

**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 Sime Darby Plantation Berhad
Client company Address: Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 3)- Elphil Palm Oil Mill
Location of Certification Unit: Batu 6, Jalan Lintang, Sungai Siput Utara, 31100 Sungai Siput, Perak, Malaysia
Date of Final Report: 21/06/2022

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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 3A, 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 3)- Elphil Palm Oil Mill		
Location / Address	Batu 6, Jalan Lintang, Sungai Siput Utara, 31100 Sungai Siput, Perak, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Mdm.Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM)	E-mail	Shylaja.vasudevan@simedarby.com
Telephone	03-78487379 (Head Office)	Facsimile	03-78487356 (head Office)

2. Certification Information			
Certificate Number	RSPO 550180	Certificate Start Date	18/06/2021
Date of First Certification	18/06/2011	Certificate Expiry Date	17/06/2026
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	The objective of the assessment was to conduct an annual 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	45mt/Hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 705883	MS 2530-3: 2013	BSI Services (M) Sdn. Bhd.	24/03/2023
MSPO 705885	MS 2530-4: 2013	BSI Services (M) Sdn. Bhd.	24/03/2023
MSPO 717672	MSPO SCCS: 2018	BSI Services (M) Sdn. Bhd.	11/11/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Elphil Palm Oil Mill	Batu 6, Jalan Lintang, Sungai Siput Utara, 31100 Sungai Siput, Perak, Malaysia.	4° 53' 24.90" N	101° 5' 38.00" E
Elphil Estate	Ladang Elphil, Jalan Lintang, 31100 Sungai Siput(U), Perak, Malaysia	4° 53' 24.90" N	101° 5' 38.00" E
Kamuning Estate	Ladang Kamuning/Changkat Salak, 31100 Sungai Siput (U), Perak, Malaysia.	4° 49' 34.80" N	101° 3' 43.70" E
Kinta Kellas Estate	Ladang Kinta Kellas, 31007, Batu Gajah, Perak, Malaysia.	4° 27' 46.15" N	101° 4' 30.72" 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
Elphil Estate	1,660.33	26.53	176.92	1,863.78	88.34
Kamuning Estate	2,638.19	84.59	1,165.65	3,888.43	67.85
Kinta Kellas Estate	936.34	3.69	100.71	1,040.74	89.97
Total	5,234.86	114.81	1,443.28	6,792.95	82.06

Notes:

1. Elphil Estate : Reduction of 1.65 Ha at total planted (Mature + Immature) due to land acquisition for Biogas project in 2021.
2. Kinta Kellas Estate : Reduction 20 Ha at total planted (Mature + Immature) due land acquisition for Solar project in Jan 2022.

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6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Elphil Estate	218.63	373.26	156.91	892.43	19.10	1,441.70	218.63
Kamuning Estate	508.00	857.00	237.00	1,036.19	-	2,130.19	508.00
Kinta Kellas Estate	59.61	367.8	-	508.93	-	876.73	59.61
Total (ha)	786.24	1,568.06	393.91	2,437.55	19.10	4,448.62	786.24

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Jun 21 – May 22)	Actual (Mar 21 – Feb 22)		Forecast (Jun 22 – May 23)
		Previous license period (Mar – May 21)	Current license period (Jun 21 – Feb 22)	
Elphil Estate	30,145.00	9,652.82	19,202.90	32,302.01
Kamuning Estate	43,376.00	11,963.39	21,143.62	38,559.88
Kinta Kellas Estate	21,119.55	6,121.380	10,886.45	16,574.00
Total	94,640.55	78,970.56		87,435.89

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Jun 21 – May 22)	Actual (Mar 21 – Feb 22)		Forecast (Jun 22 – May 23)
		Previous license period (Mar – May 21)	Current license period (Jun 21 – Feb 22)	
NA		-	-	
Total		-		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Jun 21 – May 22)	Actual (Mar 21 – Feb 22)		Forecast (Jun 22 – May 23)
		Previous license period (Mar – May 21)	Current license period (Jun 21 – Feb 22)	
Tang Tatt	NA	27,246.403	73,611.095	NA
Eng Huat Latex		7,699.84	31,657.875	

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NLFCS Dovenby		-	798.944	
NLFCS Sg Krudda		-	42.44	
NLFCS Sungai Siput		71.18	188.00	
FELCRA Sg Siput		123.345	551.138	
FELCRA Kg Jasa		63.30	346.687	
Green View		-	5.59	
Total			142,405.84	

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	Mar 2021	9,670.71	12,713.94	22,384.65
2	Apr 2021	9,046.30	12,365.58	21,411.88
3	May 2021	9,020.58	10,124.58	19,145.16
4	Jun 2021	7,994.78	12,378.89	20,373.67
5	Jul 2021	7,353.14	14,342.95	21,696.09
6	Aug 2021	7,021.77	12,257.91	19,279.68
7	Sep 2021	5,641.20	12,754.23	18,395.43
8	Oct 2021	6,623.36	12,450.23	19,073.59
9	Nov 2021	5,220.53	11,619.68	16,840.21
10	Dec 2021	4,461.05	11,527.19	15,988.24
11	Jan 2022	3,726.48	10,044.27	13,770.75
12	Feb 2022	3,190.66	9,826.39	13,017.05
	TOTAL	78,970.56	142,405.84	221,376.40

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10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (Jun 21 – May 22)	Actual (Mar 21 – Feb 22)		Forecast (Jun 22 – May 23)
	Previous license period (Mar – May 21)	Current license period (Jun 21 – Feb 22)	
FFB	FFB		FFB
94,640.55 mt	27,737.59 mt	51,232.97 mt	87,435.89 mt
	78,970.56 mt		
CPO (OER: 20.60 %)	CPO (OER: 20.97 %)		CPO (OER: 20.75 %)
19,495.95 mt	5,689.81 mt	10,871.27 mt	18,142.94 mt
	16,561.08 mt		
PK (KER: 5.50 %)	PK (KER: 5.34 %)		PK (KER: 5.40 %)
5,205.23 mt	1,476.90 mt	2,738.41 mt	4,721.53 mt
	4,215.31 mt		

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Mar 2021	1,976.28	527.97
2	Apr 2021	1,882.26	482.49
3	May 2021	1,831.27	466.44
4	Jun 2021	1,725.91	395.91
5	Jul 2021	1,525.01	391.87
6	Aug 2021	1,515.34	414.95
7	Sep 2021	1,213.05	318.78
8	Oct 2021	1,446.38	333.40
9	Nov 2021	1,139.32	275.02
10	Dec 2021	923.61	230.12
11	Jan 2022	762.07	216.73
12	Feb 2022	620.58	161.63
	TOTAL	16,561.08	4,215.31

11. Summary of Actual Volume sold					
Current License period (June 2021 – February 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		

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CPO (MT)	1,653.54	-	-	5,367.02	7,020.56
PK (MT)	6,808.43	-	-	-	6,808.43
Credits	2,000.00	-	-	-	2,000.00
Previous License period (March 2021 – May 2021)					
CPO (MT)	500.00	-	-	5,100.00	5,600.00
PK (MT)	-	-	-	1,470.00	1,470.00
Credits	-	-	-	-	-

Note:

1. Conventional is RSPO certified material but sold as non-RSPO.
2. SOU 3 Elphil POM have oversold RSPO-Certified PK during the current license period. A Critical Non-Conformity has been raised under indicator 3.8.12 of the Supply Chain Requirements. As for the corrective actions the mill has stop all sales of RSPO Certified PK till the mass balance record shows positive stock. This was verified and found to be successfully addressed by the mil during the Critical NC Close Out verification done on 18/05/2022.

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	XXX	TR-3fcfadec-da7f	183.03	-
2	XXX	TR-d62998c2-1394	200	-
3	XXX	TR-7532531d-3eae	250	-
4	XXX	TR-eb195f65-8f99	100	-
5	XXX	TR-220cb28f-4cc7	29.03	-
6	XXX	TR-ac284542-0ea4	500	-
7	XXX	TR-35830766-6a28	250	-
8	XXX	TR-a90e81d4-17c1	250	-
9	XXX	TR-36669016-be96	191.46	-
10	XXX	TR-f256ff37-6e35	200.02	-
11	XXX	TR-47bf86d7-3879	-	200.00
12	XXX	TR-fcb86fb2-906d	-	75.00
13	XXX	TR-c5ffe40d-db12	-	500.00
14	XXX	TR-2845096f-e0d6	-	50.00
15	XXX	TR-4b0c7457-1b67	-	250.00
16	XXX	TR-9218cc09-1808	-	50.13
17	XXX	TR-cc7b59d2-60dc	-	280.00
18	XXX	TR-03fdbae6-5abd	-	10.24
19	XXX	TR-21114cae-e2b9	-	500.00

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20	XXX	TR-0b90a0a7-362b	-	1.46
21	XXX	TR-726fa872-b864	-	66.00
22	XXX	TR-07a9bb94-a0f6	-	250.00
23	XXX	TR-dcd683da-bf81	-	200.00
24	XXX	TR-8af0e09e-2024	-	200.00
25	XXX	TR-4a3d56e8-ca6f	-	498.87
26	XXX	TR-550c45c4-76ae	-	202.89
27	XXX	TR-fd464747-4fb5	-	14.46
28	XXX	TR-2f8cca60-7847	-	3.97
29	XXX	TR-ba5a3077-4f2f	-	7.12
30	XXX	TR-cab019f8-48c1	-	200.00
31	XXX	TR-7667cd9e-f8b6	-	254.66
32	XXX	TR-0a6b9592-d53b	-	200.00
33	XXX	TR-ec14baa3-0d68	-	200.00
34	XXX	TR-4b5bc92e-2397	-	193.49
35	XXX	TR-cfa2e27f-47f6	-	200.00
36	XXX	TR-c9499ce3-fd20	-	200.00
37	XXX	TR-0688b403-1993	-	200.00
38	XXX	TR-635583c2-fb89	-	250.00
39	XXX	TR-4d7292ca-6001	-	150.00
40	XXX	TR-4ff95be9-2d08	-	200.00
41	XXX	TR-68b33b4a-23ef	-	111.03
42	XXX	TR-f4b5c047-dd82	-	300.00
43	XXX	TR-00bb5861-419b	-	26.29
44	XXX	TR-f99a8275-fa6a	-	81.78
45	XXX	TR-aa31da2e-3d44	-	25.53
46	XXX	TR-5c10df0b-0f3f	-	200.00
47	XXX	TR-1d9689a3-d51d	-	7.89
48	XXX	TR-d0986018-eef5	-	80.95
49	XXX	TR-ea4ed17f-eec0	-	150.00
50	XXX	TR-acd70213-628d	-	216.67
TOTAL			2,153.54	6,808.43

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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)
-	-	-	-	-
TOTAL			-	-

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	XXX	10,467.02	-
2	XXX	-	1,470.00
TOTAL		10,467.02	1,470.00

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	XXX	ST-TR-a87cb8c3-fa85	2,000.00
TOTAL			2,000.00

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year (Jun 21 – May 22)			Actual (Mar 21 – Feb 22)			Forecast (Jun 22 – May 23)		
	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 (June 2021 – Feb 2021)						
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 **14th, 16th, 17th and 18th March 2022**. 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 **18th May 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.

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.

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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 (Recertification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Elphil Palm Oil Mill	✓	✓	✓	✓	✓
Elphil Estate	✓	✓	✓	✓	✓
Kamuning Estate	✓	✓	✓	✓	✓
Kinta Kellas Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: March 13, 2023 - March 16, 2023

Total Number of Mandays: 12 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Vijay Kanna Pakirisamy (VKP)	Team Leader	<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: During this assessment, he assessed on the aspects of Environmental Aspects, Estate Best Practises and supply chain requirements.</p> <p>Language proficiency: He is fluent in English, Bahasa Malaysia and Tamil languages.</p>

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<p>Mohamed Hidhir Zainal Abidin (MHZ)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006.</p> <p>Work Experience: 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: During this assessment, he assessed on the aspects of legal, social, and stakeholder engagement.</p> <p>Language proficiency: He is fluent in Bahasa Malaysia and English languages.</p>
<p>Valence Shem (VS)</p>	<p>Team Member</p>	<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 on the aspects of Occupational, Health & Safety, Estate Best Practises and supply chain requirements.</p> <p>Language proficiency: He is fluent in Bahasa Malaysia and English languages.</p>
<p>Hafriazhar Mohd. Mokhtar (HMM)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor of Engineering (Hons.) Chemical Engineering, University Technology Malaysia</p> <p>Work Experience: He has 20 years of working experience in multiple engineering disciplines emphasized on science, technology and sustainability. He acquired many skills from being involved in various industrial environments ranging from construction, plantation and mining before auditing. In summary, his started his career as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in palm oil mill, Project Control Engineer (2008-2011) in mining and Auditor (2011-present) with accredited certification bodies.</p> <p>Training attended: He has completed Social Auditing & SMETA Training, HCV & HCS Introductory Training, ISO 45001 LA Training, MSPO LA Training, Endorsed RSPO SCCS LA Training, Endorsed RSPO P&C LA Training, ISO 9001 LA Training, ISO 50001 LA Training, and ISO 14001 LA Training</p> <p>Aspect covered in this audit: During this audit, he covered Policy and commitment, Social requirements, contract agreement, human rights,</p>

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		<p>workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue and RSPO Supply Chain, HCV, General Custody of Chain, Rules on Market Communications & Claims.</p> <p>Language proficiency: He is fluent in English and Bahasa Malaysia</p>
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Accompanying Persons:

Name	Role
-	-

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1.3 Assessment Plan

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

Date	Time	Subjects	HMM	VSH	VKP	MHZ
Sunday, 13/03/2022	PM	Audit team travel to Ipoh	✓	✓	✓	-
Monday, 14/03/2022 Kinta Kellas Estate	9:00 AM – 9:30 AM	Opening meeting (combine with MSPO) • Opening presentation by audit team leader • Confirmation of assessment scope and finalize audit plan	✓	✓	✓	-
	9:30 AM – 1:00 PM	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.	✓	✓	✓	-
	10:30 AM – 11:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	✓	-	-	-
	1:00 PM – 2:00 PM	Lunch break	✓	✓	✓	-
	2:00 PM – 4:30 PM	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.)	✓	✓	✓	-
	4:30 PM – 5:00 PM	• Auditors discussion • Day 1 Interim Closing Briefing	✓	✓	✓	-
	Wednesday, 16/03/2022 Kamuning Estate	9:00 AM – 1:00 PM	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.	-	✓	✓
10:30 AM – 11:30 PM		Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	-	-	-	✓
1:00 PM – 2:00 PM		Lunch break	-	✓	✓	✓

Date	Time	Subjects	HMM	VSH	VKP	MHZ
	2:00 PM – 4:30 PM	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.)	-	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> Auditors discussion Day 2 Interim Closing Briefing 	-	✓	✓	✓
Thursday, 17/3/2022 Elphil Estate	9:00 AM – 1:00 PM	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.	-	✓	✓	✓
	10:30 AM – 11:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	-	-	-	✓
	1:00 PM – 2:00 PM	Lunch break	-	✓	✓	✓
	2:00 PM – 4:30 PM	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.)	-	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> Auditors discussion Day 3 Interim Closing Briefing 	-	✓	✓	✓
Friday, 18/03/2022 Elphil Palm Oil Mill	9:00 AM – 1:00 PM	Plant visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, lab, weighbridge, and palm product storage area etc.	-	✓	✓	✓
	10:30 AM – 11:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	-	-	-	✓
	1:00 PM – 2:00 PM	Lunch break	-	✓	✓	✓

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Date	Time	Subjects	HMM	VSH	VKP	MHZ
	2:00 PM – 4:30 PM	Document Review P1 – P7: SOPs, review on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, RSPO SCC general requirements, supply chain for CPO mill, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	-	✓	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> • Auditors discussion • Day 4 Interim Closing Briefing 	-	✓	✓	✓
	5:00 PM – 5:30 PM	Closing meeting	-	✓	✓	✓
Saturday, 19/03/2022	AM	Audit team travel back to KL	-	✓	✓	✓

Critical NC Close Out Verification Assessment Plan

Date	Time	Subjects	VKP
Wednesday, 18/05/2022	0900 – 0930	Opening Meeting at SOU 3 Elphil POM: <ul style="list-style-type: none"> - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan 	✓
	0930 – 1230	<ol style="list-style-type: none"> 1. Verification on Critical NC: <ul style="list-style-type: none"> - 2179275-202203-M1 - 2179275-202203-M2 2. Site observation, workers interview 3. Document review – implemented evidence 	✓
	1230 – 1300	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. SDP TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p> <p>http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</p>	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	<p>Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1st Oct 2018, the mill has completed the selling off transaction.</p> <p>In Indonesia, PT Mitral Austral Sejahtera was sold and currently SDP have no control in the management.</p>	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	No. There is no new acquisitions as at latest TBP 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 (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	<p>Yes.</p> <p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties was sold and currently Sime Darby Plantation Berhad have no control in the management.</p>	Complied

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	<p>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. 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. 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>		
<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 1. NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/certification/new-</p>	<p>Complied</p>

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	<p>plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited</p> <p>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</p> <p>3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd</p> <p>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</p> <p>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</p> <p>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</p> <p>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</p> <p>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</p> <p>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> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-</p>	
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	<p>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>
<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>Complied</p>

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	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.	
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?	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.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	There is no scheme smallholders and/ or outgrowers include in the scope of certification.	Complied

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 Estate					
		Sungai Buluh Estate					
		Bukit Talang Estate					
				Bukit Kerayong Oil Mill	-	Kapar Selangor	Certified
7	Bukit Kerayong	Bukit Kerayong Estate					
		Bukit Cheraka Estate					
		Elmina Estate					
				East Oil Mill	-	Carey Island, Selangor	Certified
8	East	East Estate					
		Sepang Estate					
		Dusun Durian Estate					
				West Oil Mill	-	Carey Island, Selangor	Certified
9	West	West Estate					

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10	Bukit Puteri	Bukit Puteri Oil Mill	-	Raub, Pahang	Certified	07/07/2011	-
		Bukit Puteri Estate					
11	Kerdau	Kerdau Oil Mill	-	Temerloh, Pahang	Certified	07/07/2011	Jentar Estate has merged with Kerdau Estate and reported to the CB in March/April 2021.
		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	Layang Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Layang Estate					
		Rasan Estate					
		Belian Estate					

