

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

Client Company name (Parent Company): Sime Darby Plantation Berhad
Client company Address: Level 5, Main Block, Plantation Tower No, 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 24) - Hadapan Palm Oil Mill
Location of Certification Unit: Batu 6, Jalan Bukit Permai, Bukit Permai, 81850 Layang-Layang, Johor, Malaysia
Date of Final Report: 30/04/2022

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Section 1: Scope of the Assessment

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

2. Certification Information			
Certificate Number	RSPO 739013	Certificate Start Date	29/03/2021
Date of First Certification	29/03/2011	Certificate Expiry Date	28/03/2026
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	The objective of the assessment was to conduct a surveillance assessment of the existing certification to ensure the elements of the proposed scope of registration and the requirements of the management standard are effectively addressed by the organisation's management system.		
Assessment Cycle	<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		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 mt/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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

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

5. Description of Supply Base					
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
Kulai Estate	2,652.37	0.77	520.52	3,173.66	83.57
Layang Estate	2,819.72	6.02	282.37	3,108.11	90.72
Seri Pulai Estate	1,980.76	27.61	91.46	2,099.83	94.33
CEP Rengam Estate	2,869.32	7.19	217.48	3,093.99	92.74

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Total	10,322.17	41.59	1,111.83	11,475.59
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Note:

- 1) HCV ha variance from previous year due to revised of HCV area at Seri Pulai Estate (refer addendum HCV Re-assessment Report Jan 2021).
- 2) Total area ha variance from previous year due to inaccurate figure reported last year. Current total area as per land title.

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Kulai Estate	300.58	1056.84	937.49	73.18	284.37	2,351.79	300.58
Layang Estate	68.24	542.14	2091.27	118.07	0	2,751.48	68.24
Seri Pulai Estate	293.43	668.59	377.19	571.90	69.65	1,687.33	293.43
CEP Rengam Estate	428.82	585.98	965.21	704.86	184.45	2,533.75	335.57
Total (ha)	1,091.07	2,853.55	4,371.16	1,468.01	538.47	9,324.35	997.82

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Mar 2021 – Feb 2022)	Actual (Dec 2020 – Nov 2021)		Forecast (Mar 2022 – Feb 2023)
		Previous license period (Dec 20 – Feb 21)	Current license period (Mar 21 – Nov 21)	
Kulai Estate	47,420.58	11730.81	27342.57	48,927.30
Layang Estate	73,752.61	15613.59	35761.998	61,344.35
Seri Pulai Estate	38,074.38	10193.67	20062.26	35,169.04
CEP Rengam Estate	54,058.01	9137.13	30711.62	49,382.88
Total	213,305.58	160,553.65		194,823.57

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Mar 2021 – Feb 2022)	Actual (Dec 2020 – Nov 2021)		Forecast (Mar 2022 – Feb 2023)
		Previous license period (Dec 20 – Feb 21)	Current license period (Mar 21 – Nov 21)	
Cenas Ropel Estate		0.31	248.80	
Sembrong Estate		78.21	466.47	

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Tun Dr Ismail Estate		906.34	4,395.45	
Bukit Badak Estate		2.81	2,180.83	
Pekan Estate		941.18	4,145.09	
Lambak Estate		0	842.60	
Total			14,208.09	

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Mar 2021 – Feb 2022)	Actual (Dec 2020 – Nov 2021)		Forecast (Mar 2022 – Feb 2023)
		Previous license period (Dec 20 – Feb 21)	Current license period (Mar 21 – Nov 21)	
3 rd party FFB suppliers	N/A	9,323.659	28,780.089	N/A
Total		38,103.75		

Note:

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Dec 20	13,169.170	1,808.190	14,977.36
2	Jan 21	10,588.580	1,715.600	12,304.18
3	Feb 21	9,655.620	2,023.830	11,679.45
4	Mar 21	15,190.680	3,726.039	18,916.72
5	Apr 21	14,910.650	2,693.719	17,604.37
6	May 21	14,563.458	1,689.524	16,252.98
7	June 21	14,803.360	3,134.332	17,937.69
8	July 21	17,667.940	3,634.597	21,302.54
9	Aug 21	18,619.100	6,478.443	25,097.54
10	Sept 21	15,344.210	5,833.994	21,178.20
11	Oct 21	16,334.380	2,624.140	18,958.52
12	Nov 21	13,914.590	2,741.340	16,655.93
	TOTAL	174,761.74	38,103.75	212,865.49

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10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (Mar 2021 – Feb 2022)	Actual (Dec 2020 – Nov 2021)		Forecast (Mar 2022 – Feb 2023)
	Previous license period (Dec 20 – Feb 21)	Current license period (Mar 21 – Nov 21)	
FFB	FFB		FFB
213,305.58 mt	48,478.09 mt	126,283.65 mt	194,823.57 mt
	174,761.74 mt		
CPO (OER: 20.79 %)	CPO (OER: 19.58 %)		CPO (OER: 21.15 %)
44,346.23 mt	9,629.01 mt	24,584.68 mt	41,205.19 mt
	34,213.69 mt		
PK (KER: 5.50 %)	PK (KER: 4.96 %)		PK (KER: 4.75 %)
11,731.81 mt	2,371.00 mt	6,305.58 mt	9,254.12 mt
	8,676.58 mt		

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Dec 20	2,628.882	632.364
2	Jan 21	2,001.875	504.184
3	Feb 21	2,046.991	501.127
4	Mar 21	2,951.262	733.326
5	Apr 21	2,508.260	760.420
6	May 21	2,732.746	662.773
7	June 21	3,199.166	756.959
8	July 21	3,521.378	831.906
9	Aug 21	3,604.831	981.459
10	Sept 21	2,926.132	749.558
11	Oct 21	3,341.062	854.297
12	Nov 21	2,751.106	708.205
TOTAL		34,213.69	8,676.58

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11. Summary of Actual Volume sold					
Current License period (Mar 21 – Nov 21)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	1,334.36	0	0	21,750.32	23,084.68
PK (MT)	2,313.1	0	0	3,992.476	6,305.58
Credits	10,819	0	0	0	10,819.00
Previous License period (Dec 20 – Feb21)					
CPO (MT)	0	0	0	9,629.011	9,629.01
PK (MT)	659.37	0	0	1,711.629	2,371.00
Credits	0	0	0	0	0
Note: Conventional is RSPO certified material but sold as non-RSPO.					
*unused credit carry forward : 9,629.011 mt					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	A	TR-ccde35fc-71f9 TR-f5b79bbf-d7a8 TR-f5a9f6d3-c8b3 TR-67eeade1-5ff2 TR-090c1204-c2c6 TR-8ed10316-8410 TR-76f362f0-b2f3 TR-4b795a0c-f604 TR-bd371d7e-97b0 TR-5f5e1eb0-9ac0	1,334.36	-
2	B	TR-54520089-d4eb TR-af9195ed-3857 TR-8eb61ebc-f160 TR-a58e9e30-ee09 TR-a43ad387-67d4 TR-11790f87-da6f TR-b7dbf8d4-68e1	-	2,972.47

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		TR-71920aa3-7f53 TR-4f462562-cbfe TR-43024a57-9453 TR-19672973-3889 TR-4404d705-5861 TR-a022b5bb-194e TR-e0039c93-18e2 TR-cfb51a4e-b1cd TR-f5d1deca-5de3 TR-cb8bdd86-20ba TR-00f23501-0b39 TR-86ca4b20-a568 TR-28e78e56-716e TR-270b1302-7b88		
TOTAL			1,334.36	2,972.47

11B. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	Nil			
TOTAL			N/A	N/A

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Y	31,379.332	-
2	Z	-	5,704.11
TOTAL		31,379.33	5,704.11

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
1	XYZ	xxx	10819
TOTAL			10,819

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year (Not applicable)			Actual (Not applicable)			Forecast (Not applicable)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB									
IS-CSPO									
IS-CSPKO									
IS-CSPKE									

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period (Not applicable)						
Credits						
Physical						

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)
Website: 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 **13-17/12/2021**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **4/3/2022**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. 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.

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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.

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Hadapan POM	√	√	√	√	√
Kulai Estate	√	√	√	√	√
Layang Estate	√	√	√	√	√
Seri Pulai Estate	√	√	√	√	√
CEP Rengam Estate	√	√	√	√	√

Tentative Date of Next Visit: December 12, 2022 - December 16, 2022

Total Number of Mandays: 15 man days

2.2 BSI Assessment Team

Name	Role	Competency
Mohamed Hidir Zainal Abidin (MH)	Team Leader	<p>Education: Holds a Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006.</p> <p>Work Experience: He has 4½ years working experience in palm oil industry specifically in palm oil mill as Mill Engineer. More than 10 years of auditing experience with accredited certification body for several schemes include ISO9001, ISO14001, OHSAS18001 (now ISO45001), RSPO, MSPO and RBA Labor Ethics</p> <p>Training attended: He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, MSPO Awareness Training, Endorsed RSPO SCCS Lead Auditor Course, HCV & HCS Introductory Training and SMETA Requirements Training.</p> <p>Aspect covered in this audit: Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare,</p>

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		<p>smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue.</p> <p>Language proficiency: Fluent in English and Bahasa Malaysia</p>
Vijay Kanna Pakirisamy (VK)	Team Member	<p>Education: Holds a Bachelor Degree in Agribusiness Science Management with Honours, University Utara Malaysia.</p> <p>Work Experience: He has 10 years’ experience in Oil Palm Estate Management in leading Oil Palm Companies such as KL Kepong Bhd, IOI Plantations and United Plantations. The last position held was Senior Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He has been an sustainable palm oil auditor since 2019.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, HCV & HCS Introductory Training g and SMETA Requirements Training, RSPO Independent Smallholder (IHS) Auditor Training.</p> <p>Aspect covered in this audit: Mill & Estate Best Practices, Legal, OSH and Worker’s Consultation.</p> <p>Language proficiency: Fluent in English, Tamil and Bahasa Malaysia</p>
Valence Shem (VS)	Team Member	<p>Education: Holds a Bachelor’s Degree in Industrial Technology from University of Science Malaysia</p> <p>Work Experience: He has 9 years working experience in oil palm plantation industry as estate manager. Since 2009 he has stated auditing professionally in several management system including ISO 140001, RSPO P&C, RSPO SCCS, MSPO and SMETA.</p> <p>Training attended: He has completed ISO 14001 Lead Auditor Course; ISO 9001 Lead Auditor Course; Endorsed RSPO P&C Lead Auditor Course; Endorsed RSPO SCCS Lead Assessor Course; MSPO Awareness Training; ISO 45000 Lead Auditor Course; SMETA Auditor training; HCV & HCS Introductory Training.</p> <p>Aspect covered in this audit: During this assessment, he assessed economic management plan, mill best practices, RSPO SCCS requirements, estate best practices, natural and biodiversity conservation, waste management, GHG and HCV</p> <p>Language proficiency: Fluent in English and Bahasa Malaysia</p>

Accompanying Persons:

Name	Role
Nil	

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2.3 Assessment Plan

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

Date	Time	Subjects	MH	VK	VS
Sunday 12/12/2021	PM	Audit team travel to Kluang. Check in at Anika Hotel, Kluang	√	√	√
Monday 13/12/2021 Layang Estate	0730	Audit team travel to Layang Estate	√	√	√
	0830 - 0900	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). • Verification on previous audit findings 			
	0900 - 1200	Layang Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	1200 - 1300	Lunch	√	√	√
	1300 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Tuesday 14/12/2021 Hadapan POM	0730	Hadapan POM	√	√	√
	0900 - 1200	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc. Visit to laboratory, weighbridge and palm product storage area.			
	1000 – 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1300 – 1400	Lunch break	√	√	√
	1400 - 1630	Document Review P1 – P7: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc	√	√	√
1630 - 1700	Interim Closing Briefing	√	√	√	

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Wednesday 15/12/2021 Kulai Estate	0730	Audit team travel to Kulai Estate	√	√	√
	0900 - 1200	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.			
	1000 - 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1300 - 1400	Lunch break	√	√	√
	1300 - 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630 - 1700	Interim Closing Briefing	√	√	√
Thursday 16/12/2021 Seri Pulai Estate	0730	Audit team travel to Seri Pulai Estate	√	√	√
	0900 - 1200	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.			
	1000 - 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1300 - 1400	Lunch break	√	√	√
	1300 - 1630	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 17/12/2021 CEP Rengam Estate	0730	Audit team travel to CEP Rengam Estate	√	√	√
	0900 - 1200	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.			
	1000 - 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1300 - 1400	Lunch break	√	√	√

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	1300 - 1630	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	Audit team discussion and closing meeting	√	√	√
Saturday 18/12/2021	AM	Audit team travel back to KL	√	√	√

Major NC close out verification

Time	Subjects	Mohd Hidhir
Friday 4/3/2022 (AM)	Auditor travel to Kluang	√
1430 – 1445	Opening Meeting <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Briefing on the verification plan 	√
1445 – 1700	Hadapan POM & Seri Pulai Estate – Verification on previous Major NC. Site observation, workers/stakeholder interview (individual and group session) if necessary. Document review – implemented evidence	√
1700 – 1730	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):</p> <p>http://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations</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 & 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.	There is no new acquisitions as per the latest TBP 2021.	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	Yes.	Complied

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<p>(both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification.</p> <p>PT Mitral Austral Sejahtera: The properties was sold and currently 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 & 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: www.rspo.org/certification/public-announcement</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): www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations</p> <p>ACOP 2020 has been cross-referenced as below: www.rspo.org/members/29</p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>Although there lapses has been identified at those Indonesia management units but 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 Major 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>
<p>Un-Certified Units or Holdings</p>		

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<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&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 1st 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"> 1. NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited 2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-a-subsiary-of-sime-darby-plantationbhd-guadalcanal-plain-palm-oil-ltd 3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd 4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-ramu-agri-industries-limited 5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-higaturu-oil-palms 6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamawan-png 7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamendauen-png 8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-roka-mini-estate 9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate 	<p>Complied</p>

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	<p>plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate</p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-limited-higaturu-oil-palm</p> <p>11. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc-new-planting-assessment</p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment1</p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment</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&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) has been excluded in the latest TBP as both sites was 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 due possibility 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&C criterion 4.2</p>	<p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>Sime Darby Plantation maintain corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.</p>	<p>Complied</p>

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<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&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 internal audits the uncertified 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&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 against any of the RSPO P&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.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company</p>	<p>Complied</p>

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<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</p>	<p>Choose an item.</p>

Approved Time Bound Plan

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					
		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					
		Dusun Durian Estate					
9	West	West Oil Mill	-	Carey Island, Selangor	Certified	19/05/2011	-
		West Estate					

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10	Bukit Puteri	Bukit Puteri Oil Mill	-	Raub, Pahang	Certified	07/07/2011	Jentar Estate has merged with Kerdau Estate and reported to the CB in March/April 2021.
		Bukit Puteri Estate					
11	Kerdau	Kerdau Oil Mill	-	Temerloh, Pahang	Certified	07/07/2011	-
		Kerdau Estate					
		Jentar Estate					
		Mentakab Estate					
		Chenor Estate					
Sg Mai Estate							
12	Jabor	Jabor Oil Mill	-	Kuantan, Pahang	Certified	07/07/2011	-
		Jabor Estate					
13	Labu	Labu Oil Mill	-	Nilai, Negeri Sembilan	Certified	30/12/2011	New Labu Estate has become a division of Labu Estate.
		Labu Estate					
14	Tanah Merah	Tanah Merah Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	19/05/2010	-
		Tanah Merah Estate					
		Bukit Pelandok Estate					
15	Sua Betong	Sua Betong Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	18/02/2014	Siliao Estate has now been merged into Salak Estate and Bradwall Estate.
		Sua Betong Estate					
		Sengkang Estate					
		Bradwall Estate					
		PD Lukut Estate					
		Tampin Linggi Estate					
		Sg. Bahru Estate					
Salak Estate							
16	Kok Foh	Kok Foh Oil Mill	-		Certified	07/07/2011	

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		Muar River Estate		Bahau, Negeri Sembilan			Sg. Gemas Estate has now been merged into Sg. Senarut 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					
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) Welch Estate, previously from SOU 19 (Pagoh) is now part of SOU 18 (Diamond Jubilee)
		Serkam Estate					
		Diamond Jubilee Estate					
		Bukit Asahan Estate					
19	Pagoh	Pagoh Oil Mill	-	Muar, Johor	Certified	28/1/2014	-
		Pagoh Estate					
		Welch Estate					
		Lanadron Estate					
		Pengkalan Bukit Estate					
20	Chaah	Chaah Oil Mill	-	Chaah, Johor	Certified	18/11/2010	-
		Chaah Estate					
		Sg. Simpang Kiri Estate					

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		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					
		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					
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	Lavang Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Lavang Estate					
		Rasan Estate					
		Belian Estate					

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		Kelida Estate					
		Lavang (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					
		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

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							hold. As at 1st Oct 2018, the mill has completed the selling off transaction.
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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	TBC	TBC		
4	PT Langgeng Muaramakmur	Bebunga Mill	-	-		Certified	16/03/2012	KKPA & Plasma is not under the management control of Sime Darby
		Bebunga Estate						

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		Sungai Cengal Estate			Kotabaru District – South Kalimantan			Plantation. The decision of certification is from KKPA / Plasma themselves.
		Bakau Estate						
		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	-			Certified	05/07/2011	-
		Gunung Aru Estate						

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		Gunung Kemas Estate			Kotabaru District – South Kalimantan			
		Laut Timur Estate						
		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					01/04/2014	
		Betung Estate						
		Sekayu Estate						
12		Sekunyir Mill	-	-		Certified	23/11/2010	-

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

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	PT Intipersada Aneka	Teluk Siak Estate			Pekanbaru, Siak District – Riau			
		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 – Nangroe 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 Natapalma Sandika	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						

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		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	
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	The properties was sold and currently SDP have no control in the management. Please find latest information on 'Updates on PT MAS' worksheet and updates to RSPO Secretariat.
		MAS 1 Estate						
		MAS 2 Estate						
		MAS 4 Estate						
		Plasma MAS Estate						

SDP - RSPO Certification for Time Bound Plan – Papua New Guinea / Solomon Islands Operations (NBPOL)

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)					

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		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	Poliamba (POL)	Poliamba Oil Mill	-	New Ireland Province, PNG	Certified	19/03/2012	-
		Kara Estate					
		Nalik Estate					
		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					

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		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					
		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				
	Karaisu Estate				
	Moroa Estate				
	Bilomi Estate				
	Loata Estate				
	Haella Estate				
	Garu Estate				
	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)				

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		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 were 2 Critical; 3 Minor nonconformities and 3 Opportunity For Improvement raised. The Hadapan Palm Oil Mill and Supply Base (SOU 24) 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			
NCR Ref #	2144368-202112-M1	Date Issued	17/12/2021
Due Date	16/3/2022	Date of nonconformity Closure	10/03/2022
Clause & Category (Critical / Minor)	3.4.3 (critical)		
Statement of Nonconformity:	Social management and monitoring plan for FY2021 had not been reviewed and updated in a participatory way.		
Requirement Reference:	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		
Objective Evidence:	<p>Hadapan POM</p> <p>External stakeholder (Sundry shop) - Concern raised by the sundry shop owner with regards to uncollected debt for those workers that repatriated. This issue has not been brought up to the management as the owner was not fully aware on the grievance/complaint process. The management has confirmed that no complaint received so far from the sundry shop owner for further assistance and rectification.</p> <p>Internal stakeholder (Union representatives) - The union representatives have raised a few concerns with regards to allowance entitlement and overtime issue for mill workers. For the allowance, they have claimed that previously boiler operator received special allowance called " elaun panas/stim". Status of this allowance entitlement has yet to be clearly discussed with the union representatives. The union leader has explained that he received complaints with regards to overtime deduction. Overtime approval and entitlement was not explained clearly to workers as they have interpreted differently from what has been explained by the management. None of these issues being discussed in the latest union meeting dated 13/12/21.</p> <p>The above issues have not captured in the latest SIA management plan updates in a participatory way.</p>		
Corrections:	Mill will arrange meeting with sundry shop operator and meeting with union representative to discuss further on the issue raised by them and explain on the grievance/complaint channel. Mill will review the SIA action plan and include the respective issues raised.		
Root Cause Analysis:	Awareness on complaint/grievance channel was found less effective since before this the awareness was given during stakeholder meeting. However, mill has yet		

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	<p>to conduct the stakeholder meeting after restriction of movement caused by pandemic and no meeting conducted with the sundry shop owner within one year. This resulted the sundry shop owner was not fully aware with grievance/complaint process. Thus, the issue was not received at mill's end and yet to be updated in SIA management plan.</p> <p>The issues raised by union representatives was not discussed in latest union meeting due to no specific agenda to discuss on working time/OT/allowance issues during union meeting with mill management resulted the issues was left out to be discussed during the meeting to ensure workers representative fully understand on the said matters.</p>
Corrective Actions:	<p>Mill will disseminate brochure with information on complaint/grievance process to stakeholder and start to conduct normal stakeholder meeting periodically. Issues on working time/OT/allowance will be included in the management and workers/union representative meeting agenda.</p> <p>Any social related issues require longer time or other resource (i.e. budget, etc) which monitoring is needed will be included accordingly in SIA action plan</p> <p>Major NC close out verification:</p> <ul style="list-style-type: none"> i) Dissemination of information was done via RSPO brochure to relevant stakeholders together with feedback form if they have any comments or feedbacks. ii) Meeting with NUPW representative was conducted on 22/12/2021 discussing on allowance and overtime issues which have been brought up previously during last audit. Based on the minute of meeting, the said allowance will be paid starting on January 2022. Overtime will be calculated if they need to come 30 minutes earlier than usual working hours. Interview with the NUPW representative has confirmed the decision on allowance and overtime issue. He did mentioned the special allowance was paid starting January 2022. iii) Meeting with the sundry shop owner was carried out 22/12/2021. Issues with regards to uncollected debt (goods) for repatriated workers has been discussed in the meeting. The owner shall report if the workers have not paid their accumulate debt to the management. Further verified with the sundry shop owner via interview has confirmed that debt amount has progressively reduced and as suggested cash term is preferable. He will continue to inform the management form time to time if there is any problem with worker's debt. iv) SIA management plan has been revised and updated to include site specific issues for further monitoring. SIA plan dated 4/3/22 is referred to. The new format is more detailed and specific with the action plan, person in charge assigned and timeline for completion.
Assessment Conclusion:	<p>Hence, the major NC is effectively closed on 10/3/2022 with sufficient evidence of implementation. Continuous implementation will be further verified in the next assessment.</p>

