

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (1_4)**
- Recertification Assessment (Choose an item.)**
- Extension of Scope**

Client Company Name / Parent Company: TDM Plantation Sdn Bhd
Client Company / Parent Company Address: Aras 1-5 , Bangunan UMNO Terengganu, Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu, Malaysia.
Certification Unit: Sungai Tong Palm Oil Mill
Location of Certification Unit: Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu, Malaysia
Date of Final Report: 08/03/2023

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	TDM Plantation Sdn Bhd		
RSPO Membership Number	1-0095-11-000-00	Membership Approval Date	28/02/2011
Address	Level 3, Bangunan UMNO Terengganu Lot 3224, Jalan Masjid Abidin 21000 Kuala Terengganu, Terengganu, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Sungai Tong Palm Oil Mill		
Location / Address	Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu, Malaysia		
Website	www.tdmberhad.com.my		
Management Representative	Tuan Haji Hassan Bin Osman	E-mail	ksst.tdmp@tdmberhad.com.my shahbudin.tdmp@tdmberhad.com.my
Telephone	+60 (9) 822 6566	Facsimile	+60 (9) 822 6704

2. Certification Information			
Certificate Number	RSPO 595564	Certificate Start Date	27/12/2018
Date of First Certification	27/12/2013	Certificate Expiry Date	26/12/2023
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<p>Determination of the conformity of the client's management system, or parts of it with audit criteria.</p> <p>Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</p>		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_4) <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"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 MT/Hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 678754	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn. Bhd.	26/12/2027
MSPO 686825	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3	BSI Services Malaysia Sdn. Bhd.	26/12/2027

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Sungai Tong Palm Oil Mill	Lot 7663, Batu 23, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu, Terengganu, Malaysia	5° 18' 29.88" N	102° 54' 37.80" E
Jaya Estate	Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu	5° 23' 43.61" N	102° 53' 03.32" E
Fikri Estate	Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu	5° 19' 21.50" N	102° 53' 46.00" E
Tayor Estate	Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu	5° 15' 58.00" N	102° 53' 26.00" E
Pelong Estate	Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu	5° 16' 55.56" N	102° 49' 59.52" E
Jerangau Estate	Jalan Jerangau, 21810 Ajil, Hulu Terengganu, Terengganu, Malaysia	4° 57' 41.50" N	103° 09' 47.00" E
Pinang Emas Estate	Bukit Besi 23000 Dungun, Terengganu, Malaysia	4° 45' 39.96" N	103° 13' 25.68" 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
Jaya Estate	2,770.13	-	365.59	3,135.72	88.34
Fikri Estate	2,632.62	-	978.40	3,611.02	72.91
Tayor Estate	1,895.00	5.00	319.92	2,219.92	85.36
Pelong Estate	1,121.51	-	1,890.84	3,012.35	37.23
Jerangau Estate	1,330.74	-	150.18	1,480.92	89.86
Pinang Emas Estate	2,713.57	-	1,093.49	3,807.06	71.28
Total	12,463.57	5.00	4,798.42	17,266.99	72.18

Note:

In 2022, TDMP management conducted GPS/GIS resurvey to update and review the exact land utilization of its operation. The second objective of the project is to standardize TDMP hectareage declaration as of other growers within the industry, such as excising out unproductive area (e.g.: infield roads & drains, other areas, etc.) from planted hectareage. By excising out these areas, it will give a better baseline to benchmark the company’s performance against other oil palm growers. The project was conducted by utilizing newly available technology such as aerial images and precise geolocating devices. During the resurvey, these were the issues found that contributes to error to our hectareage declaration:

1. Double declaration of block boundary, especially blocks underwent replanting programme (e.g.: a portion of the block was cleared for replanting but the hectareage was not updated, therefore, double declaration of planted ha)
2. Overlapping block boundaries
3. Demarcation of estate management area not in line with its actual operation and land title.
4. Areas acquired for government projects were not excised out from planted hectareage.

The issues listed above were solved during the project. On top of the above, the significant reduction of planted hectareage after the resurvey program were due to removal of infield roads and drains hectareage from planted hectare.

Pinang Emas Estate total hectare reduced after resurvey due to land acquisition by government & realignment of boundary with Ladang Gajah Mati (South Zone)

Tayor, Jaya Estate total hectareage reduced after resurvey due to land acquisition and realignment of estate management area to land title.

Tayor Estate total hectareage reduced after resurvey due to realignment of estate management area to land title.

Pelong Estate, The figure reported in the last year report was lesser than the land title. After GPS/GIS resurvey, the management boundary was realigned to match with actual land title awarded by the state government. Visited to the additional hectareage declared found that area was unplanted area (Scrubland).

HCV review was conducted & finalized in 2022. The report suggests that total HCV area in Ladang Tayor management area is 5.00ha. The HCV location map of for Ladang Tayor was provided during the audit. The difference of 300.88ha was outside of Ladang Tayor management area and the estate management had consider these HCV area was part of management area in previous RSPO audit(s) but in actual fact it is outside of the boundaries.

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6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Jaya Estate	-	-	2,516.43	253.70	2,710.13	-
Fikri Estate	777.17	55.36	1544.20	255.89	1,855.45	777.17
Tayor Estate	563.62	-	1,046.70	284.68	1,331.38	563.62
Pelong Estate	553.28	323.70	244.53	-	568.23	553.28
Jerangau Estate	640.85	445.95	-	243.94	689.89	640.85
Pinang Emas Estate	764.33	385.56	1,019.70	543.98	1,949.24	764.33
Total (ha)	3,299.25	1,210.57	6,371.56	1,582.19	9,164.32	3,299.25

Note: Tayor Estate and Jerangau Estate: For 0-3 years, Reduction due to new survey conducted that showed reduce hectare in Total Planted Hectare

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 2022 – Dec 2022)	Actual (Sept 2021 – Nov 2022)		Forecast (Jan 2023 – Dec 2023)
		Previous license period (Sept 2021 -Dec 2021)	Current license period (Jan 2022 – Nov 2022)	
Jaya Estate	64,000.00	24,121.38	43,225.47	54,000.00
Fikri Estate	32,400.00	12,660.52	20,339.91	29,000.00
Tayor Estate	22,200.00	8,701.62	15,490.44	20,000.00
Pelong Estate	3,840.00	1,443.17	4,018.65	5,000.00
Jerangau Estate	13,500.00	6,213.45	6,469.08	5,800.00
Pinang Emas Estate	25,150.00	77.58	5,960.68	10,900.00
Total	161,090.00	148,721.95		124,700.00

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 2022 – Dec 2022)	Actual (Sept 2021 – Nov 2022)		Forecast (Jan 2023 – Dec 2023)
		Previous license period (Sept 2021 -Dec 2021)	Current license period (Jan 2022 – Nov 2022)	
Gajah Mati Estate		-	679.86	
Total		679.86		

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 2022 – Dec 2022)	Actual (Sept 2021 – Nov 2022)		Forecast (Jan 2023 – Dec 2023)
		Previous license period (Sept 2021 -Dec 2021)	Current license period (Jan 2022 – Nov 2022)	
3 rd Party FFB Suppliers	N/A	8,376.47	43,304.79	N/A
Total		51,681.26		

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	September 2021	12,800.75	2,766.05	15,566.80
2	October 2021	14,012.23	2,795.79	16,808.02
3	November 2021	13,773.52	2,037.75	15,811.27
4	December 2021	12,631.22	776.88	13,408.10
5	January 2022	9,372.18	918.97	10,291.15
6	February 2022	6,418.96	732.97	7,151.93
7	March 2022	7,363.99	2,503.63	9,867.62
8	April 2022	5,430.91	2,514.96	7,945.87
9	May 2022	6,536.09	5,382.44	11,918.53
10	June 2022	6,352.51	4,919.13	11,271.64
11	July 2022	6,979.09	5,891.47	12,870.56
12	August 2022	10,531.83	10,199.24	20,731.07
13	September 2022	10,259.36	7,308.7	17,568.06
14	October 2022	13,948.56	1,916.17	15,864.73
15	November 2022	12,990.61	1,017.11	14,007.72
	TOTAL	149,401.81	51,681.26	201,083.07

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10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (Jan 2022 – Dec 2022)	Actual (Sept 2021 – Nov 2022)		Forecast (Jan 2023 – Dec 2023)
	Previous license period (Sept 2021 -Dec 2021)	Current license period (Jan 2022 – Nov 2022)	
FFB	FFB		FFB
161,090.00 mt	53,217.72 mt	96,184.09 mt	124,700.00 mt
	Total	149,401.81 mt	
CPO (OER: 22.56%)	CPO (OER: 18.73%)		CPO (OER: 20.38%)
36,343.10 mt	9,961.53 mt	18,024.22 mt	25,413.86 mt
	Total	27,985.75 mt	
PK (KER: 5.04%)	PK (KER: 4.83%)		PK (KER: 5.03%)
8,112.00 mt	2,836.88 mt	4,383.81 mt	6,272.41 mt
	Total	7,220.69 mt	
Note:			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month – Year	Certified CPO (MT)	Certified PK (MT)
1	September 2021	2,526.33	716.31
2	October 2021	2,715.11	788.86
3	November 2021	2,565.46	679.44
4	December 2021	2,154.63	652.27
5	January 2022	1,755.24	519.10
6	February 2022	1,189.54	317.89
7	March 2022	1,353.50	323.95
8	April 2022	1,050.81	254.82
9	May 2022	1,248.10	280.82
10	June 2022	1,132.87	265.82
11	July 2022	1,306.53	320.92
12	August 2022	1,977.34	455.33
13	September 2022	1,884.05	420.53
14	October 2022	2,607.98	578.54
15	November 2022	2,518.26	646.09
	TOTAL	27,985.75	7,220.69

11. Summary of Actual Volume sold					
Current License period (Jan 2022 – Nov 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	17,598.40	-	-	-	17,598.40
PK (MT)	3,798.06	-	-	-	3,798.06
Credits	-	-	-	-	-
Previous License period (Sept 2021 – Dec 2021)					
CPO (MT)	7,010.90	-	-	-	7,010.90
PK (MT)	2,948.06	-	-	-	2,948.06
Credits	-	-	-	-	-

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	Buyer XXXX	TR-238c4d8e-1127	213.26	-
2	Buyer XXXX	TR-de98f7d6-eccf	500.00	-
3	Buyer XXXX	TR-ac9a3042-5fe5	1,000.00	-
4	Buyer XXXX	TR-ea2d2009-e9e8	4.61	-
5	Buyer XXXX	TR-f1fd9faa-367d	231.69	-
6	Buyer XXXX	TR-3aa3dc61-79cb	7.57	-
7	Buyer XXXX	TR-686db1e6-d7c8	242.66	-
8	Buyer XXXX	TR-210df287-a562	300.00	-
9	Buyer XXXX	TR-d1d1f3a8-b70d	500.00	-
10	Buyer XXXX	TR-4b69e54e-28a0	1,000.00	-
11	Buyer XXXX	TR-3f5835bb-ad5a	7.34	-
12	Buyer XXXX	TR-4a9ae4b1-29f9	249.48	-
13	Buyer XXXX	TR-ca90522f-e1af	500.00	-
14	Buyer XXXX	TR-88ad0c51-b7a5	500.00	-
15	Buyer XXXX	TR-bfaa74d9-1163	254.11	-
16	Buyer XXXX	TR-6a75e898-2fc5	500.00	-
17	Buyer XXXX	TR-a57c744b-de31	200.18	-
18	Buyer XXXX	TR-983d6d40-3aee	800.00	-
19	Buyer XXXX	TR-780119a8-db3b	500.00	-
20	Buyer XXXX	TR-780119a8-db3b	900.00	-

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21	Buyer XXXX	TR-6e6bad13-c7cb	121.44	-
22	Buyer XXXX	TR-5a0d7be6-3877	3.77	-
23	Buyer XXXX	TR-1a1e2bfe-2f49	500.00	-
24	Buyer XXXX	TR-a7e2c9eb-baa4	800.00	-
25	Buyer XXXX	TR-35090d29-c50e	246.23	-
26	Buyer XXXX	TR-bb128d9b-29e9	91.36	-
27	Buyer XXXX	TR-aac6ef70-b89b	500.00	-
28	Buyer XXXX	TR-72ad9c89-0818	800.00	-
29	Buyer XXXX	TR-e4fbc802-4737	500.00	-
30	Buyer XXXX	TR-0d5687e2-7071	716.62	-
31	Buyer XXXX	TR-5b870cdc-ffb4	158.64	-
32	Buyer XXXX	TR-73f1ec14-2db6	9.41	-
33	Buyer XXXX	TR-53d29b0b-0743	500.00	-
34	Buyer XXXX	TR-f9920b32-b890	800.00	-
35	Buyer XXXX	TR-7a95449b-26f8	374.89	-
36	Buyer XXXX	TR-578f1906-7b57	800.00	-
37	Buyer XXXX	TR-72f0f5e7-b5a0	500.00	-
38	Buyer XXXX	TR-58a290a9-f167	800.00	-
39	Buyer XXXX	TR-73299c23-28e3	245.71	-
40	Buyer XXXX	TR-57c14fef-7cdb	4.29	-
41	Buyer XXXX	TR-50e3418d-195f	242.57	-
42	Buyer XXXX	TR-62a72856-41d8	102.00	-
43	Buyer XXXX	TR-df8eb54f-dd45	100.00	-
44	Buyer XXXX	TR-89f03a2a-844b	148.42	-
45	Buyer XXXX	TR-70ad977c-d9d5	63.02	-
46	Buyer XXXX	TR-435dbf06-c48a	200.00	-
47	Buyer XXXX	TR-a2d60766-fd94	134.81	-
48	Buyer XXXX	TR-1ad4dc04-9dda	7.43	-
49	Buyer XXXX	TR-734ede93-dbd8	31.88	-
50	Buyer XXXX	TR-b088f0d2-9065	500.00	-
51	Buyer XXXX	TR-576dfabe-5445	800.00	-
52	Buyer XXXX	TR-c2a38b80-dc14	213.91	-
53	Buyer XXXX	TR-9f815b04-2983	4.21	-
54	Buyer XXXX	TR-64a19dd8-1868	516.25	-
55	Buyer XXXX	TR-0cd50486-9bad	813.72	-
56	Buyer XXXX	TR-63264065-f31b	15.19	-

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57	Buyer XXXX	TR-1e937b4d-d908	800.00	-
58	Buyer XXXX	TR-5fc33f99-2bf0	500.00	-
59	Buyer XXXX	TR-0426be6a-6af2	487.91	-
60	Buyer XXXX	TR-fb6e22d6-2b4d	70.40	-
61	Buyer XXXX	TR-4b4072e5-1758	29.60	-
62	Buyer XXXX	TR-85694de4-386d	8.73	-
63	Buyer XXXX	TR-579ed106-70ac	12.09	-
64	Buyer XXXX	TR-6832947e-294f	170.53	-
65	Buyer XXXX	TR-504e67e7-8427	433.75	-
66	Buyer XXXX	TR-d8aae83f-15ae	499.74	-
67	Buyer XXXX	TR-1be193ea-8bab	819.88	-
68	Buyer XXXX	TR-68f35dff-aa5d	-	96.87
69	Buyer XXXX	TR-68b0d9f4-33e1	-	650.00
70	Buyer XXXX	TR-09664828-5a03	-	26.73
71	Buyer XXXX	TR-1cd57496-7f2e	-	581.02
72	Buyer XXXX	TR-38fd8df7-11f1	-	42.25
73	Buyer XXXX	TR-7db77ca5-5ee0	-	544.00
74	Buyer XXXX	TR-71af7b87-d277	-	52.60
75	Buyer XXXX	TR-d69e1532-9a7d	-	324.00
76	Buyer XXXX	TR-59a5416d-2e76	-	382.40
77	Buyer XXXX	TR-2e5efa22-34c2	-	86.74
78	Buyer XXXX	TR-798795fb-a948	-	161.45
79	Buyer XXXX	TR-dbf28468-5def	-	128.26
80	Buyer XXXX	TR-fb0c6538-9cca	-	38.55
81	Buyer XXXX	TR-4608317a-c279	-	4.46
82	Buyer XXXX	TR-1517e5a0-ac08	-	324.00
83	Buyer XXXX	TR-0384a1d2-93a9	-	111.85
84	Buyer XXXX	TR-504b77e9-0933	-	212.15
85	Buyer XXXX	TR-b79ec2fc-f192	-	215.00
86	Buyer XXXX	TR-e35707b3-5725	-	7.62
87	Buyer XXXX	TR-a9bf418f-9bd4	-	316.38
88	Buyer XXXX	TR-36e8273e-d4b2	-	250.46
89	Buyer XXXX	TR-65873e84-230e	-	73.54
90	Buyer XXXX	TR-fef24110-53fc	-	215.00
91	Buyer XXXX	TR-b64e6d28-18ab	-	41.46
92	Buyer XXXX	TR-62cc878a-1cbd	-	282.54

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93	Buyer XXXX	TR-e28305f8-89ad	-	108.35
94	Buyer XXXX	TR-2568a36f-8b95	-	321.65
95	Buyer XXXX	TR-68c88b34-7281	-	102.85
96	Buyer XXXX	TR-a42fa76c-0273	-	40.84
97	Buyer XXXX	TR-9c6707a1-0bb4	-	41.22
98	Buyer XXXX	TR-841d0f98-73d5	-	130.72
99	Buyer XXXX	TR-584fa4bb-4b26	-	129.05
100	Buyer XXXX	TR-77b24937-179a	-	167.52
101	Buyer XXXX	TR-aec804da-e2dd	-	262.48
102	Buyer XXXX	TR-fe5b5058-a418	-	189.10
103	Buyer XXXX	TR-fe4f2c2b-5f94	-	83.01
TOTAL			24,609.30	6,746.12

Note:

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)

No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
NA	NA	NA	NA	NA
TOTAL			NA	NA

11C. Records of CPO & PK Sold as conventional since the last audit (if any)

No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
NA	NA	NA	NA
TOTAL		NA	NA

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
NA	NA	NA	NA
TOTAL			NA

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

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
NA	NA	NA	NA	NA	NA	NA
TOTAL		NA	NA	NA	NA	NA

Note: 1 mt = 1 credit

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

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
NA	NA	NA	NA	NA	NA	NA	NA
TOTAL			NA	NA	NA	NA	NA

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
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Mid Valley City, Lingkaran Syed Putra,
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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 **11-15/12/2022**. 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 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 Critical NC close out on-site assessment was conducted on **12/02/2023**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Malaysia National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Sungai Tong POM	✓	✓	✓	✓	✓
Jaya Estate	✓	-	-	✓	-
Fikri Estate	-	✓	-	-	✓
Tayor Estate	-	-	✓	-	✓
Pelong Estate	-	✓	-	-	✓
Jerangau Estate	-	-	✓	-	✓
Pinang Emas Estate	✓	-	-	✓	-

Tentative Date of Next Visit: December 10, 2023 - December 14, 2023

Total Number of Mandays: 15 mandays

2.2 BSI Assessment Team

Name	Role	Competency
Nor Halis Abu Zar (NHA)	Team Leader	<p>Education: Holds a Bachelor of Science, Plantation Technology and Management, graduated from UiTM in 2012 and Diploma In Plantation and Industry Management from UiTM in 2009.</p> <p>Work Experience: He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day-to-day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for MS2530:2013 and RSPO Auditor for ENV and OSH and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p>Training attended: He has completed RSPO P&C Lead Auditor Course, Refresher RSPO P&C Lead Auditor Course, RSPO ISH Standard 2019, RSPO SCC 2020, QMS 9001:2015 Lead Auditor Course, OSH 45001:2018 Lead Auditor Course, IMS (ISO 9001:2015 & ISO 14001:2015) Lead Auditor Course, HCV & HCS Training, MSPO 2530:2013 Lead Auditor Course, MSPO SCCS Auditor and SMETA Requirement Training.</p>

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		<p>Aspect covered in this audit: During this assessment, he assessed Legal requirements, natural and HCV conservation, water & wastes management, environmental aspects, GAP, mill best practices, economic management plan and supply chain requirements.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English Language.</p>
Valence Shem (VSH)	Team Leader	<p>Education: Holds a BTech (Hons) Bachelor’s Degree in Industrial Technology, University of Science Malaysia</p> <p>Work Experience: He started his career as Assistant Manager with 9 years working experience in oil palm plantation industry. After that he expand his career as Management system auditing since 2009 for various standards such as 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 training, RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course and RSPO endorsed Refresher RSPO P&C and SCC 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: Fluent in Bahasa Malaysia and English Language.</p>
Mohd Razaleigh Mohamad (MRM)	Team Member	<p>Education: Holds a Bachelor Degree in Plantation Management and Agrotechnology, University Technology Mara (UiTM).</p> <p>Work Experience: He has 5 years’ experience in Oil Palm Estate Management with Tradewinds Plantation Berhad. The last position held was Senior Assistant Manager. He has more than 4 years of experience in Third Party Certification Audit with Control Union (M) Sdn Bhd for RSPO P&C, MSPO P&C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements.</p> <p>Training attended: He has completed ISO 9001-2015 Lead Auditor Course, ISO14001- 2015 Lead Auditor Course, ISO45001-2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed MSPO P&C Lead Auditor Course, Social Accountability SA8000 Auditor Course, RSPO Independent Smallholder (IHS) Auditor 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: Fluent in Bahasa Malaysia and English Language.</p>
	Peer Review	Nil

Accompanying Persons:

Name	Role
N/A	N/A

2.3 Assessment Plan

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

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Date	Time	Subjects	NHA	MRM	VSH
Saturday 10/12/2022	-	Audit Team Travel from Kuala Lumpur to Kuala Terengganu	√	√	√
Sunday, 11/12/2022 Fikri Estate	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan 	√	√	√
	09.00 – 12.30	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.	√	√	√
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 16.30	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.)	√	√	√
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Monday 12/12/2022 Sungai Tong POM	08.30 – 12.30	Inspection: 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, etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 16.30	Lab, weighbridge and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	√
	16.30 – 17.00	Interim Closing briefing.	√	√	√

Date	Time	Subjects	NHA	MRM	VSH
Tuesday 13/12/2022 Jerangau Estate	08.30 - 12.30	- 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.	√	√	√
	10.00 - 12.00	- Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)		√	
	12.30 - 13.30	- Lunch	√	√	√
	13.30 - 16.30	- 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.)	√	√	√
	16.30 - 17.00	- Interim Closing briefing.	√	√	√
Wednesday 14/12/2022 Pelong Estate	08.30 - 12.30	- 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.	√	√	√
	12.30 - 13.30	- Lunch	√	√	√
	13.30 - 16.30	- 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.)	√	√	√
	16.30 - 17.00	- Interim Closing briefing.	√	√	√
Thursday 15/12/2022 Tayor Estate	08.30 - 12.30	- 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.	√	√	√
	12.30 - 13.30	- Lunch	√	√	√

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Date	Time	Subjects	NHA	MRM	VSH
	13.30 – 16.00	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.)	√	√	√
	16.00 – 17.00	Audit Team Discussion and Closing Meeting	√	√	√
Friday 16/12/2022	-	Audit Team travel back to Kuala Lumpur	√	√	√

