estate (GPS: 2° 6'30.18"N 103° 0'31.56"E) have residential areas and/or river or waterways within their 3 km radius distance. This is not in-line with the Landfill Management in Estate procedure [SD/SDP/PSQM(ESH)/203-EN7, rev. 0, dated 13/03/2017], Clause 6.3.3 a) and b) which reads:</p> <ul style="list-style-type: none"> <li>a) The landfill shall be located no less than 3 km away from nearest household area, offices or other premises</li> <li>b) The landfill shall be located no less than 3 km away from the nearest river or waterway</li> </ul>		
<b>Corrections:</b>	Estate will relocate the landfill accordingly in line with the landfill management procedure.		
<b>Root Cause Analysis:</b>	Person in charge from estates was did not fully aware on the distance requirement as they were not properly briefed on the Landfill Management procedure.		
<b>Corrective Actions:</b>	Training will be conducted on company landfill management procedure to the Person In Charge.		
<b>Assessment Conclusion:</b>	The correction and corrective action plan are accepted. The evidence of implementation shall be verified in the next assessment visit.		

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

Non-conformity			
<b>NCR Ref #</b>	2155450-202201-N1	<b>Date Issued</b>	21/01/2022
<b>Due Date</b>	Next assessment visit	<b>Date of nonconformity Closure</b>	Open
<b>Clause &amp; Category (Critical (Major) / Minor)</b>	2.2.2 Minor		
<b>Statement of Nonconformity:</b>	A contractor was not able to adequately demonstrate meeting the applicable requirements.		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
<b>Objective Evidence:</b>	An FFB transport contractor at North Labis Estate was found to be utilizing one of its FFB trucks (Reg. No. JNA7851) under expired PUSPAKOM's Inspection Certificate [ref.: BL 4979168, expiry date: 11/01/2022] via public road to transport FFB from the estate to Sime Darby's Gunung Mas POM. Based on the Gunung Mas POM's FFB Receive Detail Report by Supplier, the truck has been delivering FFB on 12, 15, and 20/01/2022.		
<b>Corrections:</b>	Estate has requested contractor to submit PUSPAKOM inspection certificate to estate		
<b>Root Cause Analysis:</b>	Lacking in monitoring of FFB transporter documentation due inconsistency submission from the contractor.		
<b>Corrective Actions:</b>	Estate will communicate with contractors to submit required documents regularly. Estate had been appointed Person in charge for monitoring of FFB transporter documentation immediately.		
<b>Assessment Conclusion:</b>	The correction and corrective action plan are accepted. The evidence of implementation shall be verified in the next assessment visit.		

Non-conformity			
<b>NCR Ref #</b>	2155450-202201-N2	<b>Date Issued</b>	21/01/2022
<b>Due Date</b>	Next assessment visit	<b>Date of nonconformity Closure</b>	Open
<b>Clause &amp; Category (Critical (Major) / Minor)</b>	3.4.2 Minor		
<b>Statement of Nonconformity:</b>	A contractor was not able to adequately demonstrate meeting the applicable requirements.		
<b>Requirement Reference:</b>	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.		

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

<b>Objective Evidence:</b>	Based on site visit at the boundary between Chaah Estate and smallholder [Field No. 99D (GPS: 2.179818, 103.006086)], it was found that a significant number of empty herbicides containers [Canyon (a.i.: Metsulfuron-methyl) and Alion (a.i: Indaziflam)] and used rubber gloves was disposed inside the estate area by unknown party. However, this environmental aspect has yet to be addressed in the estate’s environmental management plan.
<b>Corrections:</b>	Estate to retrieve and keep all the empty herbicides containers at their SW facilities immediately. The site will monitor by Person In charge to avoid future dumping.
<b>Root Cause Analysis:</b>	This issued happen due inconsistence monitoring at boundary area near with smallholder.
<b>Corrective Actions:</b>	Estate will update and review on environmental management plan on this issued. Person in charge will monitored surrounding boundary area near with smallholder. Training will be conducted on schedule waste identification to Person in charge.
<b>Assessment Conclusion:</b>	The correction and corrective action plan are accepted. The evidence of implementation shall be verified in the next assessment visit.

Non-conformity			
<b>NCR Ref #</b>	2155450-202201-N3	<b>Date Issued</b>	21/01/2022
<b>Due Date</b>	Next assessment visit	<b>Date of nonconformity Closure</b>	Open
<b>Clause &amp; Category (Critical (Major) / Minor)</b>	4.2.2 Minor		
<b>Statement of Nonconformity:</b>	There is an inconsistency in understanding of housing complaint/repair request system among workers in North Labis Estate.		
<b>Requirement Reference:</b>	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.		
<b>Objective Evidence:</b>	Based on the site visit at North Labis Estate workers housing area, it was found that there is an inconsistency in understanding of the system for housing complaint/repair request which is currently based on the SOP: Workers Housing Management Procedure, Effective Date: 26/11/2021, that has been communicated to all Operating Units via Inter Office Memo (IOM) email [ref. # UM/HSE/013/11/2021, dated 26/11/2021]. From the site interview with the workers occupying house # E14 & E15 in North Labis Estate, their understanding of the system could not be determined. Only another one worker outside the housing area managed to answer according to current system for housing complain/repair latest SOP.		
<b>Corrections:</b>	Estate to conduct `OilPalmPal` Digital Housing Complaint System (OPP DHCS) refreshers training to the workers.		
<b>Root Cause Analysis:</b>	Lack of understanding on `OilPalmPal` Digital Housing Complaint System (OPP DHCS) for workers housing complaints.		
<b>Corrective Actions:</b>	To conduct the OilPalmPal` Digital Housing Complaint System (OPP DHCS) refresher training to the workers regularly. Estate will be putting up QR code flyers		

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

	at every worker quarters. Housing inspection also will be done weekly by Person in charge.
<b>Assessment Conclusion:</b>	The correction and corrective action plan are accepted. The evidence of implementation shall be verified in the next assessment visit.

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>2155450-202201-I1</b>	<u>Indicator 6.2.4</u> Provision of NEST's (Nursery For Estate's Toddlers) amenities such as toys and play items, mattress and pillow as well as educational material including posters, television, DVD player, books, magazines etc. could be further enhanced in Chaah Estate with available toddlers and operated NEST.
<b>2155450-202201-I2</b>	<u>Indicator 6.3.2</u> The minutes of meetings copy for meeting between the unit of certification management with trade unions (NUPW) or workers representatives, could be further provided digitally/electronically (WhatsApp, email, etc.) for ease of workers' representative safekeeping or distribution among workers as an alternative to hardcopy records provision in Sg. Simpang Kiri Estate.
<b>2155450-202201-I3</b>	<u>Indicator 7.2.10</u> The monitoring of the annual medical surveillance at North Labis Estate for workers exposed to herbicides can be further improved therefore the interval period of 12 months is not exceeded.

<b>Positive Findings</b>	
<b>PF #</b>	<b>Description</b>
<b>PF 1</b>	Very good cooperation and hospitality by management team/staff/sustainability team
<b>PF 2</b>	Prompt retrieval of relevant documents by the management team
<b>PF 3</b>	Good awareness on sustainability aspects among the workers and stakeholders

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

Non-conformity																									
<b>NCR Ref #</b>	1944861-202008-M1	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	6.2.2 (Critical)																						
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/11/2020																						
<b>Statement of Nonconformity:</b>	Some of the legal labour compliance is not effectively demonstrated.																								
<b>Requirement Reference:</b>	Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.																								
<b>Objective Evidence:</b>	<p>North Labis Estate:</p> <p>The JTK Permit for water bill deduction in North Labis Estate is RM10 for shared usage for single workers. However, sampled below workers has the deduction for water bill more than RM10 as below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Worker</th> <th style="width: 30%;">Month</th> <th style="width: 40%;">Deduction rate</th> </tr> </thead> <tbody> <tr> <td>Komarudin</td> <td rowspan="2">Mar 2020</td> <td>RM 12.00</td> </tr> <tr> <td>Saw Mu Phaw S</td> <td>RM 13.18</td> </tr> <tr> <td>Komarudin</td> <td rowspan="3">Apr 2020</td> <td>RM 12.12</td> </tr> <tr> <td>Saw Mu Phaw Sel</td> <td>RM 10.20</td> </tr> <tr> <td>Barun Mallick</td> <td>RM 13.56</td> </tr> <tr> <td>Komarudin</td> <td rowspan="3">May 2020</td> <td>RM 14.40</td> </tr> <tr> <td>Saw Mu Phaw Sel</td> <td>RM 11.58</td> </tr> <tr> <td>Barun Mallick</td> <td>RM 14.30</td> </tr> </tbody> </table>			Worker	Month	Deduction rate	Komarudin	Mar 2020	RM 12.00	Saw Mu Phaw S	RM 13.18	Komarudin	Apr 2020	RM 12.12	Saw Mu Phaw Sel	RM 10.20	Barun Mallick	RM 13.56	Komarudin	May 2020	RM 14.40	Saw Mu Phaw Sel	RM 11.58	Barun Mallick	RM 14.30
Worker	Month	Deduction rate																							
Komarudin	Mar 2020	RM 12.00																							
Saw Mu Phaw S		RM 13.18																							
Komarudin	Apr 2020	RM 12.12																							
Saw Mu Phaw Sel		RM 10.20																							
Barun Mallick		RM 13.56																							
Komarudin	May 2020	RM 14.40																							
Saw Mu Phaw Sel		RM 11.58																							
Barun Mallick		RM 14.30																							
<b>Corrective Actions:</b>	Estate will apply new JTK Permit on wage deduction for water bill. Estate will appoint person in charge for monitoring of wage deduction.																								
<b>Assessment Conclusion:</b>	<p>Due to increase of COVID-19 cases in Malaysia, the Critical NC close out off-site assessment was conducted on 05/11/2020 after approval by BSI RSPO Global Scheme Manager.</p> <p>All the evidences of closing the Major NC were reviewed and interview session were conducted online to the workers. Therefore, the all the Major NC raised previously were recommended to be closed.</p> <p>Evidence reviewed:</p> <ol style="list-style-type: none"> <li>a) Appointment letter for person in charge for salary deduction monitoring.</li> <li>b) Memo on the water bill deduction to workers.</li> <li>c) Pay slip (Komarudin, Saw Mu Phaw Sel, Barun Mallick) for Sept &amp; Oct 2020.</li> </ol>																								

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

	<p>d) Evidence of reimbursement to workers (Komarudin, Saw Mu Phaw Sel, Barun Mallick) for March, April &amp; May 2020.</p> <p>e) Application to Labour Department on the increase rate of water bill limit.</p>
<b>ASA2_1 Verification</b>	<p>As per Inter-Office Mail from Sime Darby Plantation’s Head, HR Upstream to Senior Managers/Managers Estate &amp; Mill for all Northern Region, Central East Region, Central West Region on Implementation of Revised Workers’ Contracts and Register of Maternity Leave and Allowances; Date: 3/12/2019.</p> <p>All workers work agreement were also based on MAPA Circular No. 1/2020; Date: 14/1/2020; Minimum Wages Order 2020 (MWO 2020) where the order provides for the minimum wages rates payable to an employee who works in a place of employment in any City Council or Municipal Council area as specified in the schedule.</p> <p>Based on sample workers pay documents sighted, no over-deduction made. Hence, the Critical NC remained close.</p>

Non-conformity			
<b>NCR Ref #</b>	1944861-202008-M2	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	3.6.1 (Critical)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/11/2020
<b>Statement of Nonconformity:</b>	No evidence of risk at Chemical Storage area has been assessed.		
<b>Requirement Reference:</b>	All operations are risk assessed to identify H&S issues. Mitigation plans, and procedures are documented and implemented.		
<b>Objective Evidence:</b>	<p>Chaah Estate:</p> <p>Sighted during site visit at chemical store, noted that the Rat Bait were arrange on a rack where there was a risk to storekeeper/workers during arranging and issue the rat bait. During document review, it was noted that the no evidence of risk assessment was conducted for chemical store area in the HIRARC report.</p>		
<b>Corrective Actions:</b>	Estate will review the HIRARC for chemical store to include high storage of chemical based on company SOP. Refresher training on HIRARC will be conducted for related personnel.		
<b>Assessment Conclusion:</b>	<p>Due to increase of COVID-19 cases in Malaysia, the Critical NC close out off-site assessment was conducted on 05/11/2020 after approval by BSI RSPO Global Scheme Manager.</p> <p>All the evidences of closing the Major NC were reviewed and interview session were conducted online to the workers. Therefore, the all the Major NC raised previously were recommended to be closed.</p> <p>Evidence reviewed:</p> <ol style="list-style-type: none"> <li>1. Revised HIRARC includes high stacking in chemical store.</li> <li>2. HIRARC refresher training on 24/08/2020.</li> </ol>		
<b>ASA2_1 Verification</b>	The HIRARC for high stacking of rat baits boxes was still maintained. Based on interview with storekeepers at the sampled estates, it was noted that they were		

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

	aware of the hazard if the rat bait boxes were stacked too high. Thus, the NCR remains closed.
--	--

Non-conformity			
<b>NCR Ref #</b>	1944861-202008-M3	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	3.8.4 (Critical)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/11/2020
<b>Statement of Nonconformity:</b>	Transaction information registered in PalmTrace is not accurate.		
<b>Requirement Reference:</b>	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.		
<b>Objective Evidence:</b>	For transactions ID TR-0b9d1d55-fc38c, the shipping date stated in the PalmTrace is not consistent with the actual shipping date. As per the despatch note, the date of shipping was 03/03/2020 while shipping announcement date in PalmTrace is 18/07/2020.		
<b>Corrective Actions:</b>	HQ will inform GTM to halt performing any transaction via meeting and email and notify UTZ immediately for any technical problem occurs during transaction key-in in the future via email. This will be informed through a training program on PalmTrace to PIC in GTM and related parties that is scheduled to be conducted by HQ tentatively in mid of October 2020.		
<b>Assessment Conclusion:</b>	<p>Due to increase of COVID-19 cases in Malaysia, the Critical NC close out off-site assessment was conducted on 05/11/2020 after approval by BSI RSPO Global Scheme Manager.</p> <p>All the evidences of closing the Major NC were reviewed and interview session were conducted online to the workers. Therefore, the all the Major NC raised previously were recommended to be closed.</p> <p>Evidence reviewed:</p> <ol style="list-style-type: none"> <li>1. Discussion on RSPO SCCS &amp; Palmtrace training on 23/10/2020.</li> <li>2. E-Mail communication GSD HQ to GTM and UTZ on Palmtrace transaction on 14/08/2020.</li> <li>3. Meeting session Sustainability Unit and Supply Chain Unit with GTM (Training Module on 23/10/2020).</li> </ol>		
<b>ASA2_1 Verification</b>	Verification of transaction ID # TR-c8f92d53, TR-cc0bb677 and TR-ed40ed22 showed that the shipping dates reported in the PalmTrace were consistent with the dispatch notes. Thus, the NCR remains closed.		