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Non-conformity			
NCR Ref #	2144368-202112-M2	Date Issued	17/12/2021
Due Date	16/03/2022	Date of nonconformity Closure	10/03/2022
Clause & Category (Critical / Minor)	3.6.1 (Critical)		
Statement of Nonconformity:	The risk controls that have been assessed in the HIRARC and contractor management were not adequately implemented and monitored.		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p>The risk controls that have been assessed in the HIRARC and contractor management were not adequately implemented and monitored in the mill and estate as below.</p> <p>Hadapan POM</p> <ul style="list-style-type: none"> • The HIRARC for Kernel Recovery Station states (PPE and training) identified as existing control measure to be comply with. Observed during site visit at Kernel Recovery Station, the said control measures were not being practiced and followed by the operator. • Sighted the Contract Agreement for Guna Sons Earthwork Constructions (Co. No. JM 0584860-T) stated "all contract workers are compulsory to be equipped with the basic personal protection equipment namely safety helmet, safety shoe, safety glasses, ear plug and safety gloves if necessary". Based of permit to work (PTW) dated 14/12/21, declaration in the pre-work checklist was found to be contrary with actual onsite condition observed. • Flashback Arrestor was not fixed for 1-unit oxygen and acetylene tanks that was used in the mill workshop. The hazard and risks associated with oxygen and acetylene tanks such as the decomposition which can generate heat and cause fire and explosions through flashbacks from welding & hot work operations and movement & separation of the gas and the porous mass inside the cylinder and its control measures has not been assessed in the HIRARC. <p>Seri Pulai Estate</p> <ul style="list-style-type: none"> • The HIRARC for Workshop (Welding – Flammable materials/substance) states: Existing Control – To install Flashback Arrestor for oxy tank. During the visit to the workshop, it was noticed that the Flashback Arrestor was not fixed for the oxygen and acetylene tanks that were being used. 		
Corrections:	<p>Mill will immediately ensure:</p> <ol style="list-style-type: none"> 1) Operator at Kernel recovery Station wear PPE accordingly as per stated in HIRARC. 2) Contractor Guna Sons wear PPE accordingly as per stated inside the contract agreement. 3) Mill to fix flashback arrestor for oxygen and acetylene tanks used in the mill workshop and included in the HIRARC. <p>Seri Pulai Estate</p>		

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	<p>Flashback arrestor has been installed accordingly for the oxygen and acetylene tank used at Seri Pulai Estate. Briefing on control measure for potential hazard welding activity will be conducted to workshop personnel and the contractor.</p>
<p>Root Cause Analysis:</p>	<p>Hadapan POM</p> <p>Training on HIRARC and its implementation has yet to be conducted for the respective person in charge (Kernel Recovery Station, Guna Sons Contractor & Workshop) resulted the implementation was not in place</p> <p>Seri Pulai Estate</p> <p>The oxygen and acetylene tank used at Seri Pulai Estate was not fixed with flashback arrest due to estate has outsourced the welding work since the estate's foreman has been advised to temporarily stop welding work while waiting for the re-test result for manganese test. However, no briefing given to the contractor on control measure as per HIRARC for the respective work resulted they use oxygen and acetylene tank without flashback arrestor</p>
<p>Corrective Actions:</p>	<p>Hadapan POM</p> <p>Mill will conduct refresher training on the control measure for Kernel Recovery Station Operators, workshop personnel, contractor and ensure control measure to be implemented immediately</p> <p>Seri Pulai Estate</p> <p>Safety briefing will be conducted to outsourced work/contractor will be included on the potential hazard control measure for related work as per Estate HIRARC.</p> <p>Major NC close verification:</p> <p>Hadapan POM</p> <p>i) PPE monitoring and compliance was done through workplace inspection and also permit to work (PTW) prior to work for contractor. Monthly workplace inspection was verified for workshop and kernel station in January 2022. No OSH non-compliance reported. As for oxygen and acetylene vessel standby set, it has been fully equipped with flashback arrestor for both vessels. PTW dated 5/3/22 was verified with the pictorial evidence of compliance for the contractor (Guna and Sons). Complete PPE worn by the operator and no OSH non-compliance reported.</p> <p>ii) HIRARC training was given to the workers and contractor (Guna and Sons) on 17/12/2021. This to create awareness on hazards and associated risk while doing their day to day work and task.</p> <p>Seri Pulai Estate</p> <p>i) Flashback arrestor has been installed as part of engineering control and fixed at each oxygen and acetylene vessel. Based on the purchase order (4502783976, dated 29/12/2021), the new unit for each vessel was installed for the ready to use unit. SSSO Site Sustainability and Safety Officer (SSSO) has visited the estate on 2/3/2022 to check on the implementation. Workplace inspection record for January 2022 was verified. No OSH non-compliance reported. Refresher training as conducted on 21/12/21 to all workshop operators. Evidence of training was verified and confirmed.</p>

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Assessment Conclusion:	Hence, the major NC is effectively closed on 10/3/2022 with sufficient evidence of implementation. Continuous implementation will be further verified in the next assessment.
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Non-conformity			
NCR Ref #	2144368-202112-N1	Date Issued	17/12/2021
Due Date	16/12/2022	Date of nonconformity Closure	In the next surveillance audit
Clause & Category (Critical / Minor)	3.3.2 (minor)		
Statement of Nonconformity:	The implementation of procedures was not consistently monitored.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<p>Hadapan POM</p> <p>The storage of Gearbox Oil was not in accordance with the Mill Quality Management System under the Occupational Safety Health Manual, Chapter 9 (Chemical Safety Management) states under No. 6.0 Procedures for Handling, iii. Ensure that containers is properly labelled, not damaged and no spillage during handling. During the site visit to the Mill Workshop, it was noticed that the gearbox oil was stored in plastic containers that were not labelled accordingly.</p> <p>Seri Pulai Estate</p> <p>It was noticed that Diesel was issued and temporarily stored in 20-liter containers and placed outside the workshop. The containers were not relabeled and/or did not have pictorial symbols such as "highly flammable substance/materials" attached to it.</p>		
Corrections:	Hadapan Mill and Seri Pulai Estate has changed the container using suitable container and relabel accordingly for the gearbox oil and diesel.		
Root Cause Analysis:	At Hadapan Mill and Seri Pulai Estate, it was found that awareness training on chemical handling was not fully include the MB/ tractor driver and workshop helper resulted the use of unsuitable container for diesel and gearbox oil.		
Corrective Actions:	Mill and estate will conduct chemical handling training for workshop personnel and emphasize on the storage requirement (container suitability and relabelling). For estate the training also will be included the MB and tractor driver.		
Assessment Conclusion:	Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.		

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Non-conformity			
NCR Ref #	2144368-202112-N2	Date Issued	17/12/2021
Due Date	16/12/2022	Date of nonconformity Closure	In the next surveillance audit
Clause & Category (Critical / Minor)	6.2.5 (minor)		
Statement of Nonconformity:	Efforts to improve worker's access to affordable food was not effectively demonstrated		
Requirement Reference:	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.		
Objective Evidence:	<p>CEP Rengam Estate</p> <p>Based on interview with workers representatives (NUPW and EWC), they have raised an issue with regards to expensive goods price at Kedai Runcit JK Maju. Further check at the sundry shop has confirmed that no price displayed especially for fresh and loose items (vegetables, onion, potatoes etc). This was not in compliance with Price Control Order (Indication of Price by Retailer) 1993.</p>		
Corrections:	Estate will conduct meeting with sundry shop owner to discuss on the pricing and brief on the requirement of price display at the sundry shop		
Root Cause Analysis:	Monitoring of pricing and price display was only conducted twice a year which was found not adequate and meeting with the sundry shop owner has yet to be conducted to discuss on the monitoring result.		
Corrective Actions:	<p>Estate will conduct more regular (quarterly) price monitoring for the estate's sundry shop.</p> <p>Due to location of CEP Rengam Estate which located beside the main road and empty shop is available. Estate management has planned to get another vendor to open sundry shop at CEP Rengam Estate, so that estate's residence may have options/more variety of goods with healthy price competition among the shops.</p>		
Assessment Conclusion:	Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.		

Non-conformity			
NCR Ref #	2144368-202112-N3	Date Issued	17/12/2021
Due Date	16/12/2022	Date of nonconformity Closure	In the next surveillance audit
Clause & Category (Critical / Minor)	7.3.1 (minor)		
Statement of Nonconformity:	The implementation of wastes management plan was not satisfactorily demonstrated.		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		

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Objective Evidence:	Based on verification through Google Earth, the wastes landfill at Layang Estate (GPS: 1.816244, 103.450217), CEP Rengam Estate (GPS: 1.883646, 103.367359), Seri Pulai Estate (GPS: 1.610332, 103.481629) 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: a) The landfill shall be located no less than 3 km away from nearest household area, offices or other premises b) The landfill shall be located no less than 3 km away from the nearest river or waterway
Corrections:	Estates will re-locate the area at the most suitable area as per required distance in the procedure
Root Cause Analysis:	Respective estates PIC was not fully aware on the distance requirement for landfill area as per the procedure and some estates facing challenge to find the suitable area due to estate's location and terrain factor.
Corrective Actions:	Estates will liaise with regional office to find outsource contractor for rubbish collection at municipal landfill area.
Assessment Conclusion:	Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	2144368-202112-I1 (4.2.3) - Communication on the grievance/complaint mechanism has yet to be explained clearly to the relevant stakeholders. This to ensure that any concern raised via verbal complaints were recorded and acknowledged by the management for further action.
OFI 2	2144368-202112-I2 (3.3.1) - The Chemical Safety Management Procedure; Doc Number: UM/HSE/OCP/04, can be further improved to include the Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000, requirements VI which mentions about labelling and relabelling.
OFI 3	2144368-202112-I3 (2.1.1) - CEP Rengam Estate has its own sewage treatment plant at the staff quarters to cater more than 130 housing units. The need of whether or not to notify the Department of Environment (DOE) in accordance to EQ (Sewage) Regulations 2009, Reg. 4 (1) and 4 (2), can be further improved by getting clarification directly from the DOE themselves

Positive Findings	
PF #	Description
PF 1	Good cooperation given to the audit team by site and HQ team
PF 1	No negative feedback received from the internal and external stakeholders.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1997037-202012-M1	Date Issued	11/12/2020
Due Date	10/03/2021	Date of nonconformity Closure	10/03/2021
Clause & Category (Critical / Minor)	3.6.2 - Critical (Major)		
Statement of Nonconformity:	Monitoring of the effectiveness of the H&S plan to address health and safety risks to people is not adequate		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	<p>Kulai Estate:</p> <p>It was noted during the interview with the manuring workers travelled to the worksite/field in the Manuring tractor where they sit on the pile of fertiliser in the fertiliser trailer exposing themselves to possible risks and hazards. The practice was not in-line with the Pictorial Safety Standard (PSS); 12.0 Pengangkutan; 12.4 Pengangkutan Yang Membawa Peralatan dan Bahan (Kimia dan Baja); d. Dilarang membawa penumpang di kenderaan ini.</p> <p>CEP Renggam Estate:</p> <ul style="list-style-type: none"> - The tractor TF 001 (Ford) used by the Spraying Gang at Field 2000 was noticed to be not in good working condition with oil leakage surrounding the engine and drops on the ground. Further clarification with the foreman and daily inspection record (Pejagaan Traktor: Penyelenggaraan Harian & Mingguan) indicated that the daily inspection was done last on 18th January 2020. <p>The action plan for CHRA recommendations were not adequately done for CHRA Report (DOSH Ref Number: HQ/15/ASS/00/363-2020-153) dated June 2020; Page Number 76; 5. Recommendation; 5.2 Recommendation On Organisational Controls (OC); Adoption of Safe Work Systems and Practices; b. Register of Chemical Hazardous to Health (USECHH 2000, Regulation 5); 3. Recommendation: Update welding rode and welding gas in chemical register. Visit to the workshop indicated that the welding works using welding rods, acetylene and oxygen tank are use on a regular basis. Reference done with the 'Register of Chemicals Hazardous to Health' dated 30.11.2020 indicated that the welding rod and welding gas were not included in the register.</p>		
Corrections:	<p>Kulai Estate:</p> <p>Immediate briefing has been given to the said workers and the rest of manuring workers on the seriousness of risks and hazards when travelling to the field by sitting on the pile of fertilizer in the fertilizer trailer dated 8/12/2020.</p> <p>CEP Renggam Estate:</p> <ul style="list-style-type: none"> - Pressure oil switch was replaced with a new part and leaking issues was solved. Daily inspection for TF001 was updated in (Penjagaan Traktor: Penyelenggaraan Harian & Mingguan). - Estate have registered the Welding Rod and Welding Gas in Chemical Register 		

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	under Workshop Operation.
Root Cause Analysis:	<p>Kulai Estate: For the current practice, all the manuring workers travel to the field using motorcycle. On the said date, 2 extra workers were added to the team but they missed out the passenger trailer trip. Due to lack of monitoring since during that time the mandore in-charge has travelled to the field site, the said workers has decided to board at the back of trailer carrying fertilizer to the field.</p> <p>CEP Renggam Estate: Based on Estate investigation, tractor TF001 pressure oil switch was damage due to high pressure and temperature. This tractor was rarely used and has been used as backup tractor on that day. Thus, the inspection record was not updated in the Daily Inspection Record. Estate have missed the registration of welding rod and Welding gas because those chemical just added in the latest CHRA. The person in charge to update chemical register (store clerk) was not yet briefed on the new chemical added in the CHRA.</p>
Corrective Actions:	<p>Kulai Estate</p> <ul style="list-style-type: none"> - Briefing will be given to all the drivers not to allow any workers to travel in trailer load with fertilizer or premix chemical mounted to their tractor except in passenger trailer. - Monitoring will be done by Staff/mandore in charge of manuring by conducting head counting after morning muster to ensure no workers left or missed out the passenger trailer trip. <p>CEP Renggam Estate</p> <ul style="list-style-type: none"> - Estate management will conduct training to all tractors drivers and foreman regarding on the tractor maintenance and inspection. Daily inspection logbook will be updated by respective driver and checked by foreman on weekly basis. - Assistant manager will brief person in charge for updating chemical register (store clerk) on new chemical added in the CHRA.
Assessment Conclusion:	<p>ASA2_1 verification: Interview with estate sprayers and manurers indicated that they travel to the field via separate vehicles on not on the same vehicle transporting chemicals or fertilizers. Regular trainings are provided to the workers on the general safe operating procedures that are to be adhered to during the operations.</p> <ol style="list-style-type: none"> a. Daily tractor inspection checklist was available in the estates where the tractor drivers are accountable to check the condition of the tractor prior to starting work for the day. The checklists were available for verification. Interview with the sampled tractor drivers indicated that they are aware of the checklist and the requirements to ensure that the tractors are in safe working condition before commencing to work for each day. b. Chemical Register were available for each estate and the mill. Chemical Register was updated on a yearly basis and as and when there are new chemicals added to the estate stock. Verified the chemical register to include all chemicals that were sighted in the chemical store, workshop and lubricant store.

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	The adequacy required to monitor the health and safety plans in the estates were deemed to be acceptable and therefore the major non-conformity remains closed.
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Non-conformity			
NCR Ref #	1997037-202012-M2	Date Issued	11/12/2020
Due Date	11/12/2020	Date of nonconformity Closure	10/03/2021
Clause & Category (Critical / Minor)	6.7.3 (critical)		
Statement of Nonconformity:	<ol style="list-style-type: none"> Evidence of PPE provision was insufficient. PPE was not use appropriately by workers to cover potentially hazardous operations. 		
Requirement Reference:	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		
Objective Evidence:	<p>Evidence of PPE provision was insufficient.</p> <p>CEP Rengam Estate:</p> <ol style="list-style-type: none"> During visit to the field for manuring and spraying operations, it was sighted that the workers worn different type of rubber boots. Interview with the Manuring Gang and Spraying Gang workers revealed that they were provided with Wellington Boots every 4 to 6 months for free. However, the workers complained that the boots provided won't last long and worn out less than 4 months and they need to purchase on their own. Cross reference of PPE issuance records and clarification made with the store clerk confirmed that boots are provided to workers every 4 to 6 months on case to case basis. However there's no evidence of issuance for sample worker with Employee ID # 139754 while the PPE issuance records shown the boots was last issued on 16.10.2019 for sample worker with Employee ID # 17333. PPE was not use appropriately by workers to cover potentially hazardous operations. <p>Kulai Estate:</p> <p>During the visit to the Spraying Gang, it was noted that the worker's understanding was to only wear safety goggles during P&D Spraying and were not required to wear safety goggles during herbicide spraying operations. Further clarification identified that for the day, only 1 out of 6 workers brought the safety goggles for the herbicide operations.</p> <p>Seri Pulai Estate:</p> <p>During the visit along Field 2000, it was sighted that 2 workers riding the Mechanical Buffalo (Badang) were not wearing appropriate PPE (Safety Helmet).</p>		
Corrections:	CEP Renggam Estate: Estate has issued new PPE (wellington boot) to both workers:		

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	<ul style="list-style-type: none"> - Employee ID # 139754 (Rampada Ghosh) - Employee ID # 17333 (Batu Malai A/L V.Rajoo) <p>Kulai Estate: All the sprayer has been instructed to wear goggle immediately before continue the spraying work and Assistant Manager has briefed to the workers on PPE usage including goggle to be wear during all spraying activity on 7/12/2020.</p> <p>Seri Pulai Estate: The MB drivers has been immediately wear the PPE (safety helmet) before continue their work on the same day of audit visit after instructed by staff in-charge.</p>
Root Cause Analysis:	<p>CEP Renggam Estate: From Estate investigation, estate management have agreed to provide the replacement of wellington boot for every 4 months if the boot are damage since 2019. However, the information was not briefed to the workers properly on the PPE replacement. The complaint on PPE (wellington boot) was not channelled accordingly to the estate management.</p> <p>Kulai Estate: During the spraying training, trainer did emphasize on the importance of PPE usage especially goggle during herbicide spraying operation. He mentioned that among all the spraying works, P&D is the most crucial activity that needed protection for workers' eye as the spraying work is done from higher point so workers were always reminded to ensure they do not forget to bring and use safety goggle during this activity. However, misunderstanding occurs as some workers take it as safety goggle only need to be used during P&D spraying activity only.</p> <p>Seri Pulai Estate: The 2 MB drivers was sometime refuse to wear PPE (safety helmet) due to inadequate awareness on importance of PPE usage.</p>
Corrective Actions:	<p>CEP Renggam Estate: Estate has conducted briefing to the workers regarding the procedure to replace the PPE (wellington boot) on 14/12/2020. Estate will conduct briefing on complaint and grievance procedure to the workers to ensure any complaints will be recorded accordingly for further action by estate management.</p> <p>Kulai Estate: Refresher training regarding PPE usage and its importance will be conducted periodically and included in the estate's training plan to ensure sprayer awareness and understanding on PPE usage is in place.</p> <p>Seri Pulai Estate: Refresher training for all MB drivers on importance of PPE wearing to be conducted periodically and included in the estate's training plan to ensure the awareness and understanding on PPE usage is in place.</p>

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Assessment Conclusion:	<p>ASA2_1 verification:</p> <p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang, Harvesting Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required appropriate PPEs were worn by the personals. Therefore, the major non-conformity remains closed.</p>
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Non-conformity			
NCR Ref #	1997037-202012-N1	Date Issued	11/12/2020
Due Date	17/12/2020	Date of nonconformity Closure	17/12/2021
Clause & Category (Critical / Minor)	7.3.2 (minor)		
Statement of Nonconformity:	Disposal of wastes (Domestic waste & Schedule waste) according to the Waste Management Plan 2020 was not fully demonstrated.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	<p>Layang Estate:</p> <p>According to the Waste Management Plan 2020, the disposal of wastes is through the following method;</p> <ul style="list-style-type: none"> - Domestic wastes to be disposed at the landfill area and through recycle collector - Schedule wastes is through a licensed contractor. <p>However, it was discovered during the site visit to Block P2008 (2), a pile of mixed type of wastes consisted of Domestic waste & Scheduled waste such as plastic bottles, paper boxes, contaminated empty lubricant containers, safety helmet (yellow) and used wellington boots were found at the stacking area.</p>		
Corrections:	<p>Layang Estate:</p> <p>All rubbish (domestic waste mixed with other waste) at field OP 2008, block 2 has been removed to the landfill. The waste has been segregated accordingly with their category before dumped into landfill. The scheduled waste was collected and transferred to scheduled waste store for proper disposal.</p>		
Root Cause Analysis:	<p>Layang Estate:</p> <p>One of the tractor driver was not dumping the waste accordingly at designated landfill since he making shortcut way. He was not yet briefed on the waste management and effect of his action to the environment.</p>		
Corrective Actions:	<p>Layang Estate</p> <p>Estate will conduct training on waste management to all workers including the tractor's driver. The training will be scheduled and included in the estate's training plan. Monitoring on rubbish disposal will be conducted by staff/mandore in-charge on weekly basis.</p>		
Assessment Conclusion:	ASA2_1 verification:		

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	The latest waste management training was carried out on 7/12/21 at Layang Estate. Training module and attendance for the programme was made available for verification. Based on site at the visited OUs, it was found that no evidence of illegal waste dumping within the estates. Domestic waste disposed at landfill or approved government landfill and collected by municipal council's appointed contractor. Scheduled waste was disposed accordingly to the DOE's licensed contractor. No recurrence of issues noted, thus the minor NC was closed on 17/12/21. Continuous implementation will be further verified in the next assessment.
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Opportunity for Improvement	
OFI#	Description
OFI 1	Nil
OFI 2	

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1997037-202012-M1	Critical	3.6.2	11/12/2020	Closed on 10/03/2021
1997037-202012-M2	Critical	6.7.3	11/12/2020	Closed on 10/03/2021
1997037-202012-N1	Minor	7.3.2	11/12/2020	Closed on 17/12/2021
2144368-202112-M1	Critical	3.4.3	17/12/2021	Closed on 10/03/2022
2144368-202112-M2	Critical	3.6.1	17/12/2021	Closed on 10/03/2022
2144368-202112-N1	Minor	3.3.2	17/12/2021	"Open". To be closed in the next surveillance audit
2144368-202112-N2	Minor	6.2.5	17/12/2021	"Open". To be closed in the next surveillance audit
2144368-202112-N3	Minor	7.3.1	17/12/2021	"Open". To be closed in the next surveillance audit

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 Hadapan Palm Oil Mill and Supply Base (SOU 24 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

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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)
Communities	Sundry shop (Kedai JK Runcit) Villagers - Kampung Paya Layang - Kampung Sri Sempurna	Face to face interview
Contractor/supplier	Contractor/supplier/vendor - Evergreen - Ah Bee Kluang Auto Sdn Bhd - PSMF - Edaran Badang Sdn Bhd - PSJ	Face to face interview
Union	NUPW Representatives	Face to face interview
Internal	Gender Committee Representatives & female workers	Face to face interview
Internal	Foreign workers by nationalities	Face to face interview