Major NC Close Out

Date	Time	Subjects	NHA
Saturday 11/02/2023	-	Auditor Travelling	√
Sunday 12/02/2023	08.30 – 09.00	Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan	√
08.30 – 11.30 Sg Tong POM & Supply Bases	09.00 – 11.00	<ul style="list-style-type: none"> • Verification on previous Major NC: <ol style="list-style-type: none"> 1. 2288561-202212-M1 2. 2288561-202212-M2 3. 2288561-202212-M3 4. 2288561-202212-M4 • Site observation, workers interview (individual and group session) if necessary • Document review – implemented evidence 	√
	11.00 – 11.30	Closing Meeting	√
	11.30 – 13.30	Audit travel	√

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?	Yes. Please refer to Approved Time Bound Plan for details on the mills and estates of TDM Plantation Sdn. Bhd. Group.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	Except for the newly acquired Bukit Bidong Estate, all estates and mills in Malaysia has been certified within five years. Certification for sites in Indonesia has been deemed unnecessary as the operation and management control are already transferred to Ikhasas Sawit Sdn. Bhd. Refer latest communication with RSPO by email dated 19/12/2022	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. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	Yes, there is newly acquired estate from Tabung Haji Plantation (Bukit Bidong Estate) on 01/08/2020. The newly acquired TDM-YT Bukit Bidong Estate has been planned to be audited and certified by August 2023. Refer latest communication with RSPO by email dated 27/07/2022.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	As of now there are no deviations on the period required for approval by the RSPO Secretariat.	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?	No, there are no changes to the time bound plan since the last audit. ACOP Reporting has been verified and found to be consistent.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No, there has not been any isolated lapses in the implementation of the plan.	Complied
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	No, there is no fundamental failure in implementation of the plan.	Complied
Un-Certified Units or Holdings		
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.	Newly acquired TDM-YT Bukit Bidong Estate has already conducted it's HCV assessment by Sabarinah & Associates Sdn. Bhd. Report will be received on February 2023.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new plantings since 1 st January 2010 that requires compliance with the RSPO New Plantings Procedure.	Complied

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<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>Based on RSPO RACP tracker, there are 2 cases of Management Units with potential liability, Concept Note and Remediation Plan required. These 2 cases involving Indonesia operations which already been sold and TDM-YT Bukit Bidong Estate which already conducted it's HCV assessment and pending its report which will be used to finish up LUCA and RaCP.</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>No labour dispute reported in the uncertified units.</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>No legal non-compliance reported in the uncertified unit (TDM-YT Bukit Bidong Estate).</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>Internal audit was done on 20/07/2022 and the uncertified unit which is TDM-YT Bukit Bidong Estate need to conduct HCV & SIA assessment which the report will be used to finalize LUCA report. HCV assessment was conducted by Sabarinah & Associates Sdn. Bhd. on 27th October 2022 and SIA was conducted by Green Sustainability Sdn. Bhd. on 18th October 2022. Both assessments are now pending final report. Positive assurance statement was available and has been verified.</p>	<p>Complied</p>
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>Yes, TDM-YT Bukit Bidong Estate is lacking it's HCV and SIA reports which already in progress of completion and pending reports. Communication with RSPO also already been made and they are waiting for the LUCA report to be finalized after TDM received the HCV report.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Yes. Stakeholders including NGO were consulted in the uncertified unit and documented.</p>	<p>Complied</p>

3.2 Progress of scheme smallholders and/or outgrowers

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

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Approved Time Bound Plan

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	Date of Last TBP Verified and Approved by CB	REVISION OF THE TBP <i>(Only applicable when revision is made)</i>			
							Any revision from the last approved TBP? (Yes / No)	New Proposed Year for Certification	Justification of changes for each UoC	Date of approval from RSPO
KEMAMAN	MALAYSIA	KEMAMAN PALM OIL MILL	Certified		2013	1st July 2022				
	MALAYSIA	JERNIH ESTATE	Certified		2013	1st July 2022				
	MALAYSIA	PELANTOH ESTATE	Certified		2013	1st July 2022				
	MALAYSIA	TEBAK ESTATE	Certified		2013	1st July 2022				
	MALAYSIA	AIR PUTIH ESTATE	Certified		2013	1st July 2022				
	MALAYSIA	MAIDAM ESTATE	Certified		2013	1st July 2022				
	MALAYSIA	GAJAH MATI ESTATE	Certified		2013	1st July 2022				
SUNGAI TONG	MALAYSIA	SUNGAI TONG PALM OIL MILL	Certified		2013	1st July 2022				
	MALAYSIA	FIKRI ESTATE	Certified		2013	1st July 2022				
	MALAYSIA	PELONG ESTATE	Certified		2013	1st July 2022				
	MALAYSIA	TAYOR ESTATE	Certified		2013	1st July 2022				
	MALAYSIA	JAYA ESTATE	Certified		2013	1st July 2022				
	MALAYSIA	PINANG EMAS ESTATE	Certified		2013	1st July 2022				
	MALAYSIA	JERANGAU ESTATE	Certified		2013	1st July 2022				
	MALAYSIA	TDM-YT BUKIT BIDONG ESTATE	Not Certified	Aug-23						

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 4 (four) Critical; 2 (two) Minor nonconformities and 0 (none) Opportunity For Improvement raised. The Sg Tong 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 #	2288561-202212-M1	Issued Date	15/12/2022												
Due Date	14/03/2023	Closure Date	12/02/2023												
Indicator & Category (Critical / Minor)	2.2.2 Critical														
Statement of Nonconformity:	EPF and SOCSO contribution is not according to Employees' Social Security Act 1969, Employee Provident Fund 1991 and employment contract.														
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>Verification has been done by the auditor on compliance of legal requirement for contractor in Fikri Estate and found out that EPF and SOCSO contribution made not according to Employees' Social Security Act 1969, Employee Provident Fund 1991 and employment contract. Details as per below</p> <p>Details as per below</p> <p>Contractor: Technopalm Resources Sdn Bhd contract number Tech/LFK/2022</p> <table border="1"> <thead> <tr> <th>Workers A</th> <th>Total salary</th> <th>Actual amount</th> <th>Amount as per requirement</th> </tr> </thead> <tbody> <tr> <td>EPF Contribution</td> <td>RM1,800</td> <td>RM250</td> <td>13%, RM234</td> </tr> <tr> <td>SOCSO contribution</td> <td></td> <td>RM60.35</td> <td>RM32.35</td> </tr> </tbody> </table> <p>Minor Nonconformities has been raised during the previous audit at the same indicator. Hence the non-conformities have been escalated to Major NCs.</p>			Workers A	Total salary	Actual amount	Amount as per requirement	EPF Contribution	RM1,800	RM250	13%, RM234	SOCSO contribution		RM60.35	RM32.35
Workers A	Total salary	Actual amount	Amount as per requirement												
EPF Contribution	RM1,800	RM250	13%, RM234												
SOCSO contribution		RM60.35	RM32.35												
Corrections:	Meeting and discussion regarding compliance on legal requirement and company policies among management and contractors has been conducted on 26/09/2022 (Fikri Estate) and 16/11/2022 (North Zone). Reminder letter and training was delivered to Technopalm Resources Sdn Bhd on 20/12/2022.														
Root Cause Analysis:	Technopalm Resources Sdn Bhd is one of the contractors for replanting program and first worked for Fikri Estate in November 2021. They were well notified and acknowledge about the compliance on legal requirements. However, there were														

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	some confusions on their admin side during the calculation of the value for deduction due to the variation percentage for EPF and SOCSO.
Corrective Actions:	<p>Management meeting at operation unit, Fikri Estate decided to stop collaboration with those who failed to fulfil and comply on legal requirement. Memo regarding this matter will be blast to all contractors immediately.</p> <p>Compliance clerks will conduct monthly inspection and checks to ensure compliance is met. For instance, the contractors must submit proof or documents of EPF and SOCSO deductions (such as Borang 8A) together with the work agreement.</p>
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. Memo has been distributed to all contractors dated 27/12/2022. Training to contractors has been conducted on 12/12/2022. Refer Memo "Surat Peringatan Pematuhan Terhadap Kata Kerja Dan Polisi Syarikat". Contractors has been told on stop collaboration with those who failed to comply as per evidence training materials as per Memo. 2. Monthly inspection by compliance clerk to check the contractors compliance has been verified. Refer latest record 07/02/2023. 3. Interview has been conducted to compliance clerk found they have good understanding on the training given and show good awareness on monitoring of the contractors issue. <p>Based on the above evidence, the major Non-Conformity is closed effectively on 12/02/2023. Continuous implementation will be further verified in the next assessment.</p>

Non-conformity			
NCR Ref #	2288561-202212-M2	Issued Date	15/12/2022
Due Date	14/03/2023	Closure Date	12/02/2023
Indicator & Category (Critical / Minor)	3.6.2 Critical		
Statement of Nonconformity:	There is no HIRARC registered for Working at height during putting and removing net of FFB and no certificate of fitness for scissor lift.		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	<ol style="list-style-type: none"> 1. Based on the HIRARC records, the monitoring of identification of some safety hazards was not effectively implemented. Among the activities which has yet to be registered in the HIRARC were: <ul style="list-style-type: none"> - Working at height during putting on net to cover FFB in a truck (Jerangau, and Pelung Estate) - Working at height during removing of net that is covering FFB in a truck (Pelung Estate) 2. Fikri and Taylor estates have been using scissor lift trailer attached to farm tractor in their FFB evacuation operation. However, there is no evidence that the estates have obtained the certificate of fitness in accordance with the 		

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	Factories and Machinery (Notification, Certificate of Fitness and Inspection) Regulations, 1970.
Corrections:	<p>To identify and include working at height (WAH) during net installation and removal into the HIRARC.</p> <p>Letter and email to notify top management and related person regarding this issue has been delivered on 12th December 2022 and required action will be taken. Official discussion and meeting between TDMP and DOSH to get their advice on how to obtain CF for scissor lift.</p>
Root Cause Analysis:	<p>The hazard working at height during putting/ removing of net to cover FFB was not properly identified and reviewed by the estates. Estate operation management did not have communication with the company's SHO/ sustainability team to include the said jobs into the HIRARC, which were updated annually.</p> <p>Estate unaware about the requirement certificate of fitness for scissor lift. Estates have annual air compressor renewal inspections with the Department of Safety and Health (DOSH). During those years, we received no comment/report/advice from the Department regarding the certificate of fitness for scissor lift. The awareness training on legal was not effectively conducted to the PIC.</p>
Corrective Actions:	<p>The practices for updating the documentation of HIRARC will be continuously conducted and monitored by the PIC together with HIRARC review committee. Any new activities will be discussed in SHC meeting. The memorandum will be distributed to estates/mills of TDM Plantation Sdn Bhd, as a reminder. Follow up will be discussed during Management Meeting on monthly basis.</p> <p>Required action has been taken to ensure utmost safety and compliance with equipment certification. Estate has communicated with DOSH officer regarding the certification process. Based on conversation with Mr. Irwan Sunardi (DOSH officer) on 21st December 2022 at 10:31 a.m, to proceed with the application, approval letter from DOSH Putrajaya for mentioned equipment must be provided and submitted. Next step will be taken as required to obtain the certificate process. The awareness training on legal will be given to the PIC in order to keep them updated with the requirements.</p>
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. HIRARC on Netting installation and Netting Removal has been documented and updated in the HIRARC dated 07/02/2023 at Jerangau Estate and Pelung Estate. For Jerangau Estate meeting conducted on 08/02/2023. Prepared by Compliance clerk and endorsed by the Manager. 2. Memo has been distributed to all management units as per evidence email dated 07/02/2023. Sample of meeting regarding on this Memo has been conducted on 08/02/2023 at Jerangau Estate and 09/02/2023 at Pelung Estate. 3. Refer letter to Pengarah, JKPP Negeri Terengganu dated 26/01/2023 titled "Permohonan Permit Mesin Angkat (PMA) / Certificate of Fitness (CF) Bagi Mesin Scissor Lift Trailers di TDM Plantations Sdn Bhd (TDMP) with reference document TDMP/OD/07/60-10. Sighted evidence of drawing as per Appendix A and B. Process on certification was in progress. 4. Training online with DOSH Department has been planned on 15-16/03/2023 as per evidence letter dated 06/02/2023 to DOSH Officer with reference letter TDMP/OD/07/60-10.

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	<p>5. Interview has been conducted to sample workets (Trailer Driver, Tractor Driver at Pelung Estate, Jerangau Estate and Fikri Estate) found they have good understanding on the training given and show good awareness on safety at respective area.</p> <p>6. Site visit at estate found all correction and corrective action has been implemented.</p> <p>Based on the above evidence, the major Non-Conformity is closed effectively on 12/02/2023. Continuous implementation will be further verified in the next assessment.</p>
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Non-conformity			
NCR Ref #	2288561-202212-M3	Issued Date	15/12/2022
Due Date	14/03/2023	Closure Date	12/02/2023
Indicator & Category (Critical / Minor)	6.2.4 Critical		
Statement of Nonconformity:	Workers quarters has not been maintained in comfortable, hygiene and good condition.		
Requirement Reference:	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.		
Objective Evidence:	<p>Jerangau Estate</p> <p>There are 3 workers quarters for Jerangau Estate which is in Jerangau Division (Local and foreinger) and at Landas Estate. During the site visit at workers quarter at Jerangau Estate, found out that the workers quarters has not been maintained in good conditions.</p> <ol style="list-style-type: none"> 1. Overdue grass cutting at the back of the housing quarters 2. Blockage of drainage 3. Poor waste management. Sighted waste like plastic, tyres, broken grass cutter in the drain and scattered at the workers quarters 4. Broken window glass and damaged mosquito netting 5. Leakage roof at foreign workers housing toilet 		
Corrections:	<p>Management has taken immediate action as below:</p> <ol style="list-style-type: none"> 1) Additional two (2) units of grass cutter machines and to replace the current contractor with the new one. 2) Arrange for one (1) JCB unit to desilt the main drain and a few workers to clean the drainage. 3) Closely monitor domestic waste management and appoint contractors to collect domestic waste twice a week. 		

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	<ol style="list-style-type: none"> 4) The management had purchased new window glass and a mosquito net to replace the broken/ damaged ones. 5) Immediately hire contractors to repair the roof of the foreign workers' housing toilet.
Root Cause Analysis:	<p>Management was ineffectively monitors the source of the issue as below:</p> <ol style="list-style-type: none"> 1) The car garage construction work causes soil to enter the drain and clog it. 2) The attitude of workers who do not keep the housing area clean. 3) The rainy season caused some cleaning work could not be carried out immediately. 4) No complaint received for objective evidence no.4 and no.5.
Corrective Actions:	<ol style="list-style-type: none"> 1) Monitoring on weekly inspections record will be updated by details up the Section to check involve on Linesite (Drain, Condition of Roof, Electrical Wiring and Domestic Waste). 2) The management will rearrange grass cutting schedule in the line site area from one round into two round per month. 3) Training with evaluation will be conducted to workers to provide information to housing residents to submit a complaint form if there is damage to the housing and reminded to always keep the line site area clean . 4) Weekly inspection will be conducted by Compliance Clerks and verified by the Assistant Manager. The training will be given to the PIC with training evaluation to refresh their knowledge.
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. Weekly inspection form has been updated on Section "Kawasan Sekeliling", "Longkang Parit", "Pendawaian Eletrik" and "Mosquito Netting". Refer Linesite Inspection Record dated 02/01/2023, 09/01/2023, 16/01/2023 and 23/01/2023 2. Refer re-schedule of grass cutting as per dated 31/01/1023. Refer Contract Agreement "Menjalankan kerja-kerja pemotong rumput di Ladang Jerangau Bahgian Jerangau bagi Bulan januari 2023 (2 Pusingan) 3. Training to resident has been related Complaint Form in damage issue at housing area has been conducted on 10/01/2023. Training Evaluation training has been documented dated 11/01/2023. 4. Reminder to resident has been given on Cleanliness Issue has been given dated 10/01/2023. Sighted training materials, attendance and photos. 5. Compliance clerk has been given training on line site inspection dated 11/01/2023. 6. Interview has been conducted to sample compliance clerk found they have good understanding on the training given and show good awareness on safety at respective area. 7. Site visit at linesite area found all correction and corrective action has been implemented. <p>Based on the above evidence, the major Non-Conformity is closed effectively on 12/02/2023. Continuous implementation will be further verified in the next assessment.</p>

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Non-conformity			
NCR Ref #	2288561-202212-M4	Issued Date	15/12/2022
Due Date	14/03/2023	Closure Date	12/02/2023
Indicator & Category (Critical / Minor)	6.7.3 Critical		
Statement of Nonconformity:	Safety harness was not equipped for FFB Truck at estate and security guard at mill, and Badang Driver used Wellington Boot during FFB evacuation.		
Requirement Reference:	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Objective Evidence:	<p>During the site visit, it was observed that some of the workers were not wearing PPE in accordance with the company’s PPE Matrix. Among the cases found are as follows:</p> <ol style="list-style-type: none"> 1. Safety harness was not equipped during CPO tank seal checking by security guards at the mill 2. At Jerangau Estate, based on interview with the management, safety harness was not equipped by the driver during putting on or removing of net that covers the FFB in the truck 3. “Badang” driver was using Wellington Boot instead of safety shoes and not using ear plugs during FFB evacuation at Jerangau Estate. Tractor driver was Wellington Boot instead of safety shoes during FFB evacuation operation at Tayor Estate 		
Corrections:	The PPE matrix has been revised by the Sustainability and Compliance Unit, and the Memo/SOP has been endorsed to the estates and mills on 19th December 2022.		
Root Cause Analysis:	The Standard Operating Procedure for PPE was issued on 11th November 2021 and applies to all staff, workers, contractors, and visitors to any estates/mills of TDM Plantation Sdn. Bhd. However, the wearing of PPE does not fully cover the cases as per objective evidence during the audit session because lack of supervision from the management .		
Corrective Actions:	<p>Workers to undergo training to ensure that the PPE wearing, and procedure is followed. Those who fail to comply will receive a show-cause letter. Training evaluation will be documented to ensure the effectiveness of the training.</p> <p>The Assistant Manager and staff in charge have been reprimanded to be stricter on the enforcement of SOPs pertaining to safety and PPEs. The training will be conducted for both workers and management for better understanding and execution.</p>		
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. PPE Matrix has been revised dated 19/01/2023 on section Scope of Protection Foot (Use of wellingtons boots and safety shoes), Miscellaneous (Safety Harness Set), Era (Eraplugs). 		

	<p>2. Training to workers on PPE has been conducted on 01/01/2023 at Tayor Estate and Jerangau 18/01/2023. Sighted evidence of training materials, attendance and photos. Training evaluation has been documented on 01/01/2023 and showed all workers were understand on the training.</p> <p>3. Memo to the Management Teams has been given as per letter dated 01/01/2023 with refence number TDMP/LTY/PPE/23 with title "Pelaksanaan PPE Kepada Pekerja". Refer training PPE has been conducted on 01/01/2023 at Tayor Estate. Sighted evidence of training materials, attendance and photos. Training evaluation has been documented on 01/01/2023 and showed all management teams were understand on the training.</p> <p>4. Interview has been conducted to sample management teams and workers (Tractor Driver MB Driver and Security Guards) found they have good understanding on the training given and show good awareness on safety at respective area.</p> <p>5. Site visit at estate Harvesting area found all correction and corrective action has been implemented.</p> <p>Based on the above evidence, the major Non-Conformity is closed effectively on 12/02/2023. Continuous implementation will be further verified in the next assessment.</p>
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Non-conformity			
NCR Ref #	2288561-202212-N1	Issued Date	15/12/2022
Due Date	Next Assessment (Recertification)	Closure Date	Next Assessment (Recertification)
Indicator & Category (Critical / Minor)	3.3.2 Minor		
Statement of Nonconformity:	Chemical activities effect was sighted at water ways area		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	During site visit at Pelong Estate, P21A and P18A2, it was noted portion of chemical activities near the water ways. It was not in line with Standard Operating Procedure Immature upkeep dated 01/05/2011 Section 5.1.1: Do not pollute waterways and 4.1.14.6: Water way must not be contaminated by the chemical used for the job.		
Corrections:	FA and workers will be given a reminder that no activities involving chemical can be done at the buffer zone area during muster call every morning. Estate management to identify the river buffer zone and to stop chemical activities near the water ways immediately. Those who fail to comply will receive a show-cause letter.		
Root Cause Analysis:	The workers/ sprayer does not notice the buffer zone area because there is no signage provided to indicate it and the training given is not effective. Lack of training for the workers and lack of supervision and action from the Assistant Manager (AM) and Field Assistant (FA).		

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Corrective Actions:	To provide relevant signage near the water ways (river buffer zone) and the training related to the buffer zone area will be done to the workers and staffs. The FA and AM will monitor on the spraying activities. A report or checklist will be signed by the Manager.
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the raised nonconformity, based on the root cause identified were reviewed and deemed to be appropriate. Thus, the effectiveness of the CAP will be verified during the next surveillance assessment.