Non-conformity			
<b>NCR Ref #</b>	1944861-202008-M4	<b>Clause &amp; Category (Critical (Major) / Minor)</b>	3.2.1 (Critical)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/11/2020



**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

<b>Statement of Nonconformity:</b>	Plans are not documented and/or implemented effectively.
<b>Requirement Reference:</b>	The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.
<b>Objective Evidence:</b>	<ol style="list-style-type: none"> <li>1) The final discharge of the mill is for land application at Chaah Estate. Management plan to manage the aspect &amp; impact especially during rainy season is not available.</li> <li>2) Flood management plan at Chaah Estate was developed but has not conducted participatory with smallholders at downstream. This is further evident from grievance received during stakeholder consultation.</li> <li>3) Waste management plan at Chaah Estate has not been implemented effectively:             <ul style="list-style-type: none"> <li>• It was found that wastes (i.e. lubricant container, oil drum) are stored without label. As per the Waste Management Plan FY 2020, these wastes shall be labelled.</li> <li>• There was no inventory of scrap iron since 2018. As per the Waste Management Plan FY 2020, the scrap iron is collected and recorded.</li> </ul> </li> <li>4) The Sungai Simpang Kiri Estate’s water management plan FY 2020 has not been updated to illustrate governmental water supply. The plan still state water source from estate water treatment plant.</li> <li>5) The HCV plan for Sungai Simpang Kiri Estate was not established accurately. It is required to conduct patrolling activity along the forest border regularly but there Sungai Simpang Kiri estate has not forest border).</li> <li>6) As per the Operation control procedure, to check river pollutant, monitoring is required to be conducted once every 3 months. However, at North Labis estate, the water sampling is not conducted in 3 month basis.</li> <li>7) The HCV management plan for North Labis Estate has indicated to have conducted 4 HCV awareness training, however, only 1 record is available.</li> </ol>
<b>Corrective Actions:</b>	The RSQM team will conduct a training to estate management team on effective reviewing of management plans. A team for management review team will be established to ensure the progress and review of the management plan is well monitored by the team. Appointment letter for the estate management review team will be issued out and outline the responsibilities i.e. conduct annual management review meeting which include review of management plan, monitoring of management plan.
<b>Assessment Conclusion:</b>	<p>Due to increase of COVID-19 cases in Malaysia, the Critical NC close out off-site assessment was conducted on 05/11/2020 after approval by BSI RSPO Global Scheme Manager.</p> <p>All the evidences of closing the Major NC were reviewed and interview session were conducted online to the workers. Therefore, the all the Major NC raised previously were recommended to be closed.</p> <p>Evidence reviewed: <u>Chaah Estate</u></p> <ol style="list-style-type: none"> <li>1. Revised EAI &amp; EIE furrow.</li> <li>2. Revised flood management plan.</li> <li>3. Photos of waste labelled (oil drum &amp; lubricant container).</li> <li>4. Management review minute of meeting dated 21/10/2020.</li> </ol>

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

	<ol style="list-style-type: none"> <li>5. Management review team appointment letter dated 17/10/2020.</li> <li>6. Scrap iron inventory.</li> </ol> <p><u>North Labis Estate</u></p> <ol style="list-style-type: none"> <li>1. Revised HCV Management Plan.</li> <li>2. Management review minute of meeting dated 17/10/2020.</li> <li>3. Management review team appointment letter dated 17/10/2020.</li> <li>4. Water sampling program.</li> </ol> <p><u>Sg Simpang Kiri Estate</u></p> <ol style="list-style-type: none"> <li>1. Revised HCV Management Plan.</li> <li>2. Management review minute of meeting dated 17/10/2020.</li> <li>3. Management review team appointment letter dated 17/10/2020.</li> <li>4. Water management plan</li> <li>5. Training on effective review and implementation on management plan by RSQM team to all estates on 16/10/2020.</li> </ol>
<b>ASA2_1 Verification</b>	<ul style="list-style-type: none"> <li>- The revised EAI &amp; EIE for final discharge of the mill is for land application at Chaah Estate, including its management plan to manage the aspect &amp; impact especially during rainy season were still maintained.</li> <li>- The updated flood management plan at Chaah Estate which was developed in participatory of smallholders at downstream was remain implemented.</li> <li>- Waste management plan at Chaah Estate is continued being implemented effectively which include the labelling of lubricant container and oil drum, and inventory of scrap iron is being updated</li> <li>- The Sungai Simpang Kiri Estate's water management plan FY 2021 has been updated to illustrate governmental water supply</li> <li>- The correct version of HCV plan for Sungai Simpang Kiri Estate was still maintained</li> <li>- The sampled estates have been monitoring their river water quality at the frequency required in the procedure i.e. 3 monthly basis. Records of analysis were well maintained for verification</li> <li>- Records of the HCV awareness training were well maintained by the operating units as per management plan</li> </ul> <p>Thus, the NCR remains closed.</p>

Opportunity for Improvement	
OFI#	Description
<b>OFI 1</b>	<p><b>OFI Statement:</b></p> <p>4.2.3 During the stakeholder consultation, the Ketua Kampung of Seri Sejangung has voiced out his grievance about the construction of bund at Sg Simpang Kiri Estate along a river between the estate (field no. 2000B2) and oil palm plantation belonged to Kg Sejangung villagers had caused the flood in the villagers' plantation area to be worsed.</p> <p>The handling of this grievance can be further improved by having it recorded and documented according to the company's procedure.</p> <p><b>ASA2_1 Verification / Follow-up actions:</b></p>

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

	<p>Neither any complaints nor land dispute occurred in the SOU 20 Certification Unit since the last audit. Records of previous grievances and requests found to be responded within short time by respective recipients.</p> <p>External stakeholders consultation meeting however unable to be conducted due to the MCO enforcement by the government. Consultation made via survey email to get the feedbacks from them. No negative feedbacks received for the email survey conducted on July 2021. Previous face to face consultation meeting with external stakeholders were conducted on 4/8/2020.</p>
<b>OFI 1</b>	<p><b>OFI Statement:</b></p> <p>3.8.5 The crop diversion information in Appendix 15 of the Standard Operation Procedure for Sustainable Supply Chain and Traceability ver 2 dated April 2019 can be further improved:</p> <ol style="list-style-type: none"> <li>1. On crop diversion information.</li> <li>2. Volume removal when there is crop diversion.</li> </ol> <p><b>ASA2_1 Verification / Follow-up actions:</b></p> <p>There has been no crop diversion for the period under review. Nonetheless, based on interview, the mill management is aware of the removal of volume should there be any diversion.</p>

**3.3.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1228987M1	Major	4.7.1	29/08/2015	Closed 28/09/2015
1228987N1	Minor	6.6.2	29/08/2015	Closed on 22/9/2016
1228987N2	Minor	4.4.1	29/08/2015	Closed on 22/9/2016
1228987N3	Minor	4.7.5	29/08/2015	Closed on 22/9/2016
1381349M1	Major	6.5.2	22/09/2016	Closed on 11/11/2016
1381349M2	Major	4.7.1	22/09/2016	Closed on 11/11/2016
1381349M3	Major	2.1.1	22/09/2016	Closed on 11/11/2016
1381349M4	Major	4.6.11	22/09/2016	Closed on 11/11/2016
1381349N1	Minor	6.2.3	22/09/2016	Closed on 11/08/2017
1509988-201707-M1	Major	5.3.2	11/08/2017	Closed on 10/10/2017
1509988-201707-N1	Minor	5.3.3	11/08/2017	Closed on 25/09/2018
1816031-201906-M1	Minor	2.1.1	23/08/2019	Closed on 03/10/2019
1816031-201906-N1	Minor	6.5.3	23/08/2019	Closed on 14/08/2020
1816031-201906-N2	Minor	6.10.4	23/08/2019	Closed on 14/08/2020
1944861-202008-M1	Critical	6.2.2	14/08/2020	Closed on 05/11/2020
1944861-202008-M2	Critical	3.6.1	14/08/2020	Closed on 05/11/2020
1944861-202008-M3	Critical	3.8.4	14/08/2020	Closed on 05/11/2020
1944861-202008-M4	Critical	3.2.1	14/08/2020	Closed on 05/11/2020
2095494-202108-N1	Minor	2.2.2	24/08/2021	Open

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

2095494-202108-N2	Minor	7.3.1	24/08/2021	Open
2155450-202201-N1	Minor	2.2.2	21/01/2022	Open
2155450-202201-N2	Minor	3.4.2	21/01/2022	Open
2155450-202201-N3	Minor	4.2.2	21/01/2022	Open

### 3.4 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 Strategic Operating Unit (SOU 20) – Chaah 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.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal stakeholder	Creche Ayah	Face to face interview
Internal stakeholder	Estate Medical Assistant	Face to face interview
Internal stakeholder	Office Clerk (Gender committee)	Face to face interview
Internal stakeholder	Workers Union representatives	Face to face interview
Internal stakeholder	Estates’ foreign workers’ representative	Face to face interview
Contractors & suppliers	FFB transporters, spare part suppliers, canteen and sundry shop	Face to face interview
Surrounding communities	Cattle Owners	Face to face interview
Surrounding communities	Village Representatives	Face to face interview
Government	School Headmaster	Face to face interview

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks:</b> School Headmaster (SJKT) Estate management always participated in school events except during Covid-19 Movement Control Orders. A lot of contributions received from estate management including school children’s excellent award</p> <p><b>Audit Team verification and response:</b> No further issue</p>
<b>2</b>	<p><b>Feedbacks:</b> Cattle Owners Estate management always communicated well in terms of company’s policy on cattle rearing within estate field area. No issue between all cattle owners and estate management that having very good relationship.</p>

	<p><b>Audit Team verification and response:</b> No further issue</p>
<b>3</b>	<p><b>Feedbacks:</b> Village Representatives Both mill and estate management always helpful and contributed a lot to local villagers. Contributions including food basket to Covid-19 quarantined families and recently house cleaning with foods and clothes to families affected by flood.</p> <p><b>Audit Team verification and response:</b> No further issue</p>
<b>4</b>	<p><b>Feedbacks:</b> Estates' and mill's workers representatives Positive response given by the sampled workers and representatives. The employer have been treating them well and fair especially with regards to wages, safety and welfare. No form of discrimination in any forms practiced. The complaint channel/mechanism is also well understood.</p> <p><b>Audit Team verification and response:</b> No further issue</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions

Note: NA as the estates have undergone first cycle of replanting.



Previous land owner / user comment	
	<b>Feedbacks:</b> NA
	<b>Audit Team verification and response:</b> NA

### 3.5 Impartiality and conflict of interest

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

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

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

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Strategic Operating Unit (SOU 20) Chaah Palm Oil Mill and supply base has complied with the Malaysia National Interpretation 2019 of the RSPO P&amp;C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Strategic Operating Unit (SOU 20) Chaah Palm Oil Mill is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
<p><b>Name:</b> Valence Shem</p>	<p><b>Name:</b> HASNOL HIC HAM RIN HAMDAN</p>
<p><b>Company Name:</b> BSI Services (Malaysia) Sdn Bhd</p>	<p><b>Company Name:</b> SIME DARBY PLANTATION BHD. CHAAH ESTATE .</p>
<p><b>Title:</b> Lead Auditor</p>	<p><b>Title:</b> MANAGER ESTATE .</p>
<p><b>Signature:</b></p> 	<p><b>Signature:</b> <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
<p><b>Date:</b> 15/03/2022</p>	<p><b>Date:</b> 16/3/2022.</p>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1:</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>Documents required for all unit of certification available in SOU 20 Certification Unit:</p> <ul style="list-style-type: none"> <li>- Land titles/user rights</li> <li>- Occupational health and safety plans</li> <li>- Plans and impact assessments relating to environmental and social impacts</li> <li>- HCV documentation</li> <li>- Pollution prevention and reduction plans</li> <li>- Details of complaints and grievances</li> <li>- Continuous improvement plans</li> <li>- Public summary of certification assessment report</li> <li>- Group Sustainability Policy</li> <li>- Record of contributions to community development</li> </ul>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul>	<p>Information provided as per sample records of Stakeholder Consultation Meeting for Chaah Estate external stakeholders conducted on 17/1/2022 at Chaah Estate Community Hall. Among stakeholders attended including local village head, school headmaster, vendors and cattle owners. No negative feedback received from stakeholders attended during the meeting.</p> <p>North Labis Estate conducted a special consultation meeting with cattle owners on 20/4/2021. The minutes of meeting records indicated that both</p>	Complied



		estate management and cattle owners managed to come to a consensus in terms of estates' and cattle rearing operational benefits.	
1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Request by stakeholders conducted through stakeholders meeting, visitor books, letters and forms. The mill and estates maintain the records of all request and response. Sighted the sample records of request from the stakeholders maintained by SOU 20 as following:</p> <ul style="list-style-type: none"> <li>- Chah POM DOSH inspection visit report requests dated 1/3/2021</li> <li>- Chah POM DOE inspection visit requests dated 5/5/2021</li> <li>- Simpang Kiri Estate workers' housing (house # 18/86) repair request dated 17/8/2021</li> <li>- North Labis Estate workers' housing (house # D/21) repair request dated 6/6/2021</li> </ul> <p>All requests found to be responded within short time by respective recipients.</p>	Complied
1.1.4	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Consultation and communication procedure documented as the Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 for handling communication regarding social issues. Additionally, there's Mill Quality Management System Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>Procedures were briefed to external stakeholders during the consultation meeting and to all workers during workers meeting and assembly sessions from time to time.</p> <p>The person in charge for communication and consultation for Chaah POM is Mr. Azharol Amir, Assistant Manager as per appointment letter dated 1/4/2021, for Chaah Estate is Mr. Zulkefly Ahmad, Sr. Assistant Manager as per letter dated 3/7/2020, for Simpang Kiri Estate is Mr. Mohd Zulfasrol</p>	Complied

		Zulkifli, Assistant Manager as per letter dated 3/1/2020 and for North Labis Estate is Ms. Juliana Mohamad, Chief Clerk as per letter dated 15/1/2021.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	The latest Stakeholders Lists for all operating units within SOU 20 sighted available as updated on July 2021. Information of stakeholders' details available included person in charge, address, e-mail and contact number for various stakeholders' category among internal and external stakeholders including local communities, authorities, vendors and neighbours etc.	Complied
<b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	<p>SOU 20 has implemented policy on code of ethical conduct and integrity (Code of Business Conduct - COBC) which covered all operations in the plantation operation. Briefing session was given to all workers of audited operating units.</p> <p>Latest briefing was conducted by management to workers of Chaah POM on 18/8/2021, Chaah Estate on 23/7/2021, Simpang Kiri Estate on 6/4/2021 and North Labis Estate on 23/2/2021.</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 &amp; human rights, ethics &amp; management practices.</p> <p>The Vendor Integrity Pledge sighted available for sampled Chaah POM contractor Syarikat Wijaya (Masai) Sdn. Bhd.; Date: 1/1/2021, Simpang Kiri contractor RSKP Brothers; Date: 1/4/2021 and Chaah Estate contractor Perniagaan Khidmat Setia; Date: 2/1/2021.</p>	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Monitoring included the internal audit conducted by Regional SQM internal auditors for SOU 20. Latest internal audit was conducted on 22-26/7/2021 found no issues in the implementation of the policy and overall ethical business practice.	Complied
<b>Principle 2: Operate legally and respect rights</b>			

<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<b>(C)</b> The Unit of Certification complies with legal requirements - Critical (Major) compliance -	<p>The mill &amp; estates continue to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Among the evidence of compliance verified were:</p> <p><u>Chaah POM:</u></p> <ul style="list-style-type: none"> <li>- Private installation from Energy Commission, #202002585, valid until 11/11/2021</li> <li>- Diesel permit #P(J00748), valid until 06/03/2024</li> <li>- MPOB License #518940004000, valid until 28/02/2022</li> <li>- DOE License #004721, valid until 30/06/2022</li> <li>- Certificate of Fitness (Boiler) #JH PMD 80145, valid until 03/04/2022</li> <li>- Certificate of Fitness (Hoist crane) #JH PMA 13364, valid until 31/05/2022</li> <li>- Certificate of Fitness (Sterilizer) #JH PMT 21640, valid until 31/05/2022</li> <li>- Certificate of Fitness (Air receiver tank) #JH PMT 80553, valid until 30/04/2022</li> </ul> <p><u>Chaah Estate:</u></p> <ul style="list-style-type: none"> <li>- MPOB License, #518848002000, valid until 28/02/2022</li> <li>- MPOB License for nursery, #617601011000, valid until 31/08/2022</li> <li>- Permit to store diesel &amp; petrol, #JH(SGT)0123/05 PSK, valid until 04/11/2021</li> <li>- CF air compressor, #MK PMT 1885, valid until 24/08/2022</li> <li>- CF air compressor, #JH PMT 2909, valid until 10/04/2022</li> </ul>	Complied