Stakeholders comment	
1	<p>Feedbacks: Village representative – Good cooperation given by Sime Darby Plantation management team from mill and estates. Contributions not only monetary but also manpower was given if there is any such assistance required. So far no land encroachment from Sime Darby Estate and Mill receive outside crop from the neighbouring smallholders/dealers. Job opportunity were given to the locals however, only a few people interested with the estate job.</p> <p>Audit Team verification and response: The management continue to maintain good relationship with neighbouring villagers and contribute whenever necessary</p>
2	<p>Feedbacks: Vendor/supplier/contractor – All jobs/contracts offered were official via purchase order or contract and local work order. Payment was done in promptly manner as per agreed term and conditions. They have signed agreement and Vendor Integrity Pledge @ VIP as part of self-declaration on due diligence process.</p> <p>Audit Team verification and response: The management will continue to ensure payment make promptly and maintain good relationship with the suppliers/vendors/contractors.</p>
3	<p>Feedbacks: NUPW Representatives – They informed that no pending issue during the time of audit. They will discuss with the management if there is any issue reported. Workers are paying in accordance with Minimum Wage Order 2020.</p> <p>Audit Team verification and response: The management will continue to ensure the workers are paying accordingly. No other issue.</p>

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4	<p>Feedbacks: Gender Committee Representatives & female workers – They informed that no sexual harassment and violence case reported since last audit. The female workers understand the function of Gender committee and aware of the complaint mechanism if there is any issues. They were treated equally without any discrimination by the management.</p> <p>Audit Team verification and response: The management will respect the rights of female employees and monitor if there is any case of sexual harassment and violence happen. No further issue.</p>
5	<p>Feedbacks: Foreign workers – They did not pay any recruitment fee for getting a job in Sime Darby. They have been briefed on the terms and conditions and working environment in the plantations while they were in home country. No contract substitution occurred. Their wages are paid according to Minimum Wage Order 2020 and overtime was offered to them on voluntary basis.</p> <p>Audit Team verification and response: The management will continue to ensure employment law is being complied with.</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
China Engineers (Malaysia) Sdn. Bhd. (Sime Darby Plantation Berhad)	From 2008 until current	11,371.82	n/a	n/a	n/a
The Pataling Rubber Estates Limited (Golden Hope Plantation)	Until 2008	11,371.82	Yes	No	Yes, ownership changed due to company merging as Sime Darby

Previous land owner / user comment	
	Feedbacks: N/A
	Audit Team verification and response: N/A


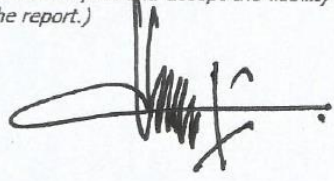
3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Hadapan Palm Oil Mill and Supply Base (SOU 24) has complied with the Malaysia National Interpretation 2019 of the RSPO P&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 Hadapan Palm Oil Mill and Supply Base (SOU 24) is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Bin Zainal Abidin	Name: Azhari bin M'Kalam
Company Name: BSI Services (M) Sdn Bhd	Company Name: Sime Darby Plantation Berhad
Title: Lead Auditor	Title: Manager (Chairman SOU 24 Hadapan)
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 24 th April 2022	Date: 27/4/2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Documents required for all unit of certification available in SOU 24 Certification Unit:</p> <ul style="list-style-type: none"> • Land titles/user rights • Occupational health and safety plans • Plans and impact assessments relating to environmental and social impacts • HCV documentation • Pollution prevention and reduction plans • Details of complaints and grievances • Continuous improvement plans • Public summary of certification assessment report • Group Sustainability Policy • Record of contributions to community development 	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Information available in appropriate languages and accessible to relevant stakeholders through sample meeting latest conducted for whole SOU 24 external stakeholder on 05/12/2019 at CEP Rengam Estate Innovation Hall. For Layang Estate and CEP Rengam Estate Stakeholder Meeting conducted on 3/12/2020 at Ulu Remis Jr. Club. In addition to that, the stakeholders at Layang Estate were also provided with the company’s policy and feedback forms through email or by hand on 06/12/2021.</p>	Complied

<p>1.1.3</p>	<p>(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p>Request by stakeholders conducted through stakeholders meeting, visitor books, letter and forms. The operating units maintain records of all request and response. During the Movement Control Order (MCO) period, face to face session was unable to be carry out as to minimize social gathering activities. Engagement process via email/letter to stakeholders were done together with feedback form if there is any issue to be reported or highlighted to the management. For example, at Seri Pulai Estate, the engagement process was done 11/11/2021. Sighted the records of request from the stakeholders as follows:</p> <p><u>Layang Estate</u></p> <p>Stakeholder’s engagement process carried out via email as to minimize face to face session with stakeholders on 6/12/21. Summary of feedbacks received as per the following:</p> <ul style="list-style-type: none"> a. Fire Department, Rengam – To form a community firefighting team and registered with Fire Department. b. SJK (T) Ladang Layang – Written request received from SJK(T) Ladang Layang on 30/5/2021 to request for trimming of trees and cleaning the area outside SJK(T) Layang Layang. Action: Application approved on 2/6/2021 <p><u>CEP Rengam</u></p> <ul style="list-style-type: none"> a. Request to open gate for Temple special prayer on 12/9/21. Action: Management has approved the application on 9/12/21. 	<p>Complied</p>
<p>1.1.4</p>	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -</p>	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). 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. This has been</p>	<p>Complied</p>

		communicated to workers during muster briefing and for external stakeholders via bulletin. Latest bulletin communication was done on 6 th December 2021. Any responses and comments to be replied by 11 th December 2021 and recorded as stakeholder's input for improvement. New mechanism for housing complaint report via QR code has been introduced in Q4 2021. Latest briefing was carried out on 1/12/21 at Layang Estate.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Current stakeholders registered as List of Stakeholders Information Within Certification Unit which consists of stakeholders among Local Community Heads, Neighbours, Local Authorities, Vendors (Contractors & Suppliers) and Outside Crop Producers (OCP) per sample sighted as following: - Layang Estate, updated on 03/09/2021 - Hadapan POM, updated on 11/11/2021 - CEP Rengam Estate, updated in Jan 2021 - Kulai Estate, updated in Aug 2021 - Simpang Pulai Estate, updated in Jan 2021 The lists have the information about name of organization, address, contact person, contact number and type of business.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	Sime Darby Plantation Berhad has implemented Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The policy was developed in Bahasa Malaysia and English. The latest Group Sustainability & Quality Policy Statement also includes the clause 'promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC) signed by Group Managing Director on	Complied

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		02/12/2019. The policy has been briefed to the workers during morning briefing. Besides, policies were briefed to stakeholders during the stakeholder meeting. COBC training was done on 19/2/21 at Kulai Estate and 22/11/21 at Seri Pulai Estate.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	Sime Darby Plantation has established the Vendor Integrity Pledge and Vendor COBC as a due diligence for external parties engaged by Operating Units. Sighted sampled as below: i. Guna Sons Earthwork Construction (JM 0875057V) signed on 6/8/2021 ii. Rajandran Setia Sdn Bhd (628700K) signed on 6/9/2021 iii. APEX Uniparts Sdn Bhd (267363-P) signed on 24/2/2021 iv. VR Plantation (M) Sdn Bhd (654972-W) signed 1/1/2021 v. Pengangkutan Sutra Jaya signed on 11/1/2021 vi. Berwang Enterprise (JM0640273-A) signed on 11/1/21 vii. Tan You Chai (JM0078629) signed on 11/1/21	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	The SOU 24 Certification Unit continues its commitment in complying with the applicable requirements. Among permits and licences verified at the certification unit are: <u>Hadapan POM</u> 1. MPOB License; License Number: 510425004000; Processing Capacity: 270,000 mt FFB a year; License Validity Period: 01/03/2021 – 28/02/2022. 2. River Water Extraction and Diversion License; License Number: 08/A/KJ/043; File Number: BAKAJ/334/300/05/02/08/03; License Expiry Date: 31/12/2021.	Complied

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		<p>3. DOE License Occupying Premises); License Number: 003865; License Validity Period; 01/07/2021 – 30/06/2022.</p> <p>4. DOE (Seksyen 21 - Contradiction License); License Number: 005392; License Validity Period: 01/07/2021 – 31/12/2021.</p> <p><u>Layang Estate</u></p> <p>1. MPOB License; License Number: 50844340200; Estate Area: 2954.57 Ha; License Validity Period: 01/04/2021 – 31/03/2022.</p> <p>2. Permit Barang Kawalan Berjadual; Serial Number: P (J 002082) Reference Number: BPGK JH (KLU) 2147 SK; Description: Diesel; Storage Capacity: 32760 Litres; License Validity Period; 06/04/2021 – 05/04/2023.</p> <p>3. Permit Barang Kawalan Berjadual; Serial Number: PKGK JH (KLU)215/18/SK2; Description: Petrol; Storage Capacity: 150 Litres; License Validity Period: 29/06/2021 – 28/06/2022.</p> <p><u>CEP Rengam Estate</u></p> <p>1. MPOB License (FFB); License Number: 508444202000; License Estate Area: 3093.38 Ha; Validity Period: 01/04/2021 – 31/03/2022.</p> <p>2. Air Compressor License (Air Receiver); Registration Number: PMT149077; License Expiry Date: 28/02/2022.</p> <p>3. Permit Barang Kawalan Berjadual; Reference Number: BPGK JH (KLU) 0454 SK; Serial Number: P.J/KLU000001; License Validity Period: 28/11/2020 – 27/11/2021. License renewal has been approved on 22/11/2021 and estate is awaiting the printed copy.</p>	
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		<p><u>Kulai Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 508509102000; License Validity Period: 01/04/2021 – 31/03/2022. 2. Permit Barang Kawalan Berjadual; Reference Number: KPDNKK.J-JB/26/5A/11/107 (P/D) (P4); Serial Number: P(J003789); Description: Diesel; Storage Quantity: 8,000 Litres; License Validity Period: 26/07/2021 – 25/07/2024. 3. Air Receiver License; Registration Number: JH PMT 5089; License Expiry Date: 09/08/2022. 4. Air Compressor Receiver License; Registration Number: JH PMT 3252; License Expiry Date: 09/08/2022 <p><u>Sri Pulai Estate</u></p> <ol style="list-style-type: none"> 1. MPOB License; License Number: 520195002000; License Validity Period: 01/05/2021 – 30/04/2022. 2. Permit Barang Kawalan Berjadual; Serial Number: P (J 004297); Reference Number: KPDNHEP.J-JB/26/5A/11/1424 (P/D) (P1); Description: Diesel; Storage Quantity: 18,000 Litres; License Validity Period: 09/11/2021 – 08/11/2024. 3. Energy Commission (Private Installation License); Serial Number: 004053/2021; Installation Number: ST(SJB)P/S/JHR/00893; License Expiry Date: 26/04/2022. 4. River Water Diversion and Extraction License; License Number: 07/A/KJ/054; File Number: BAKAJ/334/300/05/02/07/06; License Expiry Date: 31/12/2021. 5. SPAN License; Class License Number: SPAN/JKSP/PT/800-4(2)/7/17; License Validity Period: 04/06/2020 – 03/06/2021 	
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		CEP Rengam Estate has its own sewage treatment plant at the staff quarters to cater more than 130 housing units. The need of whether or not to notify the Department of Environment (DOE) in accordance to EQ (Sewage) Regulations 2009, Reg. 4 (1) and 4 (2), can be further improved by getting clarification directly from the DOE themselves (OFI).	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. - Minor compliance -	As per records of Sime Darby Plantation Berhad Estate/Mill – Upstream Malaysia Legal & Other Requirements Register (LORR) by Group Sustainability & Quality Management; Updated 13/09/2021 (Layang Estate); 30/06/2021 (Hadapan POM); 01/09/2021 (CEP Rengam Estate). Sighted latest inclusion as follows: <ul style="list-style-type: none"> - Workers Minimum Standards of Housing and Amenities (Amendment) Act 2019. - Code of Practise for Safe Working in a Confined Space, 2010 - Pesticides (Amendment of First Schedule) Order 2019. - Perintah Kawalan Pergerakan 2020. - Whistleblower Protection Act 2010 - Malaysian Anti-Corruption Commission Act (amended) 2018 	Complied
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 boundary, methods used are security trenching, PVC pegs (coloured with red and white) roads and fences. The demarcations were visibly maintained as below. <ol style="list-style-type: none"> 1. Hadapan POM is located within the Layang Estate’s Hadapan Division’s premises. The boundary of the mill compound is fenced. 2. Kulai Estates boundary with PLUS Highway Reserve land were clearly demarcated with fences. Boundary between Kulai Estate’s Field 15C and Sri Pulai Forest Reserve were demarcated with security trenches and boundary roads. 	Complied

		<p>3. Layang Estate’s Field P02A boundary with Forest Reserve were demarcated with security trenches. The boundary markers were well maintained with red and white poles at coordinate Lat: 001° 44’29” N, Lon: 103° 27’07” E and Lat: 001° 45’39” N, Lon: 103° 25’60” E.</p> <p>4. CEP Rengam Estate’s Field 2010 A boundary with Smallholders were demarcated with security fences. The boundary stones were well maintained at coordinate Lat: 001° 54’40” N, Lon: 103° 22’53” E.</p>	
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>A list of contracted parties maintained by all operating units within SOU 24 in their respective List of Stakeholders Information FY 2021 which consists of stakeholders among Local Community Heads, Neighbours, Local Authorities, Vendors (Contractors & Suppliers) and Outside Crop Purchase (OCP) Suppliers (Mill only).</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>Contracts contain specific clauses on meeting applicable legal requirements available for OCP suppliers as per sample FFB purchase agreements as following:</p> <p>a. VR Plantation Sdn Bhd; Agreement No: P/P/1220/FFB02607L; Date: 16/07/2021</p> <p>b. BP Reality & Plantation Sdn Bhd; Agreement No: P/P/0321/FFB03011L; Date: 13/07/2021</p> <p>c. Pertubuhan Peladang Kawasan Rengit; Agreement No; P/P/1220/FFB02606L; Date:13/08/2021.</p> <p>Other contracts contain specific clauses on meeting applicable legal requirements available in the Vendor Integrity Pledge records for sampled contractors i.e.</p> <p>a. Hadapan POM</p>	Complied

		<ul style="list-style-type: none"> - Apex Uniparts Sdn Bhd (267363-P); Date: 24/02/2021 <p>b. Layang Estate</p> <ul style="list-style-type: none"> - Guna Sons Earthwork Construction (JM0875057V); Date: 06/08/2021 - Rajandran Setia Sdn Bhd (628700 K); Date: 06/09/2021 <p>c. CEP Rengam Estate</p> <ul style="list-style-type: none"> - Evergreen Agricultural Enterprise (JM0339328-H) - AVN Brothers (JM 0359066-K) <p>4. Kulai Estate</p> <ul style="list-style-type: none"> - Pengangkutan Sutra Jaya (Transportation of FFB) – date 01/01/2021 – 30/12/2021 - Banli Construction & Enterprise (JM 0529660-A) <p>5. Sri Pulai Estate</p> <ul style="list-style-type: none"> - Berwang Enterprise (JM0640273-A) - Chin Hann Woei Trading 	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>The contract documents and Vendor Integrity Pledge (VIP) records sighted in the indicator 2.2.2 above also contain clauses disallowing child, forced and trafficked labour. No young workers are employed by contractors and vendors.</p>	Complied
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license 	<p>The mill is maintaining a file which consist of documents of the third party FFB suppliers such as contract agreement, MPOB license, location maps with GPS coordinates information and evidence of ownership, to name a few.</p>	Complied

	- Critical (Major) compliance -																																
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 -	There were several indirectly sourced FFB and the mill is still in the process of collecting the information described in 2.3.1.	Complied																														
Principle 3: Optimise productivity, efficiency, positive impacts and resilience																																	
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.																																	
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	Annual business plan in the form of annual budget and the projection for 5 years (2020 – 2024) prepared as guidance for future planning. The business plan contains FFB yield, CPO, FFB mill intake (Group and OCP crop), OER and KER, Processing Cost, Checkroll and contract labour, Maintenance (EXT-Contract Hiring and SI-Internal i.e Spare parts), Consumables - Fuel and lubricants, general store and chemicals, EVIT (Vehicles running, TNB and Power supply), Fix Cost, Admin and Labour Cost, Mill Cost (Processing + Fix Cost) OPEX, CAPEX etc.	Complied																														
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	A 5-year replanting program was available at all the estates visited. The data collected is as below: <table border="1" data-bbox="1137 1034 1912 1359"> <thead> <tr> <th>Year</th> <th>Kulai Estate</th> <th>CEP Rengam Estate</th> <th>Layang Estate</th> <th>Seri Pulai Estate</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>Nil</td> <td>180.22</td> <td>116.86</td> <td>69.65</td> </tr> <tr> <td>2023</td> <td>73.18</td> <td>177.92</td> <td>61.58</td> <td>73.37</td> </tr> <tr> <td>2024</td> <td>127.07</td> <td>286.70</td> <td>0.00</td> <td>165.59</td> </tr> <tr> <td>2025</td> <td>Nil</td> <td>155.41</td> <td>136.70</td> <td>157.19</td> </tr> <tr> <td>2026</td> <td>Nil</td> <td>235.24</td> <td>194.42</td> <td>Nil</td> </tr> </tbody> </table>	Year	Kulai Estate	CEP Rengam Estate	Layang Estate	Seri Pulai Estate	2022	Nil	180.22	116.86	69.65	2023	73.18	177.92	61.58	73.37	2024	127.07	286.70	0.00	165.59	2025	Nil	155.41	136.70	157.19	2026	Nil	235.24	194.42	Nil	Complied
Year	Kulai Estate	CEP Rengam Estate	Layang Estate	Seri Pulai Estate																													
2022	Nil	180.22	116.86	69.65																													
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2026	Nil	235.24	194.42	Nil																													

3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>The Management Review 2021 was conducted as below:</p> <ol style="list-style-type: none"> 1. Hadapan POM: 15/09/2021 2. Kulai Estate: 21/10/2021 3. Sri Pulai Estate: 23/10/2021 4. Layang Estate: 11/10/2021 5. CEP Rengam Estate: 29/09/2021 <p>Among the issue discussed are internal audit findings, operations, changes that could affect the management systems, recommendation for improvement and other matters.</p>	Complied
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The estate and mill have established the main social and environment improvement plans as stated in the Social Impact Assessment Plan and Environmental Management Plan. The Action plan have been developed based on the areas and issues of concern that have been raised. Social Improvement Plan developed as per the following:</p> <ol style="list-style-type: none"> 1. Housing condition/living improvement. 2. Workers safety and health during pandemic COVID19 3. Accommodation upgrades (bedstead/mattress/fan/wardrobe) 	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>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p>	<p>RSPO metric template version 2.1 is used for the reporting of Hadapan POM certification unit's metrics (economic, social and environment). Data reporting period is January to December 2020 for (social and environment metrics) and economic metrics from November 2020 – October 2021 (counting back from audit month). Based on verification with input data, no discrepancies of data</p>	Complied

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	<p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>reported in the metrics for the period under review for all the operating units.</p>	
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
<p>3.3.1</p>	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>SOP available in place for the Palm Oil Mill and Estates. For Palm Oil Mill holds two SOPs: Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1st November 2008) includes Palm Oil Mill SOP and Palm Oil Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the Palm Oil Mill.</p> <p>For Estate daily operations, the estate is referring to Standard Operating Procedure (Issue No. 1, date 1st November 2018) and Sime Darby Agricultural Reference Manual (Issue: 2011/1). The SOP includes:</p> <ul style="list-style-type: none"> • Planting Material • Nursery Techniques • Replanting • Land Preparation • Planting Density • Maturity Age • Field Upkeep • Manuring • Canopy Management • Water Management in coastal/ peat plantings <p>Others SOP as follows.</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> • Quality Management Manual (QMM) effective April 2008 • Standard Operating Manual (SOM) effective April 2008 • SOP Estate Quality Management System effective April 2008 • PSQM (Environment, Safety and Health) effective February 2008 <p>The Chemical Safety Management Procedure; Doc Number: UM/HSE/OCP/04, can be further improved to include the Occupational Safety and Health (Use and Standards of Exposure of Chemicals Hazardous to Health) Regulations 2000, requirements VI which mentions about labelling and re-labelling.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>The mechanism for checking the implementation procedure as following:</p> <ol style="list-style-type: none"> 1. Sustainable internal audit <ul style="list-style-type: none"> - Hadapan POM: 10/09/2021 - Layang Estate: 08/09/2021 - CEP Rengam Estate: 28/09/2021 - Kulai Estate: 09/09/2021 - Sri Pulai Estate: 07/09/2021 2. Plantation Advisor visit. 3. Plantation Management unit <p>Follow up the action from management review all PIC has been designated to close the NC. The internal audit is planned to be conducted once a year. This was sighted from the internal audit program by the sustainability personnel. Internal audit is planned and conducted regularly to determine the strong and weak points and potential areas for further improvement.</p>	<p>Non-compliance</p>

		<p>The internal audit procedures and audit results are documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action as stated in the closure column.</p> <p>Nevertheless, the implementation of certain procedures was not consistently monitored as below.</p> <p><u>Hadapan POM</u></p> <p>The storage of Gearbox Oil was not in accordance with the <i>Mill Quality Management System under the Occupational Safety Health Manual, Chapter 9 (Chemical Safety Management) states under No. 6.0 Procedures for Handling, iii. Ensure that containers are properly labelled, not damaged and no spillage during handling.</i> During the site visit to the Mill Workshop, it was noticed that the gearbox oil was stored in containers that were not labelled accordingly.</p> <p><u>Seri Pulai Estate</u></p> <p>It was noticed that Diesel was issued and temporarily stored in 20-liter containers and placed outside the workshop. The containers were not relabeled and/or did not have pictorial symbols such as "highly flammable substance/materials" attached to it. Thus, a minor NC was issued.</p>	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	As mentioned, all estates' management has conducted a management review meeting in the estate to discuss the issues that have been raised during the internal audit for RSPO and agronomist visit. Actions taken from RSPO internal audit have been taken and recorded in the report. Action that needs to be taken	Complied

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		<p>has been recorded and the status of the issue also has been maintained.</p> <p>The Palm Oil Mill management is monitoring all the records about the operations which can be found through the Workplace Inspection Checklist, OSH Department Safety Audit Report as well as Internal Audit conducted by the sustainability department.</p> <p>Monitoring record sighted in the Palm Oil Mill such as:</p> <ol style="list-style-type: none"> 1. FFB receiving 2. CPO Outgoing 3. Electricity consumption 4. Water Consumption 5. CPO (DOBI, FFA, Impurity, Dirt), PK quality (Moisture, Dirt) 6. JKPP visit logbook 	
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting at SOU24.</p> <p>The Social Impact Assessment (SIA) Report for SOU 24 on 3rd – 7th February 2014 by Social & Environmental Projects Unit, PSQM Department. The report includes both positive and negative impact and its recommendation. Nonetheless, the assessment of environmental impact of its existing activities is documented in the following documents:</p> <ul style="list-style-type: none"> • Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register 	<p>Complied</p>