Non-conformity			
NCR Ref #	2288561-202212-N2	Issued Date	15/12/2022
Due Date	Next Assessment (Recertification)	Closure Date	Next Assessment (Recertification)
Indicator & Category (Critical / Minor)	2.3.2 Minor		
Statement of Nonconformity:	The evidence as listed in Indicator 2.3.1. has yet to be obtained for most indirectly sourced FFB by the mill.		
Requirement Reference:	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.		
Objective Evidence:	There are six collection centres supplying FFB to Sungai Tong POM, namely Tan Sing How, Syarikat Warisan, Sentong Sawit, Kim Ma Oil Palm, Pertubuhan Peladang Negeri Terengganu, and MBA Palm Trade. However, the evidence as listed in Indicator 2.3.1. has yet to be obtained for most indirectly sourced FFB by the mill, especially those under Kim Ma Oil Palm, Syarikat Warisan, and MBA Palm Trade. The very high yield/ha in 2022 for Syarikat Warisan and MBA Palm Trade is also an indication that the most of their suppliers has yet to be identified.		
Corrections:	A template has been developed and distributed to the dealers and smallholders in order to get the information available for mill safekeeping and reference. On 18th January 2023, a short discussion will be held with dealers and HQ members to discuss the requirement of RSPO regarding to FFB's supplies to TDMP collection centers.		
Root Cause Analysis:	Some of the dealers claim that the requested information is private and confidential.		
Corrective Actions:	Mill management has made the decision to discontinue accepting FFBs from dealers who have not complied with the requirements.		
Assessment Conclusion:	The submitted CAP detailing on proposed actions to be taken to address the raised nonconformity, based on the root cause identified were reviewed and deemed to be appropriate. Thus, the effectiveness of the CAP will be verified during the next surveillance assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	Good positive relationship maintained and highlighted by internal and external stakeholders
PF 2	Good cooperation by Management and Sustainability team and handling the audit.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2125413-202111-M1	Issued Date	03/11/2021
Due Date	31/01/2022	Closure Date	11/01/2022
Clause & Category (Critical / Minor)	3.6.1 (Critical)		
Statement of Nonconformity:	The risk assessment and mitigation methods were not implemented comprehensively.		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p><u>Pinang Emas Estate</u></p> <ol style="list-style-type: none"> Baseline Audiometric Test was conducted by Si Energy Sdn Bhd (1202037P) on 19th October 2020 for 28 workers deemed to be exposed to excessive noise in the estate. The results indicated the 12 of them were found to have hearing impairment and 10 of them were noted to have Hearing Loss. As per Occupational Safety and Health (Noise Exposure) Regulation 2019, those with hearing loss, hearing impairment and permanent standard threshold shift are required to see Occupational Health Doctor for further Medical Examination. As of to date, there were no evidence that the 23 workers were referred to an Occupational Health Doctor for further Medical Examination. HIRARC for Tractor, Kubota and Hooklift Tractor have been identified. Nevertheless, the Hazard identification for the mentioned machinery works was not comprehensively identified as it did not state the hazards related to excessive noise during the operation. 		
Corrections:	<ol style="list-style-type: none"> To arrange for all those 23 employees to see an Occupational Health Doctor (OHD) for further medical examination immediately. To identify and include hazards related excessive noise during operation for Tractor, Kubota and Hooklift Tractor. 		
Root Cause Analysis:	<ol style="list-style-type: none"> Hearing impairment must be verified by the OHD thus the delay in the review since the management is waiting the confirmation from OHD. The HIRARC for Tractor, Kubota and Hooklift Tractor is not properly identified and reviewed by the estate. Estate management was occupied with COVID19 		

	<p>outbreak in the estate and also the vaccination program of all workers and staffs.</p> <p>HIRARC usually been reviewed every year (Q1) and if needed to be revised, it will be revised immediately but during this pandemic, many obstacles happened suddenly. Normally HIRARC will be reviewed upon confirmation of occupational accidents.</p>
<p>Corrective Actions:</p>	<ol style="list-style-type: none"> 1. PIC will keep on monitoring the excessive noise exposure monitoring as per OHD recommendation. For example, annual audiometric test. This compliancy is also monitored by Sustainability and Compliance Unit at HQ level. 2. The existing HIRARC for Tractor, Kubota and Hooklift Tractor have been reviewed and revised immediately after the audit. In the meantime, the existing documentation update (in this case; HIRARC) practices will be continuously conducted and monitored by the PIC together with HIRARC review committee.
<p>Assessment Conclusion:</p>	<p><u>Major NC Close Out Verification</u></p> <p>From 23 personnel attend the Noise Risk Assessment Baseline on 19/10/2021, 5 of the employee has resigned from the estate. The estate has sent the remaining 18 employee for OHD examination on 08/12/2021. The examination was conducted by OHD with DOSH reg. no. HQ/08/DOC/00/272.</p> <p>Reviewed the OHD examination report. From the results, 17 employee were found with hearing impairment and 1 employee were referred to ENT specialist due to no occupational related disease. The employee with hearing impairment was reported to DOSH through JKPP 7 form on 09/12/2021 by the OHD. The OHD has explain the results to the respective employee during the examination. Reviewed the acknowledgment of understanding by the employee dated 08/12/2021.</p> <p>The estate has reviewed the HIRARC for Loader Tractor, Loader Kubota Hook Lift Tractor and Tractor c/w 8/10 Hook Lift trailer on 08/11/2021. The reviewed has been include included hazards for Loud Noise (>82 dBA).</p> <p>All the corrective action and evidence of implementation were found to be adequate. The Major NC closed on 11/01/2022.</p>
<p>Effectiveness Closure (for previous audit closed Critical NC):</p>	<p>Fikri Estate:</p> <ol style="list-style-type: none"> 1) Last audiometric test conducted on 8-27/09/2022 by SI Energy Sdn Bhd ATC Klinik Ibra (JKPP/2021/11-01/00049). 24 employees were tested, report received on 10/11/2022 <p>Results:</p> <ol style="list-style-type: none"> i) ONRHD – 6 workers. 1 worker has been notified in 2021. Remaining 5 workers notified in 2022 (JKPP 7 attached in the report) ii) Non-ONRHD – 2 workers. 1 worker was suggested to be referred to ENT specialist for further evaluation. This was not done yet since the worker was absent when he was called for meeting. The management has planned to send him to ENT in Dec 2022 iii) Temporary STS – 1 worker. He was recommended to repeat audiometry test in 3 months, and it was done on 5/12/2022. At the point of this assessment, the result has yet to come out iv) Normal – 15 workers

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	<p>2) HIRARC was last updated on 13/11/2022 for tractor operation, loader, where noise hazard has been included. Based on site visit, all operators were using ear plugs.</p> <p>There was no repetition of non-conformity. The corrective action has been effectively implemented. Thus, this Critical NC remains closed.</p>
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Non-conformity			
NCR Ref #	2125413-202111-N1	Issued Date	03/11/2021
Due Date	ASA1_4	Closure Date	15/12/2022
Clause & Category (Critical / Minor)	3.4.2 (Minor)		
Statement of Nonconformity:	Social management and monitoring plan on Employee Compliance was not comprehensively developed with participation of affected stakeholders		
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:	<p><u>Pinang Emas Estate</u></p> <p>Based on SIA management plan dated 1/10/2021, specific issues with regards to contractor management and due diligence were not identified in the management plan. Non-compliance issues related to lawful deduction (SOCISO and EPF) and contract of service was observed and recorded. Further interview with the contractor, SF Suria Enterprise has confirmed on the lawful deduction and contract of service issues which not in lined with Employment Act 1955.</p>		
Corrections:	To update the SIA management plan and include contractor management and due diligence issue immediately.		
Root Cause Analysis:	Social management and monitoring plan was not comprehensively developed because the issues are not properly captured or discussed during stakeholder meeting or via questionnaire submitted by the estate.		
Corrective Actions:	In order to capture the issues, the training/ stakeholder meeting should be conducted with addressing/ discussed contractor management issues and contractors' compliance with the legal requirement.		
Assessment Conclusion:	<p>SIA management plan for Sungai Tong POM has been established and documented in the document "Social action plan revision 2022/2023 which has been reviewed on 20/10/2022. There is evidence that all issues that has been highlighted by the stakeholders has been included in the management plan. Sample as per below</p> <ul style="list-style-type: none"> a. Contractors' management and due diligence where the management has plan to monitor compliance for contractor`s with legal requirement (EPF, SOCISO, EIS contribution, minimum wages, employment contract) b. Request by female workers for prayer room for women in the office- respond by the management, for time being, female employees may use the nursing for prayers. <p><u>Jerangau Estate</u></p> <p>SIA management plan established in the document "SIA management plan 2022". Several management plan has been established as per below</p>		

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	<ul style="list-style-type: none"> a. Poor facilities and infrastructure b. No communication of complaint procedure between employer and employee c. Contractor due diligence <p><u>Pelung Estate</u></p> <p>SIA management plan established in the document "SIA management plan 2022". Several management plan has been established as per below</p> <ul style="list-style-type: none"> a. Contribution to stakeholders b. Pregnant women assessment <p><u>Tayor Estate</u></p> <p>SIA management plan established in the document "SIA management plan 2022". Several management plan has been established as per below</p> <ul style="list-style-type: none"> a. To conduct briefing to the contractors on legal and RSPO requirement b. To conduct social activities between the management and local communities c. Communication of the complaint procedure to all the workers <p>It has been confirmed that evidence provided during is satisfactory and minor NCs closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	N/A

Non-conformity			
NCR Ref #	2125413-202111-N2	Issued Date	03/11/2021
Due Date	ASA1_4	Closure Date	15/12/2022
Clause & Category (Critical / Minor)	2.2.2 (Minor)		
Statement of Nonconformity:	Evidence of legal due diligence of all contracted third parties was not effectively demonstrated.		
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:	<u>Contract of service @ employment contract</u> <ol style="list-style-type: none"> 1. SF Suria Enterprise - Contract of service dated 1/1/21 was not comprehensively include pertinent clauses as required under Employment Act 1955. Rest day, annual leave and medical leave entitlement were not included in the contract. Rate of pay on rest day and public holiday were also not clearly explained in the said contract. 2. Abdullah Bin Musa - Contract of service dated 1/1/21 was not comprehensively include pertinent clauses as required under Employment Act 1955. Rest day, annual leave and medical leave entitlement were not included in the contract. 		

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	<p>Rate of pay on rest day and public holiday were also not clearly explained in the said contract.</p> <p><u>Lawful deduction</u></p> <p>SF Suria Enterprise - Based on latest pay slip for worker ID 69##11- #1- ##47 September 2021, no lawful deduction made for EPF,SOCOSO/EIS recorded.</p>											
Corrections:	<p>A meeting has been conducted with the contractors, SF Suria Enterprise, and Abdullah Muda on 9/11/2-21. Both contractors have been briefed on the Employment Act 1955 requirement such as to prepare a complete format of employment contract and to make deduction and contribution of EPF and SOCOSO/IES to their workers. They had to ensure that the deduction and contribution was stated in the worker's payslip.</p>											
Root Cause Analysis:	<p>There is available agreement between these two contractors with Pinang Emas Estate which indicate that the contractors had to comply with the RSPO and MSPO requirement. However, the contractors do not take it seriously and ignore the requirement because there is no proper guideline/training from the estate.</p>											
Corrective Actions:	<p>To conduct proper training to the contractors on the requirement of Employment Act 1955 and to assist the contractors to make proper deduction (EPF, SOCOSO/EIS) as per requirement under Employment Act 1955.</p>											
Assessment Conclusion:	<p>Verification has been done by the auditor on compliance of legal requirement for contractor in Fikri Estate and found out that EPF and SOCOSO contribution made not according to Employees' Social Security Act 1969, Employee Provident Fund 1991 and employment contract. Details as per below</p> <p>Contractor: Technopalm Resources Sdn Bhd contract number Tech/LFK/2022</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Workers A</th> <th style="width: 25%;">Total salary</th> <th style="width: 25%;">Actual amount</th> <th style="width: 25%;">Amount as per requirement</th> </tr> </thead> <tbody> <tr> <td>EPF Contribution</td> <td rowspan="2" style="text-align: center;">RM1,800</td> <td style="text-align: center;">RM250</td> <td style="text-align: center;">13%, RM234</td> </tr> <tr> <td>SOCOSO contribution</td> <td style="text-align: center;">RM60.35</td> <td style="text-align: center;">RM32.35</td> </tr> </tbody> </table> <p>Minor Nonconformities has been raised during the previous audit at the same indicator. Hence the non-conformities have been escalated to Major NCs.</p>	Workers A	Total salary	Actual amount	Amount as per requirement	EPF Contribution	RM1,800	RM250	13%, RM234	SOCOSO contribution	RM60.35	RM32.35
Workers A	Total salary	Actual amount	Amount as per requirement									
EPF Contribution	RM1,800	RM250	13%, RM234									
SOCOSO contribution		RM60.35	RM32.35									
Effectiveness Closure (for previous audit closed Critical NC):	<p>Not applicable</p>											

Non-conformity			
NCR Ref #	2125413-202111-N3	Issued Date	03/11/2021
Due Date	ASA1_4	Closure Date	Escalated to Major NC
Clause & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	Found inappropriate disposal of waste material in Sungai Tong POM		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		

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Objective Evidence:	<ol style="list-style-type: none"> 1. Based on the Waste Management Plan, it was found that empty chemical containers, waste of lead acid batteries and fluorescent tubes/lamps have been identified as Scheduled waste (SW 409, 102 and 109). However, from the inventory records (Record Number: AS(B)T:31/152/000/008) and latest record of SW Disposal, there were no evidence of inventory and disposal of SW 409, 102, and 109 in the mill. 2. The used N-Hexane was identified as Scheduled Waste in Sungai Tong POM. Based on the interview, the used N-Hexane has been given back to the supplier. However there were no evidence that showed that the supplier has approval from DOE to handle the scheduled waste.
Corrections:	<ol style="list-style-type: none"> 1. To register empty container (SW409), fluorescent tubes/ lamps (SW109) and used N-Hexane (SW322) into eSWIS system. 2. In progress to get approval from DOE to dispose the waste oil through the burning process at Boiler Station.
Root Cause Analysis:	No generation and disposal record of the stated scheduled waste because there is misunderstanding with the approval given by DOE.
Corrective Actions:	The quantity of SW409, SW109 and SW322 will be updated monthly and dispose-off accordingly through licensed scheduled waste facility/ transporter as per Environmental Quality (Scheduled Wastes) Regulation 2005.
Assessment Conclusion:	<p>Refer disposal record has been conducted by KT Wan Recycle. The disposal were recorded under SW109 and SW110. Since last audit, there is no generation of SW109 and SW110. As per new circular by CEO, TDMP dated 25/10/2022, "...therefore, the management has decided to phase out all pendaflour usage into LED Lighting. Management has requested an approval disposed through boiler for SW322 with letter reference KL.KKS/3/05.021(05.21) dated 23/11/2021 and email to DOE dated 22/11/2022 but no approval granted. Management has disposed the SW322 with reference number C/N 20221206092BJNOS. SW109 registration to E-Swiss has been done on 31/10/2022.</p> <p>The Scheduled Waste was disposed through licensed contractors, Pentas Flora Sdn. Bhd. Reviewed the consignment note latest two records as follows:</p> <ol style="list-style-type: none"> a. 30/11/2022 for SW 409, C/N 2022120609BFP1MT b. 30/11/2022 for SW 322, C/N 20221206092BJNOS <p>The corrective action found effectively implemented based on site verification however, the Minor NC was escalated to Major due to found non-conformance in the same indicator.</p>
Effectiveness Closure (for previous audit closed Critical NC):	Not applicable

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Opportunity for Improvements	
OFI #	Description
OFI 1	2125413-202111-I1 - The estate shall further ensure that the estate workers are aware of the availability of wellington boots free of charge for them so that they do not purchase them by themselves.
	<p>Verification / Follow-up actions:</p> <p>Based on interview with sampled workers at all the sampled estates, it was confirmed that all the Wellington boots were provided free of charge by the company. The receipts of the Wellington boots by the workers were also recorded in the PPE issuance records.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1687913-201808-M1	Major	2.1.3	04/10/2018	Closed on 25/11/2018
1687913-201808-M2	Major	SCCS 5.3.2	04/10/2018	Closed on 25/11/2018
1687913-201808-N1	Minor	6.10.4	04/10/2018	Closed on 25/09/2019
1828237-201906-M1	Major	2.1.1	26/09/2019	Closed on 23/12/2019
1828237-201906-M2	Major	4.7.2	26/09/2019	Closed on 23/12/2019
1828237-201906-M3	Major	4.7.2	26/09/2019	Closed on 03/12/2019
1962048-202009-M1	Major	6.2.2	24/09/2020	Closed on 23/09/2020
1962048-202009-M2	Major	3.4.1	24/09/2020	Closed on 23/09/2020
1962048-202009-N1	Minor	6.2.6	24/09/2020	Closed on 03/11/2021
1962048-202009-N2	Minor	6.5.3	24/09/2020	Closed on 03/11/2021
1962048-202009-N3	Minor	2.1.2	24/09/2020	Closed on 03/11/2021
2125413-202111-M1	Critical	3.6.1	03/11/2021	Closed on 11/01/2022
2125413-202111-N1	Minor	3.4.2	03/11/2021	Closed on 15/12/2022
2125413-202111-N2	Minor	2.2.2	03/11/2021	Escalated to Critical NC
2125413-202111-N3	Minor	7.3.2	03/11/2021	Closed on 15/12/2022
2288561-202212-M1	Critical	2.2.2	15/12/2022	Closed on 12/02/2023
2288561-202212-M2	Critical	3.6.2	15/12/2022	Closed on 12/02/2023
2288561-202212-M3	Critical	6.2.4	15/12/2022	Closed on 12/02/2023
2288561-202212-M4	Critical	6.7.3	15/12/2022	Closed on 12/02/2023
2288561-202212-N1	Minor	3.3.2	15/12/2022	Open
2288561-202212-N2	Minor	2.3.2	15/12/2022	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 Kemaman Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal stakeholder	Gender representative for each operating unit	Face to face
Local communities	JPKK Tok Dor, JPKK Pak Ba and JPKK Kampung Bukit Nenas	Face to face
Government agencies	Sekolah Kebangsaan Kampung Fikri and Sekolah Kebangsaan Landas	Face to face
Contractor	Mohd Hairey bin Ibrahim and Koperasi Ladang Sungai Tong	Face to face
Government agencies	Balai Polis Sungai Tong	Face to face

Stakeholders comment	
1	<p>Feedbacks: Gender representative for each operating unit</p> <p>5 gender representatives for each operating have been interviewed. Based on the interview, there is evidence that all female workers can participate in gender committee and has been invited for meeting that will be conducted every 6 months. As per interview, it has been confirmed that grievance procedure for any harassment has been communicated and all representatives can demonstrate their understanding on the procedure. Other than that, pregnancy test has not been conducted for female workers but only self-assessment on pregnant symptom such as period delay will be submitted online on monthly basis. Representative also has been asked on discrimination and has been confirmed there is no discrimination has been practiced. All workers have been paid as per collective agreement with MAPA/NUPW and Minimum Wages Order 2022. All female workers received same benefits, leave and others. New mother assessment has been conducted for each operating units and has been confirmed by one of representative which also new mother with baby ages 1 year 8 months.</p> <p>Audit Team verification and response: No further verification required.</p>

<p>2</p>	<p>Feedbacks: Local communities (JPKK Tok Dor, JPKK Pak Ba and JPKK Kampung Bukit Nenas) Both head of village for Kampung Pak Ba and Kampung Bukit Nenas has been interviewed. Most of the villagers works as public and government servant, fisherman, village works. Based on the on the interview, it has been confirmed that good relationships have been between both parties. They also mentioned that there are no operation/ activities in estates and POM that give adverse effect to the local communities. Any vacancies in estate/POM will be posted at notice board and nearby coffee shops at the village area. As per interview, some villagers work in the estate and POM. There is 1 river that flowing through village and estates which also source of income for the villager. There is no cases of pollution has happen and identified by the villagers.</p> <p>Audit Team verification and response: No further verification required.</p>
<p>3</p>	<p>Feedbacks: Local communities (Government agencies, Sekolah Kebangsaan Kampung Fikri and Sekolah Kebangsaan Landas) Mr Mazlan as the headmaster for Sekolah Kebangsaan Kampung Fikri for almost 3 years. He said that around 90% of the kids, their parent is working wit TDM Plantation Sdn Bhd. There is no issues of parent`s involvement on school activities where parents give full support on school activities. Other than that, there is no issues of kids that has not been sent to school due to poverty. He also mentioned that good relationship has established by both parties. There is a lot of contribution has been made by the operating units to schools such as donation money for school activities, manpower to clean up school and equipment/material support.</p> <p>Audit Team verification and response: No further verification required.</p>
<p>4</p>	<p>Feedbacks: Contractors (Mohd Hairey bin Ibrahim and Koperasi Ladang Sungai Tong) Mr. Mohd Hairey bin Ibrahim is a contractor for harvestings which has been run and all operations done by Mr Mohd Hairey itself and supported by 2 family members. While for Koperasi Ladang Sungai Tong is contractors that contracted under Sungai Tong POM for kernel transport. As per interview, both contractors have signed contract agreement and they also mentioned that they are aware the statement of compliance of legal requirement and prohibition of child labour, force labour and others. Both contractors have been asked on payment, where payment will be done every 15th each month. For both contractors, payment made based on tonnage mentioned in the weighbridge tickets. They also confirmed that there is no pending payment and payment has been made based on the payment terms,</p> <p>Audit Team verification and response: No further verification required.</p>
<p>5</p>	<p>Feedbacks: Balai Polis Sungai Tong As per interview with the representative, 4 operating units under TDM Plantations Sdn Bhd is under Balai Polis Sungai Tong territory where good relationship has been maintained by both parties. Communication has been done through phone call and consultation with stakeholders. There is no issues of civil crime has been convicted by any of the workers in TDM Plantations Sdn Bhd.</p> <p>Audit Team verification and response: No further verification required.</p>

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List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
<u>Jaya Estate</u> Kumpulan Ladang - Ladang Terengganu Sdn Bhd (Terengganu State Government Incorporated Company)	Lease hold for 99 years (Lease Period from 01/01/1973 – 31/12/2071) Under Perbadanan Memajukan Iktisad Negeri	3,455.79	Yes	N/A	All estates within Sg Tong POM complex belongs to the Terengganu State Government Incorporated Company that owns 100% stake in TDM. Verified agreement between Perbadanan Memajukan Iktisad Negeri Terengganu and Kumpulan Ladang-Ladang Terengganu Sdn Bhd.
<u>Pinang Emas Estate</u> Kumpulan Ladang - Ladang Terengganu Sdn Bhd (Terengganu State Government Incorporated Company)	Lease hold for 99 years (Lease until 31/01/2075) Under Perbadanan Memajukan Iktisad Negeri	3,870.18	Yes	N/A	All estates within Sg Tong POM complex belongs to the Terengganu State Government Incorporated Company that owns 100% stake in TDM. Verified agreement between Perbadanan Memajukan Iktisad Negeri Terengganu and Kumpulan Ladang-Ladang Terengganu Sdn Bhd.

Previous land owner / user comment	
	Feedbacks: Not applicable since all estates within Sg Tong Certification Units belongs to the Terengganu State Government Incorporated Company that owns 100% stake in TDM.
	Audit Team verification and response: No further verification required.