		<p><u>North Labis Estate:</u></p> <ul style="list-style-type: none"> <li>- MPOB License, #52249600200, valid until 31/07/2022</li> <li>- MPOB License, #52479102000, valid until 30/04/2022</li> <li>- Permit to store diesel, #J001492, valid until 10/06/2021 – permit has already been approved and pending for issuance of certificate</li> <li>- Permit to store diesel, #J001493, valid until 10/06/2021 – permit has already been approved and pending for issuance of certificate</li> <li>- CF air compressor, #MK PMT 1888, valid until 10/04/2022</li> <li>- CF air compressor, #JH PMT 2909, valid until 10/04/2022</li> </ul> <p><u>Simpang Kiri Estate:</u></p> <ul style="list-style-type: none"> <li>- MPOB License, #532593002000, valid until 30/09/2021</li> <li>- MPOB License for nursery, #54369801100, valid until 31/10/2021</li> <li>- Permit to store diesel &amp; petrol, #J000718, valid until 23/01/2022</li> <li>- CF air compressor, #MPT-JH/20 103836, valid until 24/08/2022</li> </ul>	
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> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul>	<p>Addressed in Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. A mechanism to ensure compliance to legal and other requirement has been documented in EQMS &amp; MQMS (Estate &amp; Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 20. PSQM Department and the respective operating units will undertake the responsibility of identifying, managing, updating, and tracking the legal requirement as well as monitoring the status of legal compliance.</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		Tracking system is available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office. SOU 20 has established list of all relevant laws and requirement and documented in Legal and Requirement Register. The list was updated on annual basis or new updates on the register.	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	Based on site visit at the sampled estates' boundary, methods used are trenching, PVC pegs (painted with red and white) and roads. The demarcations were visibly maintained as verified at the following sites: - Chaah Estate: Field #99D and smallholders - Sungai Simpang Kiri Estate: Field #06A and Kg Sepakat	Complied
<b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	The mill and estates in SOU 20 have listed and maintain all contracted parties and documented in List of Stakeholder as parts of their stakeholders includes internal such as employee and workers union and external stakeholders such as FFB suppliers, local community heads, government agencies. - Chaah POM Stakeholders List FY 2021; Date: 1/7/2021 - Chaah Estate Stakeholders List FY 2021; Date: 1/1/2021 - North Labis Estate Stakeholders List FY 2021; Date: 1/1/2021 - Simpang Kiri Estate Stakeholders List FY 2021; Date: 1/1/2021	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.	All contracted parties/vendors were required to signed Vendor Integrity Pledge (VIP) and to comply with all applicable laws and regulations related anti-bribery, fraud and corruption and Vendor Code of Business Conduct (VCOBC) such as labour and Human Rights. Sighted VIP samples were signed by Chaah POM contractor Syarikat Wijaya (Masai) Sdn. Bhd.; Date: 1/1/2021, Simpang Kiri contractor RSKP Brothers; Date: 1/4/2021 and Chaah Estate contractor Perniagaan Khidmat Setia; Date: 2/1/2021.	Non-compliance

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

	<p>- Minor compliance -</p>	<p>Memorandum of Agreement (MOA) also sighted for sampled contractors contained specific clauses on meeting applicable legal requirements to be demonstrated by them.</p> <p>For labour agent too, 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 &amp; human rights, ethics &amp; management practices.</p> <p>No Outside Crop Purchase (OCP) supplier in Chaah POM.</p> <p>Nonetheless, during the remote assessment, it was found that not all contractors able to demonstrate meeting applicable legal requirements. Based on sampled contractor worker's pay documents verified at Simpang Kiri Estate as follows:</p> <ul style="list-style-type: none"> <li>- Contractor: RSKP Brothers</li> <li>- Workers ID #: 000728-0X-XXXX, 880919-0X-XXXX and 810805-0X-XXXX</li> <li>- Pay documents month: Jan 2021 - May 2021,</li> </ul> <p>the compliance against requirement under Section 16(1) of Employment Insurance System Act 2017, was not satisfactorily demonstrated. Thus, a non-conformity report was assigned due to this lapse.</p> <p>During the on-site assessment, an FFB transport contractor at North Labis Estate was found to be utilizing one of its FFB trucks (Reg. No. JNA7851) under expired PUSPAKOM's Inspection Certificate [ref.: BL 4979168, expiry date: 11/01/2022] via public road to transport FFB from the estate to Sime Darby's Gunung Mas POM. Based on the Gunung Mas POM's FFB Receive Detail Report by Supplier, the truck has been delivering FFB on 12, 15, and 20/01/2022. Thus, another non-conformity report was assigned due to this lapse.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young</p>	<p>The contract signed with contractors is sighted in Chaah POM, Chaah Estate, North Labis Estate and Simpang Kiri Estate with contractors, contained</p>	<p>Complied</p>

	workers are employed, the contracts include a clause for their protection. - Minor compliance -	clause 5.8, abolishment of child labour & protecting the rights of children available in the Vendor COBC and Human Rights Charter protecting the rights of children.	
<b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	Chaah POM received FFB only from its own supply bases or diversion from other certified Sime Darby's estates. The FFB suppliers were listed in the Chaah POM FFB Suppliers list that included the information on geo-location of FFB origins, valid MPOB license, evidence of the ownership status or the right/claim to the land.	Complied
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1. - Minor compliance -	Chaah POM does not receive FFB from any indirect sources. All FFBs were received from its own supply bases and other certified Sime Darby's estates.	Not Applicable
<b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b>			
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The business plan for the mill is reflected in the form of annual budget (MPLAN) and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX.</p> <p>The business or management plan for the estates were presented in the form of annual budget (MPLAN) with 4 years projection (2022 – 2025). The annual budget contains the crop projection and the finance allocation for field operation and administrations. The management has their monthly</p>	Complied

		progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.																														
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	<p>The estates have prepared the replanting programme with minimum of 5 years projection. The review of the programme is done at the end of every year. Below are the details of the programme:</p> <table border="1"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="5">Ha</th> </tr> <tr> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Chaah</td> <td>230.36</td> <td>186.07</td> <td>190.10</td> <td>229.08</td> <td>282.33</td> </tr> <tr> <td>North Labis</td> <td>234.32</td> <td>87.10</td> <td>277.93</td> <td>134.59</td> <td>146.79</td> </tr> <tr> <td>Sg Simpang Kiri</td> <td>0</td> <td>47.98</td> <td>103.96</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	Year	Ha					2022	2023	2024	2025	2026	Chaah	230.36	186.07	190.10	229.08	282.33	North Labis	234.32	87.10	277.93	134.59	146.79	Sg Simpang Kiri	0	47.98	103.96	0	0	Complied
Year	Ha																															
	2022	2023	2024	2025	2026																											
Chaah	230.36	186.07	190.10	229.08	282.33																											
North Labis	234.32	87.10	277.93	134.59	146.79																											
Sg Simpang Kiri	0	47.98	103.96	0	0																											
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	<p>Management review meeting for the operating units were last conducted on 16/08/2021 (Chaah POM), 09/08/2021 (Chaah Estate), 04/08/2021 (North Labis Estate) and 31/07/2021 (Sg Simpang Kiri Estate). The meetings were chaired by the managers of the operating units and attended by the key personnel.</p> <p>Among the agenda discussed were:</p> <ul style="list-style-type: none"> <li>• Results of internal audit</li> <li>• Customer feedback</li> <li>• Status of preventive and corrective actions</li> <li>• Follow-up actions from previous management review</li> <li>• Changes that could affect management system</li> <li>• Recommendations for improvement</li> </ul>	Complied																													
<p><b>Criterion 3.2:</b> The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>																																



3.2.1	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 20 has the continuous improvement plan categorized for social, environmental and OSH impacts. Generally, the continuous improvement plan is addressed in various management plans such as SIA action plan, pollution prevention plan, wastes management plan, water management plan, biodiversity management plan to name a few.</p>	Complied
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b>            The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.            Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>The Certification Unit has completely filled its RSPO metrics template version 2.1 and submitted to the CB prior to this assessment. The input data was found to be accurate based on the following records verification:</p> <ul style="list-style-type: none"> <li>• SAP accounting system</li> <li>• Land titles</li> <li>• Complaints &amp; grievance records</li> <li>• Dept. of Safety &amp; Health’s JKPP8 form</li> </ul>	Complied
<b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>SOP available for the Palm Oil Mill and the Estates. Palm Mill holds two SOPs:</p> <ol style="list-style-type: none"> <li>1. Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill.</li> <li>2. Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) to includes mill SOPs. Sighted SOP for fruit handling station, sterilization station, threshing station, pressing station, kernel recovery station, boiler station and effluent treatment plant.</li> </ol>	Complied

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		<p>Estates have a separate SOP which is SOP EQMS, Pictorial Safety Standard, Estate Quality Management System and Agricultural reference Manual that covered planting material, nursery techniques, replanting, land preparation, planting density, canopy management, water management, harvesting, loose fruit collection, weed control and transport.</p> <p>Verified the latest generic SOP for COVID-19 3rd Wave dated 07/12/2020, version 5. Apart from that, there is also a Reminders on Compliance to MCO 3.0 SOPs, from the CEO of SDPB [ref. no: UM/HSE/005/06/2021] dated 29/06/2021 to be adhered to.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>Apart from daily routine supervision, among the other mechanism to check consistent implementation of the procedures are visits by Mill Advisor and Plantation Advisor, visit by the agronomist, internal audit, site inspection by the SHO, ESH visit, and SORA visit to name a few.</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>The sampled operating units maintain all records of monitoring and available for review. Among the records verified but not limited to were:</p> <ul style="list-style-type: none"> <li>- Mill Advisor (MA) and Plantation Advisor (PA) report where the performance of compliance towards the SOP, Budget and Productivity are reported</li> <li>- Various checklists used by the estates and mill for operations</li> <li>- Health and safety monitoring</li> <li>- Line site Inspections (Weekly)</li> <li>- Work Site Inspections (Quarterly)</li> <li>- Crop Quality Assessment by SQM (6 Months)</li> <li>- Plantation Management Unit (Yearly)</li> <li>- Internal Audit (Yearly)</li> <li>- Environment, Safety &amp; Health Visit (As and When Required)</li> <li>- Structured Oil Recovery Assessment (SORA) – (6 Months)</li> </ul>	Complied

<b>Criterion 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting in all the sampled estates. Nonetheless, the assessment of environmental impact of its existing activities is documented in the following documents:</p> <ul style="list-style-type: none"> <li>• Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register</li> <li>• Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI</li> <li>• Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE</li> </ul>	Complied
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>No new planting in all estates within SOU 20. For existing operations, the operating unit of SOU 20 documented the continual improvement plan for social in the Social Management Plan. Identified main social aspects and impacts from SIA considered in the plan including the following categories:</p> <ul style="list-style-type: none"> <li>- Workers’ Housing Condition/Living Improvement</li> <li>- Workers’ Working Condition</li> <li>- External stakeholders feedbacks</li> </ul> <p>Improvements conducted by individual operating units within SOU 20 including housing improvement programs, minimum wages achievement monitoring and community contribution programs.</p> <p>Environment Aspect and Impact Identification for various activities- construction work, compound, dispensary, field, harvesting and collection, main entrance, pest and disease control, petrol and diesel, power station, replanting, road, schedule waste store, workshop.</p> <p>After the EAI is completed, the Environmental Impact Evaluation is conducted to evaluate the impact severity using a format (Environmental</p>	Non-compliance

		<p>Impact Evaluation Form). There are 3 classifications of impact established in order to justify the action plan (mitigations) required i.e.:</p> <table border="1" data-bbox="1048 475 1921 675"> <tr> <th colspan="2">Guidance of Action required</th> </tr> <tr> <td>100 ~ 199</td> <td>No action required</td> </tr> <tr> <td>200 ~ 249</td> <td>To initiate corrective and preventive actions</td> </tr> <tr> <td>250 and above</td> <td>To develop environmental objective and programme</td> </tr> </table> <p>Mitigation measures were documented in various management plan such as Pollution Preventive Plan (PPP), Wastes Management Plan, Water Management Plan, Energy Management Plan to name a few.</p> <p>However, based on site visit at the boundary between Chaah Estate and smallholder [Field No. 99D (GPS: 2.179818, 103.006086)], it was found that a significant number of empty herbicides containers [Canyon (a.i.: Metsulfuron-methyl) and Alion (a.i: Indaziflam)] and used rubber gloves was disposed inside the estate area by unknown party. However, this environmental aspect has yet to be addressed in the estate’s environmental management plan. Thus, a non-conformity report was assigned due to this lapse.</p>	Guidance of Action required		100 ~ 199	No action required	200 ~ 249	To initiate corrective and preventive actions	250 and above	To develop environmental objective and programme	
Guidance of Action required											
100 ~ 199	No action required										
200 ~ 249	To initiate corrective and preventive actions										
250 and above	To develop environmental objective and programme										
<p>3.4.3</p>	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.          - Critical (Major) compliance -</p>	<p>The action plan will be reviewed together with internal and external stakeholders through consultation meetings. All operating units reviewed the plan with internal stakeholders among workers during meeting and training/briefing sessions which were latest conducted by management to workers of Chaah POM on 18/8/2021, Chaah Estate on 23/7/2021, Simpang Kiri Estate on 6/4/2021 and North Labis Estate on 23/2/2021.</p> <p>External stakeholders consultation meeting however unable to be conducted due to the MCO enforcement by the government. Consultation made via survey email to get the feedbacks from them. No negative feedbacks received for the email survey conducted on July 2021. Previous</p>	<p>Complied</p>								

		face to face consultation meeting with external stakeholders were conducted on 4/8/2020.	
<b>Criterion 3.5:</b> A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented as the SOP 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.	Complied
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Employment procedures are well implemented with records well maintained as per information reported in indicator 6.1.1 to 6.6.2 below.	Complied
<b>Criterion 3.6:</b> An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<b>(C)</b> All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	The mill and estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following: - Change in work process - Revision/changes in legislative requirement - Occurrence of accidents Based on the risk assessments, appropriate risk control measures were determined and implemented for the respective activities and operation.	Complied
3.6.2	<b>(C)</b> The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -	The CU has established and documented safety and health plan. The plan was monitored on timely basis by the person responsible assigned. Sighted the implementation of the management plan as follows:	Complied