		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	-	-	Musi 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	-					-
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		Sekunzir 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 Aneka Intipersada	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 Sandika Natapalma	Lembiru Mill	-	-	Ketapang District – West Kalimantan	Certified	03/07/2014	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru Mill.	
		Lembiru Estate							
		Awatan Estate							

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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 – New Britain Palm Oil (NBPOL) Operations (as at March 2021)

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name						
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	-	Guadalcanal Province, Solomon Islands	Certified	18/03/2011	-
		Tetere Estate					
		Ngalimbiu Estate					
		Mbalisuna Estate					
		Smallholders – West Zone (83)					
		Smallholders – Central Zone (53)					

		Smallholders – MBA East Zone (59)					
		Smallholders – MBE East Zone (37)					
2	Milne Bay Estate (MEB)	Hagita Oil Mill	-	Milne Bay Province, PNG	Certified	15/02/2018	-
		Giligili Estate					
		Hagita Estate					
		Waigani Estate					
		Sagarai Estate					
		Padipadi Estate					
		Mariawatte Estate					
		Smallholders – East Gurney Estate (264)					
		Smallholders – West Gurney Estate (229)					
		Smallholders – East Sagarai Estate (157)					
		Smallholders – West Sagarai Estate (221)					
3	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 (Paddox) Estate					
		Surinam Estate					
		Dumpu Estate					
		Ngaru Estate					
		J Estate (Jephcott) Estate					
		Smallholders - Madang VOPs (71)					
		Smallholders - Morobe VOPs (253)					
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	-	Oro Bay Province, PNG	Certified	01/02/2013	-
		Mamba Oil Mill					
		Embi Estate					
		Ambogo Estate					
		Sangara Estate					
		Sumbiripa Estate					
		Mamba Estate					
		Sambogo Estate					
		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					
		Karausu 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					

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		Smallholders LSS Mosa (1822)					
		Smallholders VOP East (1817)					
		Smallholders VOP Central (1964)					
		Smallholders VOP West (1279)					
		Smallholders LSS Kapiura (551)					
		Smallholders VOP Kapiura (850)					
		Smallholder Kaulong / Akami / Pushiki / Repamira / Sakapei					
7	Markham Farms Company Limited (MFCL) / Markham Agro Pte Ltd	Erap Mill	-	Markham Farms	Certified	27/3/2020	There is total area NPP: 710.30ha which is currently excluded from the certification scope until the NPP is approved
		Munum Estate					
		Maralumi Estate					
		Erap Estate					

3.3 Details of Nonconformities

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

During this Assessment there were Two (2) Critical; One (1) Minor nonconformities and One (1) Opportunity For Improvement raised. The Elphil Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2179275-202203-M1	Date Issued	18/03/2022
Due Date	16/06/2022	Date of nonconformity Closure	18/05/2022
Clause & Category (Critical / Minor)	2.1.1 (Critical)		
Statement of Nonconformity:	The Compliance Conditions for DOE Compliance Schedule were not met.		
Requirement Reference:	The Unit of Certification complies with legal requirements		
Objective Evidence:	<p>The DOE Jadual Pematuhan (License Number: 001845) states under the license approval conditions among others as below:</p> <p>9. <i>Premis hendaklah memastikan kedalaman kolam pengolahaan sentiasa kekal mengikut rekabentuk yang telah diluluskan dan mengekalkan freeboard sekurang-kurangnya 0.5m atau 20% safety margin, yang mana lebih besar.</i></p> <p>10. <i>Setiap kolam pengolahaan effluen hendaklah dipasang Papan Tanda yang mempunyai maklumat nama kolam, kapasiti rekabentuk, tempoh penahanan effluen, Tarikh akhir penyingkiran enapcemar dan ketinggian freeboard.</i></p> <p>Based on the site visit to the mill effluent treatment pond, the following non-complying conditions were verified.</p> <ol style="list-style-type: none"> The Acidification Pond No.1, Acidification Pond No. 2 and Aerobic Pond was found to not have the freeboard specification as required in the Compliance Schedule. The signages for each effluent treatment pond that are in place did not include all the required information as required in the Compliance Schedule. 		
Corrections:	<ol style="list-style-type: none"> To add information on freeboard specification in the signage details. To emphasize that freeboard specification is set at minimum of 0.5 m based on Compliance Conditions for DOE Compliance Schedule. To raise the bund surrounding the pond and to ensure freeboard with required specification. To desilt the pond with heavy solid. 		
Root Cause Analysis:	<ol style="list-style-type: none"> Heavy rains for the past few days has caused high volume of POME at ponds. Freeboard specification was not included in the early design of signage board. 		

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	3. Existing holding solid pond full of solid and all POME pond heavily silted.
Corrective Actions:	<ol style="list-style-type: none"> 1. Ensure rotation on night shift basis to monitor and record the level of pond. 2. In case if there is rainy season, mill will continue pump for furrow application on extra hours. 3. To add details on freeboard specification at each pond signage.
Assessment Conclusion:	<p><u>Critical NC Close Out Verification</u></p> <ol style="list-style-type: none"> 1. Verified that all the signages had included the information on freeboard specifications. 2. ETP Operator checks on the depth of the freeboard on a daily basis. The data are recorded in the document "Rekod Paras Air Di Dalam Kolam" and submitted to the management to be verified. Records were available for verification. The ETP Operators are rotated on night shift basis 3. The bund surrounding all effluent ponds have been raised on (completed 14/05/2022) and verified to have sufficient freeboard as required under DOE Compliance Schedule. 4. The mill has tendered out to desilt the ponds with the heavy solids and the operations will commence in July 2022. <p>Based on the evidence provided and the visit to the mill's effluent pond it was found that the corrections and corrective action plans have been addressed accordingly. Therefore, the Critical Non-Conformity is successfully closed on 18/05/2022.</p>

Non-conformity			
NCR Ref #	2179275-202203-M2	Date Issued	18/03/2022
Due Date	16/06/2022	Date of nonconformity Closure	18/05/2022
Clause & Category (Critical / Minor)	3.8.12 (Critical)		
Statement of Nonconformity:	The mill has delivered Mass Balance sales of PK from a negative stock for the period under review (Mar 2021 to Feb 2022). The mass balance accounting have not been updated accordingly.		
Requirement Reference:	<p>Record keeping</p> <p>i) For Mass Balance Module, the mill:</p> <ol 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. 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>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>		
Objective Evidence:	1. Based on the verification of the mill's mass balance account and sales registered in RSPO PalmTrace for the period under review (Mar 2021 to Feb		

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	<p>2022), it was found that the mill has dispatched 2,593.12 mt of RSPO certified PK more than its stock balance (production and carried forward balance).</p> <ol style="list-style-type: none"> 2. The mass balance account did not capture the sales of RSPO CPO and PK which was downgraded and sold as conventional products and the sales of RSPO Credits. 3. The mass balance account did not show the correct volume for 'Balance' and 'Carry Forward' for CPO & PK.
Corrections:	<ol style="list-style-type: none"> 1. Mill management already informed GTM through email to stop immediately the sales of RSPO CSPK to balance the Mass Balance sale to positive stock during period under review. 2. To increase certified FFB supply and volume of certified PK to balance the negative stock with indicate over dispatch. 3. To revise the new MB sheet as provided by GSQM team which shown the latest formula for volume of 'Balance' and Carry Forward'.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Overdespatch of sales of RSPO CSPK because of breakdown communication with GTM. 2. Using old template MB Sheet that not include the calculation for PK/CSPK dispatched as conventional and volume for 'Balance' and 'Carry Forward' for CPO and PK are not correct. 3. Monitoring & tracking on SCCS mass balance sheet for RSPO not effective. 4. Insufficient training for PIC for documenting Mass Balance Sheet.
Corrective Actions:	<ol style="list-style-type: none"> 1. PIC to have the SCCS training by GSQM on annual basis. 2. To key in MB Sheet and monitoring on monthly basis by SCCS PIC (En. Asrul). PIC will inform management and GSQM team if any over dispatch for further action. 3. To communicate with GTM on monthly basis for clarification on MB product sales on Palm Trace.
Assessment Conclusion:	<p><u>Critical NC Verification</u></p> <ol style="list-style-type: none"> 1. Elphil POM have informed Group Trading Marketing (GTM) to stop dispatch of RSPO certified PK. Verified the email dated 19/03/2022 from the mill to GTM. 2. The mill have continuously received FFB from its supply base. The volume of FFB has increased due to the higher crop period which resulted in increase of CPO and PK production. 3. Elphil POM are currently using the newly revised MB Sheet which was provided by GSQM. The document was verified to include volume carry forward as well. 4. The mill has planned for SCCS training to be conducted in June 2022 as stated in the Annual Training Programme. <p>Based on the evidence provided and the visit to the mill's effluent pond it was found that the corrections and corrective action plans have been addressed accordingly. Therefore, the Critical Non-Conformity is successfully closed on 18/05/2022.</p>

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Non-conformity			
NCR Ref #	2179275-202203-N1	Date Issued	18/03/2022
Due Date	Next Surveillance Assessment	Date of nonconformity Closure	"Open"
Clause & Category (Critical / Minor)	3.3.2 (Minor)		
Statement of Nonconformity:	The mechanism to monitor the implementation of procedures were inadequate.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<p>Referred to Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System; SOP for Water Quality Monitoring; Date: 01/06/2016; 5.5 Evaluation of Laboratory Test Results.</p> <ul style="list-style-type: none"> - <i>Upon receiving the complete results, the Head of Operating Unit shall check whether it exceeds, or no not meet the related requirement. If the results are off limit, an investigation shall be initiated to solve the issue.</i> - <i>Arrangement for a re-sampling and analysis of the parameter of concern shall be done concurrently with the investigation and sent to the laboratory within 1 week of receiving the results.</i> <p>The mill monitors the water quality at 3 points which is Sg. Kerdah river, Mill Reservoir and Mill Drain. The Water Analysis Test Report (Report Number: IE103/2022) dated 21/01/2022 was available for verification. The results indicated that the COD and DO did not comply with the Class IIA/IIB of NWQS for natural waterways. The management of the mill have raised a Corrective/Preventive Action Report for Non-Conforming Water Analysis Results on 10/02/2022. Nevertheless, the resampling has not been done as of to date.</p>		
Corrections:	<ol style="list-style-type: none"> 1. Briefing on water sampling procedure and SOP of water quality monitoring by RSQM to PIC (En.Dzul Hakim) 2. Arrange to send re-sampling at 3 points which is Sg. Kerdah river, Mill Reservoir and Mill Drain. 		
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Wrong sampling technique used to collect sample at river point. 2. Insufficient training for PIC on collecting water sampling technique and water sampling procedure 		
Corrective Actions:	<ol style="list-style-type: none"> 1. Annual training on water sampling procedure and SOP of water quality monitoring will be conducted to PIC by RSQM 2. Upon receiving complete result sampling, investigation using CPAR form will be conduct by PIC. The CPAR result will communicate and acknowledge by Mill manager before resampling/communicate with RND department for further action. 3. Any Off Spec result and investigation result summary will be communicate during Mill EPMC meeting. 		
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	OFI Reference: 2179275-202203-I1 Clause: 6.7.4 The monitoring of expiry date of the clinical items can be further improved.

Positive Findings	
PF #	Description
PF 1	Good commitment and corporation from the management.
PF 2	Positive feedbacks from internal and external stakeholders.
PF 3	Well maintained labour quarters at the mill and estate.
PF 4	Generally, well implementation of Good Agricultural Practices (GAP).

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2033660-202103-M1	Date Issued	19/03/2021
Due Date	16/06/2021	Date of nonconformity Closure	18/05/2021
Clause & Category (Critical / Minor)	7.10.1 (Critical)		
Statement of Nonconformity:	One type of fertiliser application at the field were not reported in the Palm GHG calculator.		
Requirement Reference:	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.		
Objective Evidence:	Based on the estate's accounting system (SAP) at Kinta Kellas Estate, one type of fertiliser i.e. NK1 (417.85 mt) applied in the year 2020, was not included in the RSPO Palm GHG Calculator version 4.		
Corrections:	Immediately check and informed PIC of RSPO Palm GHG to include fertilizers which contrary with estate system.		
Root Cause Analysis:	<ol style="list-style-type: none"> Monitoring & tracking on RSPO Palm GHG calculator not effective. Lack of communication with PIC of RSPO Palm GHG. 		
Corrective Actions:	Estate management has appointed PIC to look after the RSPO Palm GHG Calculator and will monitored monthly basis & to communicate with PIC if there is any contrary with the system.		
Assessment Conclusion:	The following evidence was verified:		

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	<ol style="list-style-type: none"> 1. The corrected RSPO Palm GHG calculator that shows the NK1 fertiliser has been included in the calculation. 2. A copy of an appointment letter dated 06/04/2021 that shows a PIC to look after the RSPO Palm GHG Calculator has been appointed by the Estate Manager. <p>ASA 2_1 Verification</p> <p>The emission value is recorded and calculated through the utilisation of RSPO's Palm GHG Calculator ver. 4. The uploaded data were verified against the raw data in the mill and estate and found to be accurate. Hence the Critical Non-conformity remains closed.</p>
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Non-conformity			
NCR Ref #	2033660-202103-N1	Date Issued	19/03/2021
Due Date	18/03/2022	Date of nonconformity Closure	18/03/2022
Clause & Category (Critical / Minor)	2.2.2 (Minor)		
Statement of Nonconformity:	Evidence of legal due diligence of contractors was not available.		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
Objective Evidence:	<p><u>Kamuning Estate:</u></p> <p>There was engagement of contractor, Meel Enterprise Sdn Bhd (pruning activity) in the estate and the contractor has employed 4 Bangladesh workers. No evidence to show that due diligence of contractor is available as below:</p> <ol style="list-style-type: none"> 1. Payslips were not available for the workers during the time of audit. 2. Permit for worker (Passport No.: BM 0701628) was registered under employer of Multi Global Enterprise but employment contract was signed with Meel Enterprise Sdn Bhd. 3. Permit for the other 3 workers were not available during the audit. 4. Employee Injury Scheme of SOCSO contribution was not available during the time of audit. <p><u>Kinta Kellas Estate:</u></p> <p>The contractor, Gunasekaran (FFB transporter) has employed 4 permanent lorry drivers in the estate. The workers have signed on Daftar Pekerja where it only contains total income, deduction (advance, EPF contribution, SOCSO contribution, EIS contribution), nett income and signature of the workers. However, there is no details of wages and allowances earned during the wage period, details of holidays,</p>		

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	<p>annual and sick leave with pay granted and date of payment as per Employment Regulation 1957 detailed out in the payslip. The sampled workers as below:</p> <ol style="list-style-type: none"> 1. I/C No.: 770817-08-50XX 2. I/C No.: 680503-08-58XX 3. I/C No.: 690127-08-54XX 4. I/C No.: 790907-08-65XX <p>Besides, reviewed the Daily Oil Mill Declared Weight – By Delivery Note for December 2020 and February 2021 found that the workers were not paid twice his ordinary rate per piece for work on rest day (Sunday). This has confirmed by the contractor during the interview. The date of work on rest day as below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">I/C No.</th> <th style="text-align: left;">Date</th> </tr> </thead> <tbody> <tr> <td>770817-08-50XX</td> <td>13/12/2021, 07/02/2021, 14/02/2021, 21/02/2021</td> </tr> <tr> <td>680503-08-58XX</td> <td>13/12/2020, 27/12/2020, 07/02/2021, 14/02/2021, 21/02/2021</td> </tr> <tr> <td>690127-08-54XX</td> <td>13/12/2020</td> </tr> <tr> <td>790907-08-65XX</td> <td>13/12/2020, 27/12/2020, 07/02/2021, 21/02/2021</td> </tr> </tbody> </table>	I/C No.	Date	770817-08-50XX	13/12/2021, 07/02/2021, 14/02/2021, 21/02/2021	680503-08-58XX	13/12/2020, 27/12/2020, 07/02/2021, 14/02/2021, 21/02/2021	690127-08-54XX	13/12/2020	790907-08-65XX	13/12/2020, 27/12/2020, 07/02/2021, 21/02/2021
I/C No.	Date										
770817-08-50XX	13/12/2021, 07/02/2021, 14/02/2021, 21/02/2021										
680503-08-58XX	13/12/2020, 27/12/2020, 07/02/2021, 14/02/2021, 21/02/2021										
690127-08-54XX	13/12/2020										
790907-08-65XX	13/12/2020, 27/12/2020, 07/02/2021, 21/02/2021										
Corrections:	<p><u>Kamuning Estate</u></p> <p>Informed to contractor Meel Enterprise Sdn Bhd and immediately stopped those worker who registered under employer of Multi Global Enterprise. Also required to submit workers permit & SOCSO contribution proof immediately.</p> <p><u>Kinta Kellas Estate</u></p> <ol style="list-style-type: none"> 1. The contractor will pay the missed payment on rest day, wages on holidays and sick leave to his respective employees immediately. 2. The contractor will make workers contract agreement contains details of wages, allowances earned during the wage period, details of holidays, annual and sick leave with pay granted and date of payment as per Employment Regulation 1957 detailed out in the payslip 										
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Monitoring on contract workers documentation not effective at Kamuning & Kinta Kellas Estate. 2. There is no responsible person in charge to monitor documentation of legal due diligence of contractors. 										
Corrective Actions:	<ol style="list-style-type: none"> 1. Estate management together with RSQM department will conduct a briefing on Employment Regulation 1957 to all the contractor. 2. Estate management has appointed PIC (Assistant manager & CC) to monitor contract workers documentation. Appointed PIC will ensure hired contract & their workers should comply with Employment Regulation 1957 and Akta Keselamatan Sosial Pekerja 1969 and documented. The legal due diligence of contractors documents will be put on the list for monitoring and tracking on monthly basis. 										