3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Sungai Tong POM and Supply Bases 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 Sungai Tong POM and Supply Bases is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: NOR HALIS ABU ZAR	Name: HAJI HASSAN BIN OSMAN
Company Name: BSI SERVICES MALAYSIA SDN BHD	Company Name: PENGURUS KILANG SAWIT SUNGAI TONG SETIU, TERENGGANU
Title: CLIENT MANAGER	Title:
Signature: 	Signature:  <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i>
Date: 13/02/2023	Date: 13.02.2023

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>List of documents that publicly available is documented in the document title Communication Procedure – “Prosedur Komunikasi Dengan Pihak Kilang/Ladang”. Total 9 documents but not limited to</p> <ol style="list-style-type: none"> a. Land title b. Safety and health plan c. SIA report d. EIA report e. Pollution prevention plan f. Continuous improvement plan g. Environmental management/monitoring plan h. Communication Procedure - Prosedur Komunikasi (Aduan dan Maklumat) i. Consultation Procedure - Prosedur Rundingan. 	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Communication Flowchart with Mill/ Estate Management was developed where it has clearly described the process of request of information/ report. Timeline to respond and solve is within 28 working days. The company has implemented Request and Response Form for the stakeholders. Information available in Bahasa Malaysia and English. There is no request for information has been received by each operating units only request for assistance by the nearby stakeholders.</p>	Complied

1.1.3	<p>(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p><u>Sungai Tong POM</u> Records of request has been recorded in the logbook title "Communication records". However, there is no information request has been received for year 2022.</p> <p><u>Jerangau Estate</u> Records of request has been recorded in the logbook title "Communication records". However, there is no information request has been received for year 2022.</p> <p><u>Pelong Estate</u> Records of request has been recorded in the logbook title "Communication records". However, there is no information request has been received for year 2022.</p> <p><u>Tayor Estate</u> Records of request has been recorded in the logbook title "Communication records". However, there is no information request has been received for year 2022.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -</p>	<p>Consultation and communication procedure has been documented in the document title "Prosedur Komunikasi Dengan Pihak Kilang/Ladang" which outline process flow for consultation/communication procedure starting from request by the stakeholders. Any communication/consultation request must be responded within 14 days from the request received. <u>The procedure has been made available where it has been posted at the notice board at each operating units. It also has been communicated during the stakeholders consultation that has been conducted on stakeholders' consultation meeting conducted on 26/09/2022.</u></p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p>	<p>The current list of contact and details of stakeholders and their nominated representative was updated in the stakeholder list</p>	Complied

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	- Minor compliance -	FY2022 at each operating unit. Verified the list which has included vendor/supplier, authority and other interested party.	
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 -	Available Work Ethical Policy stating ethical issues, maintaining workers right in recruitment, selection of workers, contracts. The policy also sighted during site visit at notice board outside Office of each operating units. There is evidence that policy of ethical conduct has been appointed base of sample contracts of works in the operating units operations. It has been selected based on 3 quotations and base on the price of services offered. As at the day of the audit, there is no new recruitment for foreign workers in year 2020, 2021 and 2022 due to government action to stop any new recruitment from other countries due to COVID 19 pandemic. As per interview, the management expected to receive 300 new foreign workers by December 2022 and will be distributed to all estates under TDM Plantation Sdn Bhd.	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 -	Internal audit is one of the mechanism to monitor compliance and the implementation of the policy. Other than that, it has been monitored based on the whistle blowing procedure. Disclosure or report can be made to any of the following dedicated reporting channels, in a strictly confidential manner:- a) Secured email address at whistleblowing@tdmberhad.com.my b) By writing c) Meet in person with the Head of Compliance, Integrity & Sustainability at the following address	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.			

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<p>2.1.1</p>	<p>(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -</p>	<p>Sungai Tong Certification Unit continues to comply with all verified legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and HQ. The sampled mill and estates had obtained and renewed license and permits as required by the law. Among others the licenses/permit verified were:</p> <p>Fikri Estate</p> <ol style="list-style-type: none"> 1. MPOB Licence #503379102000 valid from 05/09/2022 to 31/08/2023 2. Air compressor #TG PMT 3948 valid from 28/03/2022 to 27/06/2023 3. Diesel Permit #KPNHEP.BST.800-1/8/16/19(SK/D) valid from 07/11/2021 to 06/11/2024 4. Permit for Salary Deduction Tabung Haji, Electricity, Union Fee, Koperasi Fee, JKK Fee #JTK/(T) 600.2.4(14) dated 22/10/2017 <p>Sungai Tong POM</p> <ol style="list-style-type: none"> 1. MPOB License, #500042704000, Validity Period: 01/04/2022 to 31/03/2023 2. DOE License – Compliance Schedule; License Number: 004079 License validity period: 03/07/2022 to 30/06/2023 3. River Water Diversion and Extraction License, #PA(P)-A0001 valid from 01/06/2021 to 31/12/2022 4. Back Pressure Receiver #TG PMT 5357 valid until 02/01/2023 5. Air Receiver Tank #TG PMT 80366 valid until 02/01/2023 6. Permit Barang Kawalan Berjadual, #KPDNKK.BST.800-1/8/23/14(SK/D); Description: Diesel; Storage Quantity: 20,000 Litres, Validity Period: 24/02/2022 to 23/02/2025. 7. Weighbridge Inspection #2105038BC1, Safety Sticker #DE18- 	<p>Complied</p>
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		<p>001575 inspected on 04/08/2022</p> <ol style="list-style-type: none"> 8. Competent Person: Certified Environmental Professional In Schedule Waste (CePSWaM), #CePSWaM/02892 dated 28/08/2019 to Compliance Executive NRIC 860406-XX-XXXX 9. Competent Person: Certified Environmental Professional In The Treatment Of Palm Oil Mill Effluent (CePPOME) #CePPOME/00307 dated 18/04/2022 to Assistant Engineer NRIC 900424-XX-XXXX 10. Competent Person: Steam Cert. Gred 2 #056/2018 dated 05/02/2018 to Assistant Engineer NRIC 900424-XX-XXXX 11. Written Notification to DOE for Fume hood Laboratory #AS(B)T:31/152/000/008Jilid.19(24) dated 06/05/2018 12. Weighbridge Calibration #E22017-0131, B2002719 by Metrology Corporation Malaysia Sdn Bhd dated 21/09/2022 <p>Jerangau Estate</p> <ol style="list-style-type: none"> 1. MPOB Licence #502250102000 valid from 01/09/2022 to 31/08/2023 2. Air compressor #TG PMT 7793 valid until 21/08/2023 3. Permit for Salary Deduction Tabung Haji, Electricity, and Water #JTK/(T) 600.2.2.1 Jld 2(4) dated 30/05/2019 <p>Pelong Estate</p> <ol style="list-style-type: none"> 1. MPOB Licence #502826702000 valid from 01/04/2022 to 31/03/2023 2. Air compressor #TG PMT 5152 valid until 16/01/2023 3. Permit Barang Kawalan Berjadual, #KPDNKK.BST.800-1/8/10/14(SK/D); Description: Diesel; Storage Quantity: 8,190 Litres, Validity Period: 24/01/2022 to 23/01/2023 4. Approval by Suruhanjaya Tenaga for Electric Fences 	
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		<p>#OTKB202200004PGR dated 14/11/2022</p> <p>Taylor Estate</p> <ol style="list-style-type: none"> 1. MPOB Licence #620785002000 valid from 14/02/2022 to 31/01/2023 2. Air compressor #TG PMT 4424 valid until 17/04/2023 3. Permit Barang Kawalan Berjadual, #KPDNHEP.BST.800-1/8/12/19(SK/D); Description: Diesel; Storage Quantity: 20,000 Litres, Validity Period: 04/08/2021 to 03/08/2024 	
<p>2.1.2</p>	<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>TDM Plantation Sungai Tong POM certification unit continued to implement and maintain their established documented system for identifying, accessing, tracking updates and monitoring of compliance with the legal requirements that are applicable to the operation.</p> <p>Each office of the operating unit (mill and estate) has its own legal requirements register (LRR) and were being evaluated individually from time to time for compliance mainly through internal audit.</p> <p>TDM Plantation has established a SOP; Procedure for Legal and other Requirements dated 01/01/2021; Edition: TDM/ESTATE/01; Revision; Estate – 00/2021. Estate and Mill management has appointed person in charge to monitor the legal compliance and update the required law and regulation when have any amendment that coming into force. Refer appointment letter as below:</p> <ol style="list-style-type: none"> 1. Fikri Estate: Mr Zamri Ismail dated 01/01/2022 2. Sg Tong POM: Pn Norwati Bte Mamat dated 21/02/2022 3. Jerangau Estate: Mr Mohd Zailani Bin Mat Ali dated 01/07/2022 4. Pelong Estate: Mr Mohd Ismadairuz Bin Yaacob dated 27/02/2022 	<p>Complied</p>

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		<p>5. Tayor Estate: Mr Ahmad Hazazi Bin Abdul Ranin dated 01/03/2021</p> <p>All applicable legal requirement was documented in TDMP 2022 Legal Register, latest updated on 18/10/2022. Among the latest amendment listed were:</p> <ol style="list-style-type: none"> 1. Minimum Wages Order 2022 2. Occupational Safety and Health (Noise Exposure) Regulation 2019 3. Fire Services (Fire Certificate) (Amendment) Regulation 2020 4. Water Services Industry (Desludging Services Regulations 2021) 5. Workers Minimum Standard Of Housing, Accommodation and Amenities Act 1990 (Amendment) 2020 	
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>Legal or authorised boundaries are clearly demarcated and visibly maintained as per verification during site visit. Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of sample estate to indicate the legal boundaries are through construction of trenches and parameter road. This was confirmed through the field visit. Apart from that, erection of concrete slab with GPS coordinate along the boundaries was also commonly practiced and clearly visible. Boundary and monthly patrolling record was verified.</p> <p><u>Fikri Estate</u></p> <p>Sighted boundary peg at PM00A3, Neighbouring to Smallholder. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p><u>Jerangau Estate</u></p>	Complied

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		<p>Sighted boundary peg at P13B2, Neighbouring to Felda Bukit Bading. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p><u>Pelong Estate</u></p> <p>Sighted boundary peg at PR21A, Neighbouring to Forest Reserve. Verified that there is no planting beyond these legal or authorised boundaries.</p>	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>List of contracted parties were made available for verification at visited OU and incorporated in FY2022 stakeholder list.</p> <p>For Fikri Estate, total 2 contractors have been listed which is Technoplam Resources Sdn Bhd (Replanting) and Koperasi Ladang Sungai Tong Terengganu Berhad (Hiring machineries).</p> <p>For Sungai Tong POM, there is 3 contracted parties has been verified which is Koperasi Ladang Sungai Tong Terengganu Berhad for Kernel Transport, Mnan Resources Sdn Bhd and Prifaria Sdn Bhd for CPO and PK transport. While for Pelong Estate, total 4 contracted parties have been listed which is Koperasi Sejahtera, Koperasi Ladang Sungai Tong Terengganu Sdn Bhd, ZGE Enterprise.</p> <p>For Tayor Estate, there is only 1 contracted parties which is Mohd Heireey bin Ibrahim as harvesting contractor.</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>Contract agreement for all contracted parties sighted and verified during the audit. There is evidence statement to comply legal requirement. Details as per below</p> <p><u>Fikri Estate</u></p> <p>a) Technopalm Resources Sdn Bhd – IP08/21 for replanting</p> <p>b) Koperasi Ladang Sungai Tong Terenggany- FK34/22</p> <p>Training for contractors has been done during the stakeholders’</p>	Non-compliance

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		<p>consultation meeting conducted on 26/09/2022 with attendance of 8 contractors.</p> <p><u>Sungai Tong POM</u></p> <ul style="list-style-type: none"> a) Mnan Resources Sdn Bhd, 02/11/2022 reference number TDMP/OD/09/01.32 b) Prifaria Sdn Bhd dated 07/09/2022 reference number TDMP/OD/09/01.32 c) Koperasi Ladang Sungai Tong Terengganu Berhad 01/11/2022 reference number TDMP/OD/09/01.32 <p><u>Jerangau Estate</u></p> <ul style="list-style-type: none"> a. Wan Family Legacy – LJR:38/22 dated 23/10/2022 b. Serasi Anjung Enterprise-LJR:39/22 dated 23/10/2022 c. Mohd Sabri bin Talib LJR:40/22 dated 23/10/2022 <p>Due diligence for those contractors has been conducted by the management for month September and October 2022. It has been found out that there is no contribution for EPF for one contractor</p> <ul style="list-style-type: none"> - Contractors Mohamad Sabri Talib, workers name Zulkarnain Talib and Zulkhairi Talib. Reminder letter has been sent by the estate on 26/10/2022. <p><u>Pelung Estate</u></p> <ul style="list-style-type: none"> a. Koperasi Sejahtera LP17/22 dated 26/05/2022 b. Koperasi Ladang Sungai Tong Terengganu dated 26/04/2022 <p>Verification has been done by the auditor on compliance of legal requirement for contractor in Fikri Estate and out that EPF and SOCSO contribution made not according Employees' Social Security Act 1969, Employee Provident Fund 1991 and employment contract. Details as per below</p> <p>Contractor: Technopalm Resources Sdn Bhd contract number</p>	
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		<p>Tech/LFK/2022</p> <table border="1" data-bbox="1137 403 1933 651"> <thead> <tr> <th>Workers A</th> <th>Total salary</th> <th>Actual amount</th> <th>Amount as per requirement</th> </tr> </thead> <tbody> <tr> <td>EPF Contribution</td> <td rowspan="2">RM1,800</td> <td>RM250</td> <td>13%, RM234</td> </tr> <tr> <td>SOCOSO contribution</td> <td>RM60.35</td> <td>RM32.35</td> </tr> </tbody> </table> <p>EPF and SOCOSO contribution is not according to Employees' Social Security Act 1969, Employee Provident Fund 1991 and employment contract. Thus, Major NC was raised.</p>	Workers A	Total salary	Actual amount	Amount as per requirement	EPF Contribution	RM1,800	RM250	13%, RM234	SOCOSO contribution	RM60.35	RM32.35	
Workers A	Total salary	Actual amount	Amount as per requirement											
EPF Contribution	RM1,800	RM250	13%, RM234											
SOCOSO contribution		RM60.35	RM32.35											
<p>2.2.3</p>	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>Contract agreement for all contracted parties sighted and verified during the audit. There are evidence statement clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. Training for contractors has been done during the stakeholders' consultation meeting conducted 16/11/2022.</p>	<p>Complied</p>											
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>														
<p>2.3.1</p>	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>Addressed in list of direct sourced FFB supply to Sungai Tong Palm Oil Mill. The Palm Oil Mill management managed to obtain the required information from the directly sourced FFB supplier. The information contains details such as:</p> <ul style="list-style-type: none"> - Source of FFB - Address of plantation/dealer - MPOB license and Validity - Coordinate and size of plantation 	<p>Complied</p>											

2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>There are six collection centres supplying FFB to Sungai Tong POM, namely Tan Sing How, Syarikat Warisan, Sentong Sawit, Kim Ma Oil Palm, Pertubuhan Peladang Negeri Terengganu, and MBA Palm Trade. However, the evidence as listed in Indicator 2.3.1. has yet to be obtained for most indirectly sourced FFB by the mill, especially those under Kim Ma Oil Palm, Syarikat Warisan, and MBA Palm Trade. The very high yield/ha in 2022 for Syarikat Warisan and MBA Palm Trade is also an indication that the most of their suppliers has yet to be identified. Thus, Minor NC was raised.</p>	Non-compliance
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>TDM Plantation Sungai Tong POM certification unit has established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. Annual business plan in the form of annual budget and the projection for 5 years (2023-2027) were prepared as guidance for future planning. In estate the business plan was include harvesting, vehicles, operation including medical expenses, upkeep and cultivation. Verified that the business plan contains FFB throughput, mill utilization rate, CPO, OER and KER, costs of production, and CAPEX. Similarly, the mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains.</p> <ol style="list-style-type: none"> 1. FFB Processing & CPO/CPK production forecast 2. Extraction Ratios – OER / KER, 3. Cost of production 4. administration / labour overhead 5. processing cost labour, maintenance, consumables 	Complied

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		<p>6. depreciation and head office charges-</p> <p>7. EVIT running accounts</p> <p>8. CAPEX - capital expenditure.</p>																																			
<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>The long-range replanting programs (LRRP) until 2027 were sighted on all the estates. The program is reviewed annually and incorporated into their annual financial budget. The program sighted for the next 5 years in hectares was as follows:</p> <table border="1" data-bbox="1137 655 1928 1034"> <thead> <tr> <th rowspan="2">Year of Replanting</th> <th colspan="4">Estate / Replanting Ha</th> </tr> <tr> <th>Fikri Estate</th> <th>Jerangau Estate</th> <th>Pelong Estate</th> <th>Tayor Estate</th> </tr> </thead> <tbody> <tr> <td>2023</td> <td>141.27</td> <td>168.21</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>2024</td> <td>114.62</td> <td>0.00</td> <td>0.00</td> <td>207.87</td> </tr> <tr> <td>2025</td> <td>328.83</td> <td>0.00</td> <td>185.44</td> <td>226.14</td> </tr> <tr> <td>2026</td> <td>338.12</td> <td>0.00</td> <td>59.09</td> <td>275.00</td> </tr> <tr> <td>2027</td> <td>320.64</td> <td>0.00</td> <td>0.00</td> <td>205.07</td> </tr> </tbody> </table>	Year of Replanting	Estate / Replanting Ha				Fikri Estate	Jerangau Estate	Pelong Estate	Tayor Estate	2023	141.27	168.21	0.00	0.00	2024	114.62	0.00	0.00	207.87	2025	328.83	0.00	185.44	226.14	2026	338.12	0.00	59.09	275.00	2027	320.64	0.00	0.00	205.07	<p>Complied</p>
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<p>3.1.3</p>	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>The management review was held on a Group basis chaired by the Plantation CEO incorporating all estates and mill in the region. Refer Marketing & Operation Meeting dated 15/09/2022 and Plantation Operation Meeting dated 15/09/2022. The agenda discussed among others includes the following:</p> <ul style="list-style-type: none"> a) Results of internal audits b) Customer feedback c) Process performance and product conformity d) Status of preventive & corrective actions 	<p>Complied</p>																																		

		<p>e) Follow up action from management review</p> <p>f) Changes that could affect the management system</p> <p>g) Recommendation for improvement</p> <p>h) Human Resources</p>	
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The action plans for continuous improvement were documented in various formats such as:</p> <ul style="list-style-type: none"> • Optimising the yield of the supply base (Criterion 3.1) • Reduction in use of pesticides through implementation of IPM (Criterion 7.2) • Environmental impacts (Criteria 3.4, 7.6 and 7.7) • Waste reduction (Criterion 7.3) • Pollution and greenhouse gas (GHG) emissions (Criterion 7.10) • Impacts on communities, workers, and smallholders (Principle 6) • Integrated management of HCV-HCS, peatland and other conservation areas (Criteria 7.7 and 7.12) <p>The sampled operating units are implementing the action plans accordingly. Progress of the plans were also discussed in the management review meetings.</p>	Complied
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p>	<p>RSPO metric template version 2.1 is used for the reporting of TDM Sungai Tong 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 November 2021 – October 2022 (counting back from audit month). Based on verification with input data, no discrepancies of data</p>	Complied

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	<p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>reported for the said period for all metrics. Based on verification through various documents such as land titles, JKPP report, employees register, computer software recording system, to name a few, the data reported in the metrics template were found to be accurate.</p>	
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
<p>3.3.1</p>	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedure has been developed for the Mill and Estate for guidance in all operation conducted in the site.</p> <p>Sample of Mill SOP were listed below:</p> <ol style="list-style-type: none"> 1. Weighbridge dated 01/05/2011 2. Threshing Station dated 01/05/2011 3. Boiler Station dated 01/05/2011 4. Water Sampling dated 01/05/2022 5. Safety and Security Practice dated 01/05/2022 <p>Sample of the Estate SOP were listed below:</p> <ol style="list-style-type: none"> 1. HIRARC Procedure dated 01/12/2022 2. Procedure of First Aid Management dated 01/10/2022 3. Supply Chain SOP – IP & MB Module dated 01/01/2022 4. Schedule Waste Revision Nov 2021 5. Working at Height dated Nov 2020 6. Permit To Work Revision Nov 2020 <p>For Daily operation, Estate was referred to the Standard Operating Procedure</p> <p>The Manuals are also kept in the administration office to facilitate reference by any interested parties. The procedures were communicated to workers through training and infield supervision.</p>	<p>Complied</p>

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		Site inspection and interview with workers confirmed that the SOPs had been implemented and the employees understood the requirements of the SOPs.	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	<p>The mechanism to check the consistency of estate and mill implementation of their procedures includes Mill/Plantation Advisor Visit, Plantation Controller, Agronomist visit and Internal Audit.</p> <p>However, the standard operating procedures was not consistently implemented.</p> <p>During site visit at Pelong Estate, P21A and P18A2, it was noted portion of chemical activities near the water ways. It was not in line with Standard Operating Procedure Immature upkeep dated 01/05/2011 Section 5.1.1: Do not pollute waterways and 4.1.14.6: Water way must not be contaminated by the chemical used for the job. Thus, Minor NC was raised.</p>	Non-compliance
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<p>Operating units visited maintained all records of monitoring and available for review. There are several levels of records beginning from the field/mill supervisors to executives and the Managers. The Plantation Controller (PC) are accountable to monitor the estates compliance towards the SOP, Budget and Productivity among others. Estates / Mill performances are reviewed during the monthly meeting with PC/CE/CEO. Refer sample of monitoring report as below:</p> <p><u>Fikri Estate</u></p> <p>1. Internal Audit report dated 19/07/2022</p> <p><u>Jerangau Estate</u></p> <p>a. Internal Audit Report dated 11/08/2022</p> <p>b. Plantation Advisory Report dated 11/03/2020</p> <p><u>Sungai Tong POM</u></p>	Complied

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		Internal Audit Report dated 19/06/2022	
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting or new operation within the Sungai Tong POM certification unit. Nevertheless, the management unit has carried out a baseline Social Impact Assessment in 2021. The assessment was done by external consultant under SRA consultancy from 18/03/21 to 19/04/21. The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into a management plan. The report includes both positive and negative impact and its recommendation. For Sungai Tong POM, new assessment has been conducted by Green Sustainability Resources Sdn Bhd on 19/10/2022 but report still pending for finalization.</p> <p>The operating units has conducted environmental aspect and impacts analysis of all operations as per SOP established and documented in Standard Operating Procedure – Environmental Aspects/Impacts Evaluation date 01/11/2017, edition TDMP/01 rev. TDMP – 01/2017.</p> <p>The management review the environmental aspects impacts on annually basis or if there is changes in the legal or estate/mill operation. Latest review on the environmental aspect impact was conducted on 17/05/2022.</p>	Complied
3.4.2	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.	SIA management plan for Sungai Tong POM has been established and documented in the document "Social action plan revision 2022/2023 which has been reviewed on 20/10/2022 and included recommendation by assessor in the SIA report. There is evidence	Complied

	<p>- Minor Compliance -</p>	<p>that all issues that has been highlighted by the stakeholders has been included in the management plan. Sample as per below</p> <ul style="list-style-type: none"> a. Contractors’ management and due diligence where the management has plan to monitor compliance for contractor`s with legal requirement (EPF, SOCSO, EIS contribution, minimum wages, employment contract) b. Request by female workers for prayer room for women in the office- respond by the management, for time being, female employees may use the nursing for prayers. <p><u>Jerangau Estate</u></p> <p>SIA management plan established in the document “SIA management plan 2022”. Several management plan has been established as per below</p> <ul style="list-style-type: none"> a. Poor facilities and infrastructure b. No communication of complaint procedure between employer and employee c. Contractor due diligence <p><u>Pelung Estate</u></p> <p>SIA management plan established in the document “SIA management plan 2022”. Several management plan has been established as per below</p> <ul style="list-style-type: none"> a. Contribution to stakeholders b. Pregnant women assessment <p><u>Taylor Estate</u></p> <p>SIA management plan established in the document “SIA management plan 2022”. Recommendation by social impact assessor and has been documented in the Social Action Plan</p>	
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		<p>revision 2022/2023. Several management plan has been established as per below.</p> <ul style="list-style-type: none"> a. To conduct briefing to the contractors on legal and RSPO requirement b. To conduct social activities between the management and local communities c. Communication of the complaint procedure to all the workers <p>The operating units have established the Environmental Management Plan base on the Environmental Risk Assessment conducted. The management plan was reviewed on annually basis during Environmental Risk Assessment Review.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Implementation of the management plan has been verified. Detail as per below</p> <p><u>Sungai Tong POM</u></p> <ul style="list-style-type: none"> a. Complaint box has been placed at canteen for workers to make any complaint b. Appointment for mill manager as person in charge for any social issues verified base on appointment letter dated 17/10/2021 c. All workers have been provided with safety helmet as per stated in the PPE statement. <p>Jerangau Estate</p> <ul style="list-style-type: none"> a. Poor facilities and infrastructure- CAPEX budget has been approved for new housing in year 2022 but has been postpone to next year 2023 with 2 blocks of Semi D total RM192,000 has been allocated. b. No communication of complaint procedure between employer and employee 	Complied

		<p>c. Contractor due diligence</p> <p><u>Pelung Estate</u></p> <p>a. Contribution to stakeholders- Contribution has been made to local communities as per below</p> <ul style="list-style-type: none"> i. Contribution to SMK Pelong for PIBG meeting ii. Baby equipment contribution to new mother iii. contribution for Takraw tournament for Kampung Seri Kenangana <p>b. Pregnant women assessment has been conducted to 1 pregnant women on 14/10/2022</p> <p><u>Taylor Estate</u></p> <p>a. To conduct briefing to the contractors on legal and RSPO requirement- conducted on 16/11/2022 during the stakeholders meeting.</p> <p>b. To conduct social activities between the management and local communities</p> <p>Communication of the complaint procedure to all the workers- conducted on 13/10/2022 to all workers during the mustercall</p> <p>The operating units have established the Environmental Management Plan base on the Environmental Risk Assessment conducted. Reviewed the implementation of the management plan as follows:</p> <p>Estate</p> <ul style="list-style-type: none"> 1. Reduce usage of chemicals by construct the Barn Owl Boxes and machine grass cuttings 2. Place a try under the vehicle to avoid any contamination of soil from lubricant spillage 	
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		<ol style="list-style-type: none"> 3. Prohibiting of open burning activities and create awareness to stakeholders from estate campaign and training 4. Establishment of planting Guatemala grass at buffer zone area for tighten the soil structure 5. Create awareness to workers on 3R Reduce, Reuse, Recycle programme <p>Mill</p> <ol style="list-style-type: none"> 1. To prevent the leakage of kernel oil from bunker, the mill has placed oil tray under the bunker. 2. The mill avoids any leachate come from EFB, the mill has in progress to build new EFB dumping site. The tender has been awarded as per Letter of Award no. TDMP 27/22 dated 14/09/2022. 3. To the greenhouse gases release by the methane gas, the mill has completed the construction of Biogas Plant. The initial operation date test was held on 27/01/2022 and the agreement has been signed with TNB. 4. To optimize water usage, the mill has placed water containers for rain harvesting at places such as workshop and stores. The rainwater harvested were used to water plant, washing tractors and chemical mixing. 5. To ensure no leachate from bio compost application flow into natural river, the estate has stop application of bio compost during rainy season and the application was done at area far from natural river. 	
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Criterion 3.5: A system for managing human resources is in place.