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		<ul style="list-style-type: none"> • Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI • Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE 							
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>There is no new planting in SOU 24 (Hadapan POM Certification Unit). Methodology of assessment is based on interview at workstation for harvesters, sprayers, union representatives, gender committee, contractor, supplier, local community, neighbouring estate, government & School. The secondary data collection – document review/file checking also been made. Main aspects/concerns identified by the assessor:</p> <ul style="list-style-type: none"> - Housing condition/living improvement - Working condition <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, FFB ramp, steriliser, boiler, laboratory, effluent treatment plant, etc.</p> <p>After the EAI is completed, the Environmental Impact Evaluation is conducted to evaluate the impact severity using a format (Environmental Impact Evaluation Form). There are 3 classifications of impact established to justify the action plan (mitigations) required i.e.:</p> <table border="1" data-bbox="1153 1300 1915 1396"> <tr> <td colspan="2">Guidance of Action required</td> </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> </table>	Guidance of Action required		100 ~ 199	No action required	200 ~ 249	To initiate corrective and preventive actions	Complied
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		<table border="1"> <tr> <td data-bbox="1144 362 1346 432">250 and above</td> <td data-bbox="1346 362 1910 432">To develop environmental objective and programme</td> </tr> </table>	250 and above	To develop environmental objective and programme	
250 and above	To develop environmental objective and programme				
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Mitigation measures were documented in Pollution Preventive Plan (PPP).</p> <p>There is no new planting in SOU 24 (Hadapan POM Certification Unit). Sighted the Social Action Plan for 2021 based on the SIA and issues raised through the gender committee, internal and external communication as the input for the SIA development.</p> <p>Management plan developed FY2021 for visit OUs as the following:</p> <ul style="list-style-type: none"> i) Housing condition/living improvement ii) Workers safety and health during pandemic COVID 19 iii) Stakeholder meeting inputs: Balai Polis Layang-Layang – to report any suspicious activity, motorcyclist helmet compliance, SOP COVID 19 compliance. iv) NUPW meeting – delay on repairing of worker’s housing v) Deduction from salary for mosque fund and school bus. vi) Drainage system issue (boundary with Kampung Melayu Raya) <p>Hadapan POM</p> <p>External stakeholder (Sundry shop) - Concern raised by the sundry shop owner with regards to uncollected debt for those workers that repatriated. This issue has not been brought up to the management as the owner was not fully aware on the grievance/complaint process. The management has confirmed that no complaint received so far from the sundry shop owner for further assistance and rectification.</p> <p>Internal stakeholder (Union representatives) - The union</p>	Non-compliance		

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		<p>representatives have raised a few concerns with regards to allowance entitlement and overtime issue for mill workers. For the allowance, they have claimed that previously boiler operator received special allowance called " elaun panas/stim". Status of this allowance entitlement has yet to be clearly discussed with the union representatives. The union leader has explained that he received complaints with regards to overtime deduction. Overtime approval and entitlement was not explained clearly to workers as they have interpreted differently from what has been explained by the management. None of these issues being discussed in the latest union meeting dated 13/12/21.</p> <p>The above issues have not captured in the latest SIA management plan updates in a participatory way. Thus, a major NC was raised.</p>	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>The Human Resource Department in HQ has established Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019 and Workforce Management Unit Liaison & Recruitment procedure (WMU/LR-SOPP/MARCH2016, Rev. 0 dated 30/03/2016) to explain the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Application form, employment interview assessment form, medical check-up report and employment contract was sighted for new recruited employees. The latest recruitment of workers in Layang Estate was on 1st August 2021. A copied of identification card was kept as record. Interviewed with the clerk confirmed that if there is any job vacancy available, they will publish a job vacancy advertisement/flyer at the places nearby the villages.</p>	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			

<p>3.6.1</p>	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>All operations were risk assessed to identify all Health and Safety issues. Mitigation plans, and procedures were available, documented and implemented as below.</p> <p><u>Hadapan POM</u></p> <ul style="list-style-type: none"> - Inadequate implementation of the risk controls was sighted in the mill as below. - The HIRARC for Kernel Recovery Station states that earplugs to be used during overall operations. It was noticed that 2 workers were conducting maintenance cleaning while the machineries were operational without wearing earplugs. - Sighted the Contract Agreement for Guna Sons Earthwork Constructions (Co. No. JM 0584860-T) stated <i>"all contract workers are compulsory to be equipped with the basic personal protection equipment namely safety helmet, safety shoe, safety glasses, ear plug and safety gloves if necessary"</i>. Backhoe driver was noticed to be not wearing necessary PPE such as Safety Shoes and Safety Helmet while conducting general works at the mill compound. - Flashback Arrestor was not fixed for 1-unit oxygen and acetylene tanks that was used in the mill workshop. The hazard and risks associated with oxygen and acetylene tanks such as the decomposition which can generate heat and cause fire and explosions through flashbacks from welding & hot work operations and movement & separation of the gas and the porous mass inside the cylinder and its control measures has not been assessed in the HIRARC. - CHRA Report (HQ/04/ASS/00/193-2018/079) was available for verification. The CHRA assessment was conducted on 28.11.2018 by Dosh Registered Assessor (Reg Number: JH/07/01/3175). 	<p>Non-compliance</p>
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		<ul style="list-style-type: none"> - Medical Surveillance was conducted for a total of 14 workers deemed to be exposed to hazardous chemicals in accordance with the recommendations stated in the CHRA. The medical surveillance conducted at Klinik Renggam indicated that all workers were fit to work with no occupational related conditions. - NRA was conducted by Ethosh Consult and Engineering Plt on 23/09/2020 and 09/10/2020 by NRA Assessor – Iszaiffah Bte Mohd Eshabah (NRA Reg No. HQ/16/PEB/00/146); NRA Report Number: HQ/LPROYKPEB/21/00314) - Audiometric Test was conducted on 27/01/2021 by Spectrum Laboratories (Johore) Sdn. Bhd. (In collaboration with PAC Testing & Consulting Sdn Bhd). A total of 47 workers were tested due to being exposed to excessive noise in the mill. The results indicated that 5 workers had Hearing Impairment, 11 workers with NIHL and 4 workers with STS. The 4 workers with STS were required to undergo retest within 3 months. Audiometric and Medical Check Up was then conducted on 26/04/2021 and resulted temporary STS which was non occupational. <p><u>Hadapan Complex Estates</u></p> <ol style="list-style-type: none"> 1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Ramp, Manuring, Harvesting Spraying, Workshop and Genset Operation. Verification done on the documentations and operations indicated that all the risk controls were adhered to. Nevertheless, inadequate implementation of the risk controls was sighted in the estates as below. 	
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		<ul style="list-style-type: none"> - <u>Seri Pulai Estate</u> The HIRARC for Workshop (Welding – Flammable materials/substance) states: Existing Control – To install Flashback Arrestor for oxy tank. During the visit to the workshop, it was noticed that the Flashback Arrestor was not fixed for the oxygen and acetylene tanks that were being used. 2. Chemical Health Risk Assessment was conducted in the estates in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000. The CHRA Report were available for the estates visited as follows. - <u>Layang Estate</u> CHRA was conducted on 26th June 2020 by Nisafety Consultancy (Dosh Reg Number: HQ/15/ASS/00/363). The CHRA Report (Report Number: HQ/15/ASS/00/363-2020-154) was available for verification. The CHRA action plan was available and done according to the recommendation. - <u>CEP Rengam Estate</u> CHRA was conducted on 26th June 2020 by Nisafety Consultancy (Dosh Reg Number: HQ/15/ASS/00/363). The CHRA Report (Report Number: HQ/15/ASS/00/363-2020-153) was available for verification. The CHRA action plan was available and done according to the recommendation. - <u>Seri Pilai Estate</u> CHRA was conducted on 29th June 2020 by Nisafety Consultancy (Dosh Reg Number: HQ/15/ASS/00/363). The CHRA Report (Report Number: HQ/15/ASS/00/363-2020-156) 	
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		<p>was available for verification. The CHRA action plan was available and done according to the recommendation.</p> <ul style="list-style-type: none"> - <u>Kulai Estate</u> CHRA was conducted on 29th June 2020 by Nisafety Consultancy (Dosh Reg Number: HQ/15/ASS/00/363). The CHRA Report (Report Number: HQ/15/ASS/00/363-2020-155) was available for verification. The CHRA action plan was available and done according to the recommendation. <p>3. Medical Surveillance were conducted in the estates based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.</p> <ul style="list-style-type: none"> - <u>Layang Estate</u> Medical Surveillance was conducted for 14 workers in the estate on 01 – 03/09/2021 at Klinik Renggam. The results indicated that all workers were fit to work with normal results. - <u>CEP Rengam Estate</u> Medical Surveillance was conducted for 31 workers in the estate on 29/09/2021. The results indicated that all workers were fit to work. - <u>Seri Pulai Estate</u> Medical Surveillance was conducted for workers exposed to chemicals and fumes in the estate on 20/10/2021 at Klinik Renggam. The results indicated that all workers were fit to work with no occupational related health issues. - <u>Kulai Estate</u> Medical Surveillance was conducted for 22 workers in the estate on 20/10/2021. The results indicated that all workers 	
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		<p>were fit to work except for 1 worker with possible occupational related health issues. The OHD has recommended for the worker to be given alternative work. Sighted the records available that shown the worker has been removed from work related to chemical handling.</p> <p>4. Noise Risk Assessment (NRA) was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the sampled sites. The recommendation stated by the assessor have been affectively addressed as verified.</p> <ul style="list-style-type: none"> - <u>Layang Estate</u> NRA was conducted by Etosh Consult & Engineering Plt. On 25/08/2020 by NRA Assessor – Nur Izzati Salleh (NRA Reg. No.: HQ/16/PEB/00/158); NRA Report Number: HQ/LPROYKPEB/21/00306. - <u>Kulai Estate</u> NRA was conducted by Etosh Consult & Engineering Plt. On 24/08/2020 by NRA Assessor Nur Izzati Salleh (NRA Reg No.: HQ/16/PEB/00/158); NRA Report Number: HQ/LPROYKPEB/20/00. - <u>Seri Pulai Estate</u> NRA was conducted by Etosh Consult & Engineering Plt. On 20/07/2020 by NRA Assessor - – Nur Izzati Salleh (NRA Reg. No.: HQ/16/PEB/00/158); NRA Report Number: HQ/LPROYKPEB/21/00155. - <u>CEP Rengam Estate</u> NRA was conducted by Etosh Consult & Engineering Plt. On 24/08/2020 by NRA Assessor – Iszaiffah Mohd Eshabah (NRA 	
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		<p>Reg. No.: HQ/16/PEB/00/146); NRA Report Number: HQ/LPROYKPEB/21/00316.</p> <p>5. Audiometric Testing was done in the estates based on the recommendation provided in the Noise Risk Assessment in compliance with OSHA 1994 – OSH (NOISE Exposure) Regulations 2019. Reports for the annual audiometric test was available for verification.</p> <ul style="list-style-type: none"> - <u>Layang Estate</u> Baseline Audiometric Report 2021 (Report Ref. No.: R2021/0909/LADANGLAYANG) available for verification. Date of Monitoring: 15/09/2021 (DOSH Reg. No: JKPP/2021/11-04/00011). The assessment was conducted by Junpec Audiometry and Safety Services Sdn Bhd on 15/09/2021 for 13 employees deemed to be exposed to excessive noise in the state. The results indicated that 8 workers had normal hearing, 3 workers had hearing Loss and 2 workers had hearing impairment. - <u>CEP Rengam Estate</u> Baseline Audiometric was conducted on 09/10/2021 for workers exposed to excessive noise as per recommendation under the NRA. A total of 30 workers had undergone the test. The results indicated that 18 workers had normal hearing, 8 workers with hearing loss and 4 workers with hearing Impairment. The report was available for verification. (Ref Number: R2021/1006/LADANGCEPRENGAM) - <u>Kulai Estate</u> Audiometric Testing was conducted for the estate workers on 03/11/2021 by PAC Testing & Consulting Sdn Bhd. A total of 27 workers were tested where 7 workers were diagnosed with 	
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		<p>hearing Impairment and 13 workers with NIHL which was required to be examined by OHD.</p> <ul style="list-style-type: none"> - <u>Sri Pulai Estate</u> <p>Audiometric test was conducted on 05/04/2021 by Nisafety Consultancy for 17 workers in the estate. The results indicated that 11 workers with normal hearing, 1 worker with hearing loss and 2 workers with hearing impairment. The 3 workers were required to be examined by OHD based on the report. The management have referred the 3 workers to the OHD on 24/05/2021 with the reports available for verification.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>The effectiveness of the Health and Safety Plans are monitored and ensured through checklist, site inspections and trainings that were conducted by Hadapan POM and its supply base estates in each of the operations. Site visits around the mill and estate indicated the control measures as per HIRARC were followed and ensured by the respective management units</p>	Complied
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>A training programme has been developed and available in the Training and Safety Briefing Plan for Year 2021. The trainings were sighted to have included Gender Specific Training and involves staffs and workers.</p> <p>Covid-19 training and briefings were sighted at the mill and estates. Interview with the workers and staff indicated that they were aware on the SOP during the current pandemic such as social distancing, regular sanitization and use of PPE (Face Mask).</p>	Complied

<p>3.7.2</p>	<p>Records of training are maintained. - Minor Compliance -</p>	<p>Records of trainings were maintained by the Mill and all estates as below:</p> <p>Hadapan POM</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Workshop Training</td> <td>07/07/2021</td> </tr> <tr> <td>Effluent Operational Training</td> <td>20/03/2021</td> </tr> <tr> <td>Effluent Treatment Plant Training</td> <td>05/04/2021</td> </tr> <tr> <td>PPE Awareness Training - ETP</td> <td>02/05/2021</td> </tr> <tr> <td>Laboratory - Chemical Spillage Training</td> <td>06/09/2021</td> </tr> </tbody> </table> <p>Layang Estate</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Contractor Vendor Management Meeting</td> <td>06/12/2021</td> </tr> <tr> <td>OSH Committee Briefing & ERP Procedure</td> <td>06/12/2021</td> </tr> <tr> <td>Harvesting Training on SOP & Safety</td> <td>09/08/2021</td> </tr> <tr> <td>Spray Pump Training on SOP</td> <td>19/03/2021</td> </tr> </tbody> </table> <p>CEP Rengam Estate</p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Mechanical Sickle (STIHL) Training</td> <td>09/11/2021</td> </tr> <tr> <td>Helpline Briefing</td> <td>06/09/2021</td> </tr> </tbody> </table>	Training	Date	Workshop Training	07/07/2021	Effluent Operational Training	20/03/2021	Effluent Treatment Plant Training	05/04/2021	PPE Awareness Training - ETP	02/05/2021	Laboratory - Chemical Spillage Training	06/09/2021	Training	Date	Contractor Vendor Management Meeting	06/12/2021	OSH Committee Briefing & ERP Procedure	06/12/2021	Harvesting Training on SOP & Safety	09/08/2021	Spray Pump Training on SOP	19/03/2021	Training	Date	Mechanical Sickle (STIHL) Training	09/11/2021	Helpline Briefing	06/09/2021	<p>Complied</p>
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		HCV & Biodiversity Training	03/06/2021	
		RSPO Training	24/08/2021	
		Harvesting Training	09/07/2021	
		Kulai Estate		
		Training	Date	
		Payslip Attributes Training	04/12/2021	
		Buffer Zone Training	15/12/2021	
		Manuring Training	10/12/2021	
		Rat Baiting Training	10/12/2021	
		Whistleblowing Training	09/12/2021	
		Chemical Spillage Training	09/12/2021	
		Sri Pulai Estate		
		Training	Date	
		Harvesting Training	22/11/2021	
		Inter Pump Maintenance Training	05/11/2021	
		MB Driver Training	22/10/2021	
		IPM Training	12/06/2021	
		HCV & Biodiversity Training	03/06/2021	
		Harvesting Incentive Scheme Briefing	07/04/2021	

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>Training for SCCS is sighted dated 2nd December 2021 that been include 12 personnel for the implementation of SCCS in Hadapan Palm Oil Mill.</p> <p>The job description has been sighted in the appointment letter. A presentation slide has been provided for evidence. Presentation by Group Sustainability Quality Management. Interview conducted with weighbridge clerk confirmed that they understand the requirement.</p>	Complied
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	NA as the mill is using Mass Balance supply chain model.	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	The mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module.	Complied

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3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. The actual tonnage produced from last audit date (Dec 2020 – Nov 2021) is reported in the summary in Table 10 of this report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The registration of PalmTrace will be carried out by the Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Company has registered their mill in the PalmTrace with the following details: Members ID – Hadapan Oil Mill: RSPO_PO1000000301 Licence valid until 28/03/2022 Member category: Oil Mill Details of palm trace transaction summarized under table 11A of the report.	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able 	<p>Procedure namely Sime Darby Plantation – Plantation Quality Management System – Sustainable Plantation Management System; Appendix 15; Standard Operating Procedure (SOP) for Sustainability Supply Chain and Traceability; Version 2; Issue no.: 5; Issue date: April 2019.</p> <p>The procedure was established which covers responsibility, reporting of certified CPO/PK, non-conformance material, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint Communication and Claim and etc.</p>	Complied

	<p>to demonstrate awareness of the mill’s procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>The Mill Manager as Head of Operating Unit has the overall responsibility for the implementation of SOP, and he may assign roles to relevant personnel or invite personnel from various departments necessary to assist in the SOP implementation. Sighted the identified and assigned suitable employees to implement and maintain the traceability system by management is En. Ariff Bin Musa (Assistant Manager) – PIC for Environmental and Quality Management Systems dated 1st June 2021.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Internal audit conducted based on the SOP for Sustainable Supply Chain and Traceability of SPMS Appendix 15 (18: Internal Audit); Version 2; Issue # 5; Date: April 2019. The procedure conforms to the requirements in the RSPO SCCS.</p> <p>The latest Internal Audit for RSPO SCCS was done on 10th September 2021 conducted by Sustainability Compliance Unit, Group Sustainability Department. There were 1 Major non-conformance raised by the audit team on SCCS requirements. The mill management produced the root cause analysis, corrections and corrective improvement plans and successfully closed the non-conformance on 23rd September 2021. The non-conformities were discussed in the management review conducted on 15/09/2021.</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>	Complied

		<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 7.7. There has been no issue about non-conforming FFB and/or document during the period under review.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>The mill ensured the required information is available in document form. Based on sampled contract [i.e. S/PSD/2111/CPO0023B], the following information was available:</p> <ul style="list-style-type: none"> • The name and address of the buyer • The name and address of the seller i.e. Sime Darby Plantation Berhad, KKS Hadapan, P.O Box 109, Batu 6, Jln Bkt Permai, Bkt Permai, 81850 Layang-Layang, Johor • The loading or shipment/ delivery date • The date on which the documents were issued • A description of the product, including the applicable supply chain model, i.e. "Crude Palm Oil (CPO) – RSPO MB" • The quantity of the products delivered • Related transport documentation, e.g. Despatch note • Supply chain certificate number of the seller e.g. in weighbridge ticket i.e. RSPO 739013 • A unique identification numbers - available in a few forms e.g. DN no., seal no., etc. (e.g. w/bridge ticket #021784) 	<p>Complied</p>

<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>No FFB and/or oil palm products processing outsource by Hadapan mill except for CPO delivery transportation only. The mill adapted Sime Darby established Standard Operating procedure for outsourced activities as per Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019, Section 13.0: Outsourced Contractors.</p> <p>In the SOP under section 13.1 stated that CPO Mill cannot outsourced processing activities like refining or crushing.</p> <p>The list of outsourced contractors was registered in List of Stakeholder records that CPO transporter as per sighted contract agreement as following:</p> <ul style="list-style-type: none"> - Sing Rubber & Transport Sdn Bhd; Transportation of Crude Palm Oil ("CPO") (Service) for Sime Darby Plantation Berhad's Peninsular Malaysia's Oil Mills – Letter of Award (LOA); Reference Number: T/SDPN/PEN/CPO/0720/003; Dated: 20/07/2020 and 05/08/2020; Contract period valid for 3 years from 01/11/2020 – 31/10/2023. - The Letter of Award is used as the documented control system that states all procedures and processes which is bound by the contractor. <p>Stated under section 5(d)(iii), 'permit the CB appointed by the company to conduct audit on its or its sub-contractors' operations and provide access to all relevant systems, documents and records when requested by the CB.</p>	<p>Complied</p>
<p>3.8.10</p>	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>No FFB and/or oil palm products processing outsource by Hadapan mill except for CPO delivery transportation only. The list of outsourced contractors was registered in List of Stakeholder records that included the CPO transporter.</p>	<p>Complied</p>

<p>3.8.11</p>	<p>The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.</p>	<p>Sime Darby has issued Memorandum to all contractors dated 26/6/2019. In the memorandum stated the contractors have to comply as follows.</p> <ul style="list-style-type: none"> a. Comply with local legal requirements b. Attend the RSPO/ISCC/MSPO/SCCS briefing or training organized by the company c. Having signed and enforceable agreement with the company d. Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary e. Having related working permits f. Ensure PPE utilization by contractors' employee while being in the company premise. 	<p>Complied</p>
<p>3.8.12</p>	<p>Record keeping</p> <ul style="list-style-type: none"> 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. 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. 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. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> a) 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. b) The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 in Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019. c) NA as the mill is using MB model <p>All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are recorded on a three-monthly basis in the mill's mass balance accounting sheet. The data was mostly sourced from the mill's Daily Production Report. Based on verification of the MB accounting sheet, there was no short selling made since the last assessment.</p>	<p>Complied</p>

	<p>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.</p> <p>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).</p>		
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>	Conversion factor of CPO and PK production is depending on the actual OER and KER.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	NA as the mill is using MB module.	Not Applicable
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>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>RSPO certified volumes sold under different scheme or as conventional were not registered in the RSPO PalmTrace.</p>	Complied

	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.		
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Hadapan POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	Not applicable as no off-product claim made by Hadapan POM as to date.	Not Applicable
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by Hadapan POM as to date.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as no off-product claim made by Hadapan POM as to date.	Complied

4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Hadapan POM as verified through documentations and websites	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e. product/commodity with SCC model (CPO/Palm Kernel RSPO MB) and RSPO certificate number.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Hadapan POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm	Business to Business communication were made through the CSPO and CSPK trading contractual and transactions documentations between the mill and buyers. No further communications made by	Not Applicable