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Assessment Conclusion:	<p>ASA 2_1 Verification.</p> <p>Due to inability to comply with the contract's terms and conditions, the services of the two contractors, Meel Enterprise Sdn Bhd who provides pruning work at Kamuning Estate and Gunasekaran who provides the FFB transportation for Kinta Kellas Estate, have been terminated. This is evident through an official letter from the respective Estate Managers to the contractors dated 23/08/2021 and 14/01/2022 respectively. The FFB service is now taken over by a contractor (Alpha Meta Agencies). Verification of employment contract between Alpha Meta and its employees, and payslips, showed that the payment of wage (including wage on rest days), EPF contribution, SOCSO contribution, EIS contribution, were made in accordance to the employment contract and legal requirements. Thus, the NCR is closed on 18/03/2022.</p>
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Non-conformity			
NCR Ref #	2033660-202103-N2	Date Issued	19/03/2021
Due Date	18/03/2022	Date of nonconformity Closure	18/03/2022
Clause & Category (Critical / Minor)	3.4.2 (Minor)		
Statement of Nonconformity:	The social management plan has not completed comprehensively.		
Requirement Reference:	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.		
Objective Evidence:	There is a social change in the estates of Sime Darby Plantation Berhad where the company has engaged into parole programme with the government. There were concerns raised by the workers during stakeholder consultation of the audit on the job opportunity for local community. However, Elphil Estate and Kamuning Estate's management plan has not included the engagement of parole programme by the group with the participation of affected stakeholders to evaluate the impact of this programme.		
Corrections:	<p><u>Kamuning & Elphil Estate</u></p> <p>To communicate the engagement of parole programme by the group during NUPW meeting and the impact / issues will be include into social action plan.</p>		
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Elphil and Kamuning Estate established social action plan for FY2021. However the engagement of parole programme by the group not captured into the social action plan due the action plan reviewed earlier on (Elphil: 05 Jan 2021 & Kamuning: 11 Jan 2021) compared to date joined of parole worker (Elphil : 25th Jan 2021 & Kamuning : 26th Jan 2021). The changes not reviewed in the action plan. 2. Monitoring of changes in social management not effective at Kamuning & Elphil Estate. 		
Corrective Actions:	<ol style="list-style-type: none"> 1. To conduct social impact assessment if there is any changes into estate management and the impact will be include into social action plan immediately. 		

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	<ol style="list-style-type: none"> 2. The social action plan and the monitoring will be carried out by Estate’s appointed social representative Person In charge (Manager / Assistant manager). 3. To communicate social complain procedure during stakeholder meeting to ensure all the impact / issues captured into social action plan.
Assessment Conclusion:	<p>ASA 2_1 Verification.</p> <ol style="list-style-type: none"> 1. The estate’s management have conducted social impact assessment whenever there are any changes into estate management and the impact has been included into social action plan. 2. The social complain procedure have been communicated during stakeholder meeting held on 03/03/2022. As of now, the parole programme has been discontinued. <p>Therefore, the minor nonconformity has been closed on 18/03/2022.</p>

Opportunity for Improvement	
OFI#	Description
OFI 1	OFI Statement: NA

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1306204M1 -5.2.2	Major	5.2.2	24/03/2016	Closed on 07/06/2016
1306204M2 – 6.5.2	Major	6.5.2	24/03/2016	Closed on 19/05/2016
1306204N1 – 4.3.2	Minor	4.3.2	24/03/2016	Closed on 23/03/2017
1306204N2 – 4.4.1	Minor	4.4.1	24/03/2016	Closed on 23/03/2017
1306204N3 – 4.7.5	Minor	4.7.5	24/03/2016	Closed on 23/03/2017
1306204N4 – 6.6.2	Minor	6.6.2	24/03/2016	Closed on 23/03/2017
1453612-201703-M1	Major	4.7.1	23/03/2017	Closed on 09/05/2017
1453612-201703-M2	Major	4.7.2	23/03/2017	Closed on 09/05/2017
1453612-201703-M3	Major	4.7.5	23/03/2017	Closed on 09/05/2017
1453612-201703-M4	Major	4.4.2	23/03/2017	Closed on 09/05/2017
1453612-201703-M5	Major	5.1.1	23/03/2017	Closed on 09/05/2017
1453612-201703-M6	Major	5.3.2	23/03/2017	Closed on 09/05/2017
1453612-201703-M7	Major	6.3.1	23/03/2017	Closed on 09/05/2017
1453612-201703-M8	Major	6.5.2	23/03/2017	Closed on 09/05/2017
1453612-201703-M9	Major	2.1.1	23/03/2017	Closed on 09/05/2017
1453612-201703-N1	Minor	4.7.3	23/03/2017	Closed on 13/03/2018

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1453612-201703-N2	Minor	4.7.6	23/03/2017	Closed on 13/03/2018
1453612-201703-N3	Minor	5.3.3	23/03/2017	Closed on 13/03/2018
1453612-201703-N4	Minor	6.9.3	23/03/2017	Closed on 13/03/2018
1453612-201703-N5	Minor	6.10.3	23/03/2017	Closed on 13/03/2018
1606941-201802-M1	Major	SCCS E.5.1	15/03/2018	Closed on 14/05/2018
1606941-201802-N1	Minor	6.8.3	15/03/2018	Closed on 22/02/2019
1606941-201802-N2	Minor	5.1.2	15/03/2018	Closed on 22/02/2019
1606941-201802-N3	Minor	5.6.1	15/03/2018	Closed on 22/02/2019
1744213-201902-M1	Major	2.1.1	22/02/2019	Closed on 07/05/2019
1744213-201902-M2	Major	6.5.2	22/02/2019	Closed on 07/05/2019
1893075-202003-M1	Critical	6.2.3	13/03/2020	Closed on 05/06/2020
1893075-202003-M2	Critical	6.2.2	13/03/2020	Closed on 05/06/2020
1893075-202003-N1	Minor	7.3.1	13/03/2020	Closed on 19/03/2021
2033660-202103-M1	Critical	7.10.1	19/03/2021	Closed on 18/05/2021
2033660-202103-N1	Minor	2.2.2	19/03/2021	Closed on 18/03/2022
2033660-202103-N2	Minor	3.4.2	19/03/2021	Closed on 18/03/2022
2179275-202203-M1	Critical	2.1.1	18/03/2022	Closed on 18/05/2022
2179275-202203-M2	Critical	3.8.12	18/03/2022	Closed on 18/05/2022
2179275-202203-N1	Minor	3.3.2	18/03/2022	"Open"

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss SOU 3 Elphil Certification Unit's environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Governmental Department	Labour Department	Face to Face
Communities	Kampung Temin	Face to Face
External Stakeholder	AMESU Management	Face to Face
Contractors	AMUSU Management Service Sdn Bhd	Face to Face
Internal Stakeholder	Gender Committee Representatives	Face to Face

Stakeholders comment	
1	<p>Feedbacks: Contractors – They informed that the payment was made promptly. They are aware of the complaint procedure and so far, they have no issue with the management.</p>
	<p>Audit Team verification and response: The management will ensure the payment will be made accordingly. No further verification.</p>
2	<p>Feedbacks: Workers – The workers are satisfied with the management and they informed that their wages have achieved Minimum Wage Order 2020. They are aware of the complaint procedure as well as latest initiatives such as social dialog and "Suara Kami". As for house repair request, the new reporting system using QR code has been introduced to expedite the process. Status of repair being monitored by the management team to ensure prompt execution.</p>
	<p>Audit Team verification and response: The management will ensure comply to legal requirements and respect all the workers without discrimination. No further verification.</p>

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3	<p>Feedbacks: Gender Committee Representatives – No sexual harassment or violence case reported during the time of assessment. They are aware of the function of the committee and informed that no discrimination from the management regardless of gender.</p> <p>Audit Team verification and response: The management will continue to monitor if there is any case of sexual harassment or violence.</p>
4	<p>Feedbacks: Labour Department: Interview was done via phone call with the Labour Department officer. No issue reported so far from Sime Darby Estates namely Kamuning and Elphil estates which fall under Kuala Kangsar district. Effective date for the implementation of New Minimum Wages Order 2022 was on 1/2/2022. Starting from 1/2/2022 onwards, minimum wages has been standardized to RM1200 regardless of area as per schedule.</p> <p>Audit Team verification and response: Will continue to communicate with Labour Department from time to time.</p>
5	<p>Feedbacks: Nearby village, Kg Temin: Interview was done via phone call with the village head. On-going issue with regards to illegal cow/cattle issue in the estate causing accident especially at night is the main concern.</p> <p>Audit Team verification and response: Noted that the cattle issue has been identified as social impact and included in the social management plan. The plan is still on going and to be verified in the next assessment.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not applicable as Elphil Certification Unit Estates have already undergone 2 nd cycle of Replanting. Sime Darby have acquired all the land (freehold and lease) from the State of Perak Government.					

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

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

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that SOU 3 Elphil POM and Supply Base 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 SOU 3 Elphil POM and Supply Base is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: VIJAY KANNA PAKIRISAMY	Name: RASHIDI MAAN
Company Name: BSI SERVICES (M) SDN BHD	Company Name: SIME DARBY PLANTATION BHD
Title: CLIENT MANAGER	Title: ESTATE MANAGER
Signature: 	Signature: <p>(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.)</p>  <p>SIME DARBY PLANTATION BERHAD (Company No. 647766-V) Ladang Kamuning</p> <p>..... Rashidi Bin Maan Manager</p>
Date: 24/05/2022	Date: 25/5/22

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 Elphil POM 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>Request by stakeholders conducted through stakeholders meeting, visitor books, letter and forms. The mill and estates maintain the records of all request and response.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Request by stakeholders conducted through stakeholders meeting, visitor books, letter and forms. The mill and estates maintain the records of all request and response. Sighted the records of request from the stakeholders as follows:</p>	Complied

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		<p>Mill records including the following: DOSH Perak mill inspection visit; Date 14/03/2022</p> <p>It was verified that the management of the mill and estate have responded to all request and inquiries in a timely manner with acknowledgement and date of acknowledgement available for verification.</p>	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.</p> <p>This has been communicated to workers and stakeholders through: Stakeholder meeting:</p> <ul style="list-style-type: none"> - Kamuning Estate: 10/03/2022 (Government office, neighboring villages, contractor, school etc) - Elphil Estate: 03/03/2022 (Government office, neighboring villages, contractor, school etc) 	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>The latest stakeholders list updated for FY 2022. Stakeholder's details available included person in charge, address, e-mail and contact number.</p> <p>Example seen as below:</p> <ul style="list-style-type: none"> - Elphil Estate: Sekolah Menengah Tok Muda Abdul Aziz, 43, Jalan Dato See Khoo Lim, Kampung Sentosa, 31100, Sungai Siput. 	Complied

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		- Kamuning Estate: AMUSU Management Service, 121A Heawood Garden, Lorong 4, 31100, Sg Siput (U) Perak.	
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 -	<p>Sime Darby Plantation Berhad has implemented Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The policy was developed in Bahasa Malaysia and English.</p> <p>The latest Group Sustainability & Quality Policy Statement also includes the clause 'promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC) signed by Group Managing Director on 02/12/2019.</p> <p>The policy has been briefed to the workers during morning briefing. Besides, policies were briefed to stakeholders during the stakeholder meeting. For Kamuning Estate, it was last carried out recently on 10/3/2022 for external stakeholder and 17/1/22 for internal stakeholders during morning muster</p>	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	<p>Sime Darby Plantation has established the Vendor Integrity Pledge and Vender COBC as a due diligence for external parties engaged by Operating Units.</p> <p>Sighted sampled as below:</p> <ul style="list-style-type: none"> i. YIH Construction Sdn Bhd (809583-T) ii. AMUSU Management Service Sdn Bhd (167336-K) iii. Woon Choon Kong (IP0184863-V) iv. KRM Mawar Murni Enterprise (IP 0168972-D) 	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	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>The mill & estates continue to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Among the evidence of compliance verified were:</p> <p><u>Elphil POM:</u></p> <ul style="list-style-type: none"> - Permit to deduct wages under Section 24 of Employment Act 1955 for electricity bill payment, ref.: BHG.PU/9/129 JLD 3(53), dated 06/07/2017 - Permit to allow female workers to work at night under Section 34 of Employment Act 1955, ref.: (14)JTK.PK.(1)PMT(SEK.34)10803, dated 14/08/2012 - Permit to assigned overtime work up to 130 hours/month under Section 60A(4)(a) of the Employment Act 1955, ref.: (13) JTK.PK.(1)PMT/SEK.60/10803, dated 14/08/2012 - Private installation from Energy Commission, #009711/2021, valid until 29/12/2022 - MPOB License #540132004000, valid until 31/05/2022 - DOE License #001485, valid until 30/06/2022 <p><u>Kinta Kellas Estate:</u></p> <ul style="list-style-type: none"> - MPOB License, #528648002000, valid until 31/03/2022 - Permit to store diesel & petrol, #P: A003249, valid until 17/07/2024 	Non-compliance

		<ul style="list-style-type: none"> - CF air compressor, #PMT-PK/22 74222, valid until 08/05/2023 <p><u>Kamuning Estate:</u></p> <ul style="list-style-type: none"> - MPOB License, #558418011000 (nursery), valid until 28/02/2023 - MPOB License, #524034002000 (Ladang Kamuning), valid until 30/09/2022 – 2018 Ha - MPOB License, #524393002000 (Ladang Changkat Salak), valid until 31/10/2022 – 1612.91 Ha - Permit to store diesel, #P: A001953, valid until 17/02/2024 - Permit to store diesel, #P: A001954, valid until 17/02/2024 - CF air compressor, #PMT-PK/21 64300, valid until 27/08/2022 - CF air compressor, #PMT-PK/21 64299, valid until 27/08/2022 <p><u>Elphil Estate:</u></p> <ul style="list-style-type: none"> - MPOB License, #529849002000, valid until 31/05/2022 - Permit to store diesel, #P: A001939, valid until 24/11/2023 - Permit to store diesel, #P: A001938, valid until 24/11/2023 - Permit to store diesel, #P: A001940, valid until 24/11/2023 - CF air compressor, #PMT-PK/22 72092, valid until 25/07/2022 - CF air compressor, #PMT-PK/22 72093, valid until 25/07/2022 - CF air compressor, #PMT-PK/22 72094, valid until 25/07/2022 	
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		<ul style="list-style-type: none"> - Permit to deduct wages under Section 24 of Employment Act 1955 for electricity bill payment, ref.: BHG.PU/9/129 JLD 3(53), dated 06/07/2017 - CF to occupy building under Reg 38(1)(a) of the Workers' Minimum Standards of Housing and Amenities Act 1990, dated 23/02/2012 - Permit Kebenaran Menggunakan Bekalan Sumber Air Sendiri untuk Ladang Elphil Bah. Plang di bawah Seksyen 6(1)(a), Akta Standard Minimum Perumahan, Penginapan dan Kemudahan Pekerja 1990, #JTK.PK(1)42/16JLD.6(52), validity: 25/10/2021 to 25/10/2023. <p>Nevertheless, non-compliance were verified as below.</p> <p>The DOE <i>Jadual Pematuhan</i> (License Number: 001845) states under the license approval conditions among others as below:</p> <ol style="list-style-type: none"> 11. Premis hendaklah memastikan kedalaman kolam pengolohan sentiasa kekal mengikut rekabentuk yang telah diluluskan dan mengekalkan freeboard sekurang-kurangnya 0.5m atau 20% safety margin, yang mana lebih besar. 12. Setiap kolam pengolohan effluen hendaklah dipasang Papan Tanda yang mempunyai maklumat nama kolam, kapasiti rekabentuk, tempoh penahanan effluen, Tarikh akhir penyingkiran enapcemar dan ketinggian freeboard. <p>Based on the site visit to the mill effluent treatment pond, the following non-complying conditions were verified.</p> <ol style="list-style-type: none"> 1. The Acidification Pond No.1, Acidification Pond No. 2 and Anaerobic Pond was found to not have the freeboard specification as required in the Compliance Schedule. 	
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		<p>2. The signages for each effluent treatment pond that are in place did not include all the required information as required in the Compliance Schedule.</p> <p>Therefore, a Critical Non-Conformity was raised.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Addressed in Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 03. RSQM Department and the respective operating units will undertake the responsibility of identifying, managing, updating, and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p>Tracking system is available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office. SOU 03 has maintained the list of all relevant laws and requirement and documented in Legal and Other Requirement Register (LORR). The list was updated on annual basis or new updates on the register. Among the new law registered since the last assessment were:</p> <ol style="list-style-type: none"> 1. Anti-money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 2. Whistleblower Protection Act 2010 	Complied
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Based on site visit at the sampled estates' boundary, methods used are either trenches, barb wire fencing and bunds. The demarcations were visibly maintained as verified at the following sites:</p> <ul style="list-style-type: none"> - Kinta Kellas: between Field #P002 and smallholder (durian orchard) 	Complied