<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>TDM Plantation Sdn Bhd has an SOP for recruitment of mill and estates. SOP named "Pengurusan Tenaga Kerja Tamu" , TDMP/SOP-OD/01 dated 1st March 2019. SOP for local workers (mill and estates) documented under "Prosedur Perlantikan Pekerja Ladang and Kilang", TDMP/SMP/3/01.01 dated 2nd November 2016.</p> <p>The SOP specifies that recruitment, selection and hiring process involves vetting and interviews, and must be medically fit. Promotions are at the sole discretion of the Company. Retirement age is fixed at 60 for local and termination of employment can be given mutually subject to the terms of the employment contract and Employment Act 1955.</p> <p>For foreign workers, or guest workers, the SOP for recruitment, hiring involves interview, selection based on age, qualification, and agricultural experience. Retirement and termination are as per Employment Act 1955 and employment contracts.</p>	<p>Complied</p>
<p>3.5.2</p>	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>As at the day of the audit, there is no new recruitment for foreign workers in year 2020, 2021 and 2022 due to government action to stop any new recruitment from other countries due to COVID 19 pandemic. As per interview, the management expected to receive 300 new foreign workers by December 2022 and will be distributed to all estates under TDM Plantation Sdn Bhd.</p> <p>Sample of employment and recruitment has been taken for local workers sample estates</p> <p>Jerangau Estate</p> <p>a. Muhammad Ikmal Azhar bin Mohamed Zulkiflie</p> <p>b. Muhammad aliff Aiman bin Othman</p> <p><u>Fikri Estate</u></p> <p>a. <u>0107xx-xx-xx04</u></p>	<p>Complied</p>

		b. <u>7301xx-xx-xx56</u>																	
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>Appropriate risk control measures were determined and implemented for the respective activities and operation.</p> <p>CHRA was last conducted at the sampled management unit as follows:</p> <table border="1"> <thead> <tr> <th>Estates/ Mill</th> <th>Date of assessment</th> <th>Report ref. No.</th> <th>Assessor Reg. No.</th> </tr> </thead> <tbody> <tr> <td>Fikri</td> <td>23/06/2020</td> <td>JKKP HQ/10/ASS/00/ 8 2020/047</td> <td>JKKP HQ/10/ASS/00/8</td> </tr> <tr> <td>STPOM</td> <td>05/08/2019</td> <td>HQ/08/ASS/00/ 259-2019/005</td> <td>HQ/08/ASS/00/2 59</td> </tr> <tr> <td>Jerangau</td> <td>15/03/2022</td> <td>JKKP HQ/10/ASS/00/ 8 2022/014</td> <td>JKKP HQ/10/ASS/00/8</td> </tr> </tbody> </table>	Estates/ Mill	Date of assessment	Report ref. No.	Assessor Reg. No.	Fikri	23/06/2020	JKKP HQ/10/ASS/00/ 8 2020/047	JKKP HQ/10/ASS/00/8	STPOM	05/08/2019	HQ/08/ASS/00/ 259-2019/005	HQ/08/ASS/00/2 59	Jerangau	15/03/2022	JKKP HQ/10/ASS/00/ 8 2022/014	JKKP HQ/10/ASS/00/8	Complied
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Fikri	23/06/2020	JKKP HQ/10/ASS/00/ 8 2020/047	JKKP HQ/10/ASS/00/8																
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Jerangau	15/03/2022	JKKP HQ/10/ASS/00/ 8 2022/014	JKKP HQ/10/ASS/00/8																

		Pelung	25/11/2019	HQ/08/ASS/00/259-2019/009	HQ/08/ASS/00/259	
		Tayor	08/03/2022	JKKP HQ/10/ASS/00/8 2022/013	JKKP HQ/10/ASS/00/8	
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>TDM has maintained the approved Health and Safety Policy dated 01/01/2022 that is displayed prominently on notice boards in English/Bahasa Malaysia. It was signed by the Chief Executive Officer. Safety & Health Management Plan was available accordingly for year 2022. Apart from daily routine supervision, among the methods to monitor the effectiveness of the H&S plan are SHO Workplace Inspection, internal audits, safety committee meetings, medical surveillance, and audiometric test. Records of monitoring were made available for verification by the sampled management units. However, the monitoring of the H&S plan was not adequately implemented as the following lapses found:</p> <ol style="list-style-type: none"> 1. Based on the HIRARC records, the monitoring of identification of some safety hazards was not effectively implemented. Among the activities which has yet to be registered in the HIRARC were: <ul style="list-style-type: none"> - Working at height during putting on net to cover FFB in a truck (Jerangau, and Pelung Estate) - Working at height during removing of net that is covering FFB in a truck (Pelung Estate) 2. Fikri and Tayor estates have been using scissor lift trailer attached to farm tractor in their FFB evacuation operation. However, there is no evidence that the estates have obtained the certificate of fitness in accordance with the Factories and 				Non-compliance

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		Machinery (Notification, Certificate of Fitness and Inspection) Regulations, 1970. Thus, Major NC was raised.																																																	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.																																																			
3.7.1	(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. - Critical (Major) compliance -	The annual training program has been established and documented in the OSH Plan, Training Matrix & Training Schedule covering all aspects of the RSPO elements. The training program also specified the target group of employees to be trained under the allocated subjects. The programme mainly covers both requirement of the estates and mill in the CU.	Complied																																																
3.7.2	Records of training are maintained. - Minor Compliance -	Records of training were maintained by the mill and estates and made available for verification. Among the records verified are as follows: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th rowspan="2">No</th> <th rowspan="2">Trainings</th> <th colspan="3">Date (Year 2022)</th> </tr> <tr> <th>Jerangau</th> <th>Fikri</th> <th>Pelung</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>OSH Legal compliance</td> <td>22/04</td> <td>25/01</td> <td>04/04</td> </tr> <tr> <td>2</td> <td>Emergency response plan</td> <td>28/08</td> <td>09/02</td> <td>16/06</td> </tr> <tr> <td>3</td> <td>HIRARC</td> <td>31/05</td> <td>25/01</td> <td>07/04</td> </tr> <tr> <td>4</td> <td>First aid</td> <td>17/07</td> <td>18/01</td> <td>02/02</td> </tr> <tr> <td>5</td> <td>Fire fighting</td> <td>15/06</td> <td>19/06</td> <td>24/05</td> </tr> <tr> <td>6</td> <td>Manuring</td> <td>17/02</td> <td>20/03</td> <td>10/03</td> </tr> <tr> <td>7</td> <td>Spraying</td> <td>24/02</td> <td>18/04</td> <td>19/06</td> </tr> <tr> <td>8</td> <td>Policies</td> <td>11/01</td> <td>03/01</td> <td>09/01</td> </tr> </tbody> </table>	No	Trainings	Date (Year 2022)			Jerangau	Fikri	Pelung	1	OSH Legal compliance	22/04	25/01	04/04	2	Emergency response plan	28/08	09/02	16/06	3	HIRARC	31/05	25/01	07/04	4	First aid	17/07	18/01	02/02	5	Fire fighting	15/06	19/06	24/05	6	Manuring	17/02	20/03	10/03	7	Spraying	24/02	18/04	19/06	8	Policies	11/01	03/01	09/01	Complied
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3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>Training on supply chain was last conducted by the mill on 04/08/2022. It was attended by personnel from various department such as administration, weighbridge, laboratory, and security. Record of attendance was made available for verification.</p>	Complied																				
<p>Criterion 3.8: Supply chain requirement for mills</p>																							

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(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	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	NA as the mill opted for MB.	Complied
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	Sg Tong POM received and processed both RSPO certified and uncertified FFB from plantations/estates, outgrowers and FFB Traders and claim only the volume of oil palm products produced from processing of the certified FFB as MB certified.	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. The actual tonnage produced from last audit date is reported in the summary in Table 7 and 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.	The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:	Complied

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		<ul style="list-style-type: none"> – Members ID: RSPO_PO1000001113 – Member category: Oil Mill <p>Details of transaction can be seen in Table 11A of this report.</p>	
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able 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>Documented Procedures were made available for verification and the requirements have been adhered to as follows:</p> <ul style="list-style-type: none"> a) RSPO Supply Chain Standard Operating Procedure (Identity Preserved & Mass Balance), doc. No. TDM/TRCBLT/04, rev. SCCS-02/2022 b) Complete and up to date records and reports in relation to RSPO SCCS were maintained and available for verification. Among the records available were Mass Balance Sheet, Internal Audit Reports, and SCCS Training records to name a few c) TDM Plantation Sdn Bhd have identified and appointed the Mill Manager as the PIC for RSPO Supply Chain Certification Standard requirements as stated in the appointment letter dated 07/07/2019, undersigned by Pengurus Pentadbiran Perladangan TDM Plantations Sdn Bhd. (Doc Reference Number: TDMP/OD/SUST/SCCS) d) Procedures for receiving and processing certified and non-certified FFBS were addressed in the Standard Operating Procedure for RSPO Supply Chain (Identity Preserved and Mass Balance Module), doc. No. TDM/TRCBLT/04, rev. SCCS-02/2022 	Complied
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: 	<p>The procedure to conduct annual internal audit is addressed in the RSPO Supply Chain Standard Operating Procedure (Identity Preserved & Mass Balance), doc. No. TDM/TRCBLT/04, rev. SCCS-02/2022. The last internal audit was conducted on 04/09/2022 by the S&H Officer. Based on the internal audit report and checklist,</p>	Complied

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	<p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>the elements of RSPO supply chain were adequately covered including the RSPO Market Communications and Claims elements. There was no non-conformity report raised from the internal audit. Should there be any non-conformity, corrective action shall be established to rectify the lapse found. The status of the non-conformity shall also be discussed in the management review meeting.</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>Sungai Tong POM maintain the daily records of all certified and uncertified FFB received and documented in daily processing records. The records include the FFB suppliers, weight, and vehicle transportation details. The mill has maintained records of FFB received such as Delivery Notes and Weighbridge operator. Sample of FFB delivery records:</p> <p>Incoming FFB</p> <p>TDM Certified Supply Base</p> <ul style="list-style-type: none"> - Company: TDM Plantation Sdn Bhd - Estate: Jaya Estate - Certified No: RSPO595564 - Date: 15/09/2021 - Ticket Number: STP22347748 - Vehicle Number: TBX8236 - Field / Block: PM05A1J - FFB Weight: 7.77 Mt <p>TDM Certified Supply Base</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> - Company: TDM Plantation Sdn Bhd - Estate: Tayor Estate - Certified No: RSPO595564 - Date: 29/06/2022 - Ticket Number: STP22343671 - Vehicle Number: TAK6958 - Field / Block: PM98A3T - FFB Weight: 8.13 Mt <p>Non-Certified 3rd Party FFB</p> <ul style="list-style-type: none"> - Company: Pusat Timbang Komuniti - Estate: Syarikat Warisan - Date: 20/06/2022 - Ticket Number: STP22343273 - Vehicle Number: DBX 3749 - FFB Weight: 9.14 Mt <p>Mechanism to handle non-conforming FFB and documents has been detailed up in the Procedure RSPO Supply Chain Section 6 Receiving FFB At The Mill.</p>	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <p>a) The name and address of the buyer;</p>	<p>Sungai Tong POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p>CPO - MB</p> <ul style="list-style-type: none"> a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; TDM Plantation Sdn Bhd c) The loading or shipment / delivery date; 24/05/2022 d) The date on which the documents were issued; 24/05/2022 	Complied

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	<ul style="list-style-type: none"> b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<ul style="list-style-type: none"> e) RSPO Certificate Number: RSPO 595564 f) A description of the product: CPO MB g) The quantity of the products delivered; 41.72 Mt h) Any related transport documentation; VGN 8396 i) A unique identification number: TDMXXXXXX <p>PK - MB</p> <ul style="list-style-type: none"> a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; TDM Plantation Sdn Bhd c) The loading or shipment / delivery date; 01/08/2022 d) The date on which the documents were issued; 01/08/2022 e) RSPO Certificate Number: RSPO 595564 f) A description of the product: PK MB g) The quantity of the products delivered; 47.04 Mt h) Any related transport documentation; VCB7771 <p>A unique identification number: TDMXXXXXX</p>	
<p>3.8.9</p>	<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: <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 	<p>TDM Plantation Sdn. Bhd. has established Standard Operating Procedure for RSPO Supply Chain (Identity Preserved and Mass Balance Module). Refer Document Edition: TDM/TRCBLT/04; Revision: SCCS – 02/2022; Document Date: 01/01/2022 under section 11: Outsourced contractors.</p> <ul style="list-style-type: none"> i. Stated in the SOP, CPO mill cannot outsource processing activities like refining or crushing. Outsourcing activities for Sungai Tong POM was for CPO and PK transportation. ii. Sighted the contract agreement between TDM Plantation Sdn. Bhd and contractor; <ul style="list-style-type: none"> a) Sungai Tong POM has legal ownership of all input material to be included in the outsourced process. Refer listing of 	<p>Complied</p>

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	<p>that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>FFB Supplier Certified and Non-Certified. The contract agreement and details like MPOB licence were kept in the file.</p> <p>b) Refer Contract Agreement between TDM Plantation Sdn Bhd and MNAN Resources Sdn Bhd (CPO and PK Transporter) dated 31/10/2022; Contract Renewal; Reference Number TDMP/OD/09/01/32; Dated 02/12/2022.</p> <p>c) The mill trades CSPO and CSPK with its buyers among refineries and/or oleo-chemical plants. Based on agreements, transporter has no ownership of transported products and owned by buyer.</p> <p>The contract agreements specified that all transporters are required to fulfil and comply with applicable legal requirements as well as TDM own requirements which include the RSPO. Refer Additional term (12).</p>	
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.	Names and contact details of transporters used for the physical handling of RSPO certified oil palm products were recorded and registered in the mill supplier database system.	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.	Names and contact details of any new transporter used for the physical handling of RSPO certified oil palm products to be informed by mill supply chain PIC upon available.	Complied
3.8.12	<p>Record keeping</p> <p>a. 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.</p> <p>b. Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory</p>	<p>Accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements available for verification.</p> <p>1. Sg Tong POM has kept the records such as SOP, training, dispatch note as per RSPO SCC Standard February 2020 requirement. Sampled seen as per 5.4.1, 5.6.1.</p>	Complied

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	<p>requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>c. 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>d. For Mass Balance Module, the mill:</p> <p>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.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.</p>	<p>2. The records are kept for 5 years as per own established SOP, TDM/TRCBLT/04, SCCS-01/2020 dated 01/12/2020.</p> <p>3. Not applicable.</p> <p>4. Based on verification of MB accounting which the mill opted for real time basis recording, it was found that the certified CPO was always delivered from positive stock. There was no short sale recorded within the last review period. Closing stock for November 2021; CPO: 1,307.45 MT, PK: 164.95 MT</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>The oil extraction rate (OER) and the kernel extraction rate (KER) estimate is based on past experience and extraction rate potential (budget) for the next financial year. For the last reporting period, OER and KER reported at 18.55% and 4.66%.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Extraction rate recorded at (OER) 18.55 % and (KER) 4.66 % for the last review period from November 2021 to November 2022.</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</p>	<p>Not applicable. Sg Tong POM is under mass balance module.</p>	Complied

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	palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.		
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Sg Tong POM take legal ownership and physically handle RSPO Certified Sustainable oil palm products (CPO and PK) and registered all transaction in the RSPO IT platform. RSPO ID: RSPO_PO1000001113, license valid until 26-03-2023</p> <p>Declaration time to do shipping announcement is within three-month period after shipment or within the duration agreed by mill's respective customers/buyers as defined in the SOP under clause 8.4.</p> <p>Details of shipping announcement can be found under appendix D of the report.</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>TDM Sungai Tong POM does not use any RSPO trademark or logo in any general corporate communication. This was evident through verification of the company website, invoices, letter head, contract with customers and others relevant records. The corporate communication is managed at TDM Plantations at HQ level.</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p> <p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p> <p>d. State the member's history with regard to the RSPO.</p>	<p>No off-product claim made by TDM Sungai Tong POM as to date.</p>	Complied

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	e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org ' where the link must lead to the member's profile page.		
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.	No off-product claim made by TDM Sungai Tong POM as to date.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	No off-product claim made by TDM Sungai Tong POM as to date.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by TDM Sungai Tong 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. Verified the weighbridge tickets to buyer where claim of CSPO (Mass Balance) was stamped on the tickets.	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 the product is CSPO (Mass Balance) with RSPO certificate number: RSPO 595564.	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	Sungai Tong POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable

	<p>product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
<p>MODULE B – MASS BALANCE SPECIFIC RULES</p>			
<p>Minimum Mass Balance content</p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>Oil palm content for CPO and PK is 100% RSPO MB certified. There was no mixture of non-certified oil palm content when MB claim is made.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>Sungai Tong POM only applies MB model and the conventional CPO are downgraded from MB whenever demanded.</p>	<p>Complied</p>
<p>Labelling and trademark (MB)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> Surrounded by the text: ‘Certified sustainable palm oil’. The RSPO label MUST contain the tag ‘MIXED’. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag ‘MIXED’ on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. 	<p>No RSPO label used as CPO and PK is semi-finished product.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>No RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product.</p>	<p>Complied</p>
Principle 4: Respect community and human rights and deliver benefits			

Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Human right Policy was developed and implemented in TDM Plantation Sdn Bhd that has been signed by CEO, Hamdan Ibrahim dated 01/01/2022. The policy has communicated to all workers during the morning mustercall for all operating units while for stakeholders it has been communicated during the stakeholders meeting conducted on 26/09/2022. <u>The procedure has been made available where it has been posted at the notice board at each operating units.</u></p> <p>This Policy is documented and affirms the Company’s commitment to support the principle of Universal Declaration of Human Rights and ILO Core Convention ON Labour Standards as to identify, evaluate and manage the social impact on human rights.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>TDM Plantation Sdn Bhd prohibits any form of harassment in their operation as per the policy above. Interviewed with the workers confirmed that no harassment by the management.</p>	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring 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>TDM Plantation Sdn Bhd has developed the grievances Procedure – Carta Aliran Pendendalian Isu Social (Stakeholder) (Aduan / Rungutan / Permohonan) / Social issues Flowchart (stakeholders) (Complaint/Application), rev.2/2017. The information / issue reported shall be rectify according to type of communication. E.g. Prosedur Komunikasi Dengan Pihak Kilang / Ladang, within 28 days & Prosedur Aduan / Rungutan; within 28 working days which include discussion with relevant parties, manager and top management. If further action request is involved Head Office, then the management will submit the request to Head Office for further approval and shall be rectified within 30 working day.</p>	Complied

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		<p>Other than that, any complaint can be lodge through the whistle blowing procedure. Disclosure or report can be made to any of the following dedicated reporting channels, in a strictly confidential manner:-</p> <ul style="list-style-type: none"> a) Secured email address at whistleblowing@tdmberhad.com.my b) By writing c) Meet in person with the Head of Compliance, Integrity & Sustainability at the following address 	
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>To ensure understanding of all affected and/or illiterate parties, the information is provided in local language and briefed to workers during muster and stakeholder meeting.</p> <ul style="list-style-type: none"> a. Sungai Tong POM- Training for policy will briefed every Monday during morning muster call. Sample has been taken communication on 13/06/2022 and 24/01/2022 b. Tayor Estate – 13/10/2022 c. Fikri Estate- 22/02/2022 	Complied
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p><u>Fikri Estate</u></p> <p>There are no grievances has been raised by the workers for year 2022 only report of house need repair. There is evidence that all housing repair complaint has been responded as per SOPs.</p> <p><u>Sungai Tong POM</u></p> <p>There are no grievances has been raised by the workers for year 2022 only report of house need repair. There is evidence that all housing repair complaint has been responded as per SOPs.</p> <p><u>Jerangau Estate</u></p> <p>There are no grievances has been raised by the workers for year 2022 only report of house need repair. There is evidence that all housing repair complaint has been responded as per SOPs</p>	Complied