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	products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	Hadapan POM for its raw products beyond its refinery and oleochemical plants buyers.	
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	No business to consumer communication on product specific claim made. Hadapan POM only producing crude and unfinished product. This is not applicable for Hadapan POM.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made. Hadapan POM only producing crude and unfinished product. This is not applicable for Hadapan POM.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made. Hadapan POM only producing crude and unfinished product. This is not applicable for Hadapan POM.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made. Hadapan POM only producing crude and unfinished product. This is not applicable for Hadapan POM.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made. Hadapan POM only producing crude and unfinished product. This is not applicable for Hadapan POM.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made. Hadapan POM only producing crude and unfinished product. This is not applicable for Hadapan POM.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified	No business to consumer communication on product specific claim made. Hadapan POM only producing crude and unfinished product. This is not applicable for Hadapan POM.	Not Applicable

	<p>supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
<p>MODULE B – MASS BALANCE SPECIFIC RULES</p>			
<p>Minimum Mass Balance content</p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>Oil palm content for CPO and PK containing 100% RSPO MB-certified.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>No non-certified oil palm within the product of RSPO-MB certified for CPO and PK.</p>	<p>Complied</p>
<p>Labelling and trademark (MB)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. 	<p>Hadapan POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>Hadapan POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Complied</p>
Principle 4: Respect community and human rights and deliver benefits			

Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has established Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC). The HRC was last revised on August 2020. They promote the human rights, safeguard democracy and its institutions and not violate the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, they are committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them. Refer to Policy on the Protection of Human Rights Defenders (HRDs) dated 25/03/2020 for more information. Policy on the Protection of HRDs_FINAL.pdf (simedarbyplantation.com).</p> <p>The policies were communicated to stakeholders during stakeholder meetings. Besides, the briefing of the policies was conducted on 29/11/2021 in Hadapan POM.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation prohibits any form of harassment in their operation as per the policies above. Interviewed with the workers confirmed that no harassment by the management.</p>	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring</p>	<p>Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to</p>	Complied

	<p>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>promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistle blowers, complainants and community spokespersons play by lodging complaints in confidence.</p>	
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>Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing. Besides, the company has implemented "Suara Kami" as a platform for the workers to raise any issue. The workers in Hadapan Palm Oil Mill were briefed on the complaint mechanism during morning muster. Besides, external stakeholders were briefed during the stakeholder meeting. Interviewed with the internal and external stakeholders confirmed that they have been briefed and understood on the complaint mechanism implemented by the company. The latest initiative introduced (ULULA - Impact Worker Helpline) effective from 27/8/2021.</p>	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>The on-site verification through consultation among internal and external stakeholders and documented records reviewed shown that SOU 24 keeps parties to a grievance informed of progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders in addressing issues raised by stakeholders. Furthermore, neither any complaints nor land dispute occurred in the SOU 24 Certification Unit at the time of audit as verified through stakeholder consultation.</p>	Complied

4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow.</p>	Complied								
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>											
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>For Sime Darby Plantation group CSR, the program was demonstrated in the company’s website as per link as following: http://www.yayasansimedarby.com/our-projects/community health List of CSR programme at SOU24 for 2021 summarized as the following: i) Donation for temple festival – Layang Estate ii) Donation and distribution of essential item to Kampung Paya – Kulai Estate iii) <i>Zakat Wakalah</i> initiative and iftar programme for Johor South Zone – Kulai Estate</p>	Complied								
<p>Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>											
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>SOU24 estates were able to demonstrate the evidence of legal ownership if its lands through possession of land titles. The estates has a list of all its land titles which have the information about names of lease, hectare, terms & conditions, lease period and grant numbers. Copies of the land titles were available at the estate’s offices while the original were kept at headquarter</p> <table border="1" data-bbox="1137 1337 1933 1385"> <thead> <tr> <th data-bbox="1137 1337 1339 1385">Estate</th> <th data-bbox="1339 1337 1541 1385">Land title</th> <th data-bbox="1541 1337 1742 1385">Land use type</th> <th data-bbox="1742 1337 1933 1385">Tenure</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Estate	Land title	Land use type	Tenure					Complied
Estate	Land title	Land use type	Tenure								

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		Layang Estate	Sample: HSD 39413, no. PT MLO 6529, Mukim Sedenak, District: Kulai Jaya title area: 1,133.1198 ha Total titles: 13 (3,108.0112 ha)	Agriculture	Freehold	
		Kulai Estate	Sample: HSD 237360, lot no. 3632, Mukim Senai, District: Kualajaya title area: 772.5437 ha HSD 229702, lot no. 5570, Mukim Kulai, District: Kualajaya	No specific term	Freehold	

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			<p>title area: 349.2432 ha</p> <p>Total titles: 16 (3,173.66 ha)</p>			
	Seri Pulai Estate	<p>Sample: GN 326462, lot no. 2940, Mukim Kulai, District: Kualajaya</p> <p>title area: 370.48.91 ha</p> <p>Sample: GN 326461, lot no. 2938, Mukim Kulai, District: Kualajaya</p> <p>title area: 1,420.4444 ha</p>	No specific term	Freehold		

			Total titles: 7 (2,099.8334 ha)		
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.</p>			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 -	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.</p>			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 -	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities.</p>			Complied

		<p>Boundary stone and trenches were available to demarcate the boundary of land.</p> <p>Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.</p>	
4.4.2c	<p>Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>There is no land dispute recorded. Boundary stone was identified and marked in the GPS surveyed map. Trenches were available to demarcate the boundary and this has confirmed by interviewed with the neighbouring smallholder and local community.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</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 related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
<p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	Complied
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples,</p>	<p>No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.</p>	Complied

	the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -		
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 plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will	Not Applicable

		be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	SOP as per indicator 4.6.1.	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 issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of	Complied

		calculation and distribution to the affected parties will be determined by Land Management Department.	
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -	SOP as per indicator 4.7.1.	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 -	There was no community that have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area.	Complied
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	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	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during	Complied

	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 -	the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	
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 issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous FFB prices were available as per MPOB Daily FFB Reference Price Summary. The price was displayed at the mill's weighbridge counter for the third party FFB suppliers to refer.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	The mill has last explained the third party FFB suppliers about the FFB pricing in a meeting with Outside Crop Producer (OCP) on 11/11/2021. Minutes of meeting were available for verification. Four of the seven suppliers attended the meeting i.e. FELCRA Bhd, Bukit Siput Resources Sdn Bhd, Pertubuhan Peladang Kawasan Rengit and VR Plantation. The others were absent with apology.	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Fair pricing is calculated as a portion of the international CPO price less costs is provided to the third party FFB suppliers. The following contracts were sampled for verification: 1) VR Plantation Sdn Bhd, agreement no. P/P/1220/FFB02607L, validity 01/01-31/12/2021 2) Hong Hui Trading, agreement no. P/P/1220/FFB02609L, validity 01/01-31/12/2021	Complied

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		<p>3) Bingan Jaya Sdn Bhd, agreement no. P/P/0621/FFB03101L, validity 21/06-31/12/2021</p> <p>4) Pertubuhan Peladang Kawasan Rengit, agreement no. P/P/1220/FFB02606L, validity 01/01-31/12/2021</p> <p>5) Bukit Siput Resources Sdn Bhd, agreement no. P/P/1220/FFB02604L, validity 01/01-31/12/2021</p> <p>6) FELCRA Bhd (Kawasan Simpang Renggam), agreement no. P/P/1220/FFB02613L, validity 01/01-31/12/2021</p> <p>7) Choon Guan Oil Palm Sdn Bhd, agreement no. P/P/1220/FFB02605L, validity 01/01-31/12/2021</p>	
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no smallholder is supplying FFB directly to the mill.	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Contracts are found to be fair, legal and transparent and have an agreed timeframe. The following contracts were sampled for verification:</p> <p>1) VR Plantation Sdn Bhd, agreement no. P/P/1220/FFB02607L, validity 01/01-31/12/2021</p> <p>2) Hong Hui Trading, agreement no. P/P/1220/FFB02609L, validity 01/01-31/12/2021</p> <p>3) Bingan Jaya Sdn Bhd, agreement no. P/P/0621/FFB03101L, validity 21/06-31/12/2021</p> <p>4) Pertubuhan Peladang Kawasan Rengit, agreement no. P/P/1220/FFB02606L, validity 01/01-31/12/2021</p>	Complied

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		<p>5) Bukit Siput Resources Sdn Bhd, agreement no. P/P/1220/FFB02604L, validity 01/01-31/12/2021</p> <p>6) FELCRA Bhd (Kawasan Simpang Renggam), agreement no. P/P/1220/FFB02613L, validity 01/01-31/12/2021</p> <p>7) Choon Guan Oil Palm Sdn Bhd, agreement no. P/P/1220/FFB02605L, validity 01/01-31/12/2021</p>													
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Payment to third party FFB suppliers is made on weekly basis (70%) and monthly basis (the remaining 30%). Payment was made through the financial department at head office. Summary of payment voucher was made available for verification. Among the information available in the summary is Vendor account no., vendor name, document date, clearing date, payment advice no. (e.g. P/ADVCH-016917), and payment amount.</p>	Complied												
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>The weighbridges at the mill were calibrated annually by a third-party verifier. The following calibration records were verified:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Weighbridge reference No.</th> <th style="width: 25%;">Capacity</th> <th style="width: 25%;">Certificate no.</th> <th style="width: 25%;">Calibration date</th> </tr> </thead> <tbody> <tr> <td>195050377</td> <td>80,000 mt</td> <td>B 1846920</td> <td>10/07/2021</td> </tr> <tr> <td>052940181</td> <td>60,000 mt</td> <td>B 1846921</td> <td>10/07/2021</td> </tr> </tbody> </table>	Weighbridge reference No.	Capacity	Certificate no.	Calibration date	195050377	80,000 mt	B 1846920	10/07/2021	052940181	60,000 mt	B 1846921	10/07/2021	Complied
Weighbridge reference No.	Capacity	Certificate no.	Calibration date												
195050377	80,000 mt	B 1846920	10/07/2021												
052940181	60,000 mt	B 1846921	10/07/2021												
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	<p>Not applicable as no smallholder is supplying FFB directly to the mill.</p>	Not Applicable												
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p>	<p>The grievance mechanism addressed in Standard Operation Manual; Date: 1/11/2008 that documented the process for</p>	Complied												

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	- Critical (Major) compliance -	Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2) for grievance handling. As of the audit date, no grievance received by SOU 24 from OCPs since the last audit.	
Criterion 5.2: 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 -	Not applicable as no smallholder is supplying FFB directly to the mill.	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 -	Not applicable as no smallholder is supplying FFB directly to the mill.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Not applicable as no smallholder is supplying FFB directly to the mill.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Not applicable as no smallholder is supplying FFB directly to the mill.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Not applicable as no smallholder is supplying FFB directly to the mill.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			

6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. They will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy could be downloaded from https://www.simedarbyplantation.com/sustainability/human-rights-charter.</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Interviewed with the workers comprises of different gender and nationalities as well as the parolees confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers, no charging of recruitment fees for the foreign workers and offered job based on capability. The worker can request for job transfer if they found they unfit for the job assigned to them.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation has developed a Career Progression for Workers Level (both local and foreign workers), Doc. No.: SDP/HRUM/2020/SOP01 where the promotion of workers is based on the work performance, suitability, and the leadership quality of the worker. The recruitment of foreign workers is through Human Resource Department in HQ based the regulation requirements.</p>	Complied

6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Interviewed with the female employees in Hadapan Palm Oil Mill and other visited estates confirmed that pregnancy testing is not conducted prior to work. They still will be able to offer for work if they are pregnant.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>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. SDPB has introduced the new Terms of Reference (TOR) for Gender Representatives and Gender Committee, dated March 2021 which supersede the previous Gender Committees Gender Committee Handbook, First Edition 2014. In this new TOR, a more definitive roles, and responsibilities as well as governance structure and programmes were added in.</p> <p>Gender Committee were established by the mill and estates management and verified at each operating unit. Meetings to be conducted once every 2 months or whenever necessary according to the new TOR. Meetings conducted at respective units as below:</p> <ul style="list-style-type: none"> • Kulai – 10/12/21, 14/9/21, 16/6/21, 17/3/21 • Hadapan POM – 25/9/21, 23/6/21 • Layang Estate – 4/12/21, 18/9/21, 5/6/21, 10/4/21 • CEP Rengam Estate – 21/9/21, 24/3/21 • Seri Pulai Estate – 10/12/21, 17/9/21, 10/6/21 <p>There was no sexual harassment case reported so far at all OU.</p> <p>SDPB has introduced the new Terms of Reference (TOR) for Gender Representatives and Gender Committee, dated March 2021 which supersede the previous Gender Committees Gender Committee Handbook, First Edition 2014. In this new TOR, a more definitive</p>	OFI

		roles, and responsibilities as well as governance structure and programmes were added in.	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	There is no discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting. Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste	Complied
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	Sime Darby has sign the Collective Agreement with National Union of Plantation Workers (NUPW). Sample of employment contracts are reviewed and the agreements are signed in both English and home country language (i.e. Hindi, Bahasa Malaysia/Indonesia). Upon the foreign workers arriving to the estate, they will be inducted for the terms and conditions of employment contract and briefed on the company’s policies. This has confirmed by interviewed with the foreign workers.	Complied
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members. - Critical (Major) compliance -	Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are in compliance with the Employment Act 1955, Minimum Wages Order 2020, SOCSO Act 1969, EPF Act 1991, EIS Act 2017, and the MAPA/NUPW agreement. Payroll documents, namely the payslip, also give accurate information on compensation for all work done. This includes those	Complied

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		<p>who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay. Also confirmed via sampled payslips that wages were paid in compliance with national legal requirements. Salary deductions and overtime were in accordance with the relevant laws (SOCISO, EPF, EIS) and Labour Office permits. None of the sampled workers had any family members performing work.</p> <ul style="list-style-type: none"> • Employment contracts template, "Employment Contract Extension for Foreign Worker (Peninsular – Indonesia/ Nepalese) – ECE1 • Check-roll records, Estate/mill daily attendance report, CKRRD005 • Employee Master List, SEMUA report. <p>Approval for overtime limit extension to 130 hours has been obtained from Labour Department, Putrajaya. Ref:(30) dlm Bhg PU/9/134 Jilid 2 dated 2/12/2013. As for salary deduction permit, blanket approval ref: (25). PTKJB/10101/55563(PMT) dated 18/1/12 was made available for verification.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Based on review of punch cards, workers' employment contracts and payslips, evidence was available that Pagoh POM and its supply base were able to demonstrate compliance with Employment Contracts 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCISO, EPF, EIS) and non-statutory deductions (e.g. union/NUPW, water, electricity bills, etc) in accordance with Labour Office permits. These permits are as detailed out under Indicator 2.1.1 above.</p> <p>Sampled during the audit were the following workers' employment contracts and payslips for the month of August 2021 (peak), February 2021 (low) and May 2021 (average/medium)</p>	Complied

		<p><u>Hadapan POM (8 workers sampled from total of 97 workers)</u> Employee ID 070322, joined date 1/6/2020 Employee ID 164975, joined date 4/6/2013 Employee ID 163040, joined date 19/4/2021 Employee ID 080376, joined date 19/2/2019 Employee ID 156619, joined date 2/12/2019 Employee ID 160236, joined date 1/10/2020 Employee ID 157735, joined date 17/12/2019 Employee ID 150346, joined date 9/5/2019 Employee ID 121214, joined date 9/5/2016</p> <p><u>Layang Estate (11 workers sampled from total of 137 workers)</u> Employee ID 163031, joined date 12/12/14 Employee ID 163217, joined date 22/12/1a7 Employee ID 164312, joined date 1/8/21 Employee ID 157832, joined date 3/2/20 Employee ID 156619, joined date 2/12/19 Employee ID 140880, joined date 6/3/18 Employee ID 139135, joined date 16/1/18 Employee ID 125697, joined date 18/9/16 Employee ID 125668, joined date 17/9/16 Employee ID 122858, joined date 21/06/16 Employee ID 115244, joined date 6/7/15 Employee ID 125451, joined date 13/9/16</p>	
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		<p><u>CEP Rengam Estate (12 workers sampled from total of 235 workers)</u></p> <p>Employee ID 101096, joined date 24/4/14 Employee ID 092735, joined date 15/7/13 Employee ID 110826, joined date 9/2/15 Employee ID 066311, joined date 19/5/11 Employee ID 088880, joined date 28/3/13 Employee ID 059911, joined date 6/3/18 Employee ID 117053, joined date 21/9/15 Employee ID 129049, joined date 3/12/16 Employee ID 125668, joined date 17/9/16 Employee ID 122858, joined date 21/06/16 Employee ID 115244, joined date 6/7/15 Employee ID 125451, joined date 13/9/16</p> <p><u>Kulai Estate (10 workers sampled from total of 158 workers)</u></p> <p>Employee ID 110618, joined date 29/01/15 Employee ID 148668, joined date 26/2/19 Employee ID 120049, joined date 27/2/16 Employee ID 092351, joined date 21/6/13 Employee ID 137062, joined date 27/9/17 Employee ID 106350, joined date 10/10/14 Employee ID 118186, joined date 30/10/15 Employee ID 109658, joined date 20/12/14 Employee ID 159360, joined date 17/8/20 Employee ID 163048, joined date 19/4/21</p>	
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		<p><u>Seri Pulai Estate (8 workers sampled from total of 105 workers)</u> Employee ID 088800, joined date 19/3/13 Employee ID 090156, joined date 3/5/13 Employee ID 104708, joined date 23/8/14 Employee ID 112910, joined date 18/4/15 Employee ID 125312, joined date 9/9/16 Employee ID 137332, joined date 11/10/17 Employee ID 146617, joined date 1/11/18 Employee ID 155682, joined date 19/10/19</p>													
<p>6.2.4</p>	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure. - Critical (Major) compliance -</p>	<p>The basic amenities and facilities at the quarters provided by the company to the workers includes electricity, water and domestic waste disposal. Electricity and water were supplied by government and deducted from salary. Seen the budget for housing repairs, sanitation, garden upkeep and CAPEX & OPEX from all operating units. Seen the record for weekly line site inspection done by Medical Assistant (estate) and QA (mill) in fortnightly basis as per the new Workers Minimum Housing and Amenities Regulation 2020. Inspection records checked:</p> <table border="1" data-bbox="1137 1075 1928 1367"> <thead> <tr> <th>Operating units</th> <th>Date of inspection</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>CEP Rengam</td> <td>13/12/21, 6/12/21, 29/11/21, 22/11/21</td> <td>Nil</td> </tr> <tr> <td>Kulai Estate</td> <td>6/12/21, 28/11/21, 14/11/21, 9/11/21.</td> <td>Nil</td> </tr> <tr> <td>Seri Pulai Estate</td> <td>10/12/21, 3/12/21, 26/11/21, 19/11/21</td> <td>Nil</td> </tr> </tbody> </table>	Operating units	Date of inspection	Remarks	CEP Rengam	13/12/21, 6/12/21, 29/11/21, 22/11/21	Nil	Kulai Estate	6/12/21, 28/11/21, 14/11/21, 9/11/21.	Nil	Seri Pulai Estate	10/12/21, 3/12/21, 26/11/21, 19/11/21	Nil	<p>Complied</p>
Operating units	Date of inspection	Remarks													
CEP Rengam	13/12/21, 6/12/21, 29/11/21, 22/11/21	Nil													
Kulai Estate	6/12/21, 28/11/21, 14/11/21, 9/11/21.	Nil													
Seri Pulai Estate	10/12/21, 3/12/21, 26/11/21, 19/11/21	Nil													

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		<p>Workers Housing Management Procedure and 'OilPalmPal' Digital Housing Complaint System (OPP DHCS). Inter-office mail (Ref. No: UM/HSE/013/11/2021), dated 26th November 2021 from CEO Upstream Malaysia. General house rule is written under "<i>Peraturan Umum Kompleks Perumahan Pekerja</i>"</p> <p>For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilizes).</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There were sundry shops located in the estates compound and the estates are nearby to the nearest town. The workers can easily access to adequate, sufficient and affordable foods and goods.</p> <p>CEP Rengam Estate</p> <p>Based on interview with workers representatives (NUPW and EWC), they have raised an issue with regards to expensive goods price at Kedai Runcit JK Maju. Further check at the sundry shop has confirmed that no price displayed especially for fresh and loose items (vegetables, onion, potatoes etc). This was not in compliance with Price Control Order (Indication of Price by Retailer) 1993.</p> <p>Thus, a minor NC was issued.</p>	Non-compliance
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019,</p>	<p>Sime Darby Plantation Berhad – Hadapan POM has provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. It includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. The payslip sighted in clause 6.2.1 showed that the salary received complied with the minimum wage order 2020 and the decent living wage set up by the group which is foreign worker is RM1,473.70/worker and local RM1,926.11/worker.</p>	Complied

<p>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 the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment 	<p>Note: Until housing basket can be determine (work in progress-data type need to pull from various departments and further segregated), in the interim SDP will refer to CA amount of RM125.</p>	
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	<ul style="list-style-type: none"> The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>There are no casual workers hired in Hadapan POM and supply bases. All employees are permanent employee (for locals) and contracted employee (for foreign workers). All permanent and full-time employment or contract workers used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively. <p>During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union.</p>	Complied

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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>Trade union meeting carried out at each respected operating unit were verified. The meeting involved the representative from employer and employee. Date of meetings summarized as per below:</p> <table border="1" data-bbox="1137 507 1924 791"> <thead> <tr> <th>Estate/mill</th> <th>Date of meeting</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Hadapan POM</td> <td>13/12/21</td> <td rowspan="5">Annual official meeting</td> </tr> <tr> <td>Layang Estate</td> <td>6/1/21</td> </tr> <tr> <td>CEP Rengam Estate</td> <td>25/10/21</td> </tr> <tr> <td>Seri Pulai Estate</td> <td>30/11/21</td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table>	Estate/mill	Date of meeting	Remarks	Hadapan POM	13/12/21	Annual official meeting	Layang Estate	6/1/21	CEP Rengam Estate	25/10/21	Seri Pulai Estate	30/11/21			Complied
Estate/mill	Date of meeting	Remarks															
Hadapan POM	13/12/21	Annual official meeting															
Layang Estate	6/1/21																
CEP Rengam Estate	25/10/21																
Seri Pulai Estate	30/11/21																
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on the worker's interview, the selection of NUPW representative made from the election among the NUPW member without management interference. Foreign workers included in the committee formation and appointment letter sighted. The selection also based on the election meeting.</p>	Complied														
Criterion 6.4: 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 & 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"> • Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. 	Complied														