		<ul style="list-style-type: none"> - Kamuning: between Field #P12C and smallholder (rubber plantation) - Elphil Estate: between Field #2019C and Choo Bee Plantations 	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>The mill and estates in SOU 03 have listed and maintain all contracted parties and documented in List of Stakeholder as parts of their stakeholders includes internal such as employee and workers union and external stakeholders such as FFB suppliers, local community heads, government agencies. The lists were reviewed and updated from time to time depending on latest changes.</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>All contracted parties/vendors were required to sign the Vendor Integrity Pledge (VIP) and to comply with all applicable laws and regulations related anti-bribery, fraud and corruption and Vendor Code of Business Conduct (VCOBC) such as labour and Human Rights.</p> <p>Sampled contractors:</p> <p>Kamuning:</p> <ol style="list-style-type: none"> 1. Amusu Management Services Sdn Bhd (FFB Transport), dated 22/02/2022, validity 1/1/2022 – 31/12/2023 2. Puan Nooraini Binti Zakaria (Sundry shop), dated 01/06/2021 <p>Memorandum of Agreement (MOA) were also verified for the sampled contractors which contains the specific clauses on meeting applicable legal requirements to be demonstrated by them.</p> <p>For labour recruitment agencies, Sime Darby has applied its Vendor COBC (30 May 2018), which includes the Fair Business practices-ensuring that the company promotes fair business practices and</p>	Complied

		compete in an ethical manner, labour & human rights, ethics & management practices.	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. - Minor compliance -	Specific clauses on disallowing child, forced and trafficked labour were documented in Vendor Integrity Pledge (VIP) and Vendor Code of Business Conduct (VOBC) under section 5.8: Abolishment of child labour and protecting the rights of children. All engaged contractors are required to understand and sign the VIP and VCOBC together with the contract agreements. The following contracts were verified to confirm implementation: - Alpha Meta Agencies Sdn Bhd - Amusu Management Services Sdn Bhd - KRM Mawar Murni Enterprise - SPD Tarshini Enterprise	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	(C) For all directly sourced FFB, the mill requires: <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 - Critical (Major) compliance -	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.	Complied
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1. - 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	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The business plan for the mill is reflected in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX. Also available the Mill Improvement Plan (MIP)/Maintenance Plan updated on 01/01/2022.</p> <p>The business or management plan for the estate was presented in the form of annual budget with 4 years projection (2022 – 2025). The annual budget contains the crop projection and the finance allocation for field operation and administrations. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p>				Complied																		
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>SOU 3 Supply Base estate’s have prepared the replanting programme with minimum of 5 years projection. The review of the programme is done at the end of every year. Below are the details of the programme:</p> <table border="1"> <thead> <tr> <th>Estates</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Elphil Estate</td> <td>168.45</td> <td>83.53</td> <td>211.31</td> <td>198.92</td> <td>161.86</td> </tr> <tr> <td>Kamuning Estate</td> <td>285.00</td> <td>274.00</td> <td>290.00</td> <td>242.19</td> <td>268.00</td> </tr> </tbody> </table>	Estates	2022	2023	2024	2025	2026	Elphil Estate	168.45	83.53	211.31	198.92	161.86	Kamuning Estate	285.00	274.00	290.00	242.19	268.00				Complied
Estates	2022	2023	2024	2025	2026																			
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Kamuning Estate	285.00	274.00	290.00	242.19	268.00																			

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		Kinta Kellas Estate	63.01	169.03	121.53	122.99	52.37	
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	<p>Management review meeting for the mill and estates were conducted as below.</p> <ol style="list-style-type: none"> 1. Elphil POM: 09/02/2022 2. Elphil Estate: 05/02/2022 3. Kamuning Estate: 14/02/2022 4. Kinta Kellas Estate: 07/03/2022 <p>Among the agenda discussed were:</p> <ul style="list-style-type: none"> - Results of internal audit - Customer feedback - Status of preventive and corrective actions - Follow-up actions from previous management review - Changes that could affect management system - Recommendations for improvement 						Complied
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.								
3.2.1	(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.	The latest Continual Improvement Plan for 2022 was adopted in the RSPO/MSPO CIP for the mill and all estates. The improvement plans include the mail social and environmental impacts such as						Complied

	- Critical (Major) compliance -	workers welfare, waste management, occupational health & safety and operations improvements. For example, a number of improvement projects have been initiated for the field operation and workers quarters.	
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. 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>	RSPO metric template version 2.1 is used for the reporting of SOU 3 Elphil Certification Unit's metrics (economic, social and environment). Data reporting period is January to December 2021 for (social and environment metrics) and economic metrics from Feb 2021 – Jan 2022 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<ol style="list-style-type: none"> SOP available for the Palm Oil Mill and the Estates. Palm Mill holds two SOPs: <ul style="list-style-type: none"> Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) to includes mill SOPs. Sighted SOP for fruit handling station, sterilization station, threshing station, pressing station, kernel recovery station, boiler station and effluent treatment plant. Estate has a separate SOP which is SOP EQMS, Pictorial Safety Standard, Estate Quality Management System and Agricultural reference Manual that covered planting material, nursery 	Complied

		<p>techniques, replanting, land preparation, planting density, canopy management, water management, harvesting, loose fruit collection, weed control and transport.</p> <p>3. Sighted the Covid-19 SOP (Doc ID – SD/SDP/GSQM (OSH)/204-OD 8) available at the Mill and Estates dated 9th March 2020.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>Sime Darby Plantations have set in place various means to ensure the consistent implementation of procedures are in place. Among others are:</p> <ol style="list-style-type: none"> 1. Internal Audits by RSQM Department 2. Management Review 3. Structured Crop Recovery Assessment for the Mill 4. Plantation Visits and Mill Advisory Visits 5. Agronomist Visits 6. Work Site Inspections 7. Weekly Linesite Inspections <p>Referred to Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System; SOP for Water Quality Monitoring; Date: 01/06/2016; 5.5 Evaluation of Laboratory Test Results.</p> <ul style="list-style-type: none"> - <i>Upon receiving the complete results, the Head of Operating Unit shall check whether it exceeds, or no not meet the related requirement. If the results are off limit, an investigation shall be initiated to solve the issue.</i> - <i>Arrangement for a re-sampling and analysis of the parameter of concern shall be done concurrently with the investigation</i> 	Complied

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		<p><i>and sent to the laboratory within 1 week of receiving the results.</i></p> <p>The mill monitors the water quality at 3 points which is Sg. Kerdah river, Mill Reservoir and Mill Drain. The Water Analysis Test Report (Report Number: IE103/2022) dated 21/01/2022 was available for verification. The results indicated that the COD and DO did not comply with the Class IIA/IIB of NWQS for natural waterways. The management of the mill have raised a Corrective/Preventive Action Report For Non-Conforming Water Analysis Results on 10/02/2022. Nevertheless, the resampling have not been done as of to date.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Operating units visited maintain all records of monitoring and available for verification. The Mill Advisor and Plantation Advisor (PA) are accountable to monitor the estates compliance towards the SOP, Budget and Productivity. Regular Internal Audits are conducted by the RSQM Department to check on the compliance towards the SOPs.</p> <p>1. Internal Audit have been conducted by the RSQM Department for the mill and estates and the Internal Audit Report was available for verification as below:</p> <ul style="list-style-type: none"> - Elphil POM: 03/02/2022 - Elphil Estate: 03/02/2022 - Kamuning Estate: 04/02/2022 - Kinta Kellas Estate: 04/02/2022 	Complied
<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>			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected</p>	<p>There is no new planting in SOU 3 (Elphil POM Certification Unit). Sighted the Social and Environmental Impact Assessment (SEIA)</p>	Complied

	<p>stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>carried out from 24-27 August 2015. The report includes both positive and negative impact and its recommendation and undertaken through a participatory methodology involving the affected stakeholders.</p>	
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 3 (Elphil POM Certification Unit). The assessment was used methodology of interview workers based on workstation, harvesters, sprayers, union representatives, gender committee, contractor, supplier, local community, neighbouring estate, government & School. The secondary data collection – document review/file checking also been made.</p> <p>Based on feedback from stakeholder consultation via letters dated on 2/3/2022, A management plan on social impact assessment established as following:</p> <ul style="list-style-type: none"> - Request by Kampung Sri Jaya village head to clear clogged drain; Target completion: March 2022 - Request by a local worker to speed on his house repair; Target completion: April 2022 <p><u>Kamuning Estate</u> SIA management plan dated 12/3/2022 has included issues raised from external stakeholders such as from Kampung Temin, SJK(T) Mahatma Gandhi etc.</p> <p><u>Elphil Estate</u> SIA management plan dated 8/3/2022 has included issues raised from external stakeholders such as from SJK(T) Ladang Elphil, NUPW representative and other internal stakeholders etc.</p>	Complied
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>There is no new planting in SOU 3 (Elphil POM Certification Unit). Sighted the Social and Environmental Action Plan dated March 2022 based on the SEIA and issues raised through the gender</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>committee, internal and external communication as the input for the SEIA development.</p> <p>Among monitoring plan sighted as per below:</p> <p><u>Kamuning Estate</u></p> <p>Kg Temin – Illegal cow/cattle issue in the estate causing accident especially at night. Action Plan: to meet and discuss with cattle owner. Status: on-going. PIC: assistant manager</p> <p><u>Elphil Estate</u></p> <p>SJK(T) Ladang Elphil – Request for help to do cleaning of grasses and upkeeping at school backyard. Action Plan: Upkeeping and cleaning was done in March 2022. Status: completed. PIC: assistant manager</p>	
<p>Criterion 3.5: A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>SDPSB has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2nd December 2019, where the management is committed to contributing to a better society includes respecting, upholding & no-exploitation of fundamental human rights, providing safe and healthy workplaces and protecting workers’ welfare and engaging and empowering communities.</p> <p>The SOPP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liason and recruitment, documentation and processing (Doc no: WMU/DP SOPP/JAN2016/R1), workforce management centre and estate are available upon request.</p>	<p>Complied</p>
<p>3.5.2</p>	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>The SOPP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liaison and</p>	<p>Complied</p>

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		recruitment, documentation and processing (Doc no: WMU/DP SOPP/JAN2016/R1), workforce management centre (WMC) and estate are available upon request. This procedure been explained to worker during the induction training on their first-time arrival. Sample of one (1) new worker (167134) recruited in January 2022 was verified. Employment procedures are implemented and related record for employment was kept in personal file and available for verification.	
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The mill and estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following:</p> <ul style="list-style-type: none"> - Change in work process - Revision/changes in legislative requirement - Occurrence of accidents <p>Based on the risk assessments, appropriate risk control measures were determined and implemented for the respective activities and operation.</p>	Complied
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>As mentioned in Indicator 3.6.1, the CU has established and documented safety and health plan. Basically, the plans were derived from risk assessments such as HIRARC, CHRA, NRA, to name a few. The effectiveness of the plans was monitored in many ways such as:</p> <ul style="list-style-type: none"> - Internal audit - Workplace inspection (including field supervision) 	Complied

		<ul style="list-style-type: none"> - Accident & incident reporting - Medical surveillance - Chemical exposure monitoring - Audiometric test - LEV performance monitoring (fume hood) 																	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.																			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	The training programmes were documented in training matrix of the operating units on annual basis. The matrix has the information about subjects of trainings and time to be conducted. Generally, the topics of training cover the subjects related to best practices, OHS, environmental and social in which also taking into account gender-specific needs.	Complied																
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Records of trainings were maintained by the mill and all estates as verified below:</p> <p>Elphil POM</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 70%;">Training</th> <th style="width: 30%;">Date</th> </tr> </thead> <tbody> <tr> <td>Hearing conservation training</td> <td>12/02/2022</td> </tr> <tr> <td>Social dialogue reinforcement briefing</td> <td>04/03/2022</td> </tr> <tr> <td>Chemical handling (WTP, kernel, boiler, lab)</td> <td>12/02/2022</td> </tr> <tr> <td>Info passport retention to foreign workers</td> <td>10/02/2022</td> </tr> <tr> <td>First aid</td> <td>21/10/2021</td> </tr> <tr> <td>Process SOP training</td> <td>08/11/2021</td> </tr> <tr> <td>Health talk briefing</td> <td>15/11/2021</td> </tr> </tbody> </table>	Training	Date	Hearing conservation training	12/02/2022	Social dialogue reinforcement briefing	04/03/2022	Chemical handling (WTP, kernel, boiler, lab)	12/02/2022	Info passport retention to foreign workers	10/02/2022	First aid	21/10/2021	Process SOP training	08/11/2021	Health talk briefing	15/11/2021	Complied
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		ESP training	15/09/2021	
		Lab forum	15/09/2021	
		Elphil Estate		
		Training	Date	
		Refresher training for sprayer	08/03/2022	
		Hearing protection briefing	09/02/2022	
		Refresher on tractor maintenance	15/02/2022	
		Policy and charter briefing	21/01/2022	
		Harvesting SOP	07/01/2022	
		SDS training	15/02/2022	
		Firefighting & fire drill	12/02/2022	
		Kinta Kellas Estate		
		Training	Date	
		First Aid	10/03/2022	
		COBC & Policy	12/01/2022	
		RSPO & MSPO	15/01/2021	
		Briefing of Employment regulations to contractors	26/03/2021	
		Kamuning Estate		

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		Training	Date	
		Tractor driver safety	12/03/2022	
		Chemical handling & SW	12/03/2022	
		Fire drill	11&12/03/2022	
		Hearing training	09&11/03/2022	
		Tall palm harvesting competency	11/03/2022	
		First aid	10/03/2022	
		Segregation & recycle campaign	09/03/2022	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor Compliance -	The last training on supply chain was conducted on 09/02/2022. It was conducted by the Assistant Manager and attended by 10 participants from various departments of the mill such as administration, security, supervisors, weighbridge, and laboratory. The CPO Transport contractor has also been given a training related to supply chain on 01/03/2022, which was attended by 14 personnel.		Complied
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)				
3.8.1	Identity Preserved Module 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. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing	SOU 3 Elphil POM receives and processes certified and uncertified FFB from its own supply base and third parties. Therefore, the mill has opted for the Mass Balance module. Hence this indicator is not applicable		Not Applicable

	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.		
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>	SOU 3 Elphil POM receives and processes certified FFB from its own supply base and third parties. The FFB received from outside the certification unit are all uncertified FFB. Therefore, the mill has opted for Mass Balance module. Only the FFB received from Elphil Estate, Kamuning Estate and Kinta Kellas Estate is claimed form processing MB-Certified CPO and PK in the mill.	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. (Table 10)	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>The registration of PalmTrace will be carried out by the GSQM Department. All transaction will be registered in the PalmTrace. Elphil POM registered license available in PalmTrace as following:</p> <ul style="list-style-type: none"> - Member ID: RSPO_PO1000000191 - Member category: Oil Mill - RSPO Membership No.: 1-0008-04-000-00 - License Status: Expires on 17/06/2022 	Complied
3.8.5	Documented procedures	<p>Documented procedures available as following:</p> <ol style="list-style-type: none"> 1. Procedure namely Sime Darby Plantation – Plantation Quality Management System – Sustainable Plantation Management 	Complied

	<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 to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>System; Appendix 15; Standard Operating Procedure (SOP) for Sustainability Supply Chain and Traceability; Version 2; Issue no.: 5; Issue date: April 2019.</p> <ul style="list-style-type: none"> 2. 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. 3. 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 Dzul Hakim Bun Zahir (Assistant Manager) – PIC for Environmental and Quality Management Systems dated 09/02/2022. 4. The procedures for receiving and processing certified and non-certified FFBs are documented in the 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>3.8.6</p>	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. 	<p>Internal audit conducted based on the SOP for Sustainable Supply Chain and Traceability of SPMS Appendix 15 (18: Internal Audit); Version 2; Issue # 5; Date: April 2019. The procedure conforms to the requirements in the RSPO SCCS.</p> <p>The latest Internal Audit for RSPO SCCS was done on 03/02/2022 conducted by Sustainability Compliance Unit, Group Sustainability Department. There were 2 Major non-conformance raised by the</p>	<p>Complied</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>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 03/03/2022. The non-conformities were discussed in the management review conducted on 09/02/2022.</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>SOU 3 Elphil POM receives RSPO Certified FFB from its own supply base estates, namely Elphil Estate, Kamuning Estate and Kinta Kellas Estate.</p> <p>FFB Ticket will be submitted to the mill during incoming of FFB from the estate. Information of the FFB Ticket is then recorded in the WB system by the Weighbridge Operator.</p> <p>Verified the sampled FFB Ticket for incoming FFB for as below:</p> <ol style="list-style-type: none"> 1. Estate: Elphil Estate <ol style="list-style-type: none"> a. Ticket Number: 18279 b. Product: FFB c. Date of Delivery: 05/03/2022 d. Vehicle Number: AJD 4595 e. FFB Weight: 8,680 KG 2. Estate: Kinta Kellas Estate <ol style="list-style-type: none"> a. Ticket Number: 17274 b. Product: FFB c. Date of Delivery: 04/01/2022 d. FFB Weight: 10,970 KG 	<p>Complied</p>

		<p>The procedures for receiving and processing certified and non-certified FFBS are documented in the 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. The procedure also states the mechanism for handling non-conforming FFB and documents.</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> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. 	<p>SOU 3 Elphil POM have ensured that all the required information are available in document form for any sales of MB-Certified products. CPO – RSPO MB and PK – RSPO MB have been sold during the audit period and sampled records of transactions have been verified as follows.</p> <p><u>MB-Certified CSPO</u></p> <ol style="list-style-type: none"> Contract No.: S/C-PSD/2202/CPO0098 <ol style="list-style-type: none"> The name and address of the buyer: Nuri Edible Oil (NEO) Complex, Lot 27, PT 234 Lebu Sultan Mohamed 1. The name and address of the seller: KKS Elphil, Bt. 6, Jalan Lintang, 31100 Sg. Siput (U), Perak The loading or shipment/ delivery date: 01/03/2022 The date on which the documents were issued: 01/03/2022 RSPO certificate number: RSPO 550180 A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Crude Palm Oil (CPO) – RSPO MB The quantity of the products delivered: 41,240 KG 	<p>Complied</p>

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		<ul style="list-style-type: none"> h. Any related transport documentation: W/B Ticket# 020590 i. A unique identification number: W/B Ticket# 020590 <p><u>MB-Certified CSPK</u></p> <ul style="list-style-type: none"> 1. Contract No.: S/C-PSD/2202/PK0110 <ul style="list-style-type: none"> a. The name and address of the buyer: Mayang Bayumas Sdn Bhd b. The name and address of the seller: KKS Elphil, Bt. 6, Jalan Lintang, 31100 Sg. Siput (U), Perak c. The loading or shipment/ delivery date: -7/03/2022 d. The date on which the documents were issued: 07/03/2022 e. RSPO certificate number: RSPO 550180 f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Palm Kernel – RSPO MB g. The quantity of the products delivered: 27,240 KG h. Any related transport documentation: W/B Ticket# 020626 i. A unique identification number: W/B Ticket# 020626 	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> 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 ii) The mill shall ensure the following: 	<p>The mill does not outsource any of its milling activities to any third party. With regards to the contracted CPO and PK transporters, it is stated in the contract agreement between Elphil POM and the contractors in Annexure 5, RSPO Supply Chain Certification Standard, that the site has legal ownership of all input material to be included in outsourced processes.</p>	Complied

	<ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 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. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 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. 		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Details of contractors are available in the list of contractors.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The list of contractors is updated from time to time by the mill. The information of any newly appointed contractor is shared with BSI through pre-audit information request prior to the audit. The information is provided to the assessment team.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> ii) 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. iii) 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. 	<ul style="list-style-type: none"> i) All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible. ii) 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. 	Non-compliance