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		<p><u>Tayor Estate</u></p> <p>There are no grievances has been raised by the workers for year 2022 only report of house need repair. There is evidence that all housing repair complaint has been responded as per SOPs</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>Conflict resolution mechanism is defined in the flowchart named Communication Procedure – Carta Aliran Pendendalian Isu Sosial (Stakeholder) (Aduan / Rungutan / Permohonan) / Social issues Flowchart (stakeholders) (Complaint/Application), rev.2/2017. Mediation included in consultation process for resolution which to allow party to be represented as in this case, union such as NUPW or other workers representative.</p>	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p><u>Fikri Estate</u></p> <p>a) 29/11/2022 by JP KK, Kampung Banggol Setar, for application for grass cutting machine</p> <p>b) 27/10/2022 reference number SKFFSR.600-3/1/4 (18) to SK Kampung Fikiri Sungai Tong to use estate van for volleyball team to SK Lembah Jaya</p> <p>c) 11/10/2022 by JP KK, Kampung Langkap, Terengganu for application for grass cutting machine</p> <p><u>Sungai Tong POM</u></p> <p>a) Contribution to Klinik Kesihatan Sungai Tong for advisor activity training</p> <p>b) Study tours from Sekolah Kebangsaan Kampung Fikri</p> <p>c) Application to take sample from Universiti Malaysia Terengganu for final year project</p> <p>d) Application to conduct research by UNISZA</p>	Complied

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		<p><u>Jerangau Estate</u></p> <p>a) Contribution for sports for JPPK Tok Dor for sports event b) PIBG SK Landas, to borrow cooking equipment for Bubur Asyura c) Contribution for Biro Wanita Ladang Jerangau for fishing competition</p> <p><u>Pelong Estate</u></p> <p>Contribution to stakeholders as per below</p> <p>a) Contribution to SMK Pelong for PIBG meeting b) Baby equipment contribution to new mother c) Contribution for Takraw tournament for Kampung Seri Kenangan</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.												
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Land titles are available to demonstrate evidence of land leases. The land titles contain information on lessee, hectareage, terms and conditions of lease period and grant numbers.</p> <p>The following land titles were sampled:</p> <p><u>Sungai Tong POM</u></p> <p>Sungai Tong POM is located under Fikri Estate with total hectareage of the 35.59Ha and leased under Kumpulan Ladang-Ladang Terengganu Sdn Bhd.</p> <p><u>Fikri Estate</u></p> <p>Total 23 land titles sighted for Fikri Estate with total hectareage of 3,611.02 Ha. Sample as per below</p> <table border="1" data-bbox="1137 1254 1921 1398"> <thead> <tr> <th>No</th> <th>Lot number</th> <th>Area (Ha)</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>6558</td> <td>19.22</td> </tr> <tr> <td>2.</td> <td>7662</td> <td>128.68</td> </tr> </tbody> </table>	No	Lot number	Area (Ha)	1.	6558	19.22	2.	7662	128.68	Complied
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4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	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,	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Complied																																	

	including information on the steps that are taken to involve them in decision making. - Minor compliance -		
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 -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	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 -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	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 -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Complied
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 -	Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.	Complied

4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>Based on documentation review, observations made, interviews with management and stakeholders, there is no evidence that the land for oil palm has diminished the legal, customary or user rights of other users without their free, prior and informed consent.</p>	Complied																											
<p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>																														
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p><u>Sungai Tong POM</u> Sungai Tong POM is located under Fikri Estate with total hectareage of the 35.59Ha and leased under Kumpulan Ladang-Ladang Terengganu Sdn Bhd.</p> <p><u>Fikri Estate</u> Total 23 land titles sighted for Fikri Estate with total hectareage of 3,611.02 Ha. Sample as per below</p> <table border="1" data-bbox="1137 858 1921 1107"> <thead> <tr> <th>No</th> <th>Lot number</th> <th>Area (Ha)</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>6558</td> <td>19.22</td> </tr> <tr> <td>2.</td> <td>7662</td> <td>128.68</td> </tr> <tr> <td>3.</td> <td>7663</td> <td>58.77</td> </tr> <tr> <td>4.</td> <td>8169/10541</td> <td>143.34</td> </tr> </tbody> </table> <p><u>Pelong Estate</u> Total 2 land titles for Pelong Estate. Details as per below</p> <table border="1" data-bbox="1137 1197 1921 1347"> <thead> <tr> <th>No</th> <th>Lot number</th> <th>Area (Ha)</th> <th>Land usage</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>HSD1235</td> <td>3002</td> <td>Agriculture</td> </tr> <tr> <td>2</td> <td>8124</td> <td>10.20</td> <td>Building</td> </tr> </tbody> </table>	No	Lot number	Area (Ha)	1.	6558	19.22	2.	7662	128.68	3.	7663	58.77	4.	8169/10541	143.34	No	Lot number	Area (Ha)	Land usage	1	HSD1235	3002	Agriculture	2	8124	10.20	Building	Complied
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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. - Critical (Major) compliance -</p>	<p>Sungai Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.</p>	Complied															
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -</p>	<p>Sungai Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.</p>	Complied															

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4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	Sungai Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	Sungai Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	Sungai Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	Sungai Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	Sungai Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area.	Complied

Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Sungai Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area. Documented procedure is in place as per "Flowchart and Procedures On Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017; that states the process of resolve the land dispute issues. Objectives of the procedure is to ensure the land dispute is resolved in timely manner. Types of disputes are such as disputes over land boundaries, conflicts with land-owners and land ownerships. Verification process of conflict will be carried out and affected stakeholders need to be informed. Compensation and negotiation process will be carried out as per the mutual agreement of both parties.</p>	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Sungai Tong POM Certification Unit and supply base did not carry out any new plantings since November 2005. The immature areas are replanted area. Documented procedure is in place as per "Flowchart and Procedures On Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017; that states the process of resolve the land dispute issues. Objectives of the procedure is to ensure the land dispute is resolved in timely manner. Types of disputes are such as disputes over land boundaries, conflicts with land-owners and land ownerships. Verification process of conflict will be carried out and affected stakeholders need to be informed. Compensation and negotiation process will be carried out as per the mutual agreement of both parties.</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>No scheme smallholdings within Sungai Tong POM certification unit. Equal opportunities are provided to both men and women</p>	Complied

	- Minor compliance -	mentioned in the said procedure if there is any customary right issues occurs in future development and new acquisition.	
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	At the point of audit, there was no process and outcomes of any negotiated agreements, compensation and payments reported.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	There is a guidance procedure for "Flowchart and Procedures On Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -	There is a guidance procedure for "Flowchart and Procedures On Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOP-ESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	No customary land authorized by customary landowners through FPIC process within Sungai Tong POM certification unit. Thus, this indicator is not applicable	Complied
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	There is no customary right land in all operating unit under Sungai Tong Complex.	Complied

	- Minor compliance -		
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 certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	There is no customary right land in all operating unit under Sungai Tong Complex.	Complied
4.8.3	<p>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)</p> <p>- Minor compliance -</p>	There is no customary right land in all operating unit under Sungai Tong Complex.	Complied
4.8.4	<p>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).</p> <p>- Minor compliance -</p>	There is no customary right land in all operating unit under Sungai Tong Complex.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	Current and previous FFB prices were displayed at the weighbridge office for the suppliers to refer. The calculation of price can be provided to the suppliers upon request. As for the collection centres, pricing is depending on contract agreements. The explanation about the pricing is provided upon signing the agreement. Any enquiry about the price is welcome and can be made through phone call or physical meeting.	Complied

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5.1.2	<p>(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 -</p>	<p>The explanation about FFB pricing was made normally through stakeholders meeting or upon request. Minutes of meeting were made available for verification.</p>	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>FFB pricing is based on the MPOB Monthly Average Price for CPO and PK and the OER and KER awarded by Sungai Tong POM. This can be evident through verification of the Self Billed Invoice to the FFB Suppliers. There has been no grievance reported with regards to unfair pricing since the last assessment.</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>There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -</p>	<p>Contract agreements between Sg Tong POM and its FFB suppliers were made available for verification. Among the terms and conditions included in the agreement were FFB pricing, method and time of payment, FFB quality, and legal compliance obligations to name a few. Signatures by both parties were clearly available in the agreements and so far, there was no grievance with regards of unfairness 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>Sungai Tong POM ensures that all agreed payments to its Outsider FFB Suppliers are made in a timely manner in accordance with the contract agreement. Samples of payment verified as follows: - Tan Sing How, payment voucher #PV22000474, dated 13/09/2022</p>	Complied

		- Warisan, payment voucher #PV22080076, dated 18/09/2022	
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Weighbridges were calibrated on an annual basis to ensure no discrepancies in the payments made to the FFB suppliers. Calibration details are as follows:</p> <p>Weighbridge 1 No. Siri Alat: B849884849; Nombor Pelekat Keselamatan: 2.1KQ 038530; Receipt Number: B2002718; Description: MPK(E) Mettler Toleou 70,000 Kg; Done By: Metrology Corporation Malaysia Sdn Bhd; Date: 21/09/2022</p> <p>Weighbridge 2 No. Siri Alat: E17618-0275; Nombor Pelekat Keselamatan: 2.1KQ 038531; Receipt Number: B2002719; Description: MPK(E) Cardinal 205 80,000 Kg; Done By: Metrology Corporation Malaysia Sdn Bhd. Date: 21/09/2022.</p>	Complied
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Complied
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Complied

	supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -		
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 -	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There are no smallholders directly under the Sungai Tong certification unit as they only receive FFB from outgrowers and FFB Traders.	Complied
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 -	Gender Policy was developed and implemented in TDM Plantation Sdn Bhd that has been signed by CEO, Hamdan Ibrahim dated 01/01/2022 where the company has the responsibility to take care the rights of workers. Stated in the policy that the management is committed that workers will works under works environment that free discriminations. Interviews held with local and foreign workers (both male and female) at all units, confirmed that there is no form	Complied

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		of discrimination. The workers confirmed that they were given equal employment opportunities and are able to enjoy all the benefits and use of amenities accorded by the Company.	
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 and verified through salary slips shows that there is no discrimination in terms of salary payment especially for similar work scope. It also has been confirmed that workers has been given same benefits such as electricity and waters, accommodations, leave and others. Activities that has been conducted sighted participation for all workers without exception of any workers group. There is mixture of workers for each group gang such as harvesters and sprayer can be sighted in the estate.</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>TDM Plantation Sdn Bhd has an SOP for recruitment of mill and estates. SOP named "Pengurusan Tenaga Kerja Tamu" , TDMP/SOP-OD/01 dated 1st March 2019. SOP for local workers (mill and estates) documented under "Prosedur Perlantikan Pekerja Ladang and Kilang", TDMP/SMP/3/01.01 dated 2nd November 2016.</p> <p>The SOP specifies that recruitment, selection and hiring process involves vetting and interviews, and must be medically fit. Promotions are at the sole discretion of the Company. Retirement age is fixed at 60 for local and termination of employment can be given mutually subject to the terms of the employment contract and Employment Act 1955.</p> <p>For foreign workers, or guest workers, the SOP for recruitment, hiring involves interview, selection based on age, qualification, and agricultural experience. Retirement and termination are as per Employment Act 1955 and employment contracts.</p> <p>As per sample taken, there is evidence that recruitment has been done base on the capabilities. Interview and medical check-up has been conducted prior to the recruitment. Base on the interview</p>	Complied

		<p>records , and medical checkup report, there is evidence that all the workers recruited fit to carry out the job.</p> <p>As per interview with the management, there is a lot of job vacancies in estates. Any new applications will be process, interview and recruited as long as the workers fit medically and physically.</p>	
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>No pregnancy test been conducted for job selection. This is confirmed through the interview session with the female workers and reviewed the medical check-up report. However, female workers need to submit their pregnancy symptoms such as due for period to the gender committee as part of mechanism to monitor pregnancy for those handling chemical.</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>For Fikri Estate, gender committee has been established with participation of female workers and staff. Latest minute meeting sighted and documented in "Minit Mesyuarat Biro Wanita" which has been conducted on 22/09/2022 with attendance of 8 persons.</p> <p>While for Sungai Tong POM, gender committee has been done on 09/08/2022 and 31/10/2022 which Cik Syazwani binti Muhamad is the chairpersons</p> <p>For Jerangau Estate, gender committee has been established and minutes meeting sighted latest on 27/07/2022 chaired by Puan Noraziah binti Wahab.</p> <p>While for Pelong Estate, gender committee meeting has been conducted latest on 28/10/2022 and 20/06/2022 and will be conducted 3 months. One issues has been raised during the meeting related to damage bridge which cause difficulties for the women workers to go for works. Repair has been done in September 2022 where contract has been awarded to Fawwaz Gemilang Enterprise and ZGE Enterprise.</p>	Complied

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		For Tayor Estate, gender committee meeting has been conducted on 02/03/2022, 09/06/2022 and 20/09/2022.	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	As per verification base on the employment contract, payslip for month March, June and September 2022, it has been confirmed that there is no deviation of salary rates between and female workers. All workers has been paid according to MAPA/NUPW collective agreement and Minimum Wages Order 2022 which is at rate RM57.77/day.	Complied
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	Collective agreement between TDM Plantations Berhad and MAPA/NUPW and has been documented in the document title "MAPA/NUPW Field and other general employees and fringe benefits agreement, 2019. Other than that, each operating units adopts the Employment Act 1955 and Minimum Wages Order, 2022. Proposed of updated collective agreement sighted dated 11/01/2022 in the reference of MAPA circular No. 4/2022 and sighted in the document "Proposed new agreement to replace the MAPA/NUPW field and other general employees and fringe benefits agreement 2019" Documentation of pay is contained in pay slips which are issued to the workers every month. Each pay slip contains details such as name of worker, month of pay, total wages wage for the month, overtime pay, paid public holiday, paid medical leave (if any), price bonus, SGP, overtime, paid annual leave, statutory deductions such as SOCSO (for all workers), EIS and EPF (for Malaysian workers only), and other deductions, if any.	Complied

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6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Sample of employment contracts has been taken for each operating units which detailed payment and condition for each worker. All workers entitled for leave as per below</p> <table border="1" data-bbox="1137 475 1908 746"> <tr> <td data-bbox="1137 475 1523 564">Annual leave</td> <td data-bbox="1532 475 1908 564">1-5 years, 14 days/year >5 years, 16 days</td> </tr> <tr> <td data-bbox="1137 564 1523 695">Sick leave</td> <td data-bbox="1532 564 1908 695">1-2years, 14 days/year 2-5years, 18 days/year >5 year, 18 days</td> </tr> <tr> <td data-bbox="1137 695 1523 746">Public Holiday</td> <td data-bbox="1532 695 1908 746">13 days/ year</td> </tr> </table> <p>Based on the above sample workers, average daily wage @ ordinary rate of pay is more than Minimum Wages Order 2022 of RM57.70 per day. Law full deduction (SOCSO, EPF, EIS) is correctly made and appear in the pay slip. Based on the sample, total overtime hours have not exceeded 104 hours.</p>	Annual leave	1-5 years, 14 days/year >5 years, 16 days	Sick leave	1-2years, 14 days/year 2-5years, 18 days/year >5 year, 18 days	Public Holiday	13 days/ year	Complied
Annual leave	1-5 years, 14 days/year >5 years, 16 days								
Sick leave	1-2years, 14 days/year 2-5years, 18 days/year >5 year, 18 days								
Public Holiday	13 days/ year								
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>For all operating, stated in the employment contract working hours, deduction, overtime and leave entitlement. Mentioned in the employment contract that entitlement of leave is depending of length of services. For workers less than 2 years services, entitled 14 days of sick leave and 8 days of annual leave. Highlighted in the contract reasons for dismissal, period of notice and other legal labour requirements.</p>	Complied						
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the</p>	<p>Sungai Tong POM and estates provide good housing with good sanitation, medical facilities, and welfare amenities. Site visits were made to workers’ housing. Overall, the houses and surrounding compound are well maintained with clean and flowing drains, no tall grass and household waste properly disposed of.</p>	Non-compliance						

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	<p>upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>All houses receive free water up to 35 gallon per day and electricity is subsidised for RM 5 per house per month. Each house has 2 rooms and in liveable condition. Among the amenities available include creche, surau, football field, sundry shop, canteen and a clinic. The clinic is managed by a Estate Health Assistant and is equipped with an ambulance. A visiting medical officer visits the clinic once a fortnight as shown on the record. Linesite inspection is conducted on a weekly basis</p> <p>Jerangau Estate</p> <p>There are 3 workers quarters for Jerangau Estate which is in Jerangau Division (Local and foreinger) and at Landas Estate. During the site visit at workers quarter at Jerangau Estate, found out that the workers has not been maintained in good conditions.</p> <p>Overdue grass cutting at the back of the housing quarters</p> <ol style="list-style-type: none"> 1. Blockage of drainage 2. Poor waste management where sighted waste like plastic, tyres, broken grass cutter in the drain 3. Broken Naco window glass and mosquito netting 4. Leakage roof at foreign workers housing toilet <p>Thus, Major NC was raised.</p>	
<p>6.2.5</p>	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>All operating units is located nearby to the main road and local communities' area where sundry shops be access by the workers. As per interview with the workers, it has been confirmed there is no issues for workers to get adequate, sufficient and affordable food.</p>	<p>Complied</p>
<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p>	<p>Prevailing wages and in-kind benefits assessment conducted by Unit of Certification (UoC). As for 2020, a baseline/pilot project for the assessment was carried out at one sample estate (Air Putih Estate).</p> <p>- In-kind benefit: RM 957</p>	<p>Complied</p>

<p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with 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 	<ul style="list-style-type: none"> - Take home salary: RM 1,200 - Total: RM2,157 <p>Progressively, prevailing wages calculation will be extended to each operating units to set a benchmark value for reference.</p>	
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	<ul style="list-style-type: none"> • 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>		
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>As per verification on the master list of the workers, pay slips, employment contract and interview with the workers, there is evidence that all permanent workers performed core work. There is no casual, temporary or seasonal workers recruited for all operating units under Sungai Tong POM</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Published statement in local language recognizing freedom of association policy is in place as documented in 'Freedom of Association Policy / Polisi Kebebasan Berpersatuan dated 1st April 2022. Workers interview confirmed that they are not being restricted to join or form trade 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>TDM Plantations Berhad is a member for MAPA/NUPW and collective agreement sighted between the management and MAPA/NUPW for year 2022. Workers are allow to join NUPW but it has been verified that workers are not interested to join. It has been confirmed through interview with the workers itself.</p> <p><u>Sungai Tong POM</u></p> <p>Minutes meeting for workers representative sighted in the document title "Minit Mesyuarat Wakil Pekerja Sesi 2022" that has</p>	Complied

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		<p>been conducted on 14/07/2022. There is no issues has been highlighted during the meeting.</p> <p><u>Tayor Estate</u></p> <p>Minutes meeting for workers representative sighted that has been conducted 29/10/2022 with attendance of representative from different workers category. There is no issues has been highlighted during the meeting.</p>	
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p><u>Sungai Tong POM and Tayor Estate</u></p> <p>As per interview with the workers representative, it has been confirmed that, there is no interference by management to select representative. Workers will decide who will represent them for meeting with the management.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>TDM Plantation Sdn Bhd has developed Social Policy/Polisi Sosial and Protection of Children Policy/Polisi Perlindungan Kanak Kanak dated 1st April 2021; that states company's commitment for not exploiting, using and recruiting child labour which under 16 years old. Document reviewed, workers interview and stakeholder consultation confirmed that no historical child labour employed in the company. Youngest workers hired by the company is 18 years old.</p>	Complied
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>Reviewed the master list in each operating units found that no young person was employed. All the workers are above 18 years old. It has been further confirmed during the interview with the workers.</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>Reviewed the master list in each operating units found that no young person was employed. All the workers are above 18 years</p>	Complied

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	- Critical (Major) compliance -	old. It has been further confirmed during the interview with the workers.	
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	TDM Plantation Sdn Bhd has developed Social Policy/Polisi Sosial and continue to implement the Protection of Children Policy/Polisi Perlindungan Kanak Kanak dated 01/01/2022; that states company's commitment for not exploiting, using and recruiting child labour which under 16 years old. Document reviewed, workers interview and stakeholder consultation confirmed that there are still no historical case of children employed in the company. Youngest workers hired by the company is 18 years old.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Gender Policy was developed and implemented in TDM Plantation Sdn Bhd where the company has the responsibility to take care the rights of workers. Latest policy dated 01/01/2022 endorsed by the new CEO was sighted. They will protect the rights of female workers The policy has communicated to all workers during the morning muster call for all operating units while for stakeholders it has been communicated during the stakeholders meeting conducted on 26/09/2022. <u>The procedure has been made available where it has been posted at the notice board at each operating units.</u>	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Polisi Reproduksi / Reproductive Rights Policy is in place, signed by the CEO, Mr Hamdan bin Ibrahim dated 01/01/2022. Policy states company commitment not interfering in reproductive planning of the workers and ensuring rights of workers to decide and avoidance in discriminating and harsh treatment to the subjected workers. The policy has communicated to all workers during the morning muster call for all operating units while for stakeholders it has been communicated during the stakeholders meeting conducted on	Complied

		26/09/2022. The procedure has been made available where it has been posted at the notice board at each operating units.	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -	For each operating units has conducted New mother assessment which has been done through google form that has been submitted all new mother.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	TDM Plantation Sdn Bhd has developed a grievances Procedure – Carta Aliran Pendendalian Isu Social (Stakeholder) (Aduan / Rungutan / Permohonan) / Social issues Flowchart (stakeholders) (Complaint/Application), rev.2/2017. The information / issue reported shall be rectify according to type of communication. E.g. Prosedur Komunikasi Dengan Pihak Kilang / Ladang, within 28 days & Prosedur Aduan / Rungutan; within 28 working days which include discussion with relevant parties, manager and top management. If further action request is involved Head Office, then the management will submit the request to Head Office for further approval and shall be rectified within 30 working day.	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All workers have entered into employment voluntarily and the following are prohibited: <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 	Sample of employment contracts for check roll local and foreign workers has clearly stated types of job, salary, benefits and all employment condition. As per interviewed with foreign workers, it has been confirmed that passport has been kept by the workers itself. The is no recruitment fee has been charges during the recruitment. There is no new recruitment for foreign workers in year 2020, 2021 and 2022 and only for local workers. As per interview, there is no involuntary overtime for each workers where all workers can decide to accept and reject for overtime.	Complied