		<ul style="list-style-type: none"> • Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. • Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations. • Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities. • Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use. • Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees. • Protecting the Rights of Children: We seek to promote the wellbeing of children and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography. <p>Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children.</p>	
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above</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</p>	<p>Complied</p>

	company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -	workers, the Workforce Management Unit Liason & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).	
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Employee Master Listing and through interviewed with the stakeholders.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders. For example, COBC briefing was given on 19/2/21 at Kulai Estate and 22/11/21 at Seri Pulai Estate.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below: We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to: <ul style="list-style-type: none"> • Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims. • Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation. The policy was communicated through the Gender Committee meeting	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	SDPSB has implemented Social Policy, Gender Policy and Social & Humanity Management Policy dated January 2015 where the	Complied

	- Critical (Major) compliance -	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.	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -	In Kulai Estate, the assessment for new needs for new mother was conducted by Gender Committee. There were new needs as sampled below: <ul style="list-style-type: none"> • 14/7/21: No new mothers in the estate. • 27/11/21: Request for time-off to breast feed. 	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	Sime Darby Plantation has developed Gender Committee Handbook, First Edition 2014 for implementation framework and guidelines where grievance reporting procedure for gender was developed. The new Term of Reference for Gender Representative and Gender Committee, dated March 2021 has been introduced to improve on the implementation of gender related activities in Sime Darby Plantation. Any cases must be reported to Social & Environment Projects Unit of the PSQM Department. Incident report template was established. Flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008 was implemented as well. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in http://www.simedarbyplantation.com/corporate/governance/whistleblowing . Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the	Complied

		complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.	
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Interviewed with the workers confirmed that no forced and trafficked labour in SOU24. The Indian workers informed that they did not pay any recruitment fee to agent as they employed directly by Sime Darby. The terms and conditions offered by the company were similar in their home country and when arrived in the plantations. No contract substitution has occurred. They keep their passport. Overtimes was monitored by the company and the workers are giving freedom to choose to overtime and resign. There was no penalty for termination of employment if they wish to terminate the contract earlier as per the employment contract signed.</p> <p>If the workers in the mill who want to work for overtime, they will need to fill in the Overtime Details form. Those who worked on rest day and public holiday is required to fill in the application form <i>Kerja/ Kerja lebih masa pada hari rehat & Kerja/ kerja lebih masa pada hari cuti am</i>. Approval from the Supervisor and Assistant is required.</p>	Complied
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB has implemented a Sime Darby's Human Rights Charter revised 2020 and can be easily access via www.simedarbyplantation.com where they committed as below:</p> <ol style="list-style-type: none"> a) Providing equal opportunity b) Respecting freedom of association c) Eradicating any form of exploitation d) Providing decent and fair wages, reasonable working 	Complied

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		<p>hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs</p> <p>e) Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution.</p> <p>All the foreign workers will be provided with induction training prior to work. Besides, they were provided with decent living condition and free from any discrimination. The workers informed that they were treated equally without any discrimination and allow joining NUPW freely. No contract substitution has occurred through interviewed with the workers.</p> <p>They also provided awareness and training to all the foreign workers for them to understand their responsibility in respect of human rights as included in the Group Sustainability Policy on 19/2/21 at Kulai Estate and 22/11/21 at Seri Pulai Estate.</p>	
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>All operating units have formed an OSH Committee in the respective mill and estate to address all issues associated to Health and Safety in the operating units. The OSH Organisation Charts were available and displayed at the workstations.</p> <ol style="list-style-type: none"> <u>Hadapan POM</u> The Mill Manager Mr. Zulaffandi Bin Samad has been appointed as the chairman of the OSH Committee in the mill as stated in the appointment letter dated 01/01/2021 undersigned by the Regional General Manager, Southern Region. <u>Layang Estate</u> 	<p>Complied</p>

		<p>The Estate Manager, Mr. Azhari Bin M Kalam as the chairman of the OSH Committee as stated in the appointment letter dated 01/01/2020 undersigned by the Regional General Manager, Southern.</p> <p>3. <u>CEP Rengam Estate</u> The Estate Manager, Mr. Mohd Mahyudin Bin Mohd Yunus has been appointed as the OSH Committee Chairman as stated in the appointment letter dated 25/11/2019 undersigned by the Regional General Manager, Southern Region.</p> <p>4. <u>Kulai Estate</u> The Estate Manager, Mr. Amir Hassan Bin Ashaari has been appointed as the OSH Committee Chairman as stated in the appointment letter dated 25/09/2019 undersigned by the Regional General Manager (Johor South), Southern Region.</p> <p>5. <u>Sri Pulai Estate</u> The Estate Manager, Mr. Wong Mun Kai has been appointed as the OSH Committee Chairman as stated in the appointment letter dated 26/07/2021 undersigned by the Regional General Manager (Johor South), Southern Region.</p> <p>OSH Committee of the respective operating units conducts regular OSH Meetings to address all issues related to OSH in the operating units. Workplace Inspections are conducted prior to the OSH Meeting.</p> <p>1. Hadapan POM have conducted regular OSH Meetings and Meeting Minutes were available for verification. The meetings were sighted to be conducted on 20/10/2021, 29/07/2021, 28/04/2021 and 13/01/2021</p>	
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		<p>2. Layang Estate conducted regular OSH Meetings in the estate. The meeting minutes were available for verification dated 26/03/2012. Remainder OSH Meetings were postponed due to the ongoing Covid 19 cases.</p> <p>3. CEP Rengam Estate conducted regular OSH Meetings in the estate. The Meeting Minutes were available for verification dated 18/09/2021, 26/06/2021 and 13/03/2021</p> <p>4. Kulai Estate conducted regular OSH Meetings in the estate. The meeting minutes were available for verification dated 22/11/2021, 11/08/2021 and 24/05/2021.</p> <p>Sri Pulai Estate conducted regular OSH Meetings in the estate and meeting minutes were available for verification dated 20/10/2021, 05/07/2021 and 05/04/2021.</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Emergency Response Plans and Procedures were available in the estates and mills to address potential emergencies such as Flood, Fire, Chemical Spillage, Poisoning, Earthquake/landslide, Accidents, Storm and Wild/ Poisonous Animal Attacks. The plans have been posted at notice boards in the mills and estates and communicated to the workers. Emergency contact numbers have been posted at the notice boards and provided to the workers as well. Interview with the workers such as mandores and store attendants indicated that the workers are aware on the available emergency response plans. Trainings were conducted in the mill and estates to provide awareness to the workers on emergency responses. The trainings were sighted as below.</p> <p>1. <u>Layang Estate</u> ERP Procedure Training was conducted on 06/12/2021.</p> <p>2. <u>CEP Rengam Estate</u></p>	<p>Complied</p>

		<p>Fire Drill Training was conducted on 23/04/2021</p> <p>3. <u>Kulai Estate</u> Fire Fighting Training was conducted on 11/12/2021</p> <p>First aiders were present in the operating units. They have been trained and obtained certificates as the PIC to address first aid in the operating units. Visit to the mill and estates indicated each station and gangs were equipped with first aid kits. Interview with the respective first aid holders indicated that they were well aware on the methods to use the items in the first aid boxes. The boxes are regularly monitored by the mill and estate Hospital Assistants to replenish the used items and replace expired items. Records of items used were also maintained and available in the boxes.</p> <p>1. <u>Hadapan POM</u> Basic First Aid Training conducted on 08/04/2021 in the mill.</p> <p>2. <u>Kulai Estate</u> First Aid Training conducted on 01/12/2021 – 02/02/2021 in the estate. Regular Monthly Monitoring of first aid box was done by the MA. Latest monitoring conducted on 01/12/2021.</p> <p>3. <u>CEP Rengam Estate</u> First Aid Training was conducted on 20/05/2021 at the estate</p> <p>4. <u>Kulai Estate</u> First Aid Training conducted in the estate on 29/09/2021.</p> <p>5. <u>Sri Pulai Estate</u> First Aid Training conducted in the estate on 07/06/2021.</p> <p>Accident records were maintained in the estate and available for verification.</p>	
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		<ol style="list-style-type: none"> 1. <u>Hadapan POM</u> There were no accident cases reported for the year 2020 and 2021 to date at the mill. The JKPP 8 form have been submitted to DOSH on 07/01.2021 and available for verification. 2. <u>Layang Estate</u> Accident records were available and maintained by the estate. There were 2 accidents reported for the year 2020 in the estate. The JKPP form 8 was also submitted on 04/01/2021 for the year ending 2020 and available for verification. For the year 2021, there were 6 accidents reported. The accident investigation records were available for verification. 3. <u>CEP Rengam Estate</u> Accident records were available and maintained in the state and available for verification. For the year 2020 there were 11 accident cases reported in the estate. The necessary JKPP 6 forms have been submitted to DOSH for accident cases exceeding 4 days of LTA. The JKPP 8 form have been submitted to DOSH on 15/01/2021 and available for verification. As for 2021 there were a total of 5 accident cases reported in the estate. The JKPP 6 forms have been submitted to DOSH accordingly and available for verification. 4. <u>Seri Pulai Estate</u> Accident records were maintained in the estate and available for verification. For the year 2020 there were 6 occupational related accidents reported in the estate resulting in 20 LTA. The JKPP 8 form for the year ending 2020 has been submitted DOSH on 09/01/2021 and available for verification. For the year 2021 there were 7 accident cases reported in the estate. The JKPP 6 form for accidents exceeding 4 LTA days have been submitted to DOSH and available for verification. 	
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		<p>5. <u>Kulai Estate</u></p> <p>Accident records were maintained in the estate and available for verification. There were 9 accident cases for the year 2020 reported in the estate. The necessary reports have been submitted to DOSH and available for verification. The JKPP 8 form have been submitted as well on 07/01/2021. For the year 2021 there were 4 accident cases reported to date. The JKPP 6 forms have been submitted to DOSH and available for verification.</p>									
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang, Harvesting Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that all required appropriate PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home due to the hazard that the chemical residues could cause.</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>Medical care is provided to all the employees. The mill and estates have their own dispensary where all workers are able to obtain medical care borne by the operating unit. Severe sickness or injuries are referred to government hospitals or clinics which are also borne by the operating units. Local workers and foreign workers were covered under SOCSO scheme. Sighted the contribution form (8A) for mill and all estate visited as below.</p> <table border="1" data-bbox="1137 1278 1926 1358"> <thead> <tr> <th>Operating Units</th> <th>Month</th> <th>Total Workers</th> <th>Amount (RM)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Operating Units	Month	Total Workers	Amount (RM)					Complied
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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>The Operating units recorded all injuries and accidents in the LTA format as below:</p> <table border="1"> <thead> <tr> <th rowspan="2">Operating Unit</th> <th colspan="2">2020</th> <th colspan="2">2021</th> </tr> <tr> <th>Cases</th> <th>LTA</th> <th>Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Hadapan POM</td> <td>nil</td> <td>nil</td> <td>nil</td> <td>nil</td> </tr> </tbody> </table>	Operating Unit	2020		2021		Cases	LTA	Cases	LTA	Hadapan POM	nil	nil	nil	nil	Complied																																				
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		Kulai Estate	9	58	4	84	
		Seri Pulai Estate	6	20	7	21	
		Layang Estate	2	5	6	9	
		CEP Rengam Estate	11	86	5	38	
Principle 7: Protect, conserve and enhance ecosystems and the environment							
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.							
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Barn owls Tyto Alba has been introduced for biological control of rats. Barn owl boxes are constructed at the rate of 1 box to 10ha. Census records show that there was minimal outbreak of leaf eating pest. Although there have been minimal outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators and further reduce the outbreak. The estates have planted beneficial plants such as Cassia cobanensis and Turnera subulata and Antigonon leptopus.</p> <p>Yearly specific plans were available for the year 2021 by the estate. Sighted the IPM Plan for each estate as below:</p> <p><u>Kulai Estate</u></p> <ol style="list-style-type: none"> Oryctes Rhinoceros Beetle <ul style="list-style-type: none"> Establishment of thick cover crop. Less than 10cm chipping trunk thickness. Apply EFB in single layer 					Complied

		<ul style="list-style-type: none"> • Construct Close Ended Conservation Trenches <p>2. Rodents</p> <ul style="list-style-type: none"> • Natural Predator (Tyto Alba) <p>3. Bagworm & Nettle Caterpillar</p> <ul style="list-style-type: none"> • Planting Beneficial Plant (E-CAT, euphorbia, cassia, antigonon, turnera) • Parasitoids • Natural predator <p><u>Seri Pulai Estate & CEP Rengam Estate</u></p> <p>1. Rat</p> <ul style="list-style-type: none"> • Predator – Tyro Alba <p>2. Oryctes Rhinoceros Beetle</p> <ul style="list-style-type: none"> • Pathogen – Kulat Metarhizium anisopliae, Baculovirus • Cultural Control – less than 10cm thickness for chipping, establishment of cover crop. Close ended conservation trenches (CECT). Application of EFB in single layers. <p>3. Bagworm & Nettle Caterpillar</p> <ul style="list-style-type: none"> • Predator – Sycanus dichotomus, Cantheconidae furcellata, Spinaria spinator • Planting beneficial plant – Eurphobia heterophylla, Casia cobanensis, Antigonon leptopus, Turnera subulate. • Parasitoid – Paraphylax varius, Eupelmus cathoxanthae • Pathogen – Nuclear Polyhedrosis Virus (NPV), Cordyceps sp. 	
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		<p><u>Layang Estate</u></p> <ol style="list-style-type: none"> 1. To achieve planting beneficial plant of 2dm/ha 2. Type of beneficial plant to be planted: <ul style="list-style-type: none"> • Turnera subulate • Antigonon leptopus • Euphorbia heterophylla 3. Instalment of new barn owl box (BOB) <ul style="list-style-type: none"> • To achieve ratio 5Ha: 1 BOB in Ladang Layang to decrease the population of rat. <p>To replace the old BOB with poor condition.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>Species referenced in the Global Invasive Species Database and CABI.org are not used in the estates.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no evidence of use of fire for pest control in all the estates.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 01.07.2011. Selected products are specific to the target pest, weed and disease.</p>	Complied

7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides used (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) is maintained by the estate and submitted to the Head Quarters on a monthly basis. Sampled the chemicals used for the month Sept, Oct and Nov 2020 as below: -</p> <table border="1" data-bbox="1137 523 1921 853"> <thead> <tr> <th>Operating Units</th> <th>Sept 2021</th> <th>Oct 2021</th> <th>Nov 2021</th> </tr> </thead> <tbody> <tr> <td>Kulai Estate</td> <td>1.20</td> <td>0.79</td> <td>0.11</td> </tr> <tr> <td>Layang Estate</td> <td>0.800</td> <td>1.050</td> <td>1.060</td> </tr> <tr> <td>Seri Pulai Estate</td> <td>1.60</td> <td>2.71</td> <td>1.41</td> </tr> <tr> <td>CEP Rengam Estate</td> <td>0.694</td> <td>0.218</td> <td>0.984</td> </tr> </tbody> </table>	Operating Units	Sept 2021	Oct 2021	Nov 2021	Kulai Estate	1.20	0.79	0.11	Layang Estate	0.800	1.050	1.060	Seri Pulai Estate	1.60	2.71	1.41	CEP Rengam Estate	0.694	0.218	0.984	Complied
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan.</p> <p>Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas.</p> <p>Paraquat was eliminated. In its place, alternatives such as Glyphosate is used instead. Monocrotophos was eliminated and in its place Acephate is used.</p>	Complied																				
7.2.4	<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 is no evidence of prophylactic use of pesticides in all estates visited.</p>	Complied																				

<p>7.2.5</p>	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>Sighted in the Chemical Registers showed that only class III & IV chemicals were used at all the estates visited. During the site visit to the chemical store it was justified that there were only class II, III and IV chemicals being used. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead. Monocrotophos was eliminated and in its place, Acephate is used.</p>	<p>Complied</p>												
<p>7.2.6</p>	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers in the estate and mill.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p> <table border="1" data-bbox="1137 1139 1917 1367"> <thead> <tr> <th>Estate</th> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Kulai Estate</td> <td>Spraying Safety & PPE Training</td> <td>09/12/2021</td> </tr> <tr> <td>Seri Pulai Estate</td> <td>Chemical Handling Training</td> <td>05/05/2021</td> </tr> <tr> <td>Layang Estate</td> <td>Spray Pump Training on SOP</td> <td>19/03/2021</td> </tr> </tbody> </table>	Estate	Training	Date	Kulai Estate	Spraying Safety & PPE Training	09/12/2021	Seri Pulai Estate	Chemical Handling Training	05/05/2021	Layang Estate	Spray Pump Training on SOP	19/03/2021	<p>Complied</p>
Estate	Training	Date													
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		CEP Rengam Estate	Inter Pump Service Training by MyCrop.	08/04/2021	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	Pesticides were found stored in the mill and all estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.			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>Empty pesticides containers are either used to contain pre-mixed pesticides or disposed through recycle vendor after undergone the triple rinsing procedure. The following receipts for the disposals were verified:</p> <ul style="list-style-type: none"> • Layang Estate: #1999, dated 12/11/2021, collected by SS Setia Teknologi Enterprise • CEP Rengam Estate: #19020, dated 13/12/2021, collected by SS Setia Teknologi Enterprise • Kulai Estate: #1989, dated 27/10/2021, collected by SS Setia Teknologi Enterprise • Seri Pulai Estate: #1966, 1968 & 1969 (dated 14/09/2021), collected by SS Setia Teknologi Enterprise 			Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is</p>	No aerial spraying for pesticide were done in all the estates.			Complied

	<p>provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -</p>		
<p>7.2.10</p>	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -</p>	<p>Medical Surveillance were conducted in the estates based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.</p> <p>a. <u>Layang Estate</u> Medical Surveillance was conducted for 14 workers in the estate on 01 – 03/09/2021 at Klinik Renggam. The results indicated that all workers were fit to work with normal results.</p> <p>b. <u>CEP Rengam Estate</u> Medical Surveillance was conducted for 31 workers in the estate on 29/09/2021. The results indicated that all workers were fit to work.</p> <p>c. <u>Seri Pulai Estate</u> Medical Surveillance was conducted for workers exposed to chemicals and fumes in the estate on 20/10/2021 at Klinik Renggam. The results indicated that all workers were fit to work with no occupational related health issues.</p> <p>d. <u>Kulai Estate</u> Medical Surveillance was conducted for 22 workers in the estate on 20/10/2021. The results indicated that all workers were fit to work except for 1 worker with possible occupational related health issues. The OHD has recommended for the worker to be given alternative</p>	<p>Complied</p>

		work. Sighted the records available that shown the worker has been removed from work related to chemical handling.	
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>All estates visited have prohibited woman workers who are confirmed pregnant or breast-feeding to handle chemicals as per Gender Policy and Occupational Safety and Health Policy signed by the Managing Director on January 2015.</p> <p>It was sighted during the visit to the stores there were signages stating that pregnant and breast-feeding women are not allowed to enter the chemical stores. Furthermore, the estates did not engage any female sprayers.</p>	Complied
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Waste 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. At Kulai Estate, the domestic waste is disposed through the local municipal council as the estate subscribes to Johor Land Administration's quit rent.</p> <p>However, based on verification through Google Earth, the wastes landfill at Layang Estate (GPS: 1.816244, 103.450217), CEP Rengam Estate (GPS: 1.883646, 103.367359), Seri Pulai Estate (GPS: 1.610332, 103.481629) 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>	Non-compliance

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		<p>a) The landfill shall be located no less than 3 km away from nearest household area, offices or other premises</p> <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>Generally, the workers have demonstrated good understanding in proper disposal of wastes. The visited labour quarters were observed to be in clean condition. Wastes were properly disposed as mentioned in Indicator 7.3.1.</p> <p>Sewage at Kulai Estate’s labour quarters was disposed through a private service company (Indah Water Konsortium Sdn Bhd). The last sewage service was made on 11/08/2021 [ref.: Invoice No. 212943, dated 11/08/2021].</p> <p>SW disposed through licensed contractors which were verifiable through eSwis. Examples of Consignment notes verified:</p> <p>LYE:</p> <p>#20210429109YK4RL, SW404, disposed on 29/04/2021</p> <p>#2021092209Z7OQE0, SW404, disposed on 22/09/2021</p> <p>- SW305, SW306 and SW410 were taken by the service provider (SDI) to their premises. DOE’s approval for this practice was made available for verification. The estate has just started to generate SW409 (empty lubricants containers) in October 2021. This waste will be disposed through a licensed collector.</p> <p>HDM:</p> <p>#20210422090NIB72, SW409, disposed on 22/04/2021</p> <p>#2021042209QVYS7W, SW410, disposed on 22/04/2021</p>	Complied

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		<p>#20210422093L8ZQC, SW110, disposed on 22/04/2021 #2021042209EU0GKJ, SW322, disposed on 22/04/2021 #2021022515ZY1S0J, SW306, disposed on 25/02/2021 #2021022515A2PBZL, SW305, disposed on 25/02/2021</p> <p>CRE: #Ref. No. 22475, SW305, disposed on 08/12/2021</p> <p>Kulai Estate: #Ref. No. 22368, SW305, disposed on 18/12/2021 #Ref. No. 21662, SW305, disposed on 20/05/2021 #Ref. No. 21665, SW305, disposed on 20/05/2021 #Ref. No. 21663, SW410 (used filter), disposed on 20/05/2021 #Ref. No. 21666, SW410 (used filter), disposed on 20/05/2021 #Ref. No. 21664, SW410 (rags), disposed on 20/05/2021 #Ref. No. 21667, SW410 (rags), disposed on 20/05/2021 #2021050314BHEJM3, SW404, disposed on 03/05/2021 #2021092211Y3FUJX, SW404, disposed on 22/09/2021</p> <p>SPE: #Ref. No. 19461, SW305, disposed on 08/09/2021 #2021092211HVOACZ, SW404, disposed on 22/09/2021 #20210429114T8R9O, SW404, disposed on 29/04/2021</p>	
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7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	The was no use of fire for waste disposal at all the sampled estates observed.	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	All sample Estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices are consistently monitored by estate operation management and the regional office. The recommendations for improvements are given to maintain sustainable practices. Leaf analysis and foliar sampling will be monitored on yearly basis. Variable dosage recommendation was given by the agronomist for fertilizer input for all sample Estates.	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 -	<p>Leaf nutrient analysis is commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf analysis and leaf sampling is conducted annually. The foliar sampling and soil analysis reports by the company’s agronomist were available at the estates during the audit assessment.</p> <ol style="list-style-type: none"> 1. Layang Estate Soil Analysis (Test Report No: S47/2018), Report Date: 03/08/2018. 2. CEP Rengam Estate Plant Analysis (Test Report No: P175/2021), Date: 07/04/2021. 3. Seri Pulai Estate Soil Analysis Test Report (Test Report No: S42/2019), Date: 19/04/2019. <p>Sighted the Agronomist report for the year 2021 prepared by R&D Department Sime Darby Plantation Berhad for all sample Estates. The report covers the following aspect: Introduction, Rainfall, FFB Yield, Palm Nutritional Status / Observation, Field observation /</p>	Complied