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	<p>iv) 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.</p> <p>v) For Mass Balance Module, the mill:</p> <p>c) 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.</p> <p>d) 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>e) 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>	<p>iii) NA as the mill is using MB model</p> <p>Nevertheless, nonconformities on the implementation of Supply Chain Records and Transactions were verified as below.</p> <ol style="list-style-type: none"> 1. Based on the verification of the mill’s mass balance account and sales registered in RSPO PalmTrace for the period under review (Mar 2021 to Feb 2022), it was found that the mill has dispatched 2,593.12 mt of RSPO certified PK more than its stock balance (production and carried forward balance). 2. The mass balance account did not capture the sales of RSPO CPO and PK which was downgraded and sold as conventional products and the sales of RSPO Credits. 3. The mass balance account did not show the correct volume for ‘Balance’ and ‘Carry Forward’ for CPO & PK. <p>Hence, a major Non-conformity was raised.</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>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</p>	Complied
3.8.15	<p>Processing</p> <p>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>	<p>NA as the mill is using MB module.</p>	Complied

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3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>i) The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace.</p> <p>ii) RSPO certified volumes sold under different scheme or as conventional were not registered in the RSPO PalmTrace.</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied
General corporate communications			
4.1	<p>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.</p>	<p>No off-product claim made by Elphil POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc). Thus, this indicator is not applicable</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ol style="list-style-type: none"> Display its RSPO membership status Display the RSPO web address (www.rspo.org) State that the member supports the work of the RSPO State the member's history with regard to the RSPO. 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>	<p>Not applicable as no off-product claim made by Elphil POM as to date.</p>	Complied

4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by Elphil POM as to date.	Not Applicable
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as no off-product claim made by Elphil POM as to date.	Not Applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Elphil 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.	Elphil POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not Applicable

	b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	No business to consumer communication on product specific claim made Elphil POM and only producing crude and unfinished product. This is not applicable for Elphil POM.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	No business to consumer communication on product specific claim made Elphil POM and only producing crude and unfinished product. This is not applicable for Elphil 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 Elphil POM and only producing crude and unfinished product. This is not applicable for Elphil 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 Elphil POM and only producing crude and unfinished product. This is not applicable for Elphil 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 Elphil POM and only producing crude and unfinished product. This is not applicable for Elphil 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 Elphil POM and only producing crude and unfinished product. This is not applicable for Elphil 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 Elphil POM and only producing crude and unfinished product. This is not applicable for Elphil POM.	Not Applicable

6.8	<p>RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>	<p>No business to consumer communication on product specific claim made Elphil POM and only producing crude and unfinished product. This is not applicable for Elphil POM.</p>	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Oil palm content is 100% CPO and claim as RSPO MB-certified.	Complied
	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.	Non-certified FFB comes from external crop and since Elphil POM is using Mass Balance module, the non-certified volume is covered in the Mass Balance sheet.	Complied
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> Surrounded by the text: 'Certified sustainable palm oil'. 	<p>Elphil POM does not use the RSPO label in its product (CPO & PK). This is confirmed due site visit observation and interview with the mill workers.</p>	Not Applicable

	<ul style="list-style-type: none"> • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is 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>No evidence of storytelling in product related communication. Hence, this requirement is not applicable</p>	<p>Complied</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>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<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>SDPB has implemented a Sime Darby’s Human Rights Charter where they committed to recognizing the role of Human Rights Defenders in accordance to the United Nations declaration on Human Rights Defender.</p> <p>They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights. The policy was communicated through the muster briefing/training to workers as below:</p> <ul style="list-style-type: none"> Kamuning Estate: 07/01/2022 Elphil Estate: 21/01/2022 <p>It was also communicated to the external stakeholder through stakeholder consultation and company website.</p>	<p>Complied</p>
<p>4.1.2</p>	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>SDPB has implemented Group Sustainability and Quality Policy Statement dated 02 Dec 2019 where the management is committed to contributing to a better society:</p> <ol style="list-style-type: none"> Respecting, upholding & no-exploitation of fundamental human rights. Providing safe and healthy workplaces and protecting workers’ welfare. Engaging and empowering communities. 	<p>Complied</p>

		This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers.							
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 anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.</p> <p>Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing.</p>	Complied						
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The policy was communicated through the muster briefing/training to workers as below:</p> <table border="1" data-bbox="1137 922 1928 1074"> <thead> <tr> <th>Estate/Mill</th> <th>Date of training</th> </tr> </thead> <tbody> <tr> <td>Kamuning Estate</td> <td>17/01/2022</td> </tr> <tr> <td>Elphil Estate</td> <td>23/12/2021</td> </tr> </tbody> </table>	Estate/Mill	Date of training	Kamuning Estate	17/01/2022	Elphil Estate	23/12/2021	Complied
Estate/Mill	Date of training								
Kamuning Estate	17/01/2022								
Elphil Estate	23/12/2021								
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>Sighted the External Complaint Book have the agreed resolution within timeframe. There was no other major complaint other than housing maintenance issues. Some of the external related request and grievance can be found under indicator 1.1.3.</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>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</p>	Complied						

	<p>- Minor compliance -</p>	<p>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. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the 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.</p>	
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
<p>4.3.1</p>	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Kinta Kellas Estate contributed as following:</p> <ul style="list-style-type: none"> - Donation for annual temple festival; Date: 26/04/2021 - Distribution of chicken to all workers for Eidul Adha celebration; Date: 13/05/2021 <p><u>Kamuning Estate</u></p> <ul style="list-style-type: none"> - Sanitation work at lapang sasar - Contribution made to SJK(T) Changkat Salak - Food bank "Kami Prihatin" 	<p>Complied</p>
<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>			
<p>4.4.1</p>	<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>SOU3 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>	<p>Complied</p>

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		Estate	Land title	Land use type	Tenure	
		Kamuning Estate	Sample : i) GRN 63218, lot 3C, Mukim Sungai Siput, District: Kuala Kangsar title area: 1,578.2715 ha Total titles: 58 (3,894.448 ha)	Agriculture (commercial crop)	Freehold	
		Elphil Estate	Sample: i) GRN 64080, lot 3319 Mukim Sg Siput, District Kuala Kangsar title area: 465.1854 ha ii) GRN 46580, lot 1294, Mukim Sg Siput, title area: 182.7153 ha Total titles: 21 (1,879.3778 ha)	Agriculture (commercial crop)	Freehold	

4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	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. 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	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	No issues 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. 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.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	No issues 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. 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	Complied

		free, prior and informed consent (FPIC) process to any new developed.	
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	No issues 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
4.4.3	(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). - Critical (Major) compliance -	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.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	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.	Not Applicable
4.4.5	(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. - 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.	Not Applicable
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - 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.	Not Applicable

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.			
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>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
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>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
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>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is</p>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable

	independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -		
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.	Not Applicable
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.	Not Applicable
4.5.8	(C) New lands are not acquired in areas invited by communities in voluntary isolation. - Critical (Major) compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Not Applicable
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 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.	Complied

4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>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 calculation and distribution to the affected parties will be determined by Land Management Department.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>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
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>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 4.7: 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.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>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</p>	Complied

		calculation and distribution to the affected parties will be determined by Land Management Department.	
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	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 calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	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
<p>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.</p>			
4.8.1	<p>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.</p> <p>- 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.	Not Applicable
4.8.2	<p>(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</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.	Not Applicable

	certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -		
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	No 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.	Not Applicable
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	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.	Not Applicable
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary by Region. As the mill is using MB module, the mill received both certified and non-certified FFB. Nonetheless, with regards to non-certified FFB, the suppliers are only those from plantations and collection centres. The FFB supplier were listed in the Elphil POM FFB Supplier list.	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 -	Explanation of FFB pricing was done during the signing of contracts. Evidence of explanation has been given was kept and made available for verification.	Complied

5.1.3	<p>(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 -</p>	<p>The FFB pricing was stated in Section 8 of the contract, Pricing of FFB under Third Schedule. The calculation method of the pricing was basically influenced by MPOB market price. Verification of the contract agreements showed that all the FFB suppliers have agreed with the pricing through signing.</p>	Complied			
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. - Critical (Major) compliance -</p>	<p>No binding contract between the mill and out-growers which includes finance, loans/credit and repayment through FFB price reduction for replanting and/or other support mechanisms. Thus, this indicator is not applicable.</p>	Complied			
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -</p>	<p>Verification of the terms and conditions of the sampled contracts showed that the contracts were fair, legal and made transparent to the contractors. The agreed timeframe of the contract was stated under Section 7 of the contract.</p>	Complied			
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -</p>	<p>Payments are broken down as defined under the First Schedule/Attachment 1 of the agreed contract. The payments were handled at HQ level and based on verification of the payment vouchers; the payments were made on timely manner.</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). - Minor compliance -</p>	<p><u>Elphil POM</u> Weighbridges were calibrated annually and evidence of calibration certificates were available as below.</p> <table border="1" data-bbox="1137 1217 1926 1326"> <tr> <td data-bbox="1137 1217 1400 1326">Weighing equipment</td> <td data-bbox="1411 1217 1697 1326">Model/capacity</td> <td data-bbox="1709 1217 1926 1326">Date of stamping, certificate no.</td> </tr> </table>	Weighing equipment	Model/capacity	Date of stamping, certificate no.	Complied
Weighing equipment	Model/capacity	Date of stamping, certificate no.				

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		Serial no. 01264406 KK	M.Toledo IND310 70 mt	21/10/2021 D 016124	
		Serial no. C 016301909	M.Toledo IND780 70 mt	21/10/2021 D 016124	
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	NA as no independent smallholders within the certification unit.			Not Applicable
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	NA as no independent smallholders within the certification unit.			Not Applicable
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 -	NA as the mill does not received FFB from any smallholders.			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 -	NA as the mill does not received FFB from any smallholders.			Not Applicable

5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	NA as the mill does not received FFB from any smallholders.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	NA as the mill does not received FFB from any smallholders.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	NA as the mill does not received FFB from any smallholders.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	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 .	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 Flemington 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</p>	Complied

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		<p>conducted once every 2 months or whenever necessary according to the new TOR. Meetings conducted at respective units as below:</p> <p>a. Elphil POM: 14/02/2022, 10/11/21 & 15/7/21.</p> <p>b. Kamuning Estate: 10/3/22, 22/01/22, 10/12/21, 14/09/21</p> <p>c. Elphil Estate: 14/02/22, 18/11/21, 7/9/21, 15/07/21</p> <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 roles, and responsibilities as well as governance structure and programmes were added in.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>There is no 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</p>	Complied
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>All employees have signed employment contracts (for foreigners), and employment letters (for locals) Each document is dated and contains provisions related to duration of contract, job scope, place of work, roles and responsibilities of employers and employees, wages, allowances, working hours, mutual termination notice, holidays, paid annual leave, medical leave, other benefits, deductions, etc. These documents were prepared in Bahasa</p>	Complied

		<p>Malaysia, a language which is understood by all workers from Malaysia, Indonesia, India and Bangladesh.</p>	
<p>6.2.2</p>	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>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 Employment Act 1955.</p> <p>Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Employment Act 1955. Verified the payslips, the payment and calculation of overt time well distributed.</p> <p>The overtime rate after 8 hours daily rated is: upkeeping</p> <ul style="list-style-type: none"> - Mon - Sat – daily rated / 8 hours x 1.5 - Sunday - daily rated / 8 hours x 2.0 - Public holiday – daily rated / 8 hours x 3.0 <p>The overtime rate after 8 hours piece rated is: harvesters</p> <ul style="list-style-type: none"> - Mon - Sat – flat rate - Sunday – flat rate x 2.0 - Public holiday – flat rate x 3.0 <p>Kinta Kellas Estate sample as following:</p> <ul style="list-style-type: none"> - Employee #22550; Female; Date joined: 12/1/1996; Malaysian - Employee #159831; Female; Date joined: 4/9/2020; Malaysian - Employee #165766; Male; Date joined: 13/10/2021; Malaysian - Employee #153672; Male; Date joined: 17/8/2019; Indian - Employee #86581; Male; Date joined: 1/1/2013; Indonesian 	<p>Complied</p>

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		<ul style="list-style-type: none"> - Employee #141258; Male; Date joined: 19/3/2018; Nepali - Employee #116765; Male; Date joined: 7/9/2015; Bangladeshi <p><u>Kamuning Estate (13 workers out of 276 workers sampled)</u></p> <p>Low: February 2022, Normal: August 2021, Peak: March 2021</p> <ul style="list-style-type: none"> - Employee #156197; Male; Date joined: 2/11/2019; Indian - Employee #156215; Male; Date joined: 2/11/2019; Indian - Employee #68697; Male; Date joined: 1/6/2011; Indonesian - Employee #87324; Male; Date joined: 1/2/2013; Malaysian - Employee #103900; Male; Date joined: 18/7/2014; Indonesian - Employee #110355; Male; Date joined: 26/1/2015; Nepali - Employee #134400; Male; Date joined: 23/6/2017; Indian - Employee #139279; Male; Date joined: 18/1/2018; Nepal - Employee #153491; Male; Date joined: 8/8/2019; Indian - Employee #167134; Female; Date joined: 5/1/2022; Malaysian - Employee #152732; Male; Date joined: 29/7/2019; Indian - Employee #155834; Male; Date joined: 26/10/2019; Indonesian - Employee #157704; Male; Date joined: 13/01/2020; Indonesian <p><u>Elphil Estate (10 workers from out of 107 workers sampled)</u></p> <p>Low: February 2022, Normal: August 2021, Peak: March 2021</p> <ul style="list-style-type: none"> - Employee #147629; Male; Date joined: 1/11/2019; Indian - Employee #47000; Male; Date joined: 12/4/2010; Malaysian - Employee #49418; Female; Date joined: 1/6/2010; Malaysian - Employee #71820; Male; Date joined: 7/9/2011; Indian 	
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		<ul style="list-style-type: none"> - Employee #96894; Male; Date joined: 1/11/2013; Indonesian - Employee #135480; Male; Date joined: 8/8/2017; Nepal - Employee #149080; Male; Date joined: 8/3/2019; Indonesian - Employee #149081; Male; Date joined: 7/3/2019; Indonesian - Employee #156122; Male; Date joined: 1/11/2019; Indian - Employee #155938; Male; Date joined: 25/10/2019; Indian <p><u>Elphil POM (8 workers from out of 103 workers sampled)</u></p> <p>Low: February 2022, Normal: August 2021, Peak: March 2021</p> <ul style="list-style-type: none"> - Employee #66677; Male; Date joined: 21/5/2011; Indonesian - Employee #120915; Male; Date joined: 3/5/2016; Indonesian - Employee #133147; Male; Date joined: 1/4/2018; Indonesian - Employee #150980; Male; Date joined: 1/1/2022; Indonesian - Employee #151773; Male; Date joined: 1/10/2019; Indonesian - Employee #159512; Male; Date joined: 1/20/2021; Malaysian - Employee #167316; Male; Date joined: 17/1/2022; Malaysian - Employee #167830; Male; Date joined: 1/3/2022; Malaysian <p>Elphil POM workers agreement based on the latest MAPA Circular # 5/2022; Proposed New Agreement To Replace The MAPA/NUPW Palm Oil Mill Agreement, 2019; Date: 11/1/2022.</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 the estates were able to demonstrate compliance with Employment Act 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCISO,</p>	Complied

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		<p>EPF, EIS) and non-statutory deductions (e.g. electricity bills, etc) in accordance with the relevant laws and Labour Office permits. Sample of deduction permits issued by Labour Department checked:</p> <ol style="list-style-type: none"> a. Deduction permit for "surau", serial no. P.P 3/7/0111 dated August 2005 b. Deduction permit for electricity, Ref: BHG.PU/9/129 JLD 33(53) dated 6 July 2017 c. Deduction permit for temple fund (RM 5 and RM 10) per month, ref: JTK.PK (1) PMT(SEK.24)0803 Jld.3 (19) 25 July 2017. d. iv) Overtime limit approval for maximum of 130 hours, ref: BHG. PU/9/134 JLD9 (11) dated 27/3/2017. 	
<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>Kinta Kellas Estate appointed Muhammad Sofian Bin Nurudin, Medical Assistant (MA) as Person In-charge of Accommodation (PIOA) as per appointment letter dated 2/1/2022. Latest housing inspection was conducted on 26/2/2022. Additionally, the estates established an Employees' Welfare Committee (EWC) The estate implemented an online Housing Repair Request System i.e. Oil Palm Pal (OPP) improved the efficiency of response action with sample request as following:</p> <ul style="list-style-type: none"> - House # A5; eqRuest date: 4/3/2022; Repair completion date: 4/3/2022 - House D-22; Request date: 7/3/2022; Repair completion date: 8/3/2022 <p><u>Kamuning Estate</u> VMO – 14/3/22, 7/3/22 Line site inspection: 11/3/22, 4/3/22, 27/2/22, 18/2/22</p> <p><u>Elphil Estate</u> VMO – 11/3/22, 25/2/22</p>	<p>Complied</p>

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		Line site inspection: 12/3/22, 5/3/22, 26/2/22, 19/2/22 <u>Elphil POM</u> Line site inspection – 10/3/22, 2/3/22, 26/2/22, 10/2/22	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	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. Price of goods were displayed at the sundry shops. Workers interview confirmed that they can easily purchase foods at the nearest shop or choose to go nearest town away from the estate by using their transport until the main guard post and public transport to the nearest town.	Complied
6.2.6	A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate). <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> 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	Sime Darby Plantation Berhad – SOU3 Elphil POM has provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. It includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. The payslip sighted in clause 6.2.1 showed that the salary received complied with the minimum wage order 2022 and the decent living wage set up by the group which is foreign worker is RM1,704.41/worker and local RM1,799.06/worker. 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.	Complied

	<p>other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage). The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
<p>6.2.7</p>	<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>All the core works are performed by permanent and full-time employees in SOU 3 Elphil Palm Oil Mill and supply bases. No contract worker was employed except for supporting work</p>	<p>Complied</p>
<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 union</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Additionally, all workers can select a representative among themselves to be the Employee Welfare Representative and attending quarterly meeting with management to discuss any issue related to workers welfare. Latest meeting was conducted on 03/12/2021 in Kinta Kellas Estate.</p> <p>Latest meeting between NUPW representative and Kinta Kellas Estate management was conducted on 8/3/2022.</p> <ul style="list-style-type: none"> - Kamuning Estate – 04/03/2022 - Elphil Estate – 10/02/2022 - Ephil Estate – 01/03/2022 	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely</p>	<p>Interviewed with the NUPW representatives and the workers confirmed that the election of the representatives were elected freely by the workers without any interference of management.</p>	Complied