	<ul style="list-style-type: none"> • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</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>TDM Plantations Sdn Bhd has been established “Foreign workers policy” and signed by CEO, Mr Hamdan Ibrahim on 01/01/2022. As stated in the policy that the management decided to recruit foreign workers following Employment Act 1955m Immigration Act 1959/63 and Compensation Act 1952.</p> <p>Based on interviews with the workers, and observations made, the following were found:</p> <p>Retention of documents: All workers are free to keep their own passports. There is no retention of identity documents or passports unless these are needed for passport/work permit renewal. Some Bangladeshi and Indonesian workers has been interviewed and confirmed that passport has been kept by the workers itself. It has been confirmed during site visit to line site where verification passport has been kept at their house.</p> <p>Involuntary overtime: Based on interviews conducted with the workers, all overtime work were carried out on a voluntary basis. Workers are free decline any offers for overtime work.</p> <p>Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with workers</p> <p>Debt bondage: There is no evidence of any incidence of debt bondage. It has been confirmed base on the pay slips of sample workers where there is no deduction for any debt. It has been further confirmed through interview with the workers.</p> <p>Withholding of wages: There is no evidence of withholding of wages where it has been confirmed through interview with the workers.</p>	Complied

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		Salary payment has been made before 7 th every months through online transaction.																														
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.																																
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The estates and mill management have conducted the regulated quarterly safety committee meeting with the participation of workers representative. Minutes of meetings were made available for verification which dated as follows:</p> <table border="1" data-bbox="1137 671 1930 979"> <thead> <tr> <th rowspan="2">OU</th> <th colspan="4">Quarter and dates</th> </tr> <tr> <th>03/2022</th> <th>02/2022</th> <th>01/2022</th> <th>04/2021</th> </tr> </thead> <tbody> <tr> <td>Fikri</td> <td>28/09</td> <td>27/06</td> <td>23/03</td> <td>01/11</td> </tr> <tr> <td>STPOM</td> <td>21/09</td> <td>22/06</td> <td>22/03</td> <td>13/12</td> </tr> <tr> <td>Pelong</td> <td>16/08</td> <td>12/04</td> <td>07/03</td> <td>19/12</td> </tr> <tr> <td>Tayor</td> <td>12/09</td> <td>22/06</td> <td>15/03</td> <td>14/12</td> </tr> </tbody> </table> <p>Generally, among the agenda discussed in the meetings are:</p> <ul style="list-style-type: none"> • Confirmation of minutes previous meeting • OHS programme • Legal compliance • PPE • Accident and investigation report • Stakeholders' complaint • Workplace inspection report • Accident report • Other matters 	OU	Quarter and dates				03/2022	02/2022	01/2022	04/2021	Fikri	28/09	27/06	23/03	01/11	STPOM	21/09	22/06	22/03	13/12	Pelong	16/08	12/04	07/03	19/12	Tayor	12/09	22/06	15/03	14/12	Complied
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		Workplace inspections were made prior to the committee meeting. By default, the respective operating units' managers were appointed as the chairman of the committees.	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>The procedures for accident and emergencies have been established and available in the TDM Plantations Sdn Bhd; Standard Operating Procedure; Emergency Preparedness & Response; Date 01/01/2018; Edition: TDM/01; Revision: TDMP-01/2018. There is a formation of ERP Team & ERP for all the identified incidents. In addition, the procedures have been summarized in flowchart forms and displayed for all employees to refer. Emergencies relating fire, chemical spillage, flood, and accident at workplace were among those included. Verified during the site visits at the mill and estates, all workstations and operations were well equipped with fire extinguishers and first aid kits. Based on interview with employees and workers, it was shown that the understanding of the procedures was good.</p> <p>The mill has established Emergency Response Team lead by the Mill Manager. The ERT chart, Fire Hydrant and Fire Extinguisher Map were displayed at several notice boards in the mill.</p> <p>First aiders were present at various workstations at the mill and estates. The first aiders were responsible for first aid kit at each workstation/operation. Interview with workers in the mill and estate field operations shows the awareness regarding the emergency procedure if accident occur, person responsible of every first aid box and the location of the nearest first aid kit.</p> <p>Accident records were available and maintained by the mill and estates monthly and submitted to the HQ accordingly. JKKP 6, JKK 7 and JKKP 8 forms were available for verification.</p>	Complied
6.7.3	(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	The management provides appropriate PPE to the employees in accordance with HIRARC, PPE Matrix, and Standard Operating	Non-compliance

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	<p>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>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. However, based on site verification and interview with workers it was found that some of the workers were not using PPE in accordance with the company's PPE Matrix. Among the cases found are as follows:</p> <ol style="list-style-type: none"> 1. Safety harness was not equipped during CPO tank seal checking by security guards at the mill 2. At Jerangau Estate, based on interview with the management, safety harness was not equipped by the driver during putting on or removing of net that covers the FFB in the truck 3. "Badang" driver was using Wellington Boot instead of safety shoes and not using ear plugs during FFB evacuation at Jerangau Estate 4. Tractor driver was Wellington Boot instead of safety shoes during FFB evacuation operation at Taylor Estate <p>Thus, Major NC was raised</p> <p>Sanitation facilities such as shower room, PPE washing area, personal clothing locker for those applying pesticides are available, so that workers can change out of PPE, wash, and put on their personal clothing were provided and well maintained.</p>	
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</p>	Complied

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		<p>inventory, VMO visits, and patients treated were made available for verification.</p> <p>The sampled estates and mill are subscribing to SOCSO to cover the accident insurance for all their workers. Latest monthly contributions were verified and confirmed with the following details:</p> <table border="1" data-bbox="1133 539 1930 817"> <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>Fikri</td> <td>07/12/2022</td> <td>ACR112220223955</td> <td>200</td> </tr> <tr> <td>STPOM</td> <td>08/11/2022</td> <td>ACR112220175224</td> <td>105</td> </tr> <tr> <td>Jerangau</td> <td>04/12/2022</td> <td>ACR122220072499</td> <td>157</td> </tr> <tr> <td>Tayor</td> <td>14/12/2022</td> <td>ACR122220367410</td> <td>124</td> </tr> </tbody> </table>	Estates/ mill	Transaction date	Payment voucher Ref. No.	No. of employees covered	Fikri	07/12/2022	ACR112220223955	200	STPOM	08/11/2022	ACR112220175224	105	Jerangau	04/12/2022	ACR122220072499	157	Tayor	14/12/2022	ACR122220367410	124	
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6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>The RSPO's Lost Time Injury Frequency Rate (LTIFR) metrics was used to record the number of lost time injuries and total hours worked for the period of Jan – Dec of 2021. Verification against the certification unit's other records such as JKKP 8 and SHE_2021_DEC_Lxx (xx=JR, LFK, PL, STPOM, LTY, LPE, LJY) found the data to be accurate.</p>	Complied																				
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>The sampled estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans.</p> <ul style="list-style-type: none"> The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The plan was guided 	Complied																				

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		<p>by SOP ref Agronomic Practices to include the IPM management revised in January 2021.</p> <ul style="list-style-type: none"> • In order to minimize use of insecticides on leaf-eating pest, the estates have planted beneficial plants such as Turnera subulata, Cassia cobanensis, Antigonon leptopus, Euphorbia heterophylla, along the roadsides and designated points in the fields and also within the nursery perimeter. • The plan also advocated single layer Bio Compost mulching in order to prevent the breeding of rhinoceros beetles. Monthly detection and observation of leaf eating pests, mammalian pests and diseases had been continued. These monthly detection and observations were carried by staff. • Census records for Ganoderma affected palms were available for verification. • All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year which recommended by the PA /Agronomist. Baiting campaigns are continued until the acceptance is below threshold level 	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>Species referenced in the Global Invasive Species Database and CABI.org are not used in all the managed areas.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>There was no evidence that use of fire for pest control at all the sampled operating units.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			

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7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The justification of all pesticides used in the estate were documented in Agricultural Reference SOP Section A11 & A12 Standard Book. The manual provides the guideline on type of agrochemical use, target pest/weed/disease, weed situation, recommended chemical brand name, application rate, and method of application. Verification of chemical register, chemical issuance records, and site visits showed that the pesticides used were in accordance with the justification in the manual.</p>	Complied
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estates. Based on the records, the total a.i. per ha for 2021 and 2022 at all the sampled estates was less than 1 lt a.i./ha for both matured and immature areas.</p>	Complied
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions is documented and justified in Agricultural Reference SOP Section A11 & A12 Standard Book. The manual provides the guideline on type of agrochemical use, target pest/weed/disease, weed situation, recommended chemical brand name, application rate, and method of application. Verification of chemical register, chemical issuance records, and site visits showed that the pesticides used were in accordance with the justification in the manual. Beneficial plants for hosting the leaf eating predators were seen planted in many places at the estates' roadsides.</p> <p>The implementation in the field is consistent with the SOP established. Class I herbicide is no longer in used by all the sampled estates.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p>	<p>There was no evidence of prophylactic use of pesticide at all the sampled estates.</p>	Complied

	- Minor compliance -		
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>There has been no use of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions at all the sampled estates. This was verified through visit of pesticides stores, inventory records, chemical registers which were submitted to the authority, CHRA report, and interview with employees.</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>Trainings on safe handling of chemical and right method of spraying were given to the relevant employees which include the storekeeper, pre-mixers, and herbicides sprayers. This is also in-line with the recommendation by the CHRA assessor. Various methods of training such as briefing, practical training and on-the-job supervisions were used to ensure effective delivery of knowledge. Records of training were well maintained for verification.</p>	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 all estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked to prevent unauthorised entrance. The hazard signage was observed to be adequately displayed on</p>	Complied

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		the exterior and interior walls. Ventilation facilities and safety data sheets were also adequately provided.																					
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under scheduled waste and disposed through waste collecting contractors (refer to Indicator 7.3.2).	Complied																				
7.2.9	(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 -	Aerial spraying of pesticides is not practiced in the sampled estates.	Complied																				
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	Annual medical surveillances for pesticide operators were last conducted with the following details: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 35%;">Estates & Dates</th> <th style="width: 10%;">No. of operators</th> <th style="width: 10%;">Results</th> <th style="width: 45%;">OHD Reg. No.</th> </tr> </thead> <tbody> <tr> <td>Fikri – 18-28/09/2022</td> <td>16</td> <td>All fit</td> <td>HQ/21/DOC/00/714</td> </tr> <tr> <td>Jerangau – 02-03/10/2022</td> <td>10</td> <td>1 unfit</td> <td>HQ/21/DOC/00/352</td> </tr> <tr> <td>Pelong – 08-22/08/2022</td> <td>23</td> <td>All fit</td> <td>HQ/12/DOC/00/271</td> </tr> <tr> <td>Tayor – 30/08/2022</td> <td>10</td> <td>All fit</td> <td>HQ/12/DOC/00/271</td> </tr> </tbody> </table>	Estates & Dates	No. of operators	Results	OHD Reg. No.	Fikri – 18-28/09/2022	16	All fit	HQ/21/DOC/00/714	Jerangau – 02-03/10/2022	10	1 unfit	HQ/21/DOC/00/352	Pelong – 08-22/08/2022	23	All fit	HQ/12/DOC/00/271	Tayor – 30/08/2022	10	All fit	HQ/12/DOC/00/271	Complied
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		All the unfit workers have been relocated to the jobs which do not involve in any handling of agrochemicals. This is verifiable through inspection of check-roll.									
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	Based on site observation and verification of employee master list and interviews at the sampled estates, there was no evidence that work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions.	Complied								
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.											
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>TDM Plantation has established SOP for handling scheduled waste and documented in Standard Operating procedure – Procedure for handling schedule waste dated 1/11/2008, edition TDMP/02 rev. TDMP – 02/2017 (Revision Nov 2021). The estates and mill have identified the waste products and source pollution generated in the estates and mill. The waste are categorized as follows:</p> <p>Estates</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Type</th> <th>Item Description</th> </tr> </thead> <tbody> <tr> <td>Scheduled Waste</td> <td> i) SW 102–Waste of lead acid batteries ii) SW 305 – spent lubricant iii) SW 306 – spent hydraulic oil iv) SW 410 – rags, plastics, papers, contaminated filters v) SW 404 – Clinical waste vi) SW 409 – empty chemical containers </td> </tr> <tr> <td>Domestic waste</td> <td>Rubbish</td> </tr> <tr> <td>Industrial waste</td> <td>Scrap metal EFB</td> </tr> </tbody> </table>	Type	Item Description	Scheduled Waste	i) SW 102–Waste of lead acid batteries ii) SW 305 – spent lubricant iii) SW 306 – spent hydraulic oil iv) SW 410 – rags, plastics, papers, contaminated filters v) SW 404 – Clinical waste vi) SW 409 – empty chemical containers	Domestic waste	Rubbish	Industrial waste	Scrap metal EFB	Complied
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		<ul style="list-style-type: none"> i) Collect recyclable materials in recycling bins provided and send to recycling ii) Collect other domestic waste from office and linesite in black bins and send to Waste Collection Centre (Majlis Daerah Setiu) iii) Create awareness on Hygiene iv) Monitoring of estate quarters <p>Sewage waste</p> <ul style="list-style-type: none"> i) To install septic tank for each toilet and call Indah Water (IWK) for maintenance, collection sewage <p>Industrial Waste</p> <ul style="list-style-type: none"> i) EFB applied to land Mulching ii) Scrap Metal is recycled, if possible, or collected by licenced contractor 	
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>TDM Plantation has established SOP for handling scheduled waste and documented in Standard Operating procedure – Procedure for handling schedule waste dated 1/11/2008, edition TDMP/02 rev. TDMP – 02/2017 (Revision Nov 2021). The certification units also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected at both estate visited and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>The certification units maintain the inventory records of the Scheduled Waste generated and reported to DOE through ESWISS. Waste disposal was conducted based on SOP and waste management plan established. Reviewed the implementation of the management plan as follows:</p> <p>Fikri Estate</p>	Complied

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		<ol style="list-style-type: none"> 1. The estate maintains the inventory records of scheduled waste generated by the estate recorded in BIN Card. The inventory was reported to DOE through ESWISS. Reviewed the inventory records for the month of January – November 2022. 2. The empty container was triple rinsed and puncture and stored at designated place under locked and key. The empty pesticides container was disposed as scheduled waste, SW 409. Reviewed the disposal records dated 23/11/2022. 3. The Scheduled Waste was disposed through licensed contractors, Pentas Flora Sdn. Bhd. Reviewed the consignment note as follows: <ul style="list-style-type: none"> - 23/11/2022 for SW 305, C/N 2022112316FIER4Y - 23/11/2022 for SW 410, C/N 2022112316742D97 - 20/09/2022 for SW 404, C/N 20220920214H850X <p>Sungai Tong POM</p> <ol style="list-style-type: none"> 1. The estate maintains the inventory records of scheduled waste generated by the estate recorded in BIN Card. The inventory was reported to DOE through ESWISS. Reviewed the inventory records for the month of January – November 2022, Latest on 28/11/2022. 2. The empty container was triple rinsed and puncture and stored at designated place under locked and key. The empty pesticides container was disposed as scheduled waste, SW 409. Reviewed the disposal records dated 30/11/2022. 3. The Scheduled Waste was disposed through licensed contractors, Pentas Flora Sdn. Bhd. Reviewed the consignment note as follows: <ul style="list-style-type: none"> - 30/11/2022 for SW 322, C/N 20221206092BJNOS - 11/12/2022 for SW 410, C/N 20221211110JIV3H 	
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		<ul style="list-style-type: none"> - 11/12/2022 for SW 305, C/N 2022121111C0FNLO 4. Domestic waste was collected 3 times a week and disposed through Licence Contractor to Majlis Daerah Setiu. 5. Empty fruit bunch was disposed through field application and raw material for bio compost production at ratio of 20% : 80%. Reviewed the disposal records for the month of January – November 2022. 6. Training on SW Management has been conducted on 01/12/2022 <p>Jerangau Estate</p> <ul style="list-style-type: none"> 1. The estate maintains the inventory records of scheduled waste generated by the estate recorded in BIN Card. The inventory was reported to DOE through ESWISS. Reviewed the inventory records for the month of January – November 2022, Latest on 29/11/2022. 2. The empty container was triple rinsed and puncture and stored at designated place under locked and key. The empty pesticides container was disposed as scheduled waste, SW 409. Reviewed the disposal records dated 12/10/2022. 3. The Scheduled Waste was disposed through licensed contractors, Pentas Flora Sdn. Bhd. Reviewed the consignment note as follows: <ul style="list-style-type: none"> - 12/10/2022 for SW 410, C/N 2022101212Q5HTEM - 12/10/2022 for SW 305, C/N 202210121278SGFN 4. Training on SW Management has been conducted 16/10/2022 5. Domestic waste was collected 2 times a week and disposed through Licence Contractor to Majlis Daerah Setiu. <p>Pelong Estate</p>	
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		<ol style="list-style-type: none"> 1. The estate maintains the inventory records of scheduled waste generated by the estate recorded in BIN Card. The inventory was reported to DOE through ESWISS. Reviewed the inventory records for the month of January – November 2022, Latest on 24/11/2022. 2. The empty container was triple rinsed and puncture and stored at designated place under locked and key. The empty pesticides container was disposed as scheduled waste, SW 409. Reviewed the disposal records dated 24/11/2022. 3. The Scheduled Waste was disposed through licensed contractors, Pentas Flora Sdn. Bhd. Reviewed the consignment note as follows: <ul style="list-style-type: none"> - 24/11/2022 for SW 410, C/N 2022112413W865RP - 24/11/2022 for SW 305, C/N 2022112413AVJ0M8 4. Training on SW Management has been conducted 18/05/2022 Tayor Estate <ol style="list-style-type: none"> 1. The estate maintains the inventory records of scheduled waste generated by the estate recorded in BIN Card. The inventory was reported to DOE through ESWISS. Reviewed the inventory records for the month of January – November 2022, Latest on 24/11/2022. 2. The empty container was triple rinsed and puncture and stored at designated place under locked and key. The empty pesticides container was disposed as scheduled waste, SW 409. Reviewed the disposal records dated 12/12/2022. 3. The Scheduled Waste was disposed through licensed contractors, Pentas Flora Sdn. Bhd. Reviewed the consignment note as follows: <ul style="list-style-type: none"> - 19/09/2022 for SW 409, C/N 20220919158LB0TF 	
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		<p>- 19/09/2022 for SW 410, C/N 2022091915FL6WJ</p> <p>4. Training on SW Management has been conducted 12/04/2022 Domestic waste was collected 2 times a week and disposed through Licence Contractor to Majlis Daerah Setiu</p>	
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Estates and Mill does not use open fire for waste disposal. Domestic wastes were collected twice a week and disposed at designated landfill or by contractors. No evidence of fire use to dispose domestic waste at housing area.</p>	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	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>SOP for good agriculture practices has been established to cover all the operations in the estates such as land preparation, planting/replanting, field maintenance, infrastructure development & maintenance, harvesting & evacuation, and integrated pest management. The related SOP namely Leaf, and Soil Sampling Notes procedure was verified. All estates operate in accordance with the Agriculture Manual and standard operating procedures. The implementations were consistently monitored by estate operation management and various internal inspections. The recommendations for improvements are given to maintain the sustainable and best practices.</p>	Complied
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Foliar and soil sampling was carried out by Agronomy and Advisory Department (AAD) Internal Agronomist from Agronomy Advisory and Services Department prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be conducted every year while for soil analysis, the frequency is once in 4 years. The latest leaf sampling soil analysis reports were made available for verification.</p>	Complied

7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -	EFB, POME and bio-compost were applied in accordance with the agriculture SOP A11. Records of application were maintained by the estates and made available for verification. Among the information available in the records is field number, quantity of EFB being applied (mt) and date of application.	Complied
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Records of fertiliser input were well maintained in various documents such as store issuance record, bin cards and month end account to name a few. Among the information available in the records was type of fertiliser, quantity and field number applied including date of application. Based on sampled fields, the amount of fertilisers issued out (i.e. applied) from the store according to Plantware P1 software system was in-lined with the recommendations by agronomist, for all the sampled estates.	Complied
Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	Maps identifying soil types, including steep terrain, were made available for verification by each sampled estate. Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available agronomy reports. No problematic soil in sampling estate during assessment.	Complied
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	The sampled estates continued to have a management strategy for planting on slopes to minimize and control erosion and degradation of soils. There was no evidence of replanting on steep slopes. The planting on slopes between 9 and 25 degrees was guided by: - Slope & River Protection Policy dated 01/01/2022 - Buffer Zone & 25-degree slope SOP - Land Preparation for Terracing in SOP Section A ref A4. It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds,	Complied

		compost application, avoidance of blanket spraying, construction of terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in some mature areas. The cover crop mucuna bracteata had been planted along some slopes by management.	
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	This compliance being addressed in the "Slope and River Protection" signed by the CEO dated 01/01/2022 stating the following commitments: "Slope of >25 degree to be excluded from any new plantation development and replanting program. For slope <25 degree the existing crop all vegetative shall be maintained accordingly". Nevertheless, there were no new plantings in all the sampled estates.	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(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. - Critical (Major) compliance -	Soil surveys were made available in a soil map for all the estates. Topographic contour maps are also available which are both used to manage the drainage and road works in the estates. There was no new planting at all the sampled estates.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Based on the soil map and agronomist report, there is no soil categorised as marginal and fragile soils at all the sampled estates.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys and topographic information was available in soil analysis report, soil maps and topography maps. Should there be any planning of construction of drainage and irrigation systems, roads and other infrastructure, the information will be used as part of the guidance.	Complied

Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates.	Complied
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE: 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 is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates.	Complied
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates.	Complied
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates.	Complied
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p>	There is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates.	Complied

	<p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>		
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates.</p>	<p>Complied</p>
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil in all estates sampled. There was also no new planting in the estates.</p>	<p>Complied</p>
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
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>Refer Standard Operating Procedure A22: Water Management Revision May 2017. For water sampling, refer SOP for Taking water Samples from Stremms / Rivers dated 01/08/2017. The certification units have established water management plan for year 2022. The management plan focuses on action to reduce water usage, water shortage/ Dry spell and severe water pollution.</p> <p>Reviewed the implementation of the management plan as follows: Water shortage / Dry Spell</p> <p>1. To purchase water supply from Jabatan Bekalan Air</p>	<p>Complied</p>