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		<p>Comments, Manuring history, Fertilizer recommendation, Fertilizer Analysis, Field observation and Agronomic matters.</p> <p>The agronomist report also emphasized on-field best practices and physical conditions such as palm appearance, canopy size and vigor, canopy colour and vigour, palm circle and inter-row condition. Nutrients assessed were Na, N, P, K, Ca, Mg, B (PPM).</p>	
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Hadapan POM and some from Ulu Remis POM. The best practice of EFB application is described in the ARM. Records were available for verification. Based on the records at all the sampled estates, it was noted that the EFB application rate per hectare was around 40 mt/Ha.</p>	Complied
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilizers in all sample Estates were applied according to agronomist recommendation. The records have the information about application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. Types of fertilizer applied were straight and mixture. The records were maintained and updated accordingly. Verification of various documents in all sample Estates such as agronomist report, annual manuring program and store issuance records shown that the inputs of fertilizers to the field were accurate. Sighted the application data for all estates as below.</p> <p><u>Layang Estate</u></p> <ol style="list-style-type: none"> Field 2004; Total Ha: 55.17 Ha; Fertiliser: AC; Total Bags: 325; Application Date: 27/02/2021 – 01/03/2021. Field 2008; Total Ha: 77.92 Ha; Fertiliser: MOP; Total Bags: 368; Application Date: 01/02/2021 – 17/02/2021. <p><u>CEP Rengam Estate</u></p> <ol style="list-style-type: none"> Fertiliser: CIRP; Field: 01A; Total Bags: 166; Application Date: 09/12/2021 – 10/12/2021. 	Complied

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		<p>2. Fertiliser: Kieserite; Field 95 A2; Total Bags: 124; Application Date: 19/11/2021.</p> <p><u>Kulai Estate</u></p> <p>1. Fertiliser: Borate (48%); Field: 2014B; Total Bags: 20; Application Date: 26/04/2021 – 27/04/2021.</p> <p>2. Fertiliser: NKC1 (12:5:30); Field: 2010B; Total Bags: 597; Application Date: 19/07/2021 – 22/07/2021 Fertilizer application program is based on the recommendation by Agronomist and documented in Agronomic and Fertilizer recommendation Report.</p>					
Criterion 7.5: Practices minimise and control erosion and degradation of soils.							
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Maps identifying the soil and terrain were made available by all the sampled estates. The maps were prepared by SDP's R&D-Plantation Research & Advisory Precision Agriculture Unit (EIM), dated 13/08/2021. There were no soils classified as fragile or marginal in both estates visited. The soil types of the estates are as follows:</p> <table border="1" data-bbox="1137 946 1749 1399"> <thead> <tr> <th data-bbox="1137 946 1352 983">Estates</th> <th data-bbox="1352 946 1749 983">Soil types</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 983 1352 1399">Kulai</td> <td data-bbox="1352 983 1749 1399"> Bukit Temiang – 0.39% Jerangau – 22.44% Kg. Kubur – 0.39% Kulai – 3.3% Lancarang – 2.98 Local Alluvium – 1.69% Masai – 2.2% Organic clay - 1.14% Pelepah – 0.46% Rengam 43.81% Tepus – 15.89 Yong Peng – 5.3% Jeranggau 68.14% </td> </tr> </tbody> </table>	Estates	Soil types	Kulai	Bukit Temiang – 0.39% Jerangau – 22.44% Kg. Kubur – 0.39% Kulai – 3.3% Lancarang – 2.98 Local Alluvium – 1.69% Masai – 2.2% Organic clay - 1.14% Pelepah – 0.46% Rengam 43.81% Tepus – 15.89 Yong Peng – 5.3% Jeranggau 68.14%	Complied
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			Renggam 31.86%		
		Seri Pulai	Batu Anam – 5.19% Bungor – 26.66% Durian – 12.97% Holyrood – 12.97% Kuah – 3.24% Kuala Berang – 0.49% Local Alluvium – 26.26% Masai – 9.43% Organic Clay – 9.43% Peat – 10.21% Renggam – 4.51%		
		Layang	Harimau – 56.51% Holyrood – 4.09% Jerneh – 1.47% Jitra – 1.14% Kawang – 0.42% Kelau – 3.71% Lanchang – 1.26% Local Alluvium – 20.58 Organic clay – 3.44% Organic sand – 0.23% Renggam – 5.96% Sunei Buloh – 0.41% Terap – 0.78%		
		CEP Renggam	Renggam – 68.04% Local Alluvium 1 – 7.40% Jerangau – 6.80% Organic Clay / Muck – 5.06% Bungor – 3.41% Local Alluvium 11 – 3.27% Bukit Lunchu – 3.16%		

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			<p>Tampin – 1.13% Masai – 0.77% Pelepah – 0.51% Munchong - Malacca – 0.26% Bukit Temiang – 0.19%</p>	
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Based on the HCV Re-assessment for Strategic Operating Unit (SOU) 24 – Hadapan, prepared by PSQM Department, SDPSB, Final Report (Version II), dated June 2014, there is no area identified as >25° slope at all the sampled estates.</p>	Complied	
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>There is no new planting at all the sampled estates.</p>	Complied	
<p>Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>				
7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>Sighted annual soil and leaf analysis record for the year 2021 in Agronomist report which covered soil and leaf analysis for all sample Estates.</p> <p>Based on the report the soil use to plant Palm oil is suitable and rich in nutrients. The monitoring of soil is done annually by R&D Development, Sime Darby Plantation Berhad.</p> <p>This survey is among determining the long term suitability of land for oil palm cultivation for the next 25 years. The soil condition in all field found suitable for OP cultivation</p>	Complied	
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>During the field visit, there is no evidence of fragile soils found in all sample Estates.</p>	Complied	

7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil and Slope maps were available in all sample Estates and used to address the planning of infrastructure in all sample estates. No establishment of new planting in all sample Estates thus far.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no new planting on after 15 November 2018 in existing and new development areas at all the sampled estates.	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: 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 -	Existing palms were planted for a total area of 205.6 ha (10.20%) of peat soil. Based on the survey area, the area was classified as flat terrain & predominantly with a slope class of < 2o. Map of peat soil was prepared on 24th May 2019 (scale 1:22,000) by R&D – Precision Agriculture Unit. The locality of peat was found in the northern & west part of the estate. Peat depth varies from moderately deep to deep (sapric condition). A layer of organic matter is more than 50cm. Verified email submission from Group Sustainability Dept. SDPB dated 14/11/2019 to RSPO Secretariat. The purpose of the email is to notify the RSPO Unit about the Peat inventory for the entire Sime Darby Estates in Malaysia. The peat soil was found in the Seri Pulai Estate specifically in the northern and west part of the estate area approximate about 205.619 Ha. Other supporting documents attached were inventory table (which has the information about estate names and peat area size), and location map of the peat area.	Complied

7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -</p>	<p>Map of subsidence poles are available in Seri Pulai Estate. Estate management has complied with the recommendation made by PSQM Department and RSPO requirement about the monitoring of subsidence at peat area. During the site visit to the peat area at Block 2005, the Auditor found the subsidence pole was well maintained and the reading of subsidence is updated yearly as follows:</p> <table border="1" data-bbox="1137 603 1691 906"> <thead> <tr> <th>Year</th> <th>Subsidence record (cm)</th> </tr> </thead> <tbody> <tr> <td>2017</td> <td>3</td> </tr> <tr> <td>2018</td> <td>5</td> </tr> <tr> <td>2019</td> <td>2</td> </tr> <tr> <td>2020</td> <td>5</td> </tr> <tr> <td>2021</td> <td>3</td> </tr> </tbody> </table>	Year	Subsidence record (cm)	2017	3	2018	5	2019	2	2020	5	2021	3	Complied
Year	Subsidence record (cm)														
2017	3														
2018	5														
2019	2														
2020	5														
2021	3														
7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>Refer to the Peat soil verification at Seri Pulai Estate prepared by PRA_RGSA (Soil Unit) dated 15th May 2019, a recommendation has made to the estate management to install both piezometer (water table tube) and peat subsidence pole in the field. For water level monitoring, a water level marker needs to be installed at the outlet and to maintain water at 40 – 60 cm from the soil surface.</p> <p>Estate management has installed the piezometer at the collection drain and the monitoring of the water level is made on monthly basis. Verified the records of water table monitoring for the year 2021 which was prepared by the Assistant Manager and verified by Estate Manager. The reading of water level is within the optimum level i.e. 40 – 60 cm.</p>	Complied												

7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>NA as the existing peat area planted with oil palm is not programmed for replanting in the next 5 years.</p>	<p>Complied</p>
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>The estate has installed both Piezometer & Peat Subsidence Pole in the field in accordance to RSPO requirements. These instruments (Piezometer & Subsidence Pole) were visibly marked & placed within an accessible distance (3 palms away from the main road). The estate has erected a water level marker at the field outlet & keeps maintaining the water level at 40 - 60cm from the soil surface.</p>	<p>Not Applicable</p>
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>Peatland conservation areas are absent in said estate. The peat moisture has been maintained & natural water regimes were monitored accordingly. Rehabilitation measures were demonstrated whereby the fire prevention plan & natural revegetation of both secondary/indigenous plants were sighted in this block.</p>	<p>Not Applicable</p>

Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.

<p>7.8.1</p>	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>Water management plan at all the sampled estates were in place and implemented as verified through records of Water Management Plan FY 2021. Generally, the plan was established to focus on minimizing waste and pollution prevention of water sources. Among the action plans are rainwater harvesting, monitoring of pipeline leakage, and establishment of buffer zones at rivers and other water bodies.</p> <p>Workers of all the sampled estates have adequate access to clean water which were supplied through public domain (Syarikat Air Johor).</p> <p>Layang Estate: Pesticides in water analysis was last conducted on 25/10/2021 where several sampling points (upstream, midstream and downstream) along Sayong River were taken. Among the presence of substance analysed were Aldrin, Dieldrin, t-DDT, Heptachlor, Heptachlor Epoxide, Chlordane, Lindane, Endosulfan, BHC and Alpha-HCH. Based on the report (#PL571/2021), no pesticides substance was detected.</p> <p>Seri Pulai Estate: River water analysis was last conducted on 16/08/2021 [report no. IE846/2021]. Among the parameters analysed were pH, BOD, COD, SS, AN, DO and P. Based on the report, the results conformed to the ClassIIA/IIB of the NWQS for natural waterways.</p>	<p>Complied</p>		
<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas</p>	<p>Water courses and wetlands are protected as per documented Guidelines on River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). The widths of the buffer zones are guided by the following measurements:</p> <table border="1" data-bbox="1137 1310 1930 1353"> <tr> <td>River width (m)</td> <td>Buffer zone width</td> </tr> </table>	River width (m)	Buffer zone width	<p>Complied</p>
River width (m)	Buffer zone width				

	<p>provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<table border="1" data-bbox="1137 362 1930 612"> <tr> <td>> 40</td> <td>50</td> </tr> <tr> <td>20 to 40</td> <td>40</td> </tr> <tr> <td>10 to 20</td> <td>20</td> </tr> <tr> <td>5 to 10</td> <td>10</td> </tr> <tr> <td>< 5</td> <td>5</td> </tr> </table> <p>Monitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/rivers, version 1, year 2008, issue no. 1, dated 1/11/2008.</p> <p>Based on verification at all the sampled estates, the riparian zones were satisfactorily maintained, and no evidence of agrochemicals application seen.</p>	> 40	50	20 to 40	40	10 to 20	20	5 to 10	10	< 5	5	
> 40	50												
20 to 40	40												
10 to 20	20												
5 to 10	10												
< 5	5												
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 series of ponds for its treatment of effluent. The mill is disposing its effluent to the land application. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Last 12 months results were verified and found that the mill complied to the BOD regulated limit i.e. 2,500 mg/L.</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 a flowmeter. Based on the records, the mill has been using 1.09 m³/mt FFB per month in 2020 and 1.01 m³/mt FFB per month in 2021 as at November.</p>	Complied										
<p>Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</p>													
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>At the estates, the plan to optimise the usage of diesel is by regular maintenance of diesel-powered machinery and educational programme for the operators on fuel saving. At the mill, the</p>	Complied										

		<p>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>	
<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - 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> <p>Based on verification of various records such as store issuance records and SAP system, all of the data was found to be accurate.</p>	Complied
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -</p>	<p>Not applicable since no new development by the certification unit.</p>	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -</p>	<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.</p>	Complied

Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Guided by SDPB ARM, preparation of replanting using fire is not allowed. Based on site visit at replanting fields of the sampled estates, there was no trace of burning observed. Palm trunks were chipped and windrowed.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Hotspot monitoring managed by HQ (Fire Hotspot Monitoring Team) – if any fire detected, inform estate. Sime Darby Daily Hotspot Monitoring system has been in place since November 2013 using NASA satellite data. The system monitors any possible occurrence of fire within or nearby the concession areas throughout Sime Darby Plantation Upstream operation globally. At the estates level, there are fire prevention team established. Among the mechanisms to prevent fire are training on firefighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	The above-mentioned fire prevention and control measures were communicated to the stakeholders through either stakeholder consultation or distribution of feedback forms sent through mail. Records of email sent, and acknowledgment returns from the stakeholders were maintained and made available for verification.	Complied
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.	There is no land clearing after November 2005. Nonetheless, In-House High Conservation Value (HCV) Assessment was carried out for SOU 24 Hadapan by PSQM Department In-House HCV Assessor i.e. Siti Norralakman Yahya, Nur Aida Ab. Gani, Norsyamimi Saifulizam and Briony Octovia Homer Mum on 16th – 20th	Complied

	<p>- Critical (Major) compliance -</p>	<p>December 2013 and re-verification visit on 13th December 2020 (New addendum).</p>	
<p>7.12.2</p>	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>Verified In-House High Conservation Value (HCV) Assessment carried out for SOU 24 Hadapan by PSQM Department In-House HCV Assessor i.e. Siti Norralakman Yahya, Nur Aida Ab. Gani, Norsyamimi Saifulizam and Briony Octovia Homer Mum on 16th – 20th December 2013 and re-verification visit on 13th December 2020 (New addendum).</p> <p>The Methodology and participatory used in the assessment process comprise of the following steps:</p> <ul style="list-style-type: none"> - Team formation and briefing on project scope - Compilation of secondary and available primary data, including preliminary Stakeholders consultation - Fieldwork and primary data collection – physical inspection, site observation, Internal and External stakeholder consultation - Data analysis and interpretation - Preparation of full report and maps - Critical review of draft report between team members - Revise report and finalize (final) <p>The study covers the HCV 1-6 allotted area of concern and the mapping /GIS specialist input.</p> <ol style="list-style-type: none"> 1) HCV 1 – There are no significant concentrations of HCV 1 species (RTE or endemic), or which contains habitat critical to the survival of these species in the area of interest 2) HCV 2 - The Palm Oil Mill had developed with oil palm and there was no large landscape ecosystem (more than 50,000ha) 3) HCV 3 – There is no RTE ecosystem and habitat in the Palm Oil Mill 4) HCV 4 – There is a water catchment area that hold a conservation value for daily basic needs or emergency water 	<p>Complied</p>

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- use
- 5) HCV 5 – There was no natural sites or resources in the Palm Oil Mill that local communities are dependent on
 - 6) HCV 6 - There are no custom ceremonies or rituals, which require a cultural, religious, or sacred site, being practiced by locals

The internal assessors have identified the following areas categorised as HCV:

Estates	Assessed areas	Area (Ha)	HCV classification	Remarks
SPE	> 25° slope	86.02	HCV 4	Promote soil conservation and prevent erosion
KLE	Ravine – Fluvial slope	14.53	HCV 4	Promote soil conservation and prevent erosion
	Water catchment	0.77	HCV 4	Provide basic service (water resources) for critical situations
LYE	Palm Oil Mill pond	6.02	HCV 4	Provide basic service (water resources) for critical situations
CRE	Water catchment	7.19	HCV 4	Provide basic service (water resources) for critical situations

The assessment team has proposed recommendations that incorporated basic conservation planning principles for consideration into management administration to manage the HCV and conservation areas. The proposed management and monitoring for HCVA possible threats in SOU 24 were then adopted by the respective estates.

7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable	Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	There was no HCVs, HCS forests identified after 15 November 2018. Nonetheless, the sampled estates have conducted their HCV monitoring through utilisation of "Monitoring of Biodiversity and HCV Areas" which were done weekly. Latest reports of checking on wildlife sighting, signage condition, sign of encroachment, rubbish/pollution and erosion were made available for verification.	Complied
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	Based on the report mentioned in Indicator 7.12.2, there was no area where rights of local communities have been identified in HCV areas. Nonetheless, employees were educated about this through various media such as morning briefing and HCV awareness training.	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>Based on the report mentioned in Indicator 7.12.2, There are no significant concentrations of HCV 1 species (RTE or endemic), or which contains habitat critical to the survival of these species in the area of interest. Nonetheless, employees were educated through morning briefing/training and signage about the restriction of hunting wildlife. Training records with the following dates were verified:</p> <ul style="list-style-type: none"> - LYE – 11/11/2021 (Layang Div.) & 15/11/2021 (Hadapan Div.) - HDM – 29/11/2021 - CRE – 16/07/2021 	Complied

		<ul style="list-style-type: none"> - Kulai – 07/09/2021 - SPE – 01/09/2021 	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The sampled estates have conducted their HCV monitoring through utilisation of “Monitoring of Biodiversity and HCV Areas” which were done weekly. Latest reports of checking on wildlife sighting, signage condition, sign of encroachment, rubbish/pollution and erosion were made available for verification.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>There is no land clearing after November 2005 in all sampled estates.</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** for **Hadapan POM** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2020** for **Hadapan POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.97
PK	0.97

Extraction	%
OER	20.21
KER	3.06

Production	t/yr
FFB Process	233,187.36
CPO Produced	47,191.59
PK Produced	7,133.10

Land Use	Ha
OP Planted Area	32,118.03
OP Planted on peat	205.62
Conservation (forested)	0
Conservation (non-forested)	0
Total	32,323.65

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	95,648.49	0.51	10,378.40	0.55	0	0	106,026.90	1.06
CO ₂ Emission from fertilizer	7,961.66	0.04	756.05	0.04	0	0	8,717.71	0.08
NO ₂ Emission	5,530.91	0.03	387.61	0.02	0	0	5,968.52	0.05
Fuel Consumption	865.57	0	89.76	0	0	0	955.33	0
Peat Oxidation	12,431.83	0.08	0	0	0	0	11,161.92	0.08
Sink								
Crop Sequestration	- 87,782.52	-0.47	-9734.48	-0.52	0	0	-97517.00	-0.99
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	33,436.03	0.18	1,877.34	0.10	4085.59	0	39,398.97	0.28

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	6,918.01	0
Fuel Consumption	34.12	0
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	6,952.13	0

Summary of Kernel Crusher Emission and Credit (if applicable)

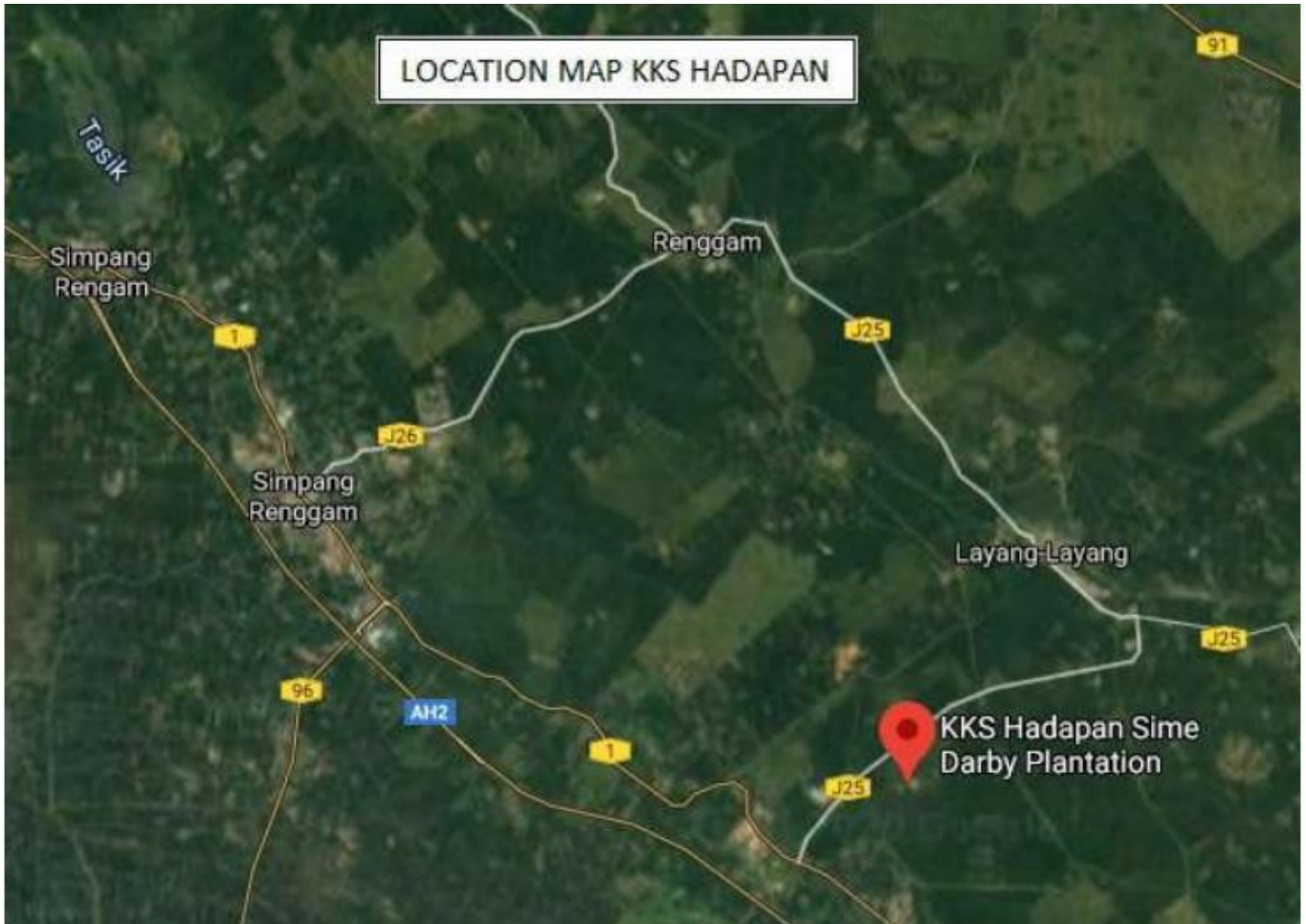
Emissions	tCO ₂ e
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