	<p>elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>		
<p>Criterion 6.4: Children are not employed or exploited.</p>			
<p>6.4.1</p>	<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. • 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. 	<p>Complied</p>

		<ul style="list-style-type: none"> 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 company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liason & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There 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.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders.</p>	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			

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6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter where they create a working environment with zero tolerance for sexual harassment and abuse, and in which violence is never used to resolve issues or conflict. The policy was communicated to the workers conducted on 11/03/2022 at Elphil Estate.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They facilitate opportunities for advancement for their employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policies were communicated to gender committee on 10/3/2022 related to the sexual harassment and reproductive rights. Seen the training attendance list. The workers have to answer quiz to ensure their understanding on the training.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -</p>	<p>Briefing of the new mother assessment was conducted during the Gender Committee meeting. This has made confirmed during interview and document review during site audit. Related request has been approved by the management.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -</p>	<p>Sime Darby Plantation has developed Gender Committee Handbook, First Edition for implementation framework and guidelines where grievance reporting procedure for gender was developed. 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</p>	Complied

		<p>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 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.</p>	
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<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 labor in SOU3. 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. Passport is kept by each worker and no longer keep in the office or passport locker. 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>	<p>Complied</p>

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"> Providing equal opportunity Respecting freedom of association Eradicating any form of exploitation Providing decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs 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>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>	Complied		
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.					
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>All the sampled estates and mill managements have conducted regular two-way communication with their employees through the quarterly OSH committee meetings. Minutes of meetings were made available for verification which dated as follows:</p> <table border="1" data-bbox="1137 1302 1930 1351"> <tr> <td data-bbox="1137 1302 1290 1351">OU</td> <td data-bbox="1296 1302 1930 1351">Quarter and dates</td> </tr> </table>	OU	Quarter and dates	Complied
OU	Quarter and dates				

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	2021				2022
	1st	2nd	3rd	4th	1st
Elphil POM	22/03	27/08	25/10	20/12	21/03 (planned)
Kinta Kellas	02/03	05/07	28/09	02/12	12/03
Kamuning	09/03	14/06	17/09	11/12	11/03
Elphil	18/01	08/04	28/07	19/11	09/03

Among the agenda discussed are:

- Confirmation of minutes previous meeting
- Workplace inspection report
- Accident report
- Medical surveillance & Audio metric
- Status of Safety Program & Environmental
- HIRARC
- Complaint from Employee/External Party
- Other matters

Workplace inspections are made prior to the ESH meeting. The respective Managers were appointed as ESH Chairman (PIC) through letter signed by Regional CEO. All letters were made available for verification.

<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>Accident of emergency procedure is presented in Mill Quality Management System Standard Operation manual (MQMS SOM) dated November 1st, 2008. Flowchart of emergency handling was presented in Appendix 5.5.3.3.</p> <p>The CU displayed the accident and emergency procedure at strategic places such as muster ground and labour quarters. Additionally, the management communicate the procedure during morning briefing and training.</p> <p>The organization chart for the ERP team was established and displayed for information of the employees. The important telephone contact numbers were also provided therein. Procedures guidelines were issued by RSQM and amended to tailor to the situation differences in the estates and mill.</p> <p>ERT members received training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trained personnel for First Aid were among the employees working as field staff/mandores. The first aid boxes were also available at various workplace such as estate office, workshop, and store. The estates distributed the first aid box to the mandores and brought along to the field during operations.</p>	<p>Complied</p>
<p>6.7.3</p>	<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>The management provides appropriate PPE to the employees in accordance to HIRARC and Standard Operating Procedure. PPE issuance records were well maintained and made available for verification. Among the information available in the record was name of employee, type of PPE (i.e. apron, safety shoes, rubber boots, N95 mask, respirator, cartridge, helmet, goggle, cotton gloves, nitrile gloves, etc.), date of PPE received and receipt acknowledgement by the recipient. On site verification and interview with workers showed that the appropriate PPE was provided for free and worn accordingly.</p>	<p>Complied</p>

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		Sanitation facilities such as shower room, PPE washing area, personal clothing locker for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing were provided and well maintained.																					
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p>Should there be any medical care needed by the employees, clinics with certified Medical or Hospital Assistants in-charge were provided at all the sampled management units. Based on site visits, all the clinics were well maintained and managed. Records of medical inventory, VMO visits and patients treated were made available for verification. Nonetheless, the monitoring of expiry date of the clinical items can be further improved (OFI).</p> <p>The sampled estates and mill are subscribing to SOCSO to cover the accident insurance for all their workers. Payment vouchers to SOCSO were made available for verification by all the operating units.</p> <table border="1" data-bbox="1137 879 1924 1225"> <thead> <tr> <th>Estates/ mill</th> <th>Transaction date</th> <th>Payment voucher Ref. No.</th> <th>No. of employees covered</th> </tr> </thead> <tbody> <tr> <td>Kinta Kellas</td> <td>15/03/2022</td> <td>MYFL220312216888</td> <td>83</td> </tr> <tr> <td>Kamuning</td> <td>15/03/2022</td> <td>MYFL220314229677</td> <td>279</td> </tr> <tr> <td>Elphil</td> <td>15/03/2022</td> <td>MYFL220304578026</td> <td>132</td> </tr> <tr> <td>Elphil POM</td> <td>15/03/2022</td> <td>MYFL220307839835</td> <td>103</td> </tr> </tbody> </table>	Estates/ mill	Transaction date	Payment voucher Ref. No.	No. of employees covered	Kinta Kellas	15/03/2022	MYFL220312216888	83	Kamuning	15/03/2022	MYFL220314229677	279	Elphil	15/03/2022	MYFL220304578026	132	Elphil POM	15/03/2022	MYFL220307839835	103	Complied
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6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	Records of all accidents are kept and filed. The methodology of occupational injuries is recorded using LTA. (Lost Man day MC.) This is summarized officially in the JKPP 8. Records are kept for a	Complied																				

		minimum 10 years in the office. Crosschecking with RSPO metrics template showed that the data was appropriately recorded.	
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>Among the specific IPM Plans that have been identified in the estates are:</p> <ol style="list-style-type: none"> 1. Continuous planting of beneficial plants at immature and replanting fields. 2. Planting of beneficial plants at areas prone to bagworm attacks. 3. Training on Barn Owl Census and Occupancy. 4. Installation of Barn Owl Box to achieve target ration of 1:10 Ha. 	Complied
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	Species referenced in the Global Invasive Species Database and CABI.org are not used in the estate.	Complied

	- Minor compliance -																										
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	There was no evidence of use of fire for pest control in all the estate.	Complied																								
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																											
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 01.07.2011. Selected products are specific to the target pest, weed and disease.	Complied																								
7.2.2	(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. - Critical (Major) compliance -	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 2020 and 2021 as below: - <table border="1" data-bbox="1137 981 1928 1276"> <thead> <tr> <th>Estate</th> <th>Oct 2021</th> <th>Nov 2021</th> <th>Dec 2021</th> <th>Jan 2022</th> <th>Feb 2022</th> </tr> </thead> <tbody> <tr> <td>Elphil Estate</td> <td>2.634</td> <td>2.671</td> <td>1.477</td> <td>1.428</td> <td>2.097</td> </tr> <tr> <td>Kamuning Estate</td> <td>0.757</td> <td>0.645</td> <td>0.735</td> <td>0.538</td> <td>0.510</td> </tr> <tr> <td>Kinta Kellas Estate</td> <td>0.08</td> <td>0.07</td> <td>0.26</td> <td>1.96</td> <td>1.08</td> </tr> </tbody> </table>	Estate	Oct 2021	Nov 2021	Dec 2021	Jan 2022	Feb 2022	Elphil Estate	2.634	2.671	1.477	1.428	2.097	Kamuning Estate	0.757	0.645	0.735	0.538	0.510	Kinta Kellas Estate	0.08	0.07	0.26	1.96	1.08	Complied
Estate	Oct 2021	Nov 2021	Dec 2021	Jan 2022	Feb 2022																						
Elphil Estate	2.634	2.671	1.477	1.428	2.097																						
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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. - Critical (Major) compliance -</p>	<p>The estate has 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 the estate, 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. - Minor compliance -</p>	<p>There is no evidence of prophylactic use of pesticides in the estate.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ol style="list-style-type: none"> Judgment of the threat and verify why this is a major threat Why there is no other alternative which can be used Which process was applied to verify why there is no other less hazardous alternative What is the process to limit the negative impacts of the application Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>Sighted in the Chemical Registers showed that only class III & IV chemicals were used at the estate. During the site visit to the chemical store it was justified that there were only class II, III and IV chemicals being used. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead. Monocrotophos was eliminated and in its place, Acephate is used.</p>	Complied

7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers in the estate.</p> <p>Sampled the training conducted for pesticide handlers as below: -</p> <p>a. Kinta Kellas Estate</p> <ul style="list-style-type: none"> - Spraying techniques and the Safety Aspects – 12/08/2021. <p>b. Kamuning Estate</p> <ul style="list-style-type: none"> - Chemical Handling and Scheduled Waste Training @ Changkat Salak Division – 12/03/2022 	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and 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.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Empty pesticides containers were triple rinsed, holes punched and stored separately in the Scheduled Waste store. Thereafter disposal arrangement will follow. The current practice for the estates are to dispose the empty chemical containers to licensed facilities. Consignment Notes of recent disposals were verified as below.</p> <ol style="list-style-type: none"> 1. <u>Kinta Kellas Estate</u> 	Complied

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		<p>SW409 – Empty Chemical Container; Disposal Date: 11/02/2022; Consignment Note No: 202202111139Y6KV; Quantity: 0.1955 Mt; Name of Facility; Edsha Solutions Sdn Bhd.</p> <p>2. <u>Kamuning Estate</u> SW409 – Empty Chemical Container; Disposal Date: 15/01/2022; Consignment Note Number: 2022011517V6IASB; Quantity: 0.9980 Mt; Name of Facility: Pentas Flora (Ipoh) Sdn Bhd.</p> <p>3. <u>Elphil Estate</u> SW409 – Empty Chemical Container & Chemical Equipment; Disposal Date : 07/03/2022; Consignment Note: 20220307110GF4M2; Quantity: 0.1580 Mt; Name of Facility: Pentas Flora (Ipoh) Sdn Bhd.</p> <p>No containers being used for other purpose in the estates with the exception that there were allocations of empty chemical containers were recycled for premixing pesticides for onward delivery to field.</p>	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -</p>	<p>No aerial spraying for pesticide were done in the estate.</p>	<p>Complied</p>
7.2.10	<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>1. <u>Kamuning Estate</u></p>	<p>Complied</p>

		<p>Previous Medical Surveillance was conducted on 13/03/2021 for 31 estate workers exposed to chemicals in the estate at Klink Tweedie. All workers were deemed fit to work with no abnormal results. Latest medical surveillance was conducted on 08 – 11/03/2022 for 33 workers. The results have not been provided by the assessor as of yet.</p> <p>2. <u>Kinta Kellas Estate</u> Occupational Medical Surveillance Programme was conducted for the Chemical Sprayers, supervisors, storekeepers and trunk injectors at Klinik Edina on 16/03/2021. The results indicated all workers were fit to work.</p> <p>3. <u>Elphil Estate</u> Medical Surveillance was conducted for estate chemical handlers on 06/07/2021 at Klinik Tweedie. The results was available for verification and indicated that all workers were fit to work.</p>	
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. - Critical (Major) compliance -</p>	<p>SOU 3 Operating Units have prohibited women 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.</p> <p>Interview with the female sprayers indicated that they are aware that pregnant and breast-feeding women are prohibited from engaging with chemical related works.</p>	Complied
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			

7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Wastes management plan is developed through the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. Generally, the scheduled wastes and recyclable waste were disposed through licensed vendors and organic wastes were disposed through landfill.</p>	Complied
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>The workers have demonstrated good understanding in proper disposal of wastes as verified during the interview. The visited labour quarters were observed to be in clean condition, free from scheduled waste. General waste were segregated and separated accordingly.</p> <p>SW disposed through licensed contractors which were verifiable through eSwis. The latest notification to DOE on types of scheduled waste was on 02/03/2022. Examples of Consignment notes verified:</p> <p><u>Elphil POM</u></p> <ol style="list-style-type: none"> SW305 – Spent Lubricant Oil; Disposal Date: 03/03/2022; Consignment Note: 2022030310YJXBQD; Quantity: 0.1100 Mt; Name of Facility: Pentas Flora (Ipoh) Sdn Bhd. SW322 – Waste of Non-Halogenated Organic Solvent; Disposal Date: 03/03/2022; Consignment Note: 2022030311DR4AP0; Quantity: 0.0641 Mt; Name of Facility: Pentas Flora (Ipoh) Sdn Bhd. <p><u>Kinta Kellas Estate</u></p> <ol style="list-style-type: none"> SW305 – Spent Lubricating Oil; Disposal Date: 11/02/2022; Consignment Note No: 2022021111VYRTQZ; Quantity: 0.0850 Mt; Name of Facility: SP Metro (M) Sdn Bhd. SW306 – Spent Hydraulic Oil; Disposal Date: 11/02/2022; Consignment Note No: 2022021111TB2R93; Quantity: 0.10 Mt; Name of Facility: SP Metro (M) Sdn Bhd. 	Complied

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		<p>3. SW409 – Empty Chemical Container; Disposal Date: 11/02/2022; Consignment Note No: 202202111139Y6KV; Quantity: 0.1955 Mt; Name of Facility: Edsha Solutions Sdn Bhd.</p> <p>4. SW410 – Used Oil Filter and Empty Containers; Disposal Date: 11/02/2022; Consignment Note No: 2022021111TB2R93; Quantity: 0.0967 Mt; Name of Facility: Edsha Solutions Sdn Bhd.</p> <p>5. SW404 – Clinical Waste; Disposal Date: 01/03/2022; Quantity: 2.0 kg; Name of Facility: Edgenta Mediserve Sdn Bhd.</p> <p><u>Kamuning Estate</u></p> <p>1. SW404 – Clinical Waste; Disposal Date: 17/02/2022; Consignment Note Number: 20220217133XE7JN; Quantity: 0.0004 Mt; Name of Facility: Edgenta Mediserve Sdn Bhd.</p> <p>2. SW306 – Spent Hydraulic Oil; Disposal Date: 15/01/2022; Consignment Note Number: 202201151ZCTOHG; Quantity: 0.0800 Mt; Name of Facility: Pentas Flora (Ipoh) Sdn Bhd.</p> <p>3. SW305 – Spent Lubricant Oil; Disposal Date: 15/01/2022; Consignment Note Number: 2022011517SO9X30; Quantity: 0.1700 Mt; Name of Facility: Pentas Flora (Ipoh) Sdn Bhd.</p> <p><u>Elphil Estate</u></p> <p>1. SW305 – Spent Lubricant Oil; Disposal Date: 07/03/2022; Consignment Note: 2022030711QBOGF7; Quantity: 0.2500 Mt; Name of Facility: Pentas Flora (Ipoh) Sdn Bhd.</p> <p>2. SW306 – Spent Hydraulic Oil; Disposal Date : 07/03/2022; Consignment Note: 2022030711RNWDHQ; Quantity: 0.1500 Mt; Name of Facility: Pentas Flora (Ipoh) Sdn Bhd.</p>	
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		3. SW409 – Empty Chemical Container & Chemical Equipment; Disposal Date : 07/03/2022; Consignment Note: 20220307110GF4M2; Quantity: 0.1580 Mt; Name of Facility: Pentas Flora (Ipoh) Sdn Bhd.	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	The operating units adhered to the policy of “Zero Open Burning” for any replanting. From field visits and interviews with the workers, there were no open burning being practiced in the estates. SOU 3 estates had replanting program spanned over the forthcoming years as shown in 3.1.2. There was no evidence that fire had been used to for waste disposal as well.	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 -	ARM Section 8 covers the procedure for fertiliser application for both immature and mature. The procedure gives the guideline type of fertilisers to be used, timing to apply, dosage and placement.	Complied
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	The internal Agronomist from Sime Darby Research Sdn Bhd and Plantation Research & Advisory, R&D Department visits the estates to perform foliar sampling prior to the fertilizer recommendation for the forthcoming year. Soil Sampling was conducted every five years. The sampling reports were available for each estate for verification as below. <u>Kinta Kellas Estate</u> Soil Analysis was conducted by Sime Darby Research Sdn Bhd. The Test Report (Report Number: S7/2019) done on 04/12/2018 was available for verification. Foliar Analysis was conducted by Plantation Research & Advisory, R&D Department on 13/01/2022. The results were provided in the	Complied