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		<p>2. To obtain water supply from SATU</p> <p>3. To train staff / workers to take necessary steps to conserve water</p> <p>Severe water pollution</p> <p>1. Water supply to be purchased from Jabatan Bekalan Air</p> <p>2. To perform treatment of polluted water</p> <p>The workers were provided with adequate access to clean water supplied by the Syarikat Air Terengganu.</p> <p>Water sampling has been conducted by estates and mill.</p> <p>Fikri Estate – Refer Water Quality Monitoring and Analysis at ladang Fikri for TDM Plantation Sdn Bhd, Report No: ERAKT/TDM/FIKRI/22/07-12 dated 21/07/2022. The result shows that all parameter measured for the river waster quality monitoring were in compliance with the limit stated in Class IIA/IIB of National Water Quality Standards for Malaysia (NWQSM)</p>																			
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Refer Policy signed by the CEO dated 01/04/2021. In the policy stated that river buffer zone must be maintained at both side of riverbank as per schedule below:</p> <table border="1" data-bbox="1144 1034 1917 1329"> <thead> <tr> <th>No</th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table>	No	River width	Buffer zone	1	> 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters	Complied
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		<p>Awareness Training on Slope and Buffer Zone has been given to the workers. The prohibiting activities in the buffer zone illustrated in the training “:Taklimat Menegenai Polisi Perlindungan Cerun & Zon Pemampan Sungai” dated 08/08/2022 while at Tayor Estate, HCV and Buffer Zone Training conducted on 14/06/2022.</p> <p>Fikri Estate</p> <p>The estate clearly demarcated the riparian buffer zone for river flow through as sighted at buffer zone for Sungai Goga, Sungai Kulim and Sungai Pak Bidin. No evidence of chemical application along the area. The estate conducted water sampling for river flow through the estate on annually basis. Latest water sampling was conducted on 23/08/2022. The results was in compliance to Class IIA/IIB of National Water Quality Standards for Malaysia.</p> <p>Pelung Estate</p> <p>The estate clearly demarcated the riparian buffer zone at buffer zone for Sungai Tengadoh, Sungai Tualan and Sungai Dagang Besar. The estate conducted water sampling for river flow through the estate on annually basis. Latest water sampling was conducted on 23/08/2022. The results was in compliance to Class IIA/IIB of National Water Quality Standards for Malaysia.</p> <p>Tayor Estate</p> <p>The estate clearly demarcated the riparian buffer zone at buffer zone for Sungai Tayor and Sungai Balo. The estate conducted water sampling for river flow through the estate on annually basis. Latest water sampling was conducted on 28/06/2022. The results was in compliance to Class IIA/IIB of National Water Quality Standards for Malaysia.</p>	
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<p>7.8.3</p>	<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. - Minor compliance -</p>	<p>Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE accordingly. Reviewed the Quarterly Return Form to DOE as follows:</p> <table border="1" data-bbox="1137 507 1921 1007"> <thead> <tr> <th>Report Date</th> <th>Quarter/Week</th> <th>BOD (Limit=100mg/L)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">13/10/2022</td> <td>1stweek/1stmonth</td> <td>7.00</td> </tr> <tr> <td>5thweek/2ndMonth</td> <td>13.00</td> </tr> <tr> <td>9thweek/3rdMonth</td> <td>19.00</td> </tr> <tr> <td rowspan="3">13/07/2022</td> <td>1stweek/1stmonth</td> <td>7.00</td> </tr> <tr> <td>5thweek/2ndMonth</td> <td>13.00</td> </tr> <tr> <td>9thweek/3rdMonth</td> <td>19.00</td> </tr> <tr> <td rowspan="3">11/04/2022</td> <td>1stweek/1stmonth</td> <td>63.00</td> </tr> <tr> <td>5thweek/2ndMonth</td> <td>10.00</td> </tr> <tr> <td>9thweek/3rdMonth</td> <td>53.00</td> </tr> </tbody> </table> <p>TDM Sg Tong discharge POME through river after treated as per "Jadual Pematuan" No:004090. Signage on "Takat Pelepasan" was maintained at Mill has conducted water sampling at final discharge. Refer Report from ERALab(KT) Sdn Bhd dated 27/11/2022 with reference number 22/11/W0897.</p>	Report Date	Quarter/Week	BOD (Limit=100mg/L)	13/10/2022	1 st week/1 st month	7.00	5 th week/2 nd Month	13.00	9 th week/3 rd Month	19.00	13/07/2022	1 st week/1 st month	7.00	5 th week/2 nd Month	13.00	9 th week/3 rd Month	19.00	11/04/2022	1 st week/1 st month	63.00	5 th week/2 nd Month	10.00	9 th week/3 rd Month	53.00	<p>Complied</p>
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<p>7.8.4</p>	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>Mill has maintained monitoring of water usage for processing FFB which are recorded monthly. Water for processing is abstracted from water catchment by using pump. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record Pasir Panjang POM. Average data as below:</p>	<p>Complied</p>																								

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		Year	FFB Processed, MT	Water/L	Water/FFB																									
		2021	154,901.87	452,200.00	2.92																									
		2022 Tdt	139,864.38	388,520.00	2.78																									
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																														
7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>The operating units has established management plan to optimise the usage of fossil fuel. Reviewed the implementation of the management plan has been monitored based on the baseline stated in the 2022 budget. The operating units monitored the diesel usage per FFB on monthly basis. reviewed the records FY 2022 as follows:</p> <table border="1"> <thead> <tr> <th>Site</th> <th>Diesel, MT</th> <th>FFB, MT</th> <th>Diesel/FFB, MT</th> </tr> </thead> <tbody> <tr> <td>Fikri Estate</td> <td>67,763.48</td> <td>20,339.91</td> <td>3.33</td> </tr> <tr> <td>Sungai Tong POM</td> <td>102,210.00</td> <td>139,934.38</td> <td>0.73</td> </tr> <tr> <td>Jerangau Estate</td> <td>46,794.51</td> <td>12,820.22</td> <td>3.65</td> </tr> <tr> <td>Pelong Estate</td> <td>34,147.00</td> <td>4,018.65</td> <td>8.50</td> </tr> <tr> <td>Tayor Estate</td> <td>57,403.39</td> <td>15,490.44</td> <td>3.71</td> </tr> </tbody> </table>				Site	Diesel, MT	FFB, MT	Diesel/FFB, MT	Fikri Estate	67,763.48	20,339.91	3.33	Sungai Tong POM	102,210.00	139,934.38	0.73	Jerangau Estate	46,794.51	12,820.22	3.65	Pelong Estate	34,147.00	4,018.65	8.50	Tayor Estate	57,403.39	15,490.44	3.71	Complied
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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>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4.0 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was correct. Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include</p>				Complied																								

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		the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.	
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>	No development within Sungai Tong POM and Supply Base since 2014.	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Significant pollutants identification was conducted during environmental impact assessment and plans are documented under environmental management plan. Implementation of plan is being monitored by appointed person in charge with target of time frame for completion. Refer Environmental Aspects Impacts Identification dated 20/06/2022. Among the activities discussed were:</p> <ol style="list-style-type: none"> 1. Reception 2. Sterelizer 3. Clarification 4. Nut & Kernel 5. Boiler House 6. Laboratory 7. Workshop etc. <p>Reviewed the implementation of the management plan as follows:</p> <ol style="list-style-type: none"> 1. The mill conducted stack sampling quarterly. Reviewed the latest stack sampling conducted. Refer report: 	Complied

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		<ul style="list-style-type: none"> - L-GB-TC2208CSN-0274 dated 10/05/2022 = 310.5@150 mg/m3 - L-GB-TC2205CSN-0362 dated 31/05/2022 = 224.1@150 mg/m3 - L-GB-TC2202CSN-0103 dated 16/02/2022 = 147.7@150 mg/m3 <p>Refer Lesen Pelanggaran 004079 valid from 01/07/2022 to 31/12/2022 with limit: 400 mg/m3</p> <ol style="list-style-type: none"> 2. To prevent the leakage of kernel oil from bunker, the mill has placed oil tray under the bunker. 3. The estate avoid any leachate come from EFB, the mill has in progress to build new EFB dumping site. The tender has been awarded as per Letter of Award no. TDMP 27/22 dated 14/09/2022. 4. To the greenhouse gases release by the methane gas, the mill has completed the construction of Biogas Plant. The initial operation date test was held on 29/01/2019 and the agreement has been signed with TNB. <p>3rd Party audit (Environmental Compliance Audit) has been conducted on 04/07/2022 by Mr Mohammad Aman Bin Samsurey as per requirement in Jadual Pematuhan No:004090.</p>	
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 -	It was verified that no replanting were prepared by burning at Field No. 2020A area. TDM Plantation has established Zero Burning Policy and documented in Occupational Safety, Health and Environmental Policy signed by the CEO.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.	No use of fire for land preparation during replanting as sighted at replanting of visited estates. No open burning noted based on the	Complied

	- Minor compliance -	records on the land clearing and felling for the replanting work. Method of land clearing and preparation was used such as (felling & chipping, cambering/land forming and path construction). Sungai Tong Certification Unit have established fire prevention and control measures for the individual units in form of Fire emergency Response Plan, formation of Fire Emergency Response Team, usage of Fire Extinguishers and others.	
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Sungai Tong POM and Supply Bases certification units has engaged with adjacent stakeholders on fire prevention and control measures. Communication was recorded in the Stakeholder Meeting TDM Plantation North Zone 2022 dated 16/11/2022. Refer Section 1.3 (6) Prosedur Kecemasan – Pelan Tindak Balas Kecemasan sekiranya berlaku kebakaran.	Complied
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	No new planting or land clearing conducted in the certification units since 15/11/2018.	Complied
7.12.2	(C) HCVs, HCS forests and other conservation areas are identified as follows: 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.	TDM Plantation Sdn. Bhd. has conducted HCV assessment on September 2022. Refer High Conservation Value (HCV) Assessment Report Kompleks Sungai Tong and Kompleks Bukit Besi prepared by Green Orbis Environmental Sdn Bhd . The HCV identified were listed in Table 4.1: Identification and Analysis of HCV’s presence within Study Area. HCV and conservation area identified in the sampled estates as follows:	Complied

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	<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>	<table border="1"> <thead> <tr> <th>Estate</th> <th>Area</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>Jerangau Estate</td> <td>Buffer Zone</td> <td>Conservation Area</td> </tr> <tr> <td>Pelung Estate</td> <td>Buffer Zone</td> <td>Conservation Area</td> </tr> <tr> <td>Fikri Estate</td> <td>Buffer Zone</td> <td>Conservation Area</td> </tr> <tr> <td>Tayor Estate</td> <td>Unplanted Area (5.00 ha)</td> <td>HCV 4</td> </tr> <tr> <td>Jaya Estate</td> <td>Border to forest reserve</td> <td>Conservation Area</td> </tr> </tbody> </table>	Estate	Area	Status	Jerangau Estate	Buffer Zone	Conservation Area	Pelung Estate	Buffer Zone	Conservation Area	Fikri Estate	Buffer Zone	Conservation Area	Tayor Estate	Unplanted Area (5.00 ha)	HCV 4	Jaya Estate	Border to forest reserve	Conservation Area	
Estate	Area	Status																			
Jerangau Estate	Buffer Zone	Conservation Area																			
Pelung Estate	Buffer Zone	Conservation Area																			
Fikri Estate	Buffer Zone	Conservation Area																			
Tayor Estate	Unplanted Area (5.00 ha)	HCV 4																			
Jaya Estate	Border to forest reserve	Conservation Area																			
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	NA	Not Applicable																		
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>Base on the HCV identified in the report, the estate has established management plan for the year 2022. Reviewed the implementation of the management plan as follows:</p> <table border="1"> <thead> <tr> <th>Action Plan</th> <th>Descriptions</th> </tr> </thead> <tbody> <tr> <td>Set Aside Nature Conservation Area</td> <td>The area shall be set aside as Nature Conservation Area by the management and to be listed under TDM Plantation Nature Conservation Area.</td> </tr> <tr> <td>Inspections</td> <td> <ul style="list-style-type: none"> - Develop schedule for monitoring - To make recommendation and conclusion. - To work with DWNP (PERHILITAN). </td> </tr> </tbody> </table>	Action Plan	Descriptions	Set Aside Nature Conservation Area	The area shall be set aside as Nature Conservation Area by the management and to be listed under TDM Plantation Nature Conservation Area.	Inspections	<ul style="list-style-type: none"> - Develop schedule for monitoring - To make recommendation and conclusion. - To work with DWNP (PERHILITAN). 	Complied												
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		<p>Rehabilitation and Habitat Enhancement</p>	<ul style="list-style-type: none"> - Communication through TDM webpage. - Establishing fact sheet for internal and external (increase the nature conservation awareness). - Encourage further research on specific biodiversity. 	
		<p>Introduction of New Policy</p>	<p>The area contains special features – steep slope, river buffer zone, etc. shall be set aside and introduced as new conservation area.</p>	
		<p>Interface with Animals</p>	<ul style="list-style-type: none"> - Company will raise the awareness of HCV and protected wildlife to the employees. - Employees are taught not to disturb or not to hunt any wildlife. - Any case of interface with wildlife or signs of wildlife entering the estates shall be reported to PERHILITAN immediately. - If animal potentially cause danger to human life, 	

			necessary action shall be taken to ensure safety.	
7.12.5	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. - Minor compliance -	There was no rights of local communities been identified in HCV areas, HCS forest after 15/11/2018, peat land and other conservation areas.		Complied
7.12.6	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. - Minor compliance -	TDM Plantation Sdn. Bhd. has conducted HCV assessment on September 2022. Refer High Conservation Value (HCV) Assessment Report Kompleks Sungai Tong and Kompleks Bukit Besi prepared by Green Orbis Environmental Sdn Bhd .Refer Section 3.2.1 Flora Composition, 3.2.2.1 Mammals, 3.3.3.3 Birds, 3.2.2.3 Herpetofauna, 3.2.2.4 Fish and aquatic life, There is no RTE recorded. Evidence during site verification, discourage illegal or hunting, fishing or collecting activities signboard were maintained and implemented. Sighted HCV Inspection Checklist latest conducted on November 2022. Refer "Jadual Pemeriksaan Kawasan HCV/ Conservation Area". The estates management continue to promote awareness on HCV/RTE to the workers during morning briefing and training. Refer latest training that has been conducted on 16/10/2022 incorporated with HCV Training.		Complied
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15/11/2018 in all estates sampled. Monitoring of these areas are made through the daily field supervision by the field staff and executives.		Complied

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		<p>The estates sampled conducted HCV/conservation area monitoring once every 2 months. The monitoring covers on animal sighting, trace of hunting, trace of animal shelter, HCV disturbance, erosion and chemical application in the area. Reviewed the monitoring records for the month of October 2022 and November 2022.</p>	
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. - Critical (Major) compliance -</p>	<p>No land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15/11/2008 2018 within certification unit.</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for **Sungai Tong POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2021** for **Sungai Tong POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.81
PKO	0.00

Extraction	%
OER	18.82
KER	4.64

Production	t/yr
FFB Process	155,431.33
CPO Produced	29,254.52
PKO Produced	7,213.23

Land Use	Ha
OP Planted Area	23,758.29
OP Planted on peat	0.00
Conservation (forested)	65.46
Conservation (non-forested)	59.53
Total	23,883.28

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	108,657.07	0.80	0.00	0.00	0.00	0.00	108,657.07	0.80
CO ₂ Emission from fertilizer	,6845.95	0.05	0.00	0.00	0.00	0.00	,6845.95	0.05
NO ₂ Emission	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fuel Consumption	1,147.45	0.01	0.00	0.00	0.00	0.00	1,147.45	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-97,305.45	-0.72	0.00	0.00	0.00	0.00	-97,305.45	-0.72
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	19,345.03	0.14	0.00	0.00	0.00	0.00	19,345.03	0.14

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	6,765.17	0.04
Fuel Consumption	490.87	0.00
Grid Electricity Utilization	0.00	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	7,256.04	0.05

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 (%)	0.00
Divert to anaerobic diversion (%)	100

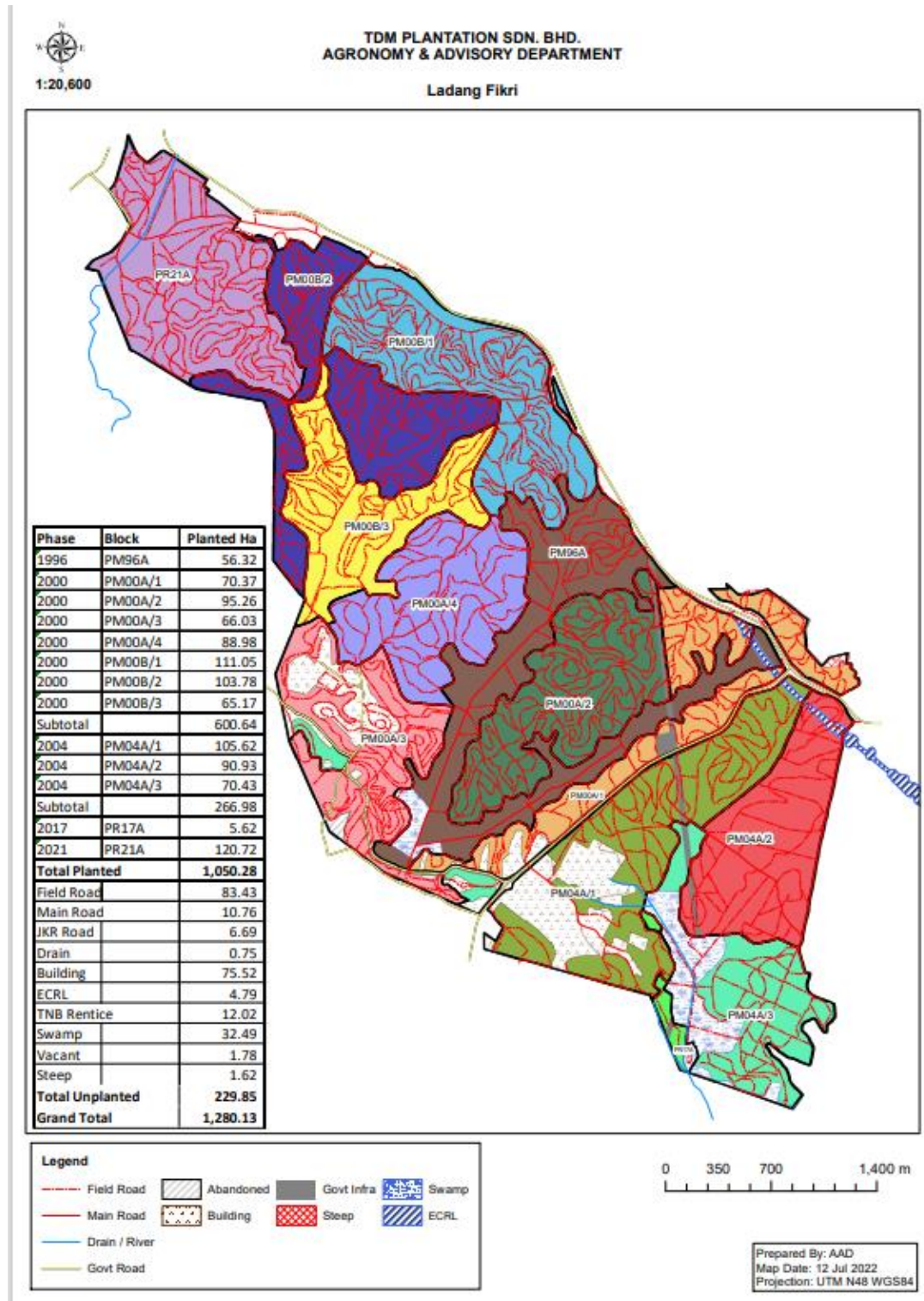
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map

Fikri Estate

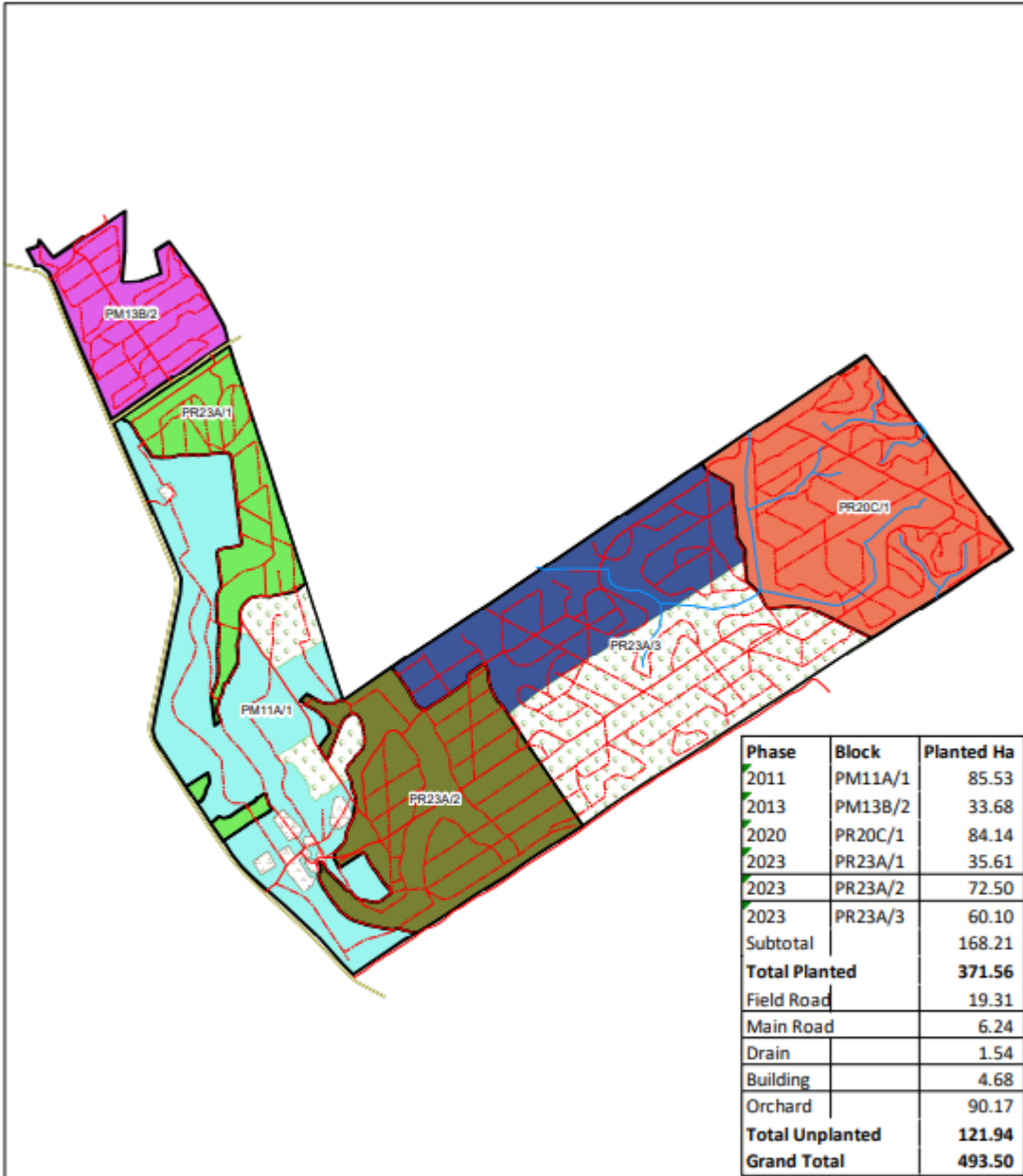


Jerangau Estate



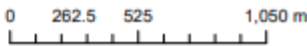
TDM PLANTATION SDN. BHD.
 AGRONOMY & ADVISORY DEPARTMENT

Ladang Jerangau



Legend

- Field Road (dashed red line)
- Main Road (solid red line)
- Drain / River (blue line)
- Govt Road (solid green line)
- Building (dotted pattern)
- Nursery / Orchard (green with plant icons)



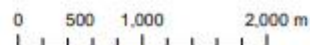