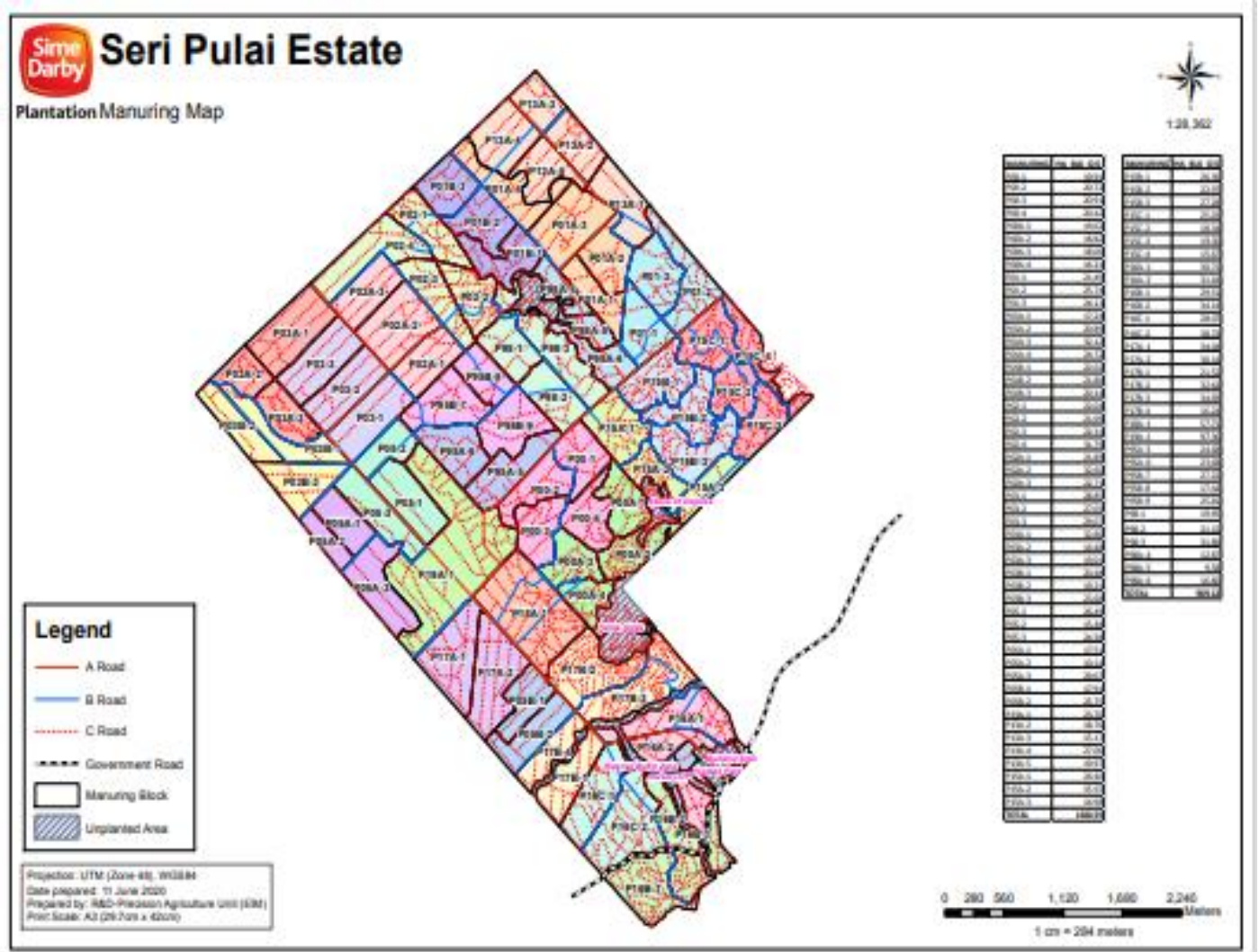
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	5
Divert to methane captured (flaring) (%)	3
Divert to methane captured (energy generation) (%)	92

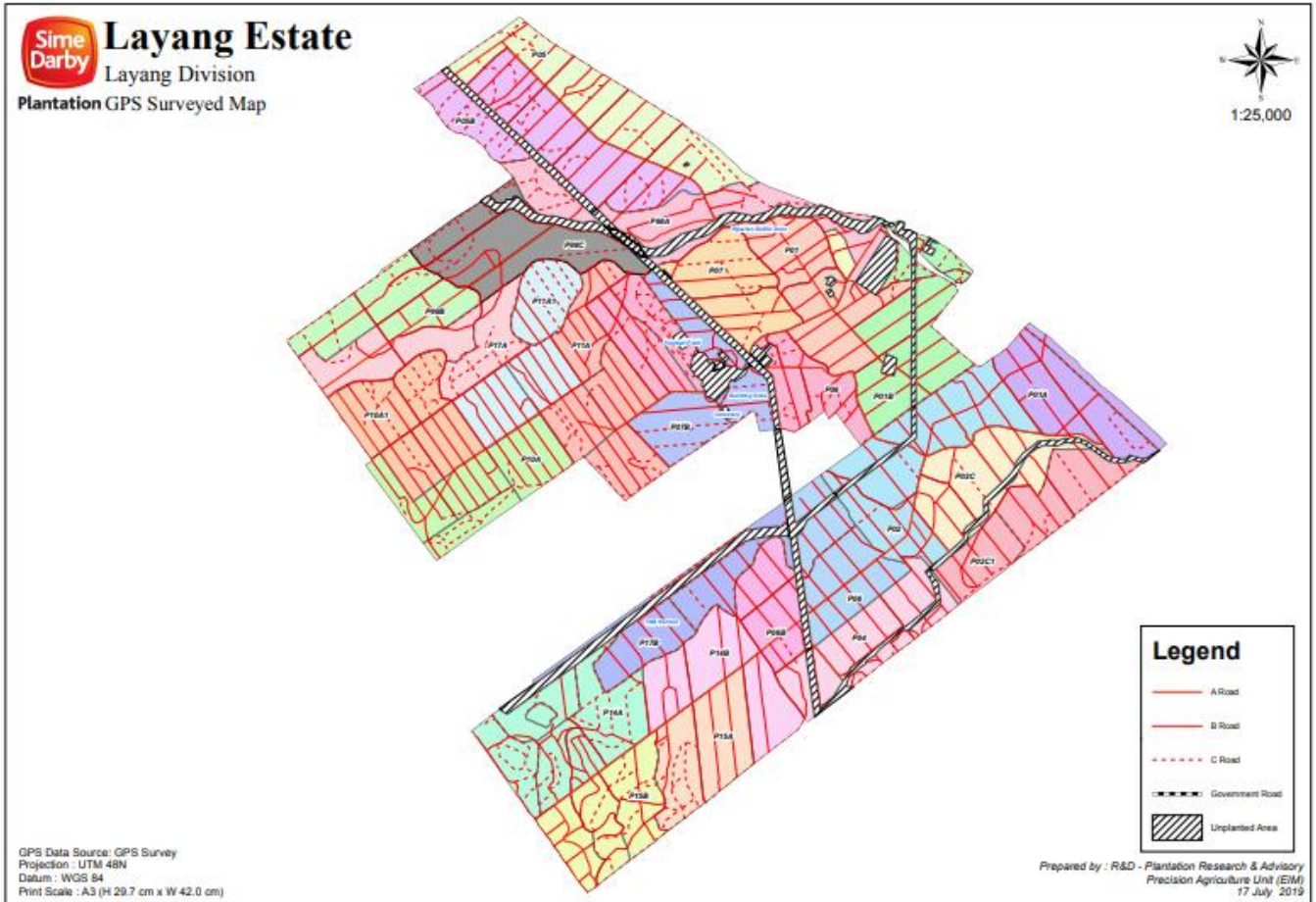
Appendix C: Location Map of Certification Unit and Supply bases

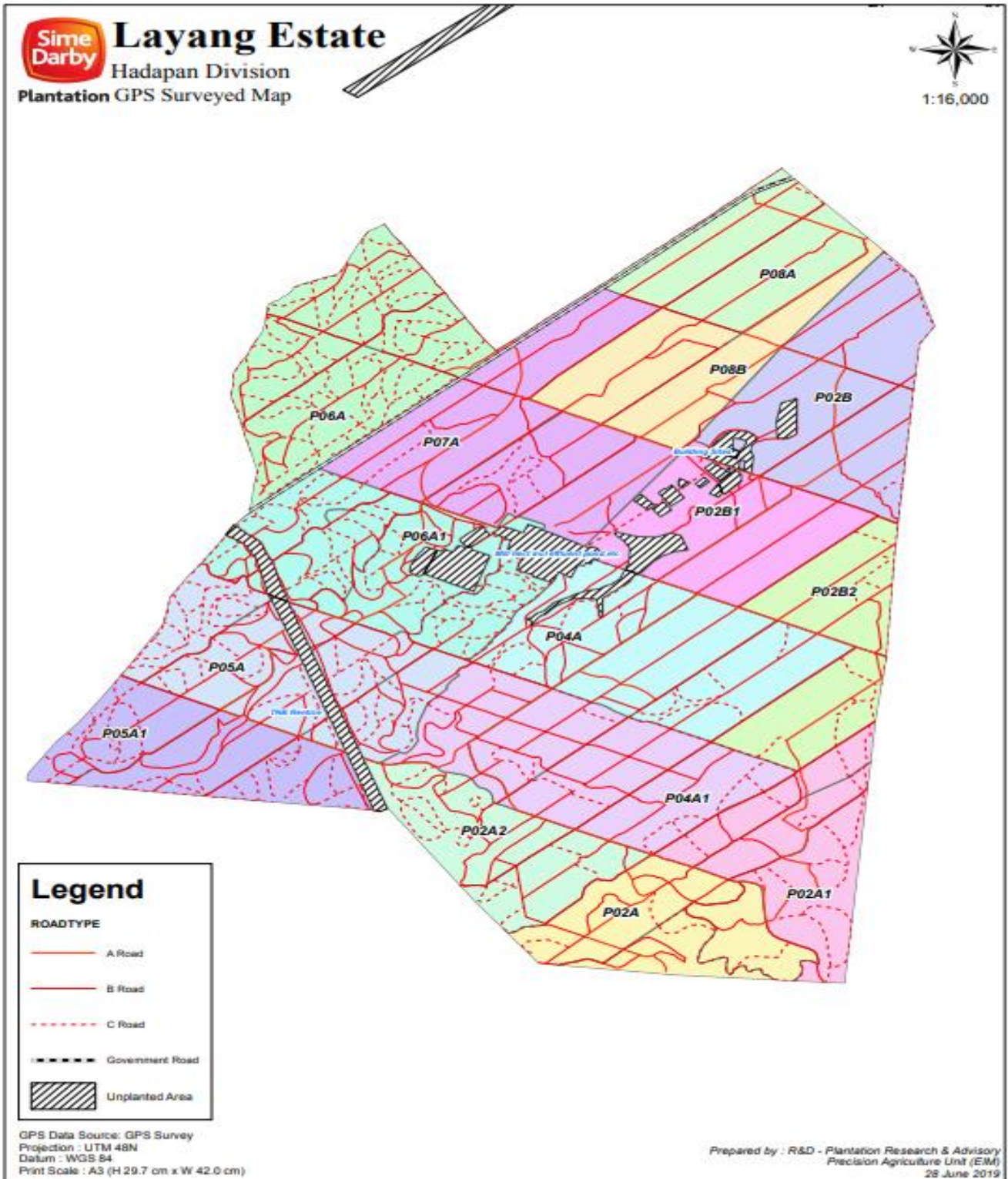


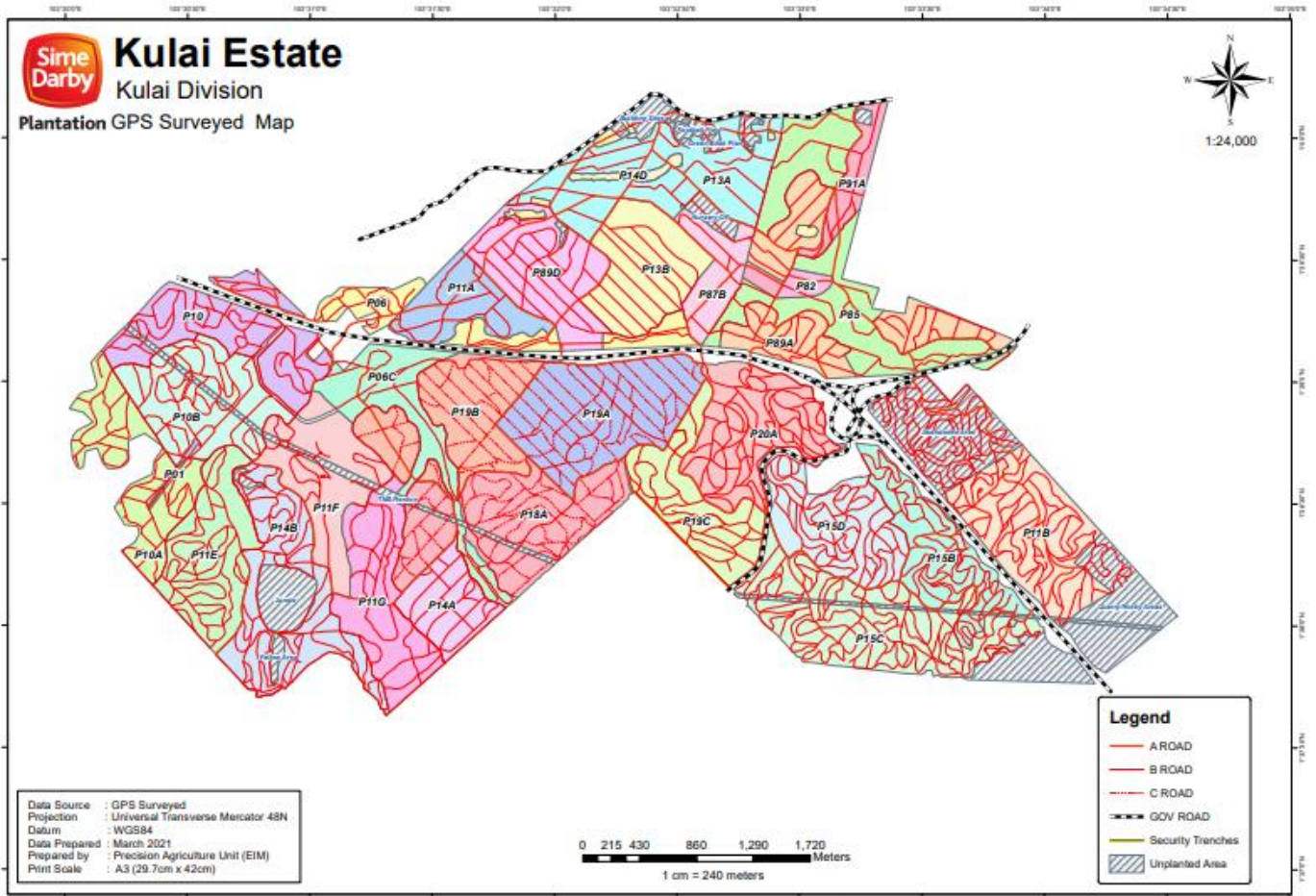
Appendix D: Estate Field Map



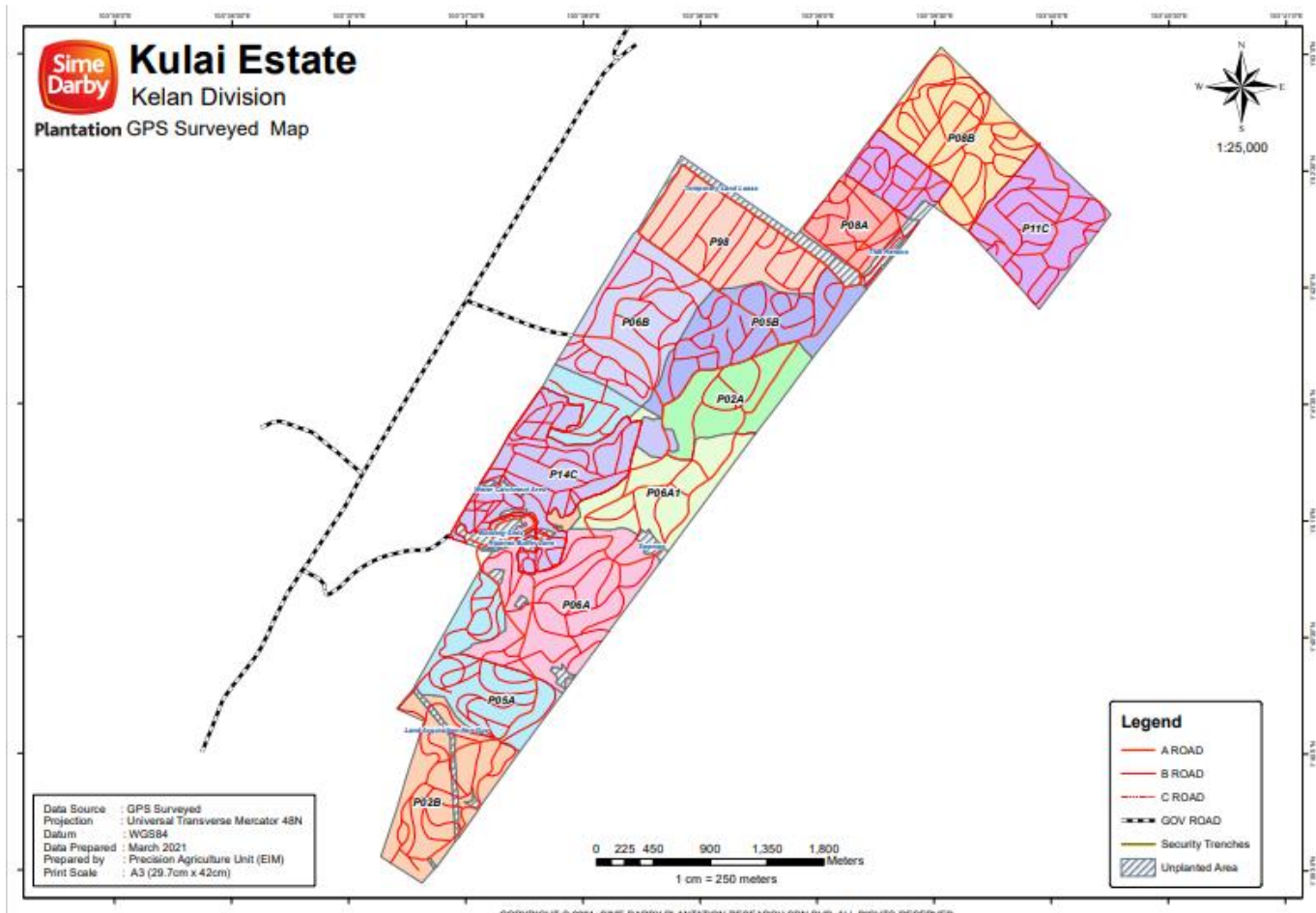
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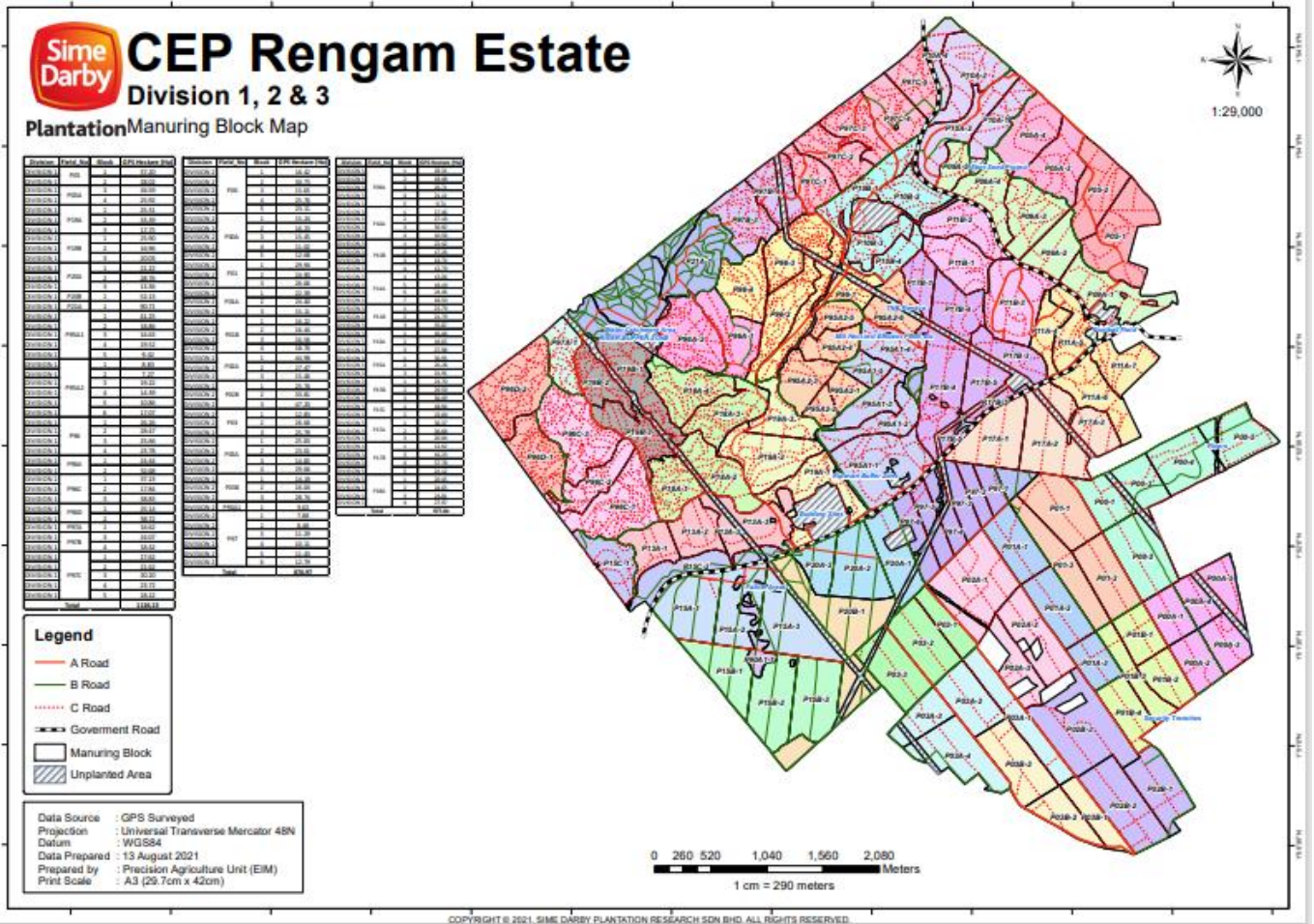






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Appendix F: List of Abbreviations

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