		<p>2022 – 23 Agronomic Highlights and Fertiliser Recommendations Report – Oil Palm.</p> <p><u>Kamuning Estate</u> Soil Analysis was conducted by Sime Darby Research Sdn Bhd. The Test Report (Report Number: S41/2019) done on 08/03/2019 was available for verification.</p> <p>Foliar Analysis was conducted by Plantation Research & Advisory, R&D Department on 15/06/2021. The results were provided in the 2021 – 22 Agronomic Highlights and Fertiliser Recommendations Report – Oil Palm.</p> <p><u>Elphil Estate</u> Soil Analysis was conducted by Sime Darby Research Sdn Bhd. The Test Report (Report Number: S40/2019) done on 08/03/2019 was available for verification.</p> <p>Foliar Analysis was conducted by Plantation Research & Advisory, R&D Department on 24/09/2021. The results were provided in the Plant Analysis Test Report.</p>	
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<p>7.4.3</p>	<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 the nutrient recycling strategy and recorded regularly. All EFB were sourced from Elphil POM. The best practice of EFB application is described in the ARM. Records were available for verification. Based on the records, it was noted that the EFB application rate per hectare was around 40 mt/Ha.</p> <p><u>EFB Application at Kamuning Estate</u></p> <table border="1" data-bbox="1137 580 1928 730"> <thead> <tr> <th>Month</th> <th>Jan 2022</th> <th>Feb 2022</th> </tr> </thead> <tbody> <tr> <td>Tonne</td> <td>434.16</td> <td>599.40</td> </tr> <tr> <td>Field</td> <td>2015A & 2015B</td> <td>2015B</td> </tr> </tbody> </table> <p><u>POME application via Farrow at Elphil Estate.</u></p> <table border="1" data-bbox="1137 818 1928 1067"> <thead> <tr> <th>Month</th> <th>Volume (m³)</th> </tr> </thead> <tbody> <tr> <td>February 2022</td> <td>125.00</td> </tr> <tr> <td>January 2022</td> <td>623.10</td> </tr> <tr> <td>December 2021</td> <td>895.40</td> </tr> <tr> <td>November 2021</td> <td>175.30</td> </tr> </tbody> </table>	Month	Jan 2022	Feb 2022	Tonne	434.16	599.40	Field	2015A & 2015B	2015B	Month	Volume (m³)	February 2022	125.00	January 2022	623.10	December 2021	895.40	November 2021	175.30	<p>Complied</p>
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<p>7.4.4</p>	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Fertilisers input is recorded in store issue notes and manuring record book, which have the information about type of fertiliser, quantity (bags and kg), dates of application and field number. Verification of records confirmed that the applied fertilisers were tally with the agronomist recommendation. Sample records were verified as below.</p> <p><u>Kinta Kellas Estate</u></p>	<p>Complied</p>																			

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		<ol style="list-style-type: none"> Field: OP2020; Hectarage: 59.61 Ha; Fertilizer: RP (28% 92O5; Rate: 0.50 KG/Palm; Total Amount: 4.05 Mt; Application Date: 09/11/2020 – 18/02/2021; Status: Completed. Field: OP2020; Hectarage: 59.61 Ha; Fertilizer: CCM45; Rate: 1.25 Kg/Palm; Total Amount: 11.05 Mt; Application Date: 30/12/2020 – 18/02/2021. Status: Completed. Field: OP2000A; Hectarage: 63.12 Ha; Fertilizer: NKC1; Rate: 3.00 Kg/Palm; Total Mt: 21.25 Mt; Application Date: 07/02/2022 – 12/02/2022. Status: Completed. <p><u>Kamuning Estate</u></p> <ol style="list-style-type: none"> Field: 2002C; Hectarage: 57.00 Ha; Fertilizer: Rock Phosphate; Rate: 2.50 Kg/Palm; Total Bags: 229 Bags; Application Date: 23/03/2022; Status: Completed. Field: 2000F; Hectarage: 40.00 Ha; Fertilizer: Kieserite; Rate: 1.50 Kg/Palm; Total Bags: 147 Bags; Application Date: 03/11/2021; Status: Completed. Field: 2014B; Hectarage: 47.00 Ha; Fertilizer: NKC1; Rate: 4.50 Kg/Palm; Total Bags: 627 Bags; Application Date: 12/08/2021 – 14/08/2021; Status: Completed. 					
Criterion 7.5: Practices minimise and control erosion and degradation of soils.							
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -</p>	<p>Soil series and terrain maps were available at all the estates. Based on the maps, there were no peat soil or soil categorised as marginal or fragile within the vicinity. The soil series at the estates are as follows:</p> <table border="1" data-bbox="1137 1270 1926 1318"> <thead> <tr> <th data-bbox="1137 1270 1370 1318">Estate</th> <th data-bbox="1370 1270 1926 1318">Soil Series</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Estate	Soil Series			Complied
Estate	Soil Series						

		<p>Elphil</p> <p>Kamuning</p> <p>Kinta Kellas</p>	<p>Bungor, Durian, Holyrood, Klau, Langkawi, Malacca, Munchong, Rengam, and unclassified</p> <p>Jerangau, Rengam, Munchong, Bungor, Local Aluvium, Langkawi, Harimau, Durian, Tavy Shallow</p> <p>Bungor, Malacca, Riverine Alluvium, Munchong, and Durian</p>	
<p>7.5.2</p>	<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>Maps that show steep terrain were also available for all the estates which were prepared by the R&D-Plantation Research and Advisory Dept., Precision Agriculture Unit (SMBH).</p> <p>Ref.: ARM Section 4, Land Preparation, Clause 8.4 which states "Areas with greater than 25-degree slope should not be planted and best left for biodiversity purposes...". The area which has more than 25 degree will be excluded from being replanted in future. For hilly area between 9 - 25-degree, ARM is referred to as a management strategy to minimise soil erosion.</p> <p>Field visit to areas identified as above 25 degrees indicated that it has been left abandoned and no replanting work has been done.</p>		<p>Complied</p>
<p>7.5.3</p>	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>Based on the field visit, the areas which has been identified having slope more than 25°, were left undeveloped. The visited areas are as follows:</p> <ul style="list-style-type: none"> - Limestone Hill - 4°50'59" N, 101°5'54" E, Elphil Estate. - Slope & Rocky Area - 4°48'57" N, 101°3'11" E, Kamuning Estate. 		<p>Complied</p>
<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>	Soil surveys are made and available in a soil map for SOU 3 Estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates. The estates had no new planting for the current year and also for the upcoming 5 years operations.	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>	SOU 3 Estates have no new planting or replanting on areas that are more than 25 degree. Plantings on steep slope are either avoided or minimized.	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	Soil surveys are made and available in a soil map at the estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates. Details as per 7.5.1 and 7.5.2.	Complied
<p>Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	There are no peat soil or soil categorized as marginal or fragile soil in all estate visited. There was also no new planting in the estates as well. Therefore this indicator is not applicable.	Not Applicable
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>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).</p> <p>- Minor compliance -</p>	There are no peat soil or soil categorized as marginal or fragile soil in all estate visited. There was also no new planting in the estates as well. Therefore this indicator is not applicable.	Not Applicable
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	There are no peat soil or soil categorized as marginal or fragile soil in all estate visited. There was also no new planting in the estates as well. Therefore this indicator is not applicable.	Not Applicable

7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>There are no peat soil or soil categorized as marginal or fragile soil in all estate visited. There was also no new planting in the estates as well. Therefore this indicator is not applicable.</p>	Not Applicable
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. This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition. - Critical (Major) compliance -</p>	<p>There are no peat soil or soil categorized as marginal or fragile soil in all estate visited. There was also no new planting in the estates as well. Therefore this indicator is not applicable.</p>	Not Applicable
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. - Critical (Major) compliance -</p>	<p>There are no peat soil or soil categorized as marginal or fragile soil in all estate visited. There was also no new planting in the estates as well. Therefore this indicator is not applicable.</p>	Not Applicable
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>There are no peat soil or soil categorized as marginal or fragile soil in all estate visited. There was also no new planting in the estates as well. Therefore this indicator is not applicable.</p>	Not Applicable

	- Critical (Major) compliance -		
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<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 and action plan at all the sampled estates for year 2022 were available. Among the objectives of the management plan are:</p> <ul style="list-style-type: none"> - water contingency during dry spell - to reduce wastage of water - to prevent pollution <p>Among the action plan established to achieve the above objectives are:</p> <ul style="list-style-type: none"> - To purchase water from the public domain supplier - To educate employees on water saving - To repair pipelines therefore reduce leakage - Rainwater harvesting - Minimise soil erosion during replanting - Maintaining riparian zones <p>The mill has documented its plans in Action Plan for Reduction of Water Usage, dated January 2022. Among the plans are rainwater collection and dry cleaning (cleaning without using water).</p> <p>Elphil Estate (Main Division), Kamuning Estate and Kinta Kellas Estates provides clean water to the workers provided via Lembaga Air Perak. Elphil Estate (Plang Division) provides treated water from its own water treatment plant for worker’s domestic usage. The</p>	Complied

		<p>water quality is monitored on a monthly basis via water sampling. Water Sampling Reports were available for verification.</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 provided there is no evidence of environmental deterioration having occurred during the previous cycle. - Critical (Major) compliance -</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 582 1921 880"> <thead> <tr> <th>River width (m)</th> <th>Buffer zone width</th> </tr> </thead> <tbody> <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> </tbody> </table> <p>dMonitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/ivers, version 1, year 2008, issue no. 1, dated 01/11/2008.</p> <p>Based on verification at all the sampled estates, the riparian zones were satisfactorily maintained, and no evidence of agrochemicals application seen.</p> <p>The river water quality was monitored by an accredited lab, Sime Darby Plantation Research Sdn Bhd (SAMM No. 030) for various parameters. Generally, the sampling points are located at the upstream, midstream and downstream of the rivers. The following reports were verified.</p> <ol style="list-style-type: none"> 1. <u>Elphil POM</u> 	River width (m)	Buffer zone width	> 40	50	20 to 40	40	10 to 20	20	5 to 10	10	< 5	5	<p>Complied</p>
River width (m)	Buffer zone width														
> 40	50														
20 to 40	40														
10 to 20	20														
5 to 10	10														
< 5	5														

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		<p>The mill monitors the water quality at 3 points which is Sg. Kerdah river, Mill Reservoir and Mill Drain. The Water Analysis Test Report (Report Number: IE103/2022) dated 21/01/2022 was available for verification. The results indicated that the COD and DO did not comply with the Class IIA/IIB of NWQS for natural waterways. The management of the mill have raised a Corrective/Preventive Action Report For Non-Conforming Water Analysis Results on 10/02/2022.</p> <p>2. <u>Elphil Estate</u></p> <p>The estate monitors the water quality at the rivers flowing through the estate on a quarterly basis. The Water Analysis Test Report (IE14/2022) dated 05/01/2022 was available for verification. The results indicated certain parameters did not conform with Class IIA/IIB of NWQS for natural waterways. The management have raise the Corrective/Preventive Action Report For Non-Conforming Water Analysis Results on 14/01/2022. The resampling have been conducted on 04/02/2022 and the results have not been provided yet.</p> <p>3. <u>Kinta Kellas Estate</u></p> <p>The Pesticide Analysis Test Report (Test Report Number: PL 127/2022) dated 13/01/2022 was available for verification. The results indicated that there were no pesticides detected in the samples and the results were all within the permitted parameters.</p> <p>4. <u>Kamuning Estate</u></p> <p>The estate monitors the water quality at Sungai Nyamuk which runs through the estate. The Water Analysis Test Report (Test Report Number: IE148/2022) dated 04/02/2022 was available for verification. The results indicated that it conforms with the Class IIA/IIB of NWQS for natural waterways.</p>	
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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>Mill effluent is treated in compliance with the Department of Environment (DOE); Syarat Syarat Lesen – Premis Kilang Minyak Kelapa Sawit Mentah (License Number: 001845).</p> <p>The mill monitors the effluent on a monthly basis and reports to DOE on a quarterly basis via the Online Environment Reporting (OER) System were available for verification.</p> <p>Effluent Analysis Report results were available for verification as below:</p> <table border="1" data-bbox="1137 651 1926 1032"> <thead> <tr> <th>Parameter</th> <th>December 2021</th> <th>January 2022</th> <th>February 2022</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>8.5</td> <td>8.0</td> <td>8.7</td> </tr> <tr> <td>BOD</td> <td>253</td> <td>56</td> <td>71</td> </tr> <tr> <td>SS</td> <td>1160</td> <td>570</td> <td>567</td> </tr> <tr> <td>TN</td> <td>94</td> <td>41</td> <td>96</td> </tr> <tr> <td>AN</td> <td>15</td> <td>8</td> <td>40</td> </tr> <tr> <td>O&G</td> <td>2</td> <td>4</td> <td>2</td> </tr> </tbody> </table>	Parameter	December 2021	January 2022	February 2022	pH	8.5	8.0	8.7	BOD	253	56	71	SS	1160	570	567	TN	94	41	96	AN	15	8	40	O&G	2	4	2	Complied
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>The mill continues to monitor its water use per tonne FFB processed which data obtained from flowmeters i.e. at mill process, boiler operation and fire hydrant. Based on the records, the mill has consumed:</p> <table border="1" data-bbox="1137 507 1933 1157"> <thead> <tr> <th>Month</th> <th>Water (m³)</th> <th>FFB (mt)</th> <th>Water/FFB (m³)</th> </tr> </thead> <tbody> <tr><td>Jan 2021</td><td>17,465.00</td><td>15,571.32</td><td>1.12</td></tr> <tr><td>Feb 2021</td><td>19,126.00</td><td>17,121.06</td><td>1.12</td></tr> <tr><td>Mac 2021</td><td>23,745.00</td><td>22,384.65</td><td>1.05</td></tr> <tr><td>Apr 2021</td><td>23,306.00</td><td>21,411.88</td><td>1.08</td></tr> <tr><td>May 2021</td><td>19,617.00</td><td>19,145.16</td><td>1.04</td></tr> <tr><td>June 2021</td><td>21,664.00</td><td>20,373.67</td><td>1.05</td></tr> <tr><td>July 2021</td><td>22,442.00</td><td>21,696.09</td><td>1.05</td></tr> <tr><td>Aug 2021</td><td>22,519.00</td><td>19,279.68</td><td>1.15</td></tr> <tr><td>Sept 2021</td><td>20,965.00</td><td>18,395.43</td><td>1.15</td></tr> <tr><td>Oct 2021</td><td>21,611.00</td><td>19,073.59</td><td>1.16</td></tr> <tr><td>Nov 2021</td><td>21,652.00</td><td>16,840.21</td><td>1.24</td></tr> <tr><td>Dec 2021</td><td>20,176.00</td><td>15,988.24</td><td>1.26</td></tr> </tbody> </table>	Month	Water (m ³)	FFB (mt)	Water/FFB (m ³)	Jan 2021	17,465.00	15,571.32	1.12	Feb 2021	19,126.00	17,121.06	1.12	Mac 2021	23,745.00	22,384.65	1.05	Apr 2021	23,306.00	21,411.88	1.08	May 2021	19,617.00	19,145.16	1.04	June 2021	21,664.00	20,373.67	1.05	July 2021	22,442.00	21,696.09	1.05	Aug 2021	22,519.00	19,279.68	1.15	Sept 2021	20,965.00	18,395.43	1.15	Oct 2021	21,611.00	19,073.59	1.16	Nov 2021	21,652.00	16,840.21	1.24	Dec 2021	20,176.00	15,988.24	1.26	Complied
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Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised

<p>7.9.1</p>	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -</p>	<p>At the estates, the plan to optimise the usage of diesel is documented in the Energy Management Plan 2022. Among the action plans implemented are by doing regular maintenance of diesel-powered machinery and educational programme for the operators on fuel saving. The fossil fuel consumption are recorded as part of monitoring.</p> <p>At the mill, the utilisation of fibre and shell as biofuel for boiler operation is consistently implemented to generate electricity through turbines. This helps to reduce the dependency to fossil fuel.</p> <p>The use of Diesel, Electricity and Water were monitored on a monthly basis in the mill and estates and records were as follows.</p> <p>Elphil Estate</p> <table border="1" data-bbox="1137 871 1930 1394"> <thead> <tr> <th>Month</th> <th>Diesel (Liter)</th> <th>Electricity (kWh)</th> <th>Water (m³)</th> </tr> </thead> <tbody> <tr> <td>Jan 2021</td> <td>3940</td> <td>35203</td> <td rowspan="2">16489</td> </tr> <tr> <td>Feb 2021</td> <td>3938</td> <td>36986</td> </tr> <tr> <td>Mar 2021</td> <td>3644</td> <td>36902</td> <td rowspan="2">22002</td> </tr> <tr> <td>Apr 2021</td> <td>3875</td> <td>36674</td> </tr> <tr> <td>May 2021</td> <td>3236</td> <td>36116</td> <td rowspan="2">26459</td> </tr> <tr> <td>Jun 2021</td> <td>1859</td> <td>36598</td> </tr> <tr> <td>Jul 2021</td> <td>1607</td> <td>36429</td> <td rowspan="2">22058</td> </tr> <tr> <td>Aug 2021</td> <td>2233</td> <td>39133</td> </tr> <tr> <td>Sept 2021</td> <td>2908</td> <td>37085</td> <td></td> </tr> </tbody> </table>	Month	Diesel (Liter)	Electricity (kWh)	Water (m ³)	Jan 2021	3940	35203	16489	Feb 2021	3938	36986	Mar 2021	3644	36902	22002	Apr 2021	3875	36674	May 2021	3236	36116	26459	Jun 2021	1859	36598	Jul 2021	1607	36429	22058	Aug 2021	2233	39133	Sept 2021	2908	37085		<p>Complied</p>
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Oct 2021	3428	31741	17361
Nov 2021	3693	35555	20998
Dec 2021	3514	34425	

Kamuning Estate

Month	Diesel (Liter)	Electricity (kWh)	Water (m ³)
Jan 2021	5,883.50	64,967	10,411
Feb 2021	8,582.00	68,969	9,403
Mar 2021	6,658.50	76,787	11,158
Apr 2021	6,046.00	79,412	11,341
May 2021	6,330.00	75,587	10,975
Jun 2021	7,310.00	76,179	10,066
Jul 2021	7,080.00	75,382	10,401
Aug 2021	5,075.00	75,382	10,401
Sept 2021	3,679.00	69,398	10,066
Oct 2021	4,921.00	64,262	10,337
Nov 2021	4,048.00	61,803	10,004
Dec 2021	3,960.00	58,438	13,139

Kinta Kellas Estate

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Month	Diesel (Litre)	Electricity (kWh)	Water (m ³)
Jan 2021	4216	4088.34	968
Feb 2021	4129	5207.78	796
Mar 2021	3969	5842.85	1006
Apr 2021	4005	5732.76	1012
May 2021	3474	5710.99	1366
Jun 2021	3397	6670.43	1296
Jul 2021	4078	5503.98	971
Aug 2021	3104	6965.16	1492
Sept 2021	2465	6965.16	1894
Oct 2021	3939	7815.98	1471
Nov 2021	2878	2162.39	1530
Dec 2021	3763	8383.29	1388

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.