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		<p>Chaah Estate</p> <ul style="list-style-type: none"> <li>• Latest CHRA was done on 25/06/2020 by competent person with DOSH reg. no. HQ/15/ASS/00/363. Briefing on the findings was done on 07/08/2020.</li> <li>• Last medical surveillance was conducted on 21-24/06/2021 by OHD with reg. no. HQ/08/DOC/00/545. Refer report no. 062/OHD/2021.</li> </ul> <p>Sg. Simpang Kiri Estate</p> <ul style="list-style-type: none"> <li>• Latest CHRA was done on 25/06/2020 by competent person with DOSH reg. no. HQ/15/ASS/00/363. Briefing on the findings was done on 07/08/2020.</li> <li>• Last medical surveillance was conducted on 09-10/12/2021 by OHD with reg. no. HQ/08/DOC/00/545. Refer report no. 095/OHD/2021</li> <li>• Audiometric test was conducted twice in 2021. Details are as follows:             <ul style="list-style-type: none"> <li>i) Report No. PRO/SEP/21(LSSK/3), test date: 01/09/2021 for 3 employees, audiogram type: Baseline, results: 0 abnormal</li> <li>ii) Report No. R2021/0810/LADANGSUNGAI SIMPANG KIRI, DATED 26/08/2021 for 17 employees, audiogram type: Baseline, results: 12 Normal Hearing, 3 Hearing Loss and 2 Hearing Impairment</li> </ul> </li> </ul> <p>North Labis Estate</p> <ul style="list-style-type: none"> <li>• Latest CHRA was done on 24/06/2020 by competent person with DOSH reg. no. HQ/15/ASS/00/363. Briefing on the findings was done on 07/08/2020.</li> <li>• Last medical surveillance was conducted on 23/11-15/12/2020 by OHD with reg. no. HQ/08/DOC/00/545. Refer report no. 095/OHD/2021</li> <li>• Audiometric test was last conducted on 26/08/2021 [Report No. R2021/0809/LADANGNORTHLABIS] for 30 employees, audiogram type:</li> </ul>	
--	--	--	--

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		<p>Baseline, results: 20 Normal Hearing, 7 Hearing Loss and 3 Hearing Impairment. The test was conducted by a certified consultant [DOSH Reg. No.: JKKP/2021/11-04/00011]. The Medical Examination &amp; Audiogram Review was then conducted on 14-21/10/2021 by an OHD (reg. #HQ/08/DOC/00/545) [report no. 14/MEA/2021 – all the hearing loss/impairment were due to age-related hearing loss (Presbycusis)</p> <p>Chaah POM</p> <ul style="list-style-type: none"> <li>• Chemical Exposure Monitoring (CEM) was last conducted on 22/06/2021 by Hygiene Technician (IHT-1) with reg. no. HQ/19/JHI/00/00039. 7 employees were monitored, and the exposure levels were at average permissible exposure limit as stipulated in USECHH 2000 Regulations.</li> <li>• Latest CHRA was done on 12/07/2018 by competent person with DOSH reg. no. HQ/06/ASS/223. Briefing on the findings was done on 07/08/2020.</li> <li>• Last medical surveillance was conducted on 08-10/12/2021 by OHD with reg. no. HQ/08/DOC/00/545. Refer report no. 093/OHD/2021</li> <li>• Audiometric test was last conducted on 01/09/2021 [Report No. PRO/SEP/21 (KKSC/65)] for 65 employees, audiogram type: Annual and Baseline, results: 58 Normal Audiogram and 7 Abnormal Audiogram. The test was conducted by an OHD [DOSH Reg. No.: HQ/16/DOC/00/454]. The Medical Examination &amp; Audiogram Review was then conducted on 18-25/11/2021 by an OHD (reg. #HQ/08/DOC/00/545) [report no. 15/MEA/2021 – all the hearing loss/impairment were due to Occupational Noise-Induced hearing loss (1 case – but already reported through JKKP7 on 01/10/2018), Age-related hearing loss (Presbycusis).</li> </ul>	
--	--	---	--

**Criterion 3.7:** All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.

3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The training programmes were documented in training matrix of the operating units on annual basis. The matrix has the information about subjects of trainings and time to be conducted. Generally, the topics of training cover the subjects related to best practices, OHS, environmental and social in which also taking into account gender-specific needs.</p>	Complied																								
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Records of trainings were maintained by the mill and all estates as verified below:</p> <p>Chaah POM</p> <table border="1" data-bbox="1048 703 1832 1201"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>HIRARC</td> <td>Jul 2021</td> </tr> <tr> <td>Scheduled wastes management</td> <td>Jul 2021</td> </tr> <tr> <td>LOTO system</td> <td>Jul 2021</td> </tr> <tr> <td>Fire fighting</td> <td>Jun 2021</td> </tr> <tr> <td>Workstations SOPs</td> <td>May 2021</td> </tr> <tr> <td>Working at height</td> <td>Jul 2021</td> </tr> <tr> <td>PPE training</td> <td>Jul 2021</td> </tr> <tr> <td>RSPO &amp; MSPO SCCS</td> <td>Jul 2021</td> </tr> <tr> <td>Social/gender related training</td> <td>Jul 2021</td> </tr> </tbody> </table> <p>Chaah Estate</p> <table border="1" data-bbox="1048 1291 1832 1382"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Briefing of ILO indicators</td> <td>26/07/2021</td> </tr> </tbody> </table>	Training	Date	HIRARC	Jul 2021	Scheduled wastes management	Jul 2021	LOTO system	Jul 2021	Fire fighting	Jun 2021	Workstations SOPs	May 2021	Working at height	Jul 2021	PPE training	Jul 2021	RSPO & MSPO SCCS	Jul 2021	Social/gender related training	Jul 2021	Training	Date	Briefing of ILO indicators	26/07/2021	Complied
Training	Date																										
HIRARC	Jul 2021																										
Scheduled wastes management	Jul 2021																										
LOTO system	Jul 2021																										
Fire fighting	Jun 2021																										
Workstations SOPs	May 2021																										
Working at height	Jul 2021																										
PPE training	Jul 2021																										
RSPO & MSPO SCCS	Jul 2021																										
Social/gender related training	Jul 2021																										
Training	Date																										
Briefing of ILO indicators	26/07/2021																										



**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		Manuring	22/07/2021		
		Rat baiting	17/07/2021		
		Circle spray	17/07/2021		
		P&D Spray	05/07/2021		
		Briefing on policies, COBC, HCV & RSPO	16/07/2021		
		Safety & productivity briefing	17/07/2021		
		North Labis			
		Training	Date		
		OSH Act & Regulations 1994	Jan 2021		
		NADOPOD	Apr 2021		
		Foreign workers induction programme	Mar 2021		
		Harvesting induction training	Jan 2021		
		COBC	Jun 2021		
		Sungai Simpang Kiri			
		Training	Date		
		Townhall	06/04/2021		
		Spray pump safety & maintenance	10/01/2021		
		Fire drill	27/07/2021		
		First aid	23/07/2021		

		Harvesting	16/08/2021	
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>The last training on supply chain was conducted on 16/07/2021 via MS Teams. It was conducted by the Sustainability Department and attended by 13 participants from various departments of the mill such as management, security, supervisors, weighbridge, laboratory, CPO contractor and estates' assistant managers.</p>		Complied
<b>Criterion 3.8: Supply chain requirement for mills</b>				
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Chaah Mill receives FFBs only from its own supply base mainly Chaah Estate, Sungai Simpang Kiri Estate and North Labis Estate.</p>		Complied
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>	<p>NA</p>		Not Applicable
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by</p>	<p>The forecasted FFB that could be process in the next license period is 142,924.23 mt with estimated OER of 21.50% and KER of 5.50%.</p>		Complied

	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.		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The registration of PalmTrace is done by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Details of registration are as follows: Member's ID: RSPO_PO1000000190 License valid until 17/11/2021 Member category: Oil Mill	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</li> </ul>	<p>SOP for Sustainable Supply Chain and Traceability, Issue No 5, Dated April 2019 which covered control of documents and records, delivery of FFB from the estate, receiving FFB at the mill, process monitoring, CPO and PK despatch, non-conforming material/product, product claims, production volume, conversion factor, internal audit, outsourced contractor, training, reclassification of mill's supply chain model, complaints and management review.</p> <p>Chaah Palm Oil Mill has prepared a dedicated records and Forms in relation to RSPO Supply Chain Certification.</p> <p>Sustainability training plan &amp; records for year 2021 was available for verification. Training on SCCS was last conducted on 16/07/2021. Interview with weighbridge operators found that they understood the requirements of supply chain for palm oil mill.</p> <p>SOP for Sustainable Supply Chain and Traceability, Issue No 5, Dated April 2019 has identified every responsible personal who involved in the implementation RSPO Supply Chain Certification. Roles and responsibility for RSPO Supply Chain team were clearly defined clause 4.0 responsibilities</p>	Complied

	d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.	under the Head of Operating Unit. Based on interview, the person in-charge was able to demonstrate good understanding of the established procedure.	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Addressed in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 18.0 Internal Audit. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure. Refer SOP ref. no. SD/SDP/PSQM/IAP.</p> <p>Combined internal audit for supply chain was last conducted on 27/07/2021 by 4 internal auditors from Group Sustainability and Quality Management Department. There were 2 non-conformity reports related to RSPO SCCS raised as a result of the internal audit. The mill has taken appropriate corrective action to close the NCR. Based on records, the NCR were closed on 18/08/2021.</p> <p>The results of Internal Audit were discussed in the Management Review Meeting as sighted in minutes meeting conducted on 16/08/2021.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>i) The accompanying documents of incoming FFB from own estate are estate's weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate's ticket number is recorded in the mill's ticket number.</p> <p>ii) There has been no projected overproduction during the period under reviewed. Nonetheless, based on interview with the staff, the facility is aware of this requirement</p> <p>Handling of non-conforming FFB and/or documents is addressed in the Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019, Clause</p>	Complied

		7.7. There has been no issue about non-conforming FFB and/or document during the period under review.	
3.8.8	<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"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<p>Chaah POM ensured the required information is available in document form. Based on sampled contracts [i.e. S/TTH/2104/CPO0102BA, S/PSD/2105/CPO0060B, S/TTH/2105/CPO0142A], the following information was available:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer</li> <li>• The name and address of the seller</li> <li>• The loading or shipment/ delivery date</li> <li>• The date on which the documents were issued</li> <li>• A description of the product, including the applicable supply chain model, e.g. "RSPO CPO IP"</li> <li>• The quantity of the products delivered</li> <li>• Related transport documentation, e.g. Despatch note</li> <li>• Supply chain certificate number of the seller</li> <li>• A unique identification numbers - available in a few forms e.g. DN no., seal no., etc.</li> </ul>	Complied
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> <li>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</li> </ul>	<p>The mill does not outsource any of its milling activities to any third party. With regards to the contracted CPO and PK transporters, it is stated in the contract agreement between Chaah POM and the contractors in Annexure 5, RSPO Supply Chain Certification Standard, that the site has legal ownership of all input material to be included in outsourced processes.</p>	Complied

	<p>ii) The mill shall ensure the following:</p> <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</li> </ul>		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Details of contractors are available in the list of contractors.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The list of contractors is updated from time to time by the mill. The information of any newly appointed contractor is shared with BSI through pre-audit information request prior to the audit. The information is provided to the assessment team.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> <li>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</li> </ul>	<ul style="list-style-type: none"> <li>i) All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible.</li> <li>ii) The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 in Standard Operating Procedure (SOP)</li> </ul>	Complied

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

	<ul style="list-style-type: none"> <li>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</li> <li>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> <li>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</li> <li>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</li> <li>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</li> </ul> </li> </ul>	<p>for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019.</p> <ul style="list-style-type: none"> <li>iii) All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are recorded on a real-time basis in the mill's Daily Production Report</li> <li>iv) NA as the mill is using IP model</li> </ul>	
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>Conversion factor of CPO and PK production is depending on the actual OER and KER. This is verifiable through the mill's daily production report.</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>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</p>	Complied
3.8.15	<p>Processing</p>	<p>The mill does not accept non-certified FFB. Thus, 100% separation is assured.</p>	Complied

	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.		
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) The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace.</p> <p>ii) RSPO certified volumes sold under different scheme or as conventional were not registered in the RSPO PalmTrace.</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
<b>General corporate communications</b>			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Chaah POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.). Thus, this indicator is not applicable.	Not Applicable
4.2	<p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p> <p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p>	Not applicable as no off-product claim made by Chaah POM as to date.	Not Applicable



**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

	<p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at <a href="http://www.rspo.org">www.rspo.org</a>’ where the link must lead to the member’s profile page.</p>		
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 Chaah 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 Chaah 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.	Not applicable as no off-product claim made by Chaah POM as to date.	Not Applicable
<b>Business to business communications</b>			
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.	Chaah POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable

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>	<p>Chaah POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.</p>	<p>Not Applicable</p>
<b>Business to consumer communication</b>			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.</p>	<p>There is no business to consumer communication as this is an upstream activity certification.</p>	<p>Not Applicable</p>
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	<p>There is no business to consumer communication as this is an upstream activity certification.</p>	<p>Not Applicable</p>
6.3	<p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p>	<p>There is no business to consumer communication as this is an upstream activity certification.</p>	<p>Not Applicable</p>

6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	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.	There is no business to consumer communication as this is an upstream activity certification.	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.	There is no business to consumer communication as this is an upstream activity certification.	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 <a href="http://www.rspo.org">www.rspo.org</a> .	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable

<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	There is no contamination of non-certified FFBs found in this certification. The mill is receiving FFBs from its own supply base or supply base of its' sister mills.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	The certification unit is Identity preserved and SG is not applicable to palm oil mill.	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 volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	The certification unit is Identity preserved and SG is not applicable to palm oil mill.	Not Applicable
<b>Labelling and trademark (IP)</b>			
	Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> <li>• RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li> </ul>	No labelling and trademark logo were used.	Not Applicable
<b>Messaging (IP)</b>			

	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>	<p>No messaging was used.</p>	<p>Not Applicable</p>
<p><b>MODULE B – MASS BALANCE SPECIFIC RULES</b></p>			
<p><b>Minimum Mass Balance content</b></p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>NA</p>	<p>Not Applicable</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition,</p>	<p>NA</p>	<p>Not Applicable</p>

	the non-certified volume must be covered by equivalent volume of RSPO Credits.		
<b>Labelling and trademark (MB)</b>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>• The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</li> <li>• The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>• Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</li> <li>• In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications &amp; Claims document.</li> </ul>	NA	Not Applicable
<b>Messaging (MB)</b>			
	Messaging ALLOWED in storytelling in product-related communications includes:	NA	Not Applicable

	<ul style="list-style-type: none"> <li>• [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain.</li> <li>• The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</li> </ul> <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"> <li>• Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</li> </ul>		
<p><b>Principle 4: Respect community and human rights and deliver benefits</b></p>			
<p><b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 20 has implemented the Sime Darby’s Human Rights Charter where they committed to recognizing the role of Human Rights Defenders in accordance to the United Nations declaration on Human Rights Defender.</p> <p>Awareness and training to all workers in order for them to understand their responsibility in respect of human rights were conducted by management to workers of Chaah POM on 18/8/2021, Chaah Estate on 23/7/2021, Simpang Kiri Estate on 6/4/2021 and North Labis Estate on 23/2/2021.</p>	<p>Complied</p>
<p>4.1.2</p>	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the mill and estates within SOU 18 do not instigate violence or use any form of harassment in their operations.</p>	<p>Complied</p>