7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Main sources of GHG emission identified were methane (CH₄) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO₂, SO_x and NO_x from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p>	Complied
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		The emission value is recorded and calculated through the utilisation of RSPO’s Palm GHG Calculator ver. 4.							
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	Not applicable since no new development by the certification unit.	Not Applicable						
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<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.</p> <p>Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring for dust particulate.</p> <p>The mill has its monitoring system to report its significant pollutants and emissions from the operating units’ activities for example monitoring stack emission from mill’s boiler operation by competent consultant.</p> <p>Elphil POM has conducted the Boiler Stack Emission monitoring in compliance with DOE’s Compliance Schedule (License Number: 001845). The latest monitoring was conducted by Environmental Science (M) Sdn Bhd on 24/02/2021 for Boiler 1 and on 08/04/2021 for Boiler 2. The results were verified as below:</p> <table border="1" data-bbox="1137 1189 1926 1383"> <thead> <tr> <th>Stack</th> <th>Average Dust Concentration (mg/m³)</th> <th>Environmental Quality (Clean Air) Regulations, 2014 (mg/m³)</th> </tr> </thead> <tbody> <tr> <td></td> <td>48.5 at 6.6 % CO₂</td> <td>-</td> </tr> </tbody> </table>	Stack	Average Dust Concentration (mg/m ³)	Environmental Quality (Clean Air) Regulations, 2014 (mg/m ³)		48.5 at 6.6 % CO ₂	-	Complied
Stack	Average Dust Concentration (mg/m ³)	Environmental Quality (Clean Air) Regulations, 2014 (mg/m ³)							
	48.5 at 6.6 % CO ₂	-							

		Stack 2 – Boiler (PK PMD 80023)	88.8 at 12.0 % CO ₂	150		
		Stack 1 – Boiler PK (PMD 745)	44.1 at 5.4 % CO ₂	-		
			98.9 at 12.0 % CO ₂	150		
Annual Pollution Prevention Plans have also established and documented by the mill and estates, which were derived from the environmental aspects evaluation. Generally, the plans are focussing on mitigating pollution to water, land and air, e.g. POME furrow leakage, open burning at line-site, domestic wastes generation, bund rupture at ETP, generation of scheduled wastes, etc.						
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 -	As advocated, the estates practiced zero burning. In the replants visited during the audit in the estate, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepared land for replanting in the estate No fire was used for waste disposal.			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 [ref.: http://www.simedarbyplantation.com/sustainability/hotspot-dashboard/]. 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			Complied	

		<p>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.</p> <p>Apart from that, Fire Prevention and Control Measures by GSQM was also established to provide guidance.</p>	
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>The above-mentioned fire prevention and control measures were communicated to the stakeholders through:</p> <ol style="list-style-type: none"> 1. Kinta Kellas Estate - Fire Prevention and Control Measures were communicated to all stakeholders via memo that was presented to all stakeholders on 02/03/2022. The acknowledgement of the stakeholders was available for verification. 2. Kamuning Estate - Fire Prevention and Control Measures were communicated to all stakeholders during the stakeholder consultation that was conducted on 10/03/2022. The Stakeholder Meeting Minutes was available for verification. 3. Elphil Estate - Fire Prevention and Control Measures were communicated to all stakeholders during the stakeholder consultation that was conducted on 03/03/2022. The Stakeholder Meeting Minutes was available for verification. 	Complied
<p>Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest. There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV. Therefore, this indicator was not applicable.</p>	Not Applicable

7.12.2	<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). - Critical (Major) compliance -</p>	<p>PSQM Department have conducted HCV reassessment for SOU 3 on Feb 2017. HCV for estate has been identified and documented in the HCV Re- Assessment for SOU 3 – Elphil, Version 2, February 2017.</p> <p>Common wildlife found during the assessment were documented in Table 10 in the HCV Re-Assessment for SOU 3 – Elphil, Version 2, February 2017. No RTE species were identified during the assessment.</p> <p><u>Elphil Estate</u> 3 HCV were identified in Elphil Estate during the assessment. The HCV identified are River Reserve (Sg. Kerdah), Mill Water Catchment and Limestone Hill and Cave. No RTE species were identified in the HCV Report.</p> <p><u>Kamuning Estate</u> 4 HCV were identified in Kamuning Estate during the assessment. The HCV identified are Slope/Rocky Area (ex-GDSB), River Reserve for Sg. Nyamuk, Water Catchment area and Isolated Remnant Forest. No RTE species were identified in the HCV report.</p> <p><u>Kinta Kellas Estate</u> 2 HCVs were identified in Kinta Kellas Estate during the assessment. The HCV identified were River Reserve (Sg. Raia) and Water Catchment Area. No RTE species were identified in the HCV Report.</p>	Complied
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	-	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</p>	<p>The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest. There was no land clearing activities made nor had damaged any</p>	Not Applicable

	<p>HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>forest to protect or enhance the HCV. Therefore, this indicator was not applicable.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest. There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV. Therefore, this indicator was not applicable.</p>	Not Applicable
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>A programme to regularly educate the workforce about the status of RTE species is in place. Evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities were maintained and implemented. Interview with the workers indicate that they are aware of the restrictions of harming the RTE species animals.</p> <p>Signage was utilised as part of creating awareness among employees on the restriction of poaching, capturing, harming, collecting and killing the RTE species.</p>	Complied
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>For existing HCV areas, on-going monitoring was done on a monthly basis. HCV management plan incorporated under Environmental Management Plan for FY 2022 (January – December 2022). Animal sighting, encroachment/illegal activities and erosion being monitored and recorded using check sheet, "Pemantauan HCV dan Pelan Konservasi". Based on last 3 months records, no evidence of</p>	Complied

		animal sighting, encroachment/illegal activities and erosion recorded.	
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>	No land clearing since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Elphil POM certification unit. Thus, this indicator is not applicable.	Not Applicable

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for SOU 3 Elphil 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 2021 for SOU 3 Elphil POM and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.34
PKO	1.34

Extraction	%
OER	20.92
KER	5.30

Production	t/yr
FFB Process	227,278.01
CPO Produced	47,553.40
PKO Produced	12,038.37

Land Use	Ha
OP Planted Area	5,254.86
OP Planted on peat	-
Conservation (forested)	-
Conservation (non-forested)	-
Total	5,254.86

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	51,711.66	0.61	0.00	0.00	0.00	0.00	51,711.66	0.00
CO ₂ Emission from fertilizer	6,475.62	0.08	0.00	0.00	0.00	0.00	6,475.62	0.00
NO ₂ Emission	3,588.48	0.04	0.00	0.00	0.00	0.00	3,588.48	0.00
Fuel Consumption	413.57	0.00	0.00	0.00	0.00	0.00	413.57	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	- 49,015.78	-0.58	0.00	0.00	0.00	0.00	- 49,015.78	0.00
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	13,173.56	0.16	0.00	0.00	0.00	0.00	34,527.81	0.00

**Note: Includes both estates and smallholders*

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	44,550.34	0.20
Fuel Consumption	35.57	0.00
Grid Electricity Utilization	945.36	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	45,531.28	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

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

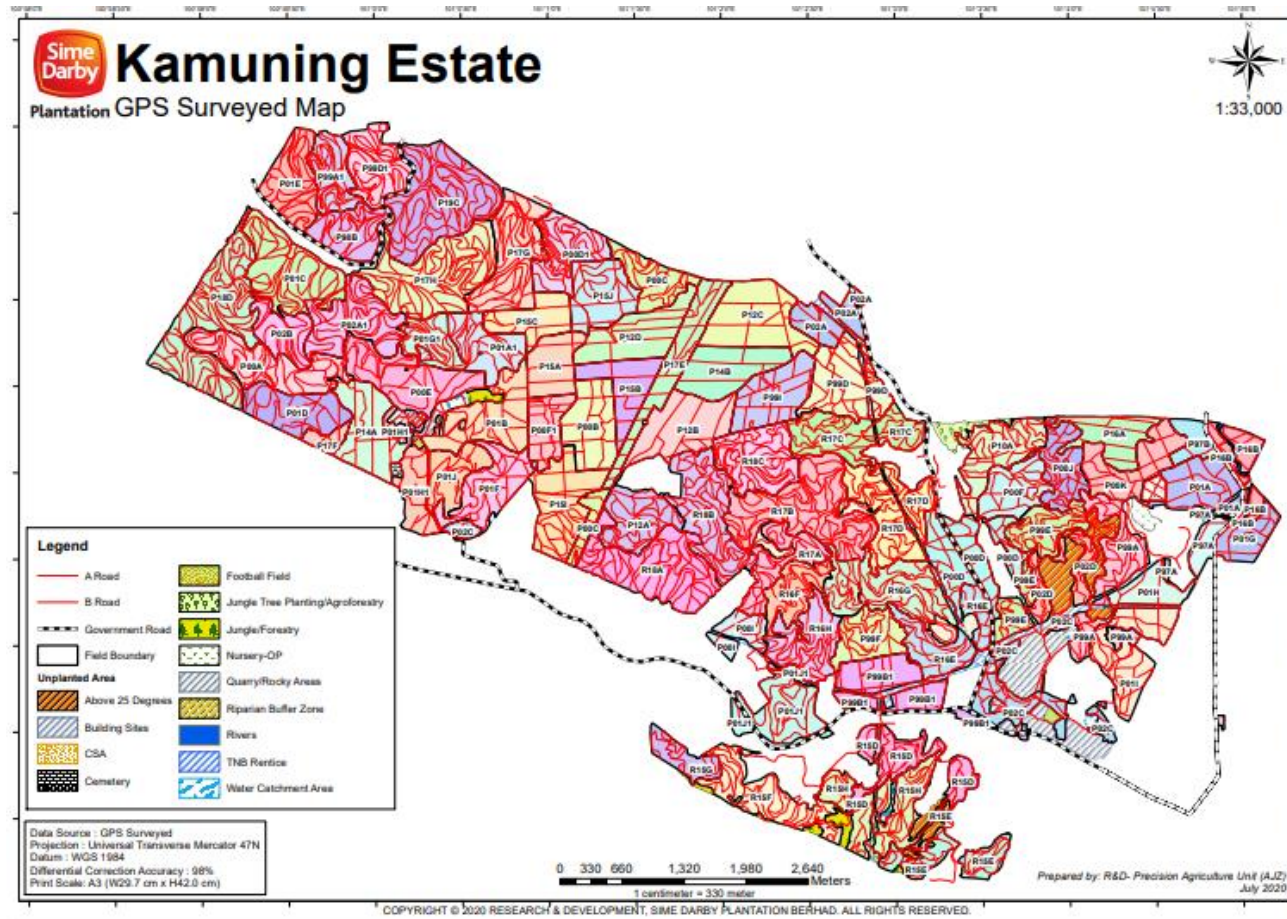
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases

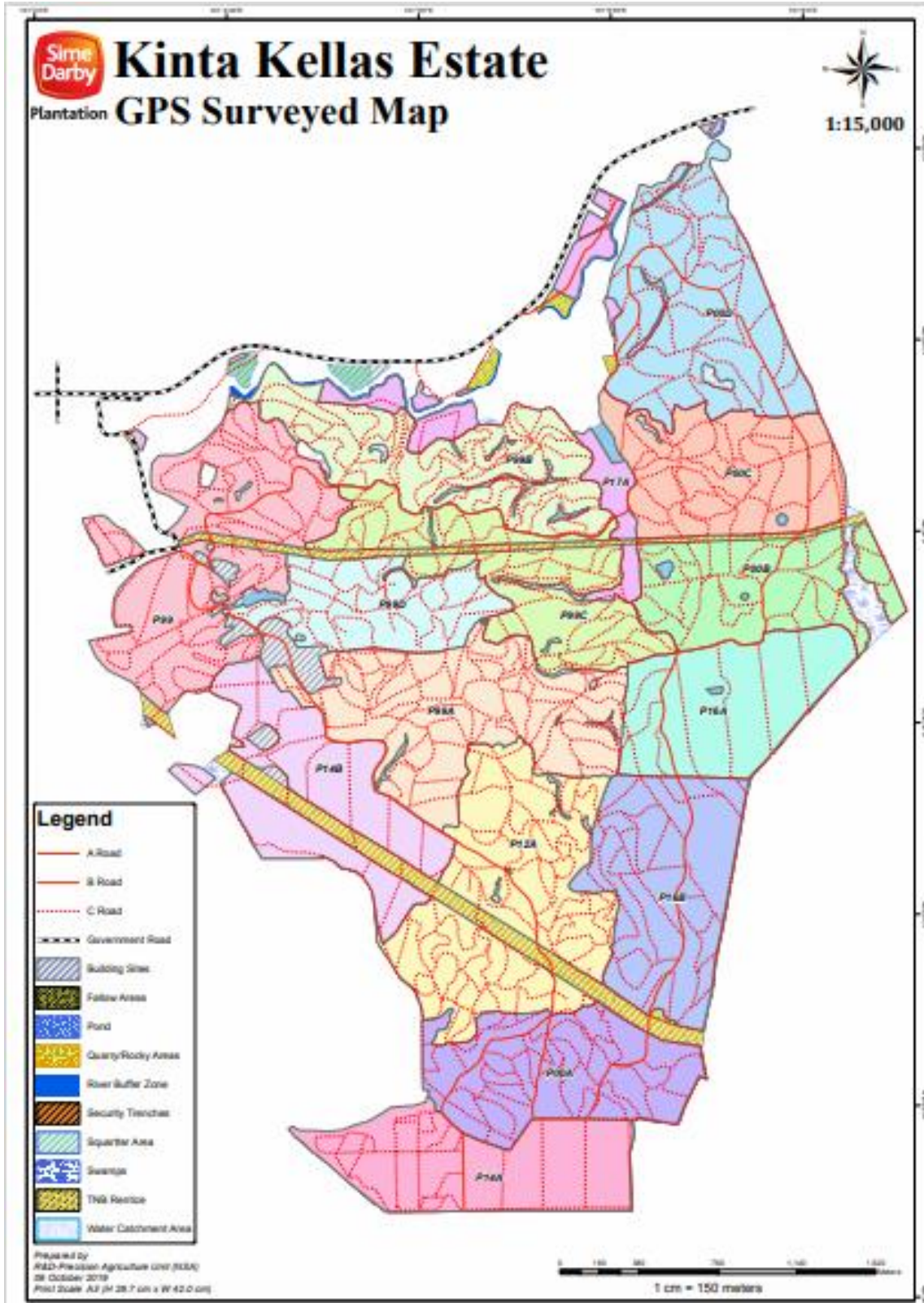


Appendix D: Estate Field Map

Kamuning Estate

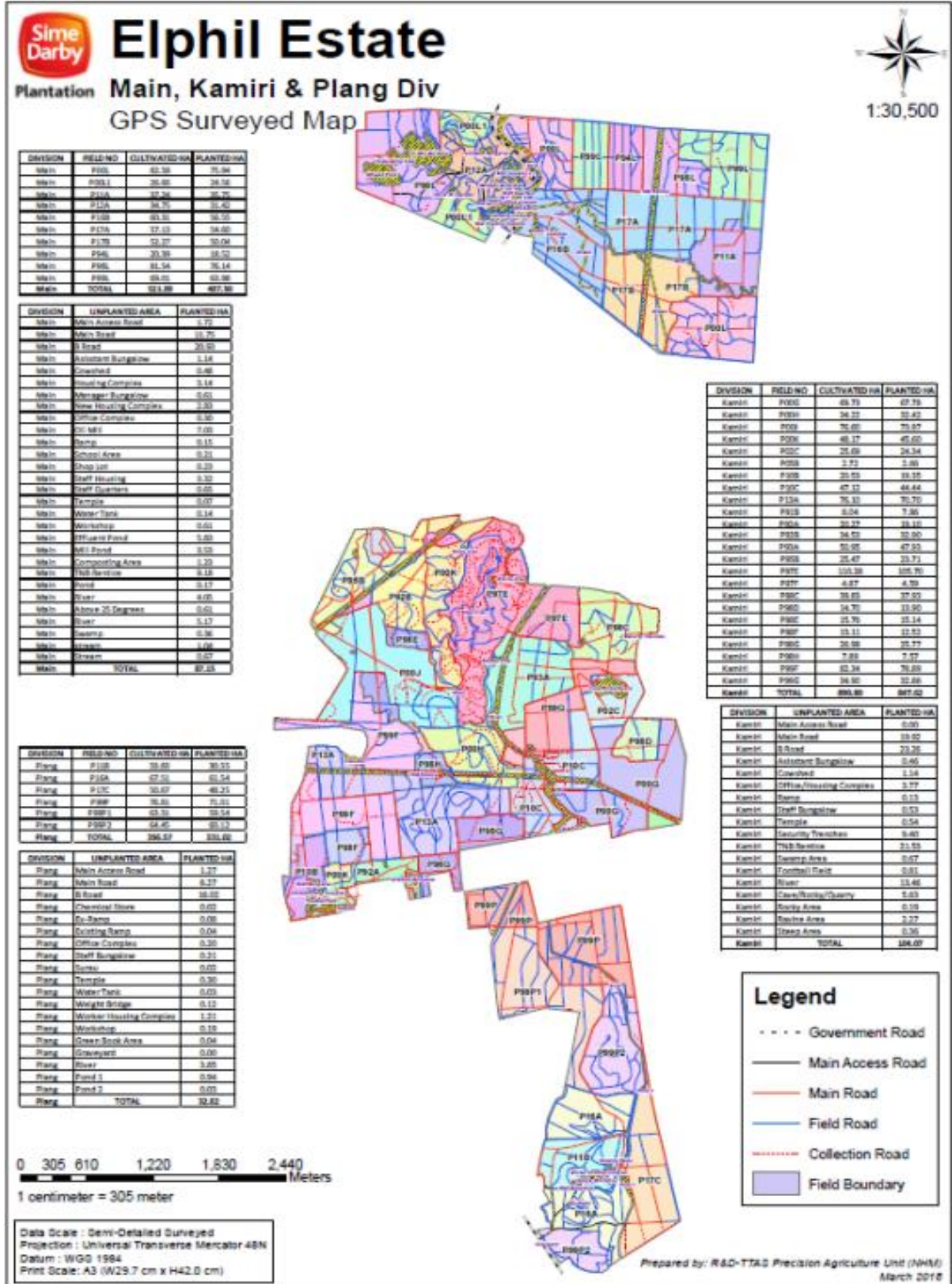


Kinta Kellas Estate



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Elphil Estate



Appendix E: List of Smallholder Registered and sampled

Not Applicable

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