<b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the records of complaints and grievances no issue of whistleblowing that requires anonymity of complainants and/or grievance parties. Interview conducted with internal stakeholders among workers and relevant external stakeholders also confirmed the information.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.</p> <p>Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing.</p> <p>Latest SOP Workers Housing Management Procedure; Effective Date: 26/11/2021.</p> <p>However, based the site visit in North Labis Estate workers housing (line site) area, it was found that there's an inconsistency in understanding of the system for housing complain/repair request which currently based on the Standard Operation Procedure (SOP): Workers Housing Management Procedure; Effective Date: 26/11/2021 that has been communicated to All Operating Units via emailed Inter Office Memo (IOM) Ref. # UM/HSE/013/11/2021 dated 26/11/2021.</p> <p>From the site interview with workers occupying house # E14 &amp; E15 in North Labis Estate, their understanding of the system could not be determined. Only another one worker who was asked outside the housing area managed to answered according to current system for housing complain/repair as per</p>	Non-compliance



		latest SOP. This indicated an inconsistency in understanding of the system, hence, a Minor NC has been raised on the matter.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	Neither any complaints nor land dispute occurred in the SOU 20 Certification Unit since the last audit.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	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.	Complied
<b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Contributions to community development that are based on the results of consultation with local communities are demonstrated as per sample sighted as following: SOU 20 Region Office: - Food bank contribution by Yayasan Sime Darby for flood victim villagers of Kg. Haji Khamisan; Date: 4/1/2022 Chaah Estate: - Tambak Tanah Kg. Haji Khamisan; Date: 15/1/2022 - Family Day at Air Papan Beach Resort Mersing; Date: 18/12/2021 - Cleaning of villagers house affected by flood in Kg. Haji Khamisan; Date: 5/1/2022 - Food bank contribution by Yayasan Sime Darby for eligible villagers of Kg. Haji Khamisan; Date: 7/1/2022	Complied

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		<p>Sg. Simpang Kiri Estate:</p> <ul style="list-style-type: none"> <li>- Food pack donation to flood victim in Kg. Haji Khamisan; Date: 10/1/2022</li> <li>- Use of Tractor Motor Grader to KHKBC Club Kg. Haji Khamisan; Date: 15/5/2021</li> </ul> <p>North Labis Estate:</p> <ul style="list-style-type: none"> <li>- Donation to estate workers who is the mangsa kebakaran rumah ; Date: 3/5/2021</li> <li>- Contribution for SJKT programs; Date: 15/5/2021</li> </ul> <p>Chaah POM:</p> <ul style="list-style-type: none"> <li>- Family Engagement Day for mill employees; Date: 19/12/2021</li> <li>- Contribution for SJKT programs; Date: 15/5/2021</li> </ul>	
<b>Criterion 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Chaah POM located within Chaah Estate land. Chaah Estate land titles as per sample sighted as following:</p> <ul style="list-style-type: none"> <li>- Title # 7745; Lot # PT 2378; Area: 1991.0502 ha; District: Batu Pahat; Sub-district: Mukim Chaah Bahru</li> <li>- Title # 7746; Lot # PT 2379; Area: 804.3114 ha; District: Batu Pahat; Sub-district: Mukim Chaah Bahru</li> </ul> <p>North Labis Estate land titles as per sample sighted as following:</p> <ul style="list-style-type: none"> <li>- Title # 37627; Lot # 8250; Area: 11.17 ha; District: Segamat; Sub-district: Mukim Labis</li> <li>- Title # 88289; Lot # 693; Area: 196.1783 ha; District: Segamat; Sub-district: Mukim Labis</li> </ul>	Complied

		<p>Simpang Kiri Estate hold a total of 5 land titles as per sample sighted as following:</p> <ul style="list-style-type: none"> <li>- Title # 14358; Lot # 2645; Area: 183.3223 ha; District: Batu Pahat; Sub-district: Mukim Chaah Bahru</li> <li>- Title # 14360; Lot # 3077; Area: 203.1519 ha; District: Batu Pahat; Sub-district: Mukim Chaah Bahru</li> </ul>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No issues of land dispute issue occurs in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	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 -	No issues of land dispute issue occurs in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	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 -	No issues of land dispute issue occurs in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	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 status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	No issues of land dispute issue occurs in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.3	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through	Boundary maps available for all estates within SOU 20 clearly demarcating estate area with location and coordinate of boundary stone and pegs.	Complied

	<p>participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>There is no land dispute recorded since last audit. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>	
4.4.4	<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>No issues of land dispute issue occurs in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>No issues of land dispute issue occurs in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</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>No issues of land dispute issue occurs in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
<p><b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied
4.5.2	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a</p>	<p>No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p>	Complied

	documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -		
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied

	- Minor compliance -		
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
<b>Criterion 4.6:</b> Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.6.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process and compensation since the last audit.	Complied

	the participation of affected parties, and made publicly available to them. - Minor compliance -	Consultation with relevant stakeholders conducted on-site confirmed the information.	
<b>Criterion 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	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 -	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
<b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied

	dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -		
4.8.2	<b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	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 -	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	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 -	No new planting and issues of customary land occurs in all estates within SOU 20 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
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. The mill received FFB from sister estate within SOU 20 and FFB diversion from other certified SOU. The FFB supplier were	Complied



		listed in the Chaah POM FFB Supplier list. No external or non-certified FFB received by Chaah POM.	
5.1.2	<b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	No smallholder in this operating unit. This operating unit was under Identity preserve. Not applicable for this indicator.	Not Applicable
5.1.3	<b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	No smallholder in this operating unit. This operating unit was under Identity preserve. Not applicable for this indicator.	Not Applicable
5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	No smallholder in this operating unit. This operating unit was under Identity preserve. Not applicable for this indicator.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	The mill received FFB from sister estate from SOU 20 and FFB diversion from other certified SOU. The FFB supplier were listed in the Chaah POM FFB Supplier list. No external or non-certified FFB received by Chaah POM.	Complied
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	The mill received FFB from sister estate from SOU 20 and FFB diversion from other certified SOU. The FFB supplier were listed in the Chaah POM FFB Supplier list. No external or non-certified FFB received by Chaah POM.	Complied
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Weighbridge stamping conducted on 9/9/2020 by Teras Integrasi Sdn. Bhd. with authorization by the Calibration Officer of Metrology Corporation Malaysia Sdn. Bhd. Sighted calibration serial # B1681836 and safety sticker # 2.1K Q020467.	Complied

5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	No smallholder involves in this operating unit. This operating unit was under Identity preserve. Not applicable for this indicator.	Not Applicable
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	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. No independent smallholders within Chaah POM certification unit.	Complied
<b>Criterion 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	No smallholder involve in this operating unit. This operating unit was under Identity preserve. Not applicable for this indicator.	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	No smallholder involve in this operating unit. This operating unit was under Identity preserve. Not applicable for this indicator.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	No smallholder involve in this operating unit. This operating unit was under Identity preserve. Not applicable for this indicator.	Not Applicable

5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	No smallholder involve in this operating unit. This operating unit was under Identity preserve. Not applicable for this indicator.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	No smallholder involve in this operating unit. This operating unit was under Identity preserve. Not applicable for this indicator.	Not Applicable
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	SOU 20 has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2 <sup>nd</sup> December 2019. The policy shall be guided by the commitments spelt out in the Company's in Human Rights Charter (HRC) where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.	Complied
6.1.2	<b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance -	Records of employments and interview conducted on-site with sampled internal and external stakeholders confirmed that the workers and groups including local communities, women, and migrant workers have not been discriminated against.	Complied
6.1.3	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. - Minor compliance -	No discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed from job vacancy advertisement and sample recruitment sighted.	Complied

6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Pregnancy testing was conducted only for women employee involved in chemical handling work to ensure no pregnant women working with the risk of chemical exposure. All women employees involved in chemical handling work within SOU 20 underwent Urine Pregnancy Test (UPT) conducted by respective estate’s Hospital Assistant upon request only.</p>	Complied
6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly and through Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability &amp; Quality Management (PSQM) Department. It explained the types of gender-based violence &amp; grievance procedures. Meetings were conducted quarterly according to the handbook. Gender Committee were established by the mill and estates management.</p> <p>The latest meetings were conducted by Chaah POM on 23/7/2021, Chaah Estate on 16/7/2021, Simpang Kiri Estate on 8/8/2021 and North Labis Estate on 15/7/2021.</p> <p>No sexual harassment case been reported since the last audit.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>No discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting.</p> <p>Sighted the job description of each workers mention the same regardless of skin colour, religion, race and caste. Evidence of equal pay sighted based on passports &amp; work permit, work agreement, payslip, attendance &amp; checkroll and Socso 8A form of September 2020, January 2021 &amp; May 2021 for sample female and male employees as following:</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		<p>ChaaH POM:</p> <ul style="list-style-type: none"> <li>- Mohd Hairi Bin A Kadir; Employee # 106172; M; A Shift</li> <li>- Hilwan; Employee # 143562; M; B Shift</li> <li>- Bala Raju Kumar; Employee # 74793; M; A Shift</li> <li>- Biswas Samir; Employee # 116096; M; B Shift</li> <li>- Vadivelan A/L Chelliah; Employee # 147181; M; Workshop</li> <li>- Jayashalini A/P Jayachandran; Employee # 157444; F; General</li> <li>- Siti Nur Aisyah Binti Hamran; Employee # 162717; F; General</li> <li>- Anisah Binti Kasirin; Employee # 14640; F; General</li> </ul> <p>ChaaH Estate:</p> <ul style="list-style-type: none"> <li>- Mohammad Sohel Rana; Employee # 108999; M; LF Collector</li> <li>- Avadhesh; Employee # 153308; M; FFB Cutter</li> <li>- Jamal Uddin Malick; Employee # 153573; M; Pruner</li> <li>- Dil Bahadur Tamang; Employee # 137609; M; Gen. Worker</li> <li>- Muhari; Employee # 124593; M; FFB Cutter</li> <li>- Salma Binti Kewon; Employee # 13597; F; Gen. Worker</li> <li>- Mariamah A/P Munusamy; Employee # 52172; F; Gen. Worker</li> <li>- Rasimah Binti Md Yusop; Employee # 87507; F; Gen. Worker</li> </ul> <p>North Labis Estate:</p> <ul style="list-style-type: none"> <li>- Abdu Suquer; Employee # 101900; M; Piece Rated Worker</li> <li>- Bhaumik Uttam; Employee # 104022; M; Field Worker</li> <li>- Johri; Employee # 163219; M; FFB Cutter</li> <li>- Gunasekaran A/L Muthu; Employee # 15218; M; Field Worker</li> <li>- Ali Bin Gopal@Yusof; Employee # 29576; M; Jamsa Driver</li> </ul>	
--	--	---	--

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		<ul style="list-style-type: none"> <li>- Kanniyama A/P Zakaiah; Employee # 59508; F; Field Worker</li> <li>- Gayathry A/P Anbalakan; Employee # 92828; F; Creche Ayah</li> <li>- Nurul Fatiha Binti Ramli; Employee # 138354; F; General Worker</li> </ul> <p>Simpang Kiri Estate:</p> <ul style="list-style-type: none"> <li>- Hossain Altab; Employee # 109434; M; FFB Cutter</li> <li>- Man Bahadur Pakhrin; Employee # 118517; M; FFB Carrier</li> <li>- Muhlisin; Employee # 125123; M; FFB Cutter</li> <li>- Ashok Rajbhar; Employee # 75030; M; General Worker</li> <li>- Mohamad Ilmin Bin Sali; Employee # 107530; M; Gen. Worker</li> <li>- Napsiah Binti Othman; Employee # 19850; F; General Worker</li> <li>- Siti Aisyah Binti Sali; Employee # 100370; F; General Worker</li> <li>- Siti Hazanah Binti Sokijo; Employee # 149739; F; General Worker</li> </ul> <p>Contractor’s workers:</p> <ul style="list-style-type: none"> <li>- Syarikat Wijaya (Masai) Sdn. Bhd. – 1 worker</li> <li>- RSKP Brothers – 2 workers</li> <li>- Khidmat Setia - 2 workers</li> </ul>	
<p><b>Criterion 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>All the workers are under direct employment and some electrical works are under contractor workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary and etc. as per employment contract in compliance with permits as following:</p> <ul style="list-style-type: none"> <li>- JTKSM Salary Deduction Permit for Electricity Bill Payment; Ref. # BHG.PU/9/129 JLD 33(53); Date: 6/7/2017</li> </ul>	Complied

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		<ul style="list-style-type: none"> <li>- JTKSM Salary Deduction Permit for Club Fee and Insurance Payment; Serial # PP3/29/025/2010; Effective Date: 1/9/2010</li> <li>- JTKSM Salary Deduction Permit for Mosque and Chapel Contribution; Serial # PP3/29/027/2010; Effective Date: 1/9/2010</li> <li>- JTKSM Overtime Limit Permit Ref. # BHG.PU/9/134 JLD 9 (11); Date: 27/3/2017</li> <li>- JTKSM Salary Deduction Permit Ref. # JTKS(E)6/115 Jld 36-20 (2); Date: 30/5/2018 for PTPTN &amp; Tabung Haji deductions</li> </ul>	
6.2.2	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>As per Inter-Office Mail from Sime Darby Plantation’s Head, HR Upstream to Senior Managers/Managers Estate &amp; Mill for all Northern Region, Central East Region, Central West Region on Implementation of Revised Workers’ Contracts and Register of Maternity Leave and Allowances; Date: 3/12/2019.</p> <p>All workers work agreement were also based on MAPA Circular No. 1/2020; Date: 14/1/2020; Minimum Wages Order 2020 (MWO 2020) where the order provides for the minimum wages rates payable to an employee who works in a place of employment in any City Council or Municipal Council area as specified in the schedule.</p>	Complied
6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.1.6 above.</p> <p>Records shown all relevant legal compliance requirements were met by SOU 20.</p>	Complied
6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions</p>	<p>Adequate housing, sanitation facilities, water supplies, medical and welfare amenities available in mill and estates visited including semi-detached house for workers, estate clinics, nursery for estate toddlers (NEST), football field, volleyball &amp; basketball court, badminton &amp; takraw court, children playground been monitored through weekly housing and facilities</p>	OFI

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

	<p>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>inspection by Medical Assistant (MA) and Visiting Medical Officer (VMO) every week and fortnight respectively.</p> <p>Sighted the sample Chaah Estate and Sg. Simpang Kiri Estate VMO records for inspection latest conducted on 19/1/2022 with no issue of irregularities reported. Sighted too the Housing Complex/ Nest/ Community Hall Weekly Inspections (PIOA) form latest done on 15/1/2022. Total score = 95%. North Labis Estate VMO visit latest dated on 12/1/2022.</p> <p>Chaah POM established the Employee Welfare Representative (EWR) with Person In-Charge of Accommodation (PIOA) to conduct the housing inspection on weekly basis. Sighted the latest quarterly housing inspection conducted on 27/12/2021 and weekly inspection on 15/1/2022. However Provision of NEST's (Nursery For Estate's Toddlers) amenities such as toys and play items, mattress and pillow as well as educational material including posters, television, DVD player, books, magazines etc. could be further enhanced in Chaah Estate with available toddlers and operated NEST.</p> <p>Hence, an OFI has been raised on the matter.</p>	
<p>6.2.5</p>	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Chaah Estate has signed a House Agreement with Baby @ Arokiam a/l Savathindair for tenancy of building for grocery shop provision as part of the efforts to improve workers' access to adequate, sufficient and affordable food. The agreement dated 1/2/2021 has included the acknowledgement by vendor to comply with RSPO requirements and other relevant requirements applied by Sime Darby Plantation including legal requirements as per Vendor Integrity Pledge signing. Also sighted the price list for groceries including food sold in the grocery store for monitoring by the estate management.</p> <p>North Labis Estate signed a Tenancy Agreement with Hatijah Binti Mohamed dated on 1/4/2021 for the rental of building of grocery shop operation within the estate as part of efforts to improve workers' access to adequate, sufficient and affordable food.</p>	<p>Complied</p>



<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include 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</i></p>	<p>SOU 20 conducted the Prevailing Wage Assessment and calculated individual local and foreign workers current salary including non-monetary benefit given average mill and estate Local Workers RM: 1,557.24; Foreign Workers: RM1,865.01. Prevailing Wage Assessment conducted by department of Group Sustainability &amp; Quality Management (GSQM) personnel of Sime Darby Plantation.</p>	<p>Complied</p>
--------------	--	--	-----------------

	<p><i>the RSPO Guidance for Implementing a Decent Living Wage</i> (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).</p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> <li>• The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.2.2 above. No casual, temporary and day labour employed within all operating units within SOU 20.</p>	Complied
<p><b>Criterion 6.3:</b> The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <p>- Providing Equal Opportunities: We promote diversity and inclusion and</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		<p>will not condone discrimination.</p> <ul style="list-style-type: none"> <li>- Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> </ul> <p>Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively and the workers have their freedom to join the NUPW/MAPA union.</p> <p>Explanation to workers were made by management via meetings which were latest conducted by management to workers of Chaah POM on 18/8/2021, Chaah Estate on 23/7/2021, Simpang Kiri Estate on 6/4/2021 and North Labis Estate on 23/2/2021.</p>	
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 for NUPW representative with estate management available for following:</p> <ul style="list-style-type: none"> <li>- Chaah Estate; Date: 11/11/2021</li> <li>- Sg. Simpang Kiri Estate; Date: 5/7/2021</li> <li>- North Labis Estate; Date: 17/2/2021</li> </ul> <p>However, the minutes of meetings copy for meeting between the unit of certification management with trade unions (NUPW) or workers representatives, could be further provided digitally/electronically (WhatsApp, email, etc.) for ease of workers' representative safekeeping or distribution among workers as an alternative to hardcopy records provision in Sg. Simpang Kiri Estate.</p> <p>Hence, an OFI has been raised on the matter.</p>	OFI
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>Interview with workers union representatives (NUPW Chairman &amp; NUPW Secretary) confirmed that they were independently elected as the NUPW by all members of NUPW among mill and estate workers via an election without interference by the management.</p>	Complied

	- Minor compliance -		
<b>Criterion 6.4:</b> Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>- Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</li> <li>- Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> <li>- Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations.</li> <li>- Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities.</li> <li>- Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use.</li> <li>- Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees.</li> </ul>	Complied

		<p>- Protecting the Rights of Children: We seek to promote the wellbeing of children, and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography.</p> <p>Verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the clause 5.8 abolishment of child labour &amp; protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children.</p>	
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liaison &amp; Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</p>	Complied
6.4.3	<p><b>(C)</b> 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>Based on the interview and employees master lists data, no young person below 18 years old employed within all operating units within SOU 20.</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>Interview conducted on-site with sampled internal and external stakeholders confirmed that the information on no child labour policy and the negative effects of child labour were provided in appropriate languages and accessible to them.</p> <p>Records of communication also available as per Vendor Integrity Pledge sighted for sampled Chaah POM contractor Syarikat Wijaya (Masai) Sdn. Bhd.; Date: 1/1/2021, Simpang Kiri contractor RSKP Brothers; Date: 1/4/2021 and Chaah Estate contractor Perniagaan Khidmat Setia; Date: 2/1/2021.</p>	Complied

<b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>- Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims.</li> <li>- Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation.</li> </ul> <p>The policy was communicated through the Gender Committee meeting conducted quarterly.</p>	Complied
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 20 has implemented Social Policy, Gender Policy and Social &amp; 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> <p>- Minor compliance -</p>	<p>North Labis Estate management latest conducted the Assessment for New Mothers through Gender Committee on 6/1/2022 and previously on 21/7/2021. The assessment checklist includes the following:</p> <ul style="list-style-type: none"> <li>- Is there any new mothers in the operating unit (workers &amp; staff)</li> <li>- If yes, how many new mothers are in the operating unit?</li> <li>- Is maternity leave (3 months) given to new mothers?</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- Does a new mother has returned to work need dedicated space to breastfeed or storing milk?</li> <li>- Does the new mother who return to work need a break outside the break time allotted by the employer (for the purpose of breastfeeding)? If yes, this need to be submitted to the employer for further consideration and approval.</li> </ul> <p>The last two assessment indicated no new mothers in North Labis Estate.</p>	
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>Interview conducted on-site with sampled internal stakeholders among all workforce confirmed that the information on grievance mechanism, which respects anonymity and protects complainants where requested, is established and communicated to them.</p> <p>No grievance issues that requires the implementation of the mechanism occurs in all operating units within SOU 20 since the last audit.</p>	Complied
<p><b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.</p>			
6.6.1	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>The recruitment cost were declared by the labour agent from source country for the applicable fees. Sampled for Tenaga Kerja Indonesia (TKI) Kepada Agensi (PL) Dan Sponsor (PL) for Indonesia effective date on 01/06/2017 (IDR 6,150,000) and Amoza Travels for India (INR 50000) for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent.</p> <p>Passport was kept by the management voluntarily. There is agreement letter signed by worker and employer on the safekeeping passport at office. If the workers want to obtain the passport for own usage, they can anytime request for it.</p> <p>There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia and India was same with the employment contract signed between worker and estate/mill.</p>	Complied

		<p>Overtime was given voluntarily. Sighted the overtime request form where employer offer work to worker after working hour/rest day/public holiday. The termination of service clearly stated that the termination of employment if:</p> <ol style="list-style-type: none"> <li>1. The company is not satisfied with your performance</li> <li>2. You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term.</li> <li>3. You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime.</li> <li>4. You have breached any express or implied terms of your employment.</li> <li>5. Fail medical examination based on FOMEMA result.</li> <li>6. Involved in any act that will affect the reputation of the company.</li> </ol> <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><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.          - Critical (Major) compliance -</p>	<p>SOU 20 has implemented a Sime Darby's Human Rights Charter on where they committed as below:</p> <ol style="list-style-type: none"> <li>a. Providing equal opportunity</li> <li>b. Respecting freedom of association</li> <li>c. Eradicating any form of exploitation</li> <li>d. Ensuring favourable working conditions</li> <li>e. Enhancing Safety and Health</li> </ol> <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



<b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>Both the estates and mill management conduct regular two-way communication with their employees through the quarterly OSH committee meeting. Among the agenda discussed are:</p> <ul style="list-style-type: none"> <li>- Confirmation of minutes previous meeting</li> <li>- Workplace inspection report</li> <li>- Accident report</li> <li>- Medical surveillance &amp; Audio metric</li> <li>- Status of Safety Program &amp; Environmental</li> <li>- First Aid Kit &amp; Fire Extinguishers Report</li> <li>- HIRARC</li> <li>- Complaint from Employee/External Party.</li> <li>- Other matters</li> </ul> <p>Workplace inspections are made prior to the ESH meeting. The respective Managers were appointed as ESH Chairman (PIC) through letter signed by Regional General Manager. All letters were made available for verification.</p>	Complied
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>Accident of emergency procedure is presented in Mill Quality Management System Standard Operation manual (MQMS SOM) dated November 1st, 2008. Flowchart of emergency handling was presented in Appendix 5.5.3.3. The CU displayed the accident and emergency procedure at strategic places such as muster ground and labour quarters. Additionally, the management communicate the procedure during morning briefing and training.</p> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by RSQM and amended to tailor to the situation differences in the estates and mill.</p>	Complied

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trained personnel for First Aid were among the employees working as field staff/mandores. The first aid boxes were also available at various workplace such as estate office, workshop, and store. The estates distributed the first aid box to the mandores and brought along to the field during operations.	
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The management provides appropriate PPE to the employees in accordance to HIRARC and Standard Operating Procedure. PPE issuance records were well maintained and made available for verification. Among the information available in the record was name of employee, type of PPE (i.e. apron, safety shoes, rubber boots, N95 mask, respirator, cartridge, helmet, goggle, cotton gloves, nitrile gloves, etc.), date of PPE received and receipt acknowledgement by the recipient. On site verification and interview with workers showed that the appropriate PPE was provided for free and worn accordingly.</p> <p>Sanitation facilities such as shower room, PPE washing area, personal clothing locker for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing were provided and well maintained.</p>	Complied
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Should there be any medical care needed by the employees, clinics with certified Medical or Hospital Assistants in-charge were provided at all the sampled management units. Based on site visits, all the clinics were well maintained and managed. Records of medical inventory, VMO visits and patients treated were made available for verification.</p> <p>The sampled estates and mill are subscribing to SOCSO to cover the accident insurance for all their workers. Payment vouchers to SOCSO were made available for verification by all the operating units.</p>	Complied
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKPP 8. Records are kept for a minimum 10 years in the	Complied

	- Minor compliance -	office. Crosschecking with RSPO metrics template showed that the data was appropriately recorded.	
<b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b>			
<b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>IPM plans for the estates are documented in "Action Plan IPM Management" which is reviewed on annual basis. The plans were guided by SOPs such as OPC 04a, OPC 04b, OPC 04f, OPC 04g and OPC 04h. Among the plans established were:</p> <ul style="list-style-type: none"> <li>i) Using barn owl (<i>Tyto alba</i>) to biologically suppress the rat population.</li> <li>ii) In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, <i>Euphorbia heterophylla</i>, along the roadsides</li> <li>iii) Establishment of LCC and chipping of felled trunks at the replanting area to reduce the rhinoceros beetles</li> </ul>	Complied
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	There is no evidence that shows the species under Global Invasive Species Database and CABI.org are used by the sampled estates.	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	There is no evidence of fire was used for pest control at all the sampled estates.	Complied
<b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The justification of all pesticides used in the estate were documented in Sime Darby Agriculture Reference Manual (ARM), Section 15 Plant Protection [Issue No. 1, Version 3, dated 01/07/2011] and Section 16 Weed Control [Issue No. 1, Version 3, dated 01/07/2011].</p>	Complied
7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the sampled estates in a document entitled "Monitoring of Chemical (Pesticide &amp; Herbicide) Usage per Hectare and per FFB Production. It has the information about chemical names, active ingredients &amp; their concentration (%), LD50, months, quantity used, and hectare applied.</p>	Complied
7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Agriculture Reference Manual (ARM), Section 15 Plant Protection [Issue No. 1, Version 3, dated 01/07/2011] and Section 16 Weed Control [Issue No. 1, Version 3, dated 01/07/2011].</p> <p>The implementation in the field is consistent with the SOP established. Among the IPM plans implemented by the estates were establishment of beneficial plants (e.g. antigonan, tunera and cassia) and barn owl (Tyto alba).</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There was no evidence that prophylactic pesticide was used by the sampled estates.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p>	<p>Based on the chemical registers for both estates dated 01/06/2021, the pesticides used are mostly of Class III and IV. Paraquat and monocrotophos were no longer in use. Much safer chemical such as glyphosate and acephate were used as alternative.</p>	Complied

	<p>The due diligence refers to:</p> <ul style="list-style-type: none"> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> <li>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> </ul> <p>- Minor compliance -</p>		
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Trainings on safe handling of chemical and right method of spraying were given to the relevant employees which include the storekeeper, pre-mixers, and herbicides sprayers. This is also in-line with the recommendation by the CHRA assessor. Various methods of training such as briefing, practical training and on-the-job supervisions were used to ensure effective delivery of knowledge. Records of training were well maintained for verification. Verified training records dated 17/07/2021 (Chaah), 16/06/2021 (North Labis) and 06/04/2021 (Sungai Simpang Kiri).</p>	Complied
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides were kept in the designated stores at all the sampled estates in accordance to the regulations. The stores were equipped with locks, ventilation and accessibility was limited to authorized personnel only. Appropriate hazard signage was also put up to create safety caution.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>All pesticide containers are triple rinsed and punctured before being disposed to the authorised collector. Receipts of disposal were made available for verification with the following details:</p> <ul style="list-style-type: none"> <li>- Chaah – last disposal on 08/12/2021 to SS Setia Teknologi</li> <li>- Sungai Simpang Kiri – last disposal on 15/01/ to SS Setia Teknologi</li> </ul>	Complied

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		Some of the 20 lt containers were used to contain pre-mixed herbicides for spraying operation in the field. There is no evidence of pesticide containers are used for other purpose.	
7.2.9	<b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	Aerial spraying is not a practice in the certification unit.	Complied
7.2.10	<b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	<p>Chaah Estate: Last medical surveillance was conducted on 21-24/06/2021 by OHD with reg. no. HQ/08/DOC/00/545. Refer report no. 062/OHD/2021 for 14 workers. Results: All workers were fit to work.</p> <p>Simpang Kiri Estate: Last medical surveillance was conducted on 09-10/12/2021 by OHD with reg. no. HQ/08/DOC/00/545. Refer report no. 095/OHD/2021 for 27 workers. Results: All workers were fit to work.</p> <p>North Labis Estate: Last medical surveillance was conducted in Dec 2021 for 8 workers. At the point of this assessment, the report wis still in progress. The monitoring of the annual medical surveillance at North Labis Estate for workers exposed to herbicides can be further improved therefore the interval period of 12 months is not exceeded (OFI).</p> <p>The Medical Surveillance Programme consists of:</p> <ul style="list-style-type: none"> <li>• History &amp; Physical Examination</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>• General blood &amp; urine tests</li> <li>• Spirometry (lung function test)</li> <li>• Cholinesterase (Store Unit) – estate only</li> <li>• Manganese (Workshop Unit) – estate only</li> <li>• Chest X-ray (Workshop Unit) – estate only</li> <li>• 2,5-Hexanedione (Laboratory H Unit) – mill only</li> </ul>	
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>There is no evidence that work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions at all the sampled estates.</p>	Complied
<p><b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
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>Wastes management plan is developed based on the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. Generally, the scheduled wastes were disposed through licensed vendors, organic wastes were disposed through landfill and recyclable wastes were sent to recycle centres.</p> <p>However, Based on verification through Google Earth, the wastes landfill at Chaah Estate (GPS: 2° 9'33.51"N 102°59'10.73"E), North Labis Estate (GPS: 2°22'30.22"N 103° 3'24.25"E) and Simpang Kiri Estate (GPS: 2° 6'30.18"N 103° 0'31.56"E) have residential areas and/or river or waterways within their 3 km radius distance. This is not in-line with the Landfill Management in Estate procedure [SD/SDP/PSQM(ESH)/203-EN7, rev. 0, dated 13/03/2017], Clause 6.3.3 a) and b) which reads:</p> <p>a) The landfill shall be located no less than 3 km away from nearest household area, offices or other premises</p>	Non-compliance

		<p>b) The landfill shall be located no less than 3 km away from the nearest river or waterway</p> <p>Thus, a non-conformity report was assigned due to this lapse.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>From waste management plan in Chaah estate, the waste identified such as SW 305, 410, and 404. The empty container identified as recycle waste, the latest disposal record was on 8/12/2021 at SS Setia Teknologi Enterprise with total RM 197.40 (No: 2016). The record of storage was available latest was on 7/12/2021 for glyphosate container and ally container.</p> <p>For record SW 305, the storage records available until Dec 2021 with total 2 liter. the disposal was on 9/11/2021 with total 60 liter (consignment note no; 25251) at Rengkas Maju (M) Sdn Bhd. The Rengkas Maju (M) Sdn Bhd was an approval contractor for SW disposal as per DOE license no 004654 (valid from 1/5/2021-30/4/2022). The license was available at site.</p> <p>For clinical waste SW 404, inventory was available with record updated until Dec 2021 with total 5700 gram. Last disposal of SW 404 was on 9/12/2021 (Consignment note: 20211209160WJ1VX) with total 0.0057 mt at Kualiti Alam Sdn Bhd.</p> <p>In Sg Simpang Kiri estate, disposal of SW 305 was on 9/11/2021 by Rengkas Maju (M) Sdn Bhd with total 200 liter. SW 404 disposal was on 9/12/2021 with total 1kg, this disposed at Kualiti Alam Sdn Bhd.</p> <p>Sighted record of SW 404 in North Labis estate last disposal was on 6/1/2021 at Kualiti Alam Sdn Bhd as per consignment note 0404546 with total 2.7 kg.</p>	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Domestic wastes generated from the operations and housing are being landfilled while industrial wastes are either disposed as scheduled wastes, recycled, or disposed through authorised authorities.</p> <p>There was no any open fire disposal observed during field assessment.</p>	Complied
<p><b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			



7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	ARM Section 8 covers the procedure for fertilizer application for both immature and mature. The procedure gives the guideline type of fertilizers to be used, timing to apply, dosage and placement.	Complied
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	Periodic foliar sampling analysis was last conducted in 2020 for the sampled estates to monitor the changes in nutrient status. The results of the analysis were used by the agronomist for their recommendation for fertilisers applications programme. The soil analysis is done once in 5 years. Analysis reports were made available for verification.	Complied
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Chaah POM. The best practice of EFB application is described in the ARM. Records were available for verification. Based on the records, it was noted that the EFB application rate per hectare was around 40 mt/Ha.	Complied
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Records of fertiliser input were well maintained in various documents such as store issuance record, bin cards and month end account to name a few. Among the information available in the records was type of fertiliser, quantity and field number applied including date of application. Based on sampled fields, the amount of fertilisers issued out (i.e. applied) from the store according to SAP software system was tally with the recommendations by agronomist, for all the sampled estates.	Complied
<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.			
7.5.1	<b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	Maps identifying the soil and terrain are available. In Chaah Estate there planting on steep terrain less than 25°. The area size is approximately 10ha. While in Sungai Simpang Kiri Estate there is no steep terrain. The conservation of 25 deg area at North Labis estate is still being maintained. Signage that the area is 25 deg is erected at the entrance of the slope area.	Complied

		Map identifying the slope is available at 1:30,000 scale. Based on the soil map, the soil type is 100 % of mineral soil for all the sampled estates.	
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 -	Replanting plan at Chaah Estate was observed at steep terrain between 20° – 24°. The area size is approximately 10ha. The 25o slope area size at North Labis estate is 70.39ha. As per the SAP categorization, the area has been categorized as “Unplatable Reserve Land”. The reservation is as per the Reclassification of Conservation Set Aside (CSA) for Upstream Operations Guideline ver 2 dated 31/05/2019. The guideline has stated that no replanting at area with slope more than 25o and more than 25ha).	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting as per site verification and record verification.	Complied
<b>Criterion 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	NA as there is no new planting. There is also no peat soil or soil categorized as marginal or fragile at the sampled estates.	Not Applicable
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2 Protect and enhance forest: We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through: vii. No new development of peat areas, regardless of depth or location. We will seek to rehabilitate existing plantings on peats where possible.	Complied

7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>The R&amp;D Precision Agriculture conducted assessment and provided the estates with topography maps. Sampled topography information at estates visited as follows:</p> <table border="1" data-bbox="1046 475 1870 823"> <thead> <tr> <th>Degree</th> <th>Chaah</th> <th>Sg. Simpang Kiri</th> <th>North Labis</th> </tr> </thead> <tbody> <tr> <td>0° - 2°</td> <td>55.69%</td> <td>68.71%</td> <td>37.04%</td> </tr> <tr> <td>2° - 6°</td> <td>38.63%</td> <td>24.30%</td> <td>40.81%</td> </tr> <tr> <td>6° - 12°</td> <td>4.69%</td> <td>6.83%</td> <td>17.58%</td> </tr> <tr> <td>12° - 20°</td> <td>0.77%</td> <td>0.16%</td> <td>4.27%</td> </tr> <tr> <td>20° - 25°</td> <td>0.19%</td> <td>0.01%</td> <td>0.29%</td> </tr> <tr> <td>&gt; 25°</td> <td>0.00%</td> <td>0.00%</td> <td>0.02%</td> </tr> </tbody> </table> <p>Soil Sampling latest conducted by R&amp;D-TTAS Precision Agriculture Unit (NHS) dated 24/12/2018. Major soil series in Chaah estate was Local Alluvium (46.41%).</p> <p>In North Labis estate, latest soil sampling and mappig was conducted on 10/5/2021 by R&amp;D Precision Agriculture Unit (NHS). Major soil in this estate was Local alluvium (26.59%) and Kulai (23.75%).</p>	Degree	Chaah	Sg. Simpang Kiri	North Labis	0° - 2°	55.69%	68.71%	37.04%	2° - 6°	38.63%	24.30%	40.81%	6° - 12°	4.69%	6.83%	17.58%	12° - 20°	0.77%	0.16%	4.27%	20° - 25°	0.19%	0.01%	0.29%	> 25°	0.00%	0.00%	0.02%	Complied
Degree	Chaah	Sg. Simpang Kiri	North Labis																												
0° - 2°	55.69%	68.71%	37.04%																												
2° - 6°	38.63%	24.30%	40.81%																												
6° - 12°	4.69%	6.83%	17.58%																												
12° - 20°	0.77%	0.16%	4.27%																												
20° - 25°	0.19%	0.01%	0.29%																												
> 25°	0.00%	0.00%	0.02%																												
<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.																															
7.7.1	<p><b>(C)</b> 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>	NA as there is no new planting. There is also no peat soil or soil categorized as marginal or fragile at the sampled estates.	Not Applicable																												
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><b>PROCEDURAL NOTE:</b></p>	NA as there is no new planting. There is also no peat soil or soil categorized as marginal or fragile at the sampled estates.	Not Applicable																												

	Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -		
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	NA as there is no new planting. There is also no peat soil or soil categorized as marginal or fragile at the sampled estates.	Not Applicable
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place. - Critical (Major) compliance -	NA as there is no new planting. There is also no peat soil or soil categorized as marginal or fragile at the sampled estates.	Not Applicable
7.7.5	<b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. - Critical (Major) compliance -	NA as there is no new planting. There is also no peat soil or soil categorized as marginal or fragile at the sampled estates.	Not Applicable
7.7.6	<b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing	NA as there is no peat soil or soil categorized as marginal or fragile at the sampled estates.	Not Applicable

	oil palm cultivation on peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -		
7.7.7	<b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance. - Critical (Major) compliance -	NA as there is no peat soil or soil categorized as marginal or fragile at the sampled estates.	Not Applicable
<b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.			
7.8.1	A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water. - Minor compliance -	Water management and action plan at all the sampled estates for year 2021 were available. Among the objectives of the management plan are: <ul style="list-style-type: none"> <li>• water contingency during dry spell</li> <li>• to reduce wastage of water</li> <li>• to prevent pollution</li> </ul> Among the action plan established to achieve the above objectives are: <ul style="list-style-type: none"> <li>• To purchase water from the public domain supplier</li> <li>• To educate employees on water saving</li> <li>• To repair pipelines therefore reduce leakage</li> <li>• Rainwater harvesting</li> <li>• Minimise soil erosion during replanting</li> <li>• Maintaining riparian zones</li> </ul>	Complied

**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

		<p>Labour quarters at the mill and estates have adequate access to clean water which were supplied by the public domain.</p>																										
<p>7.8.2</p>	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Riparian and buffer zones of Chaah Estate and Sungai Simpang Kiri Estate are maintained according to the SDP Guidelines on River Reserve Management dated April 2014.</p> <p>Interview with chemical handling workers demonstrated that they have understood the requirements of maintaining the buffer zones. Site observation of the riparian is being conserved at Sungai Simpang Kiri flowing through Sungai Simpang Kiri Estate. It was observed that the riparian is currently regenerating.</p> <p>Water sampling in Chaah estate for Sg Sayong conducted 3 monthly basis, the latest water analysis conducted on 13/12/2021 by Sime Darby Plantation Research Sdn Bhd (Test report: IE1256/2021) and previously was on 2/9/2021 (Test Report: IE806/2021).</p> <p>Water sampling in Sg Simpang Kiri estate for Sg Simpang Kiri dated 10/1/2021 (PL27/2022) and previously 7/12/2021(IE1203/2021).</p> <p>In North Labis estate conducted water sampling according to standard operation procedure, sampling on record was on 3/8/2021 (IE718/2021). The result showed complied with Natural Water Quality Standard (NWQS) as per below:-</p> <table border="1" data-bbox="1048 1109 1928 1394"> <thead> <tr> <th>Sample Ref (Sg Gatom)</th> <th>BOD</th> <th>COD</th> <th>SS</th> <th>AN</th> </tr> </thead> <tbody> <tr> <td>Upstream (14C)</td> <td>1</td> <td>16</td> <td>4</td> <td>&lt;1</td> </tr> <tr> <td>Midstream (97)</td> <td>2</td> <td>20</td> <td>18</td> <td>&lt;1</td> </tr> <tr> <td>Downstream (98B)</td> <td>2</td> <td>24</td> <td>16</td> <td>&lt;1</td> </tr> <tr> <td>NWQS Standard</td> <td>3</td> <td>25</td> <td>50</td> <td>0.3</td> </tr> </tbody> </table>	Sample Ref (Sg Gatom)	BOD	COD	SS	AN	Upstream (14C)	1	16	4	<1	Midstream (97)	2	20	18	<1	Downstream (98B)	2	24	16	<1	NWQS Standard	3	25	50	0.3	<p>Complied</p>
Sample Ref (Sg Gatom)	BOD	COD	SS	AN																								
Upstream (14C)	1	16	4	<1																								
Midstream (97)	2	20	18	<1																								
Downstream (98B)	2	24	16	<1																								
NWQS Standard	3	25	50	0.3																								

7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>The mill applies the biological system with ponds in series for its treatment of effluent. The mill is disposing its effluent to land application. The quality of discharged effluent was analysed every month an accredited laboratory and the parameters are T, pH, BOD, COD, TS, SS, O&amp;G, AN and TN. Last 12 months results were verified where all the BOD results were within the regulated limit (i.e. 2,500 ppm).</p>	Complied
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill continues to monitor its water use per tonne FFB processed which data obtained from flowmeters i.e. at mill process, boiler operation and fire hydrant.</p>	Complied
<b>Criterion 7.9:</b> 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.</p> <p>- Minor compliance -</p>	<p>For the estates, the plan to optimise the usage of diesel is documented in the Energy Management Plan 2021. Among the action plans implemented are by doing regular maintenance of diesel-powered machinery and educational programme for the operators on fuel saving. The fossil fuel consumption is recorded as part of monitoring.</p> <p>For the mill, the utilisation of fibre and shell as biofuel for boiler operation is consistently implemented to generate electricity through turbines. This helps to reduce the dependency to fossil fuel.</p>	Complied
<b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO's Palm GHG Calculator ver. 4.</p>	Complied

		Based on verification of various records such as store issuance records and SAP system, all of the data was found to be accurate.	
7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit.	Not Applicable
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment, among the identified sources of gaseous emissions were boiler chimney, diesel engines and POME to name a few. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring for dust particulate. Based on the stack sampling report by independent consultant, the mill complied with the regulated limit.	Complied
<b>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</b>			
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	Replanting sites at Chaah Estate was observed to have no burning marks. Interview with stakeholder further confirm that there was not open burning for land preparation. Sime Darby Plantations practises felling and chipping method for land preparation for replanting.	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>	Signboards for no open burning have been put up within the vicinity of the estates. Continuous awareness is given to workers during morning briefing. Last firefighting training was on 10/7/2021 to all workers.	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	Awareness program on fire prevention are shared with surrounding stakeholders during Stakeholder Consultation. The last stakeholder consultation for Chaah estate was conducted on 17/1/2022 at Community Hall with attendance 21 person.	Complied



<b>Criterion 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit.	Not Applicable
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b>            Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>An HCV assessment was conducted and reporting in August 2016. The HCV assessment was conducted internally by the SDP Sustainability team.</p> <p>The assessment was conducted in participatory with stakeholders including surrounding communities and government authorities. HCV 4 was identified to be present.</p>	Complied
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	NA	Not Applicable
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are</p>	HCV management plan for all the sampled estates were made available for verification. Generally, the main objectives of the management plan is to	Complied

	<p>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>	<p>prevent river pollution by establishing riparian zones and preserve biodiversity by restricting human intrusion to the HCV area. Among the established action plans were creating awareness among employees about HCV and RTE and conducting monitoring of the HCV areas.</p>	
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>	<p>During stakeholder meeting or interview with stakeholder no issue been raise by stakeholder regarding any HCV area or conservation area. Previously in North Labis estate, there are villagers from Juaseh village are still accessing to the Labis forest reserve. During stakeholder consultation to discuss on constructing electrical fence on 17/07/2020, it was agreed that the Juaseh villagers will still be able to access to the forest. No further issue been raised.</p>	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>Among the educational programmes conducted for the workers on protection of RTE were training on policy and legal compliance in relating to conservation of RTE species, regular reminder during muster call and planting of pictorial and no hunting signage. Records of training were made available by the operating units for verification.</p>	Complied
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>Among the educational programmes conducted for the workers on protection of RTE were training on policy and legal compliance in relating to conservation of RTE species, regular reminder during muster call and</p>	Complied

	- Minor compliance -	planting of pictorial and no hunting signage. Records of training were made available by the operating units for verification.	
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	There was no new land clearing identified. The estates were established with Oil Palm since 1970s.	Not Applicable

**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in [2020] for [Chaah Palm Oil Mill] and supply base was calculated using the PalmGHG Calculator version 4. 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 data 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 [2020] for [Chaah Oil Mill] and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.22
PKO	1.22

Extraction	%
OER	20.29
KER	5.31

Production	t/yr
FFB Processed	132,307.66
CPO Produced	26,851.51
PKO Produced	7,019.95

Land Use	Ha
OP Planted Area	15456.88
OP Planted on peat	11.91
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>15468.79</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	75824.33	0.59	2106.36	0.54	0	0	77930.69	
CO <sub>2</sub> Emission from fertilizer	6143.51	0.05	144.14	0.04	0	0	6287.65	
NO <sub>2</sub> Emission from peat	0	0	0.23	0	0	0	0.23	
NO <sub>2</sub> Emission from fertilizer	3368.50	0.03	88.70	0.02	0	0	3457.20	
Fuel Consumption	814.92	0.01	20.82	0.01	0	0	835.73	
Peat Oxidation	0	0	22.50	0.01	0	0	22.50	
<b>Sink</b>								
Crop Sequestration	-71183.19	-0.55	-1995.22	-0.51	0	0	-73178.40	
Conservation Sequestration	0	0	0	0	0	0	0	
<b>Total</b>	<b>14968.06</b>	<b>0.12</b>	<b>387.54</b>	<b>0.10</b>	<b>0</b>	<b>0</b>	<b>15355.60</b>	

\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	25934.54	0.20
Fuel Consumption	33.18	0
Grid Electricity Utilization	0	0
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>25967.72</b>	<b>0.20</b>

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

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

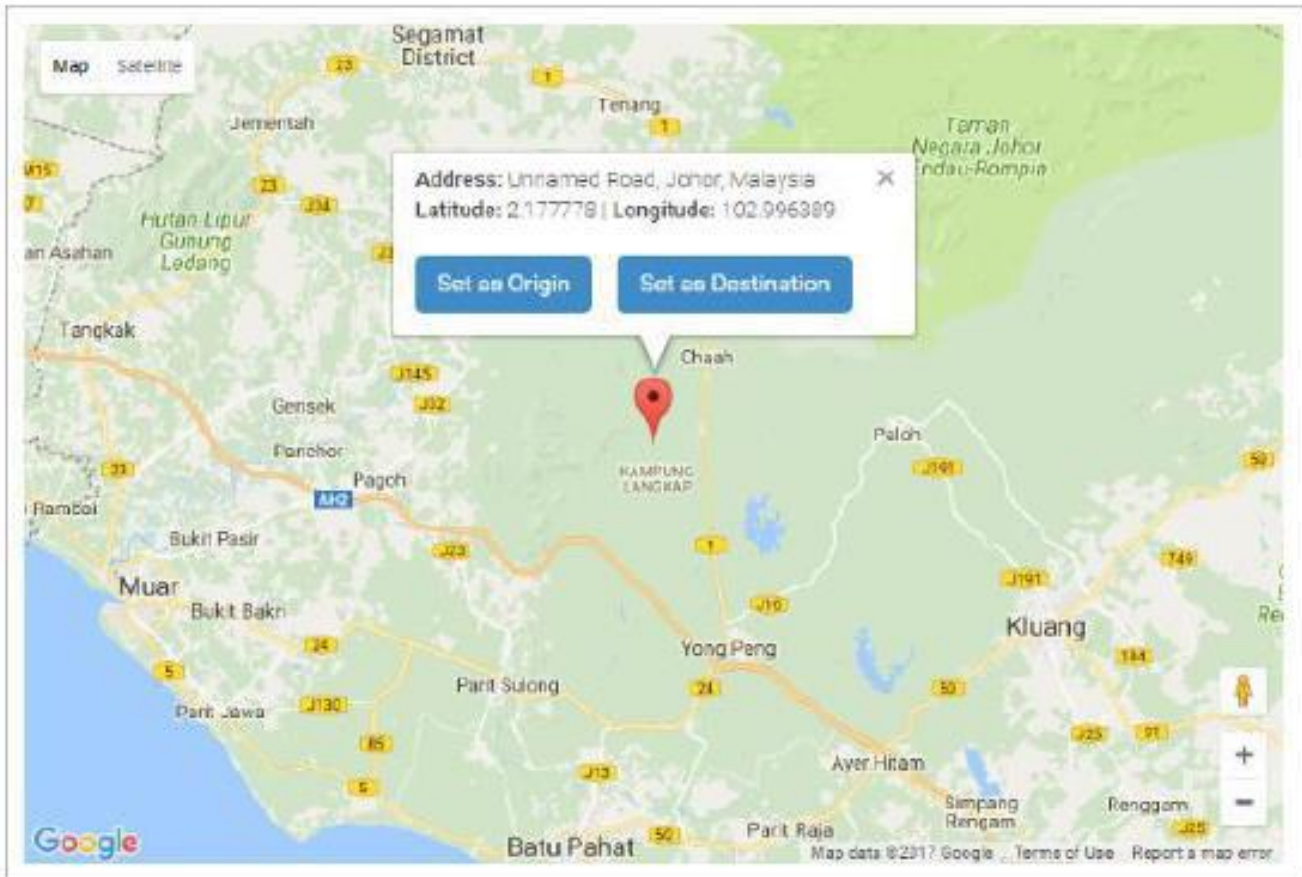
\*This mill has no kernel crusher operation.

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

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

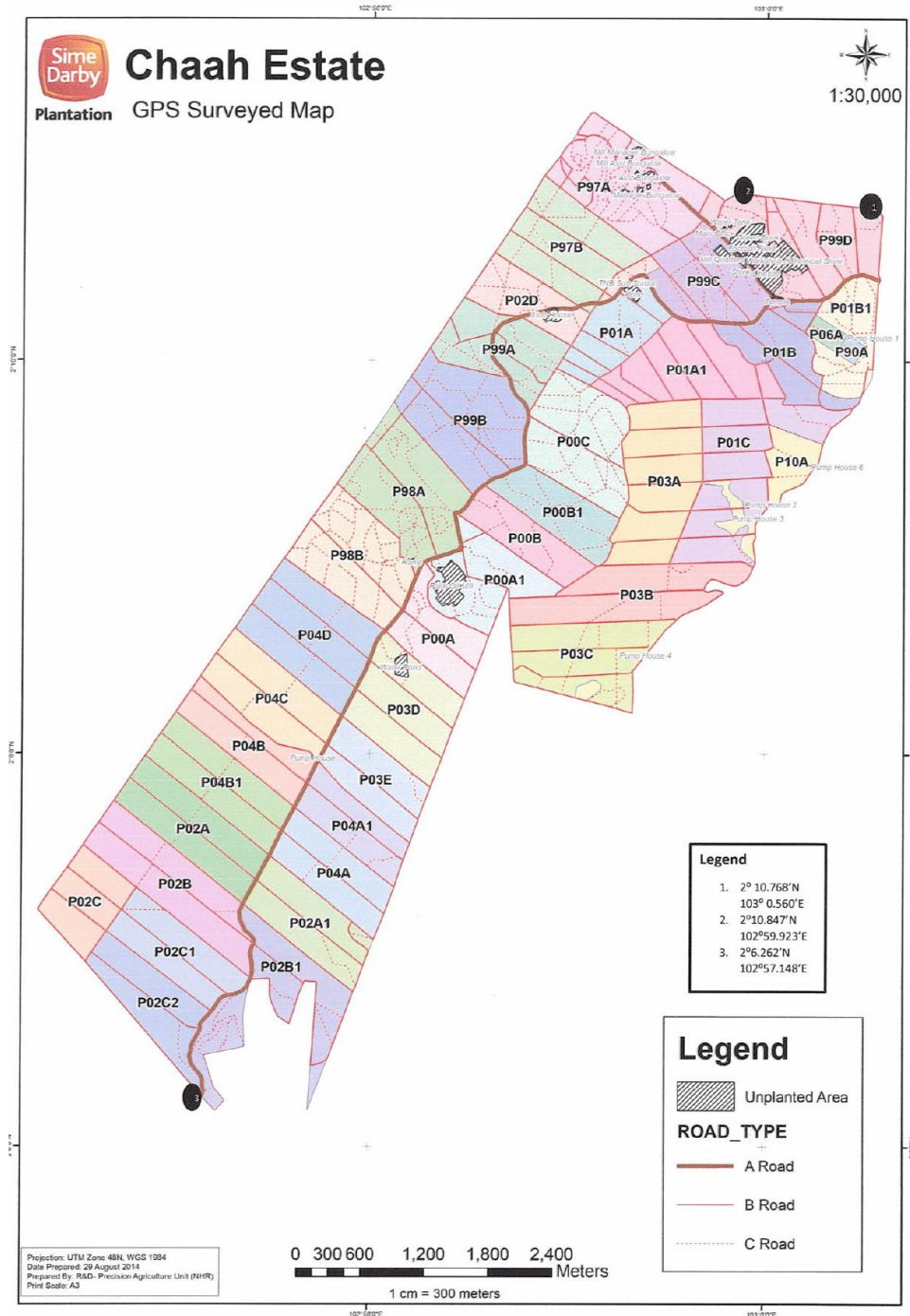
**Appendix C: Location Map of Certification Unit and Supply bases**

**Chaah Palm Oil Mill**



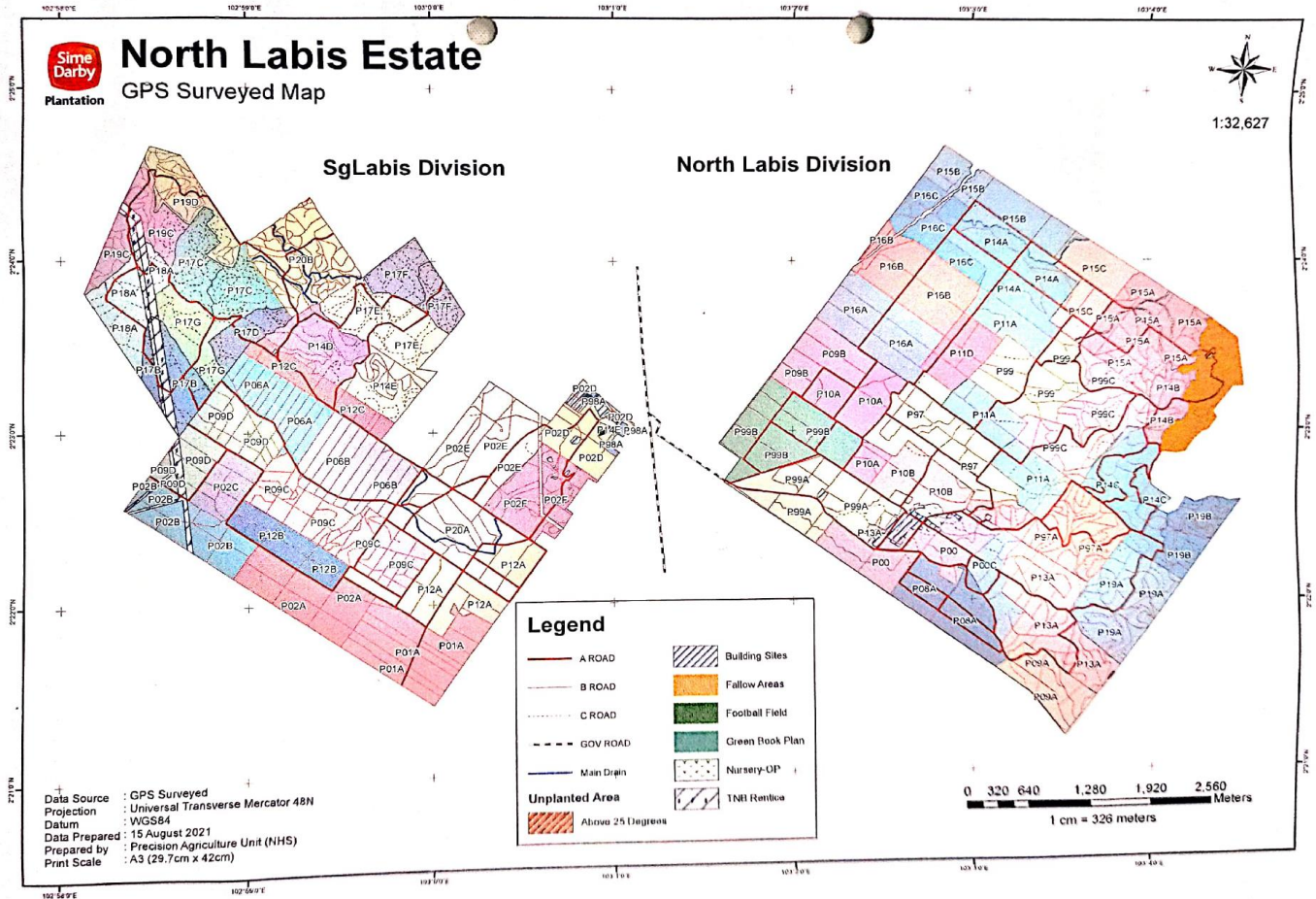
**Appendix D: Estate Field Map**

**Chaah Estate**





**North Labis Estate**





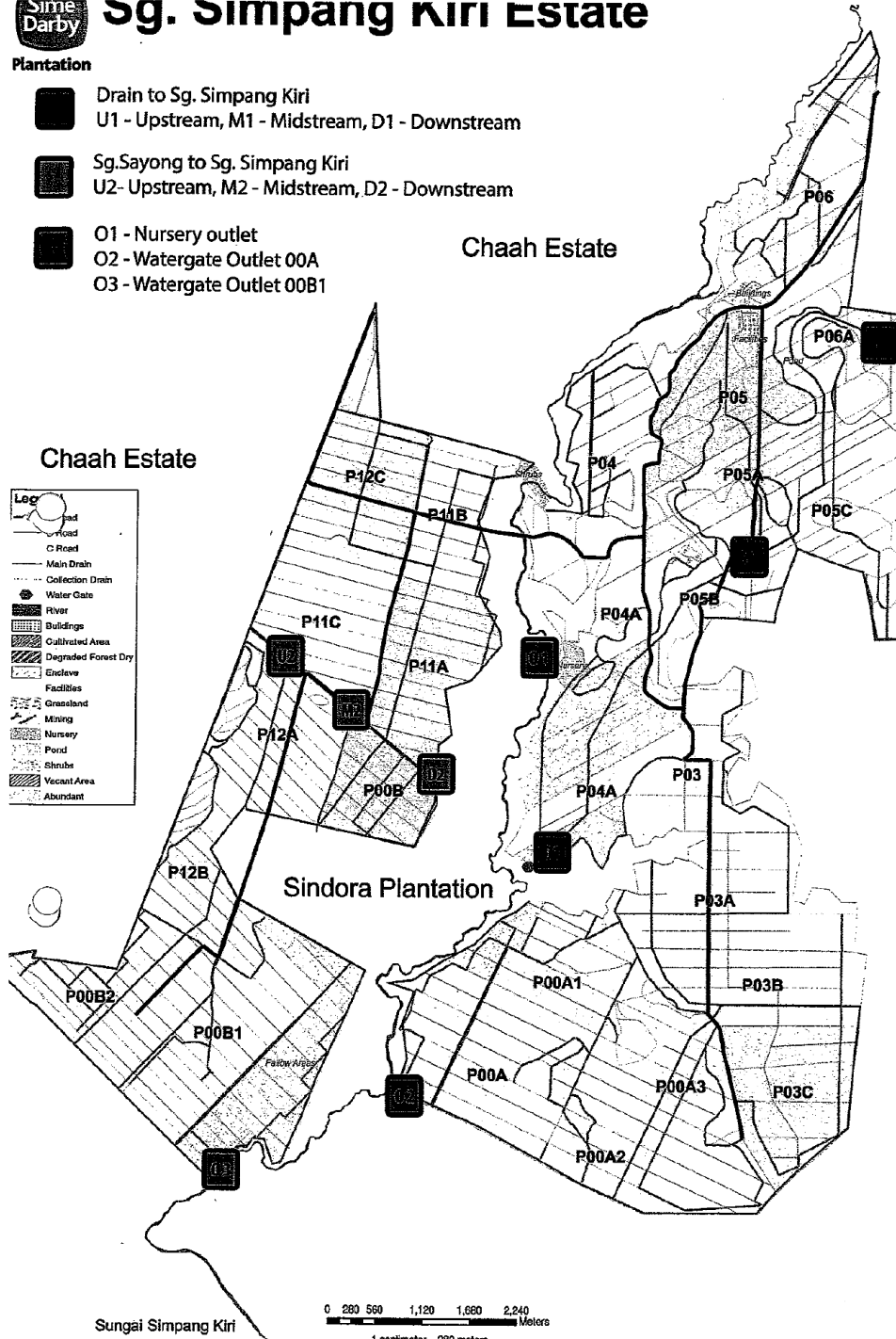
**Simpang Kiri Estate**



**Sg. Simpang Kiri Estate**

**Plantation**

- Drain to Sg. Simpang Kiri  
U1 - Upstream, M1 - Midstream, D1 - Downstream
- Sg.Sayong to Sg. Simpang Kiri  
U2- Upstream, M2 - Midstream, D2 - Downstream
- O1 - Nursery outlet  
O2 - Watergate Outlet 00A  
O3 - Watergate Outlet 00B1



**RSPO P&C Public Summary Report**  
**Revision 12 (Jun 2021)**

**Appendix E: List of Smallholder Registered and sampled – Not applicable**

*(If applicable – independent smallholder / scheme smallholder / outgrowers for group certification)*

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
<b>Total</b>									

Note: \* are smallholders sampled in this audit.

## Appendix F: 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
ISS	Independent Smallholder Standard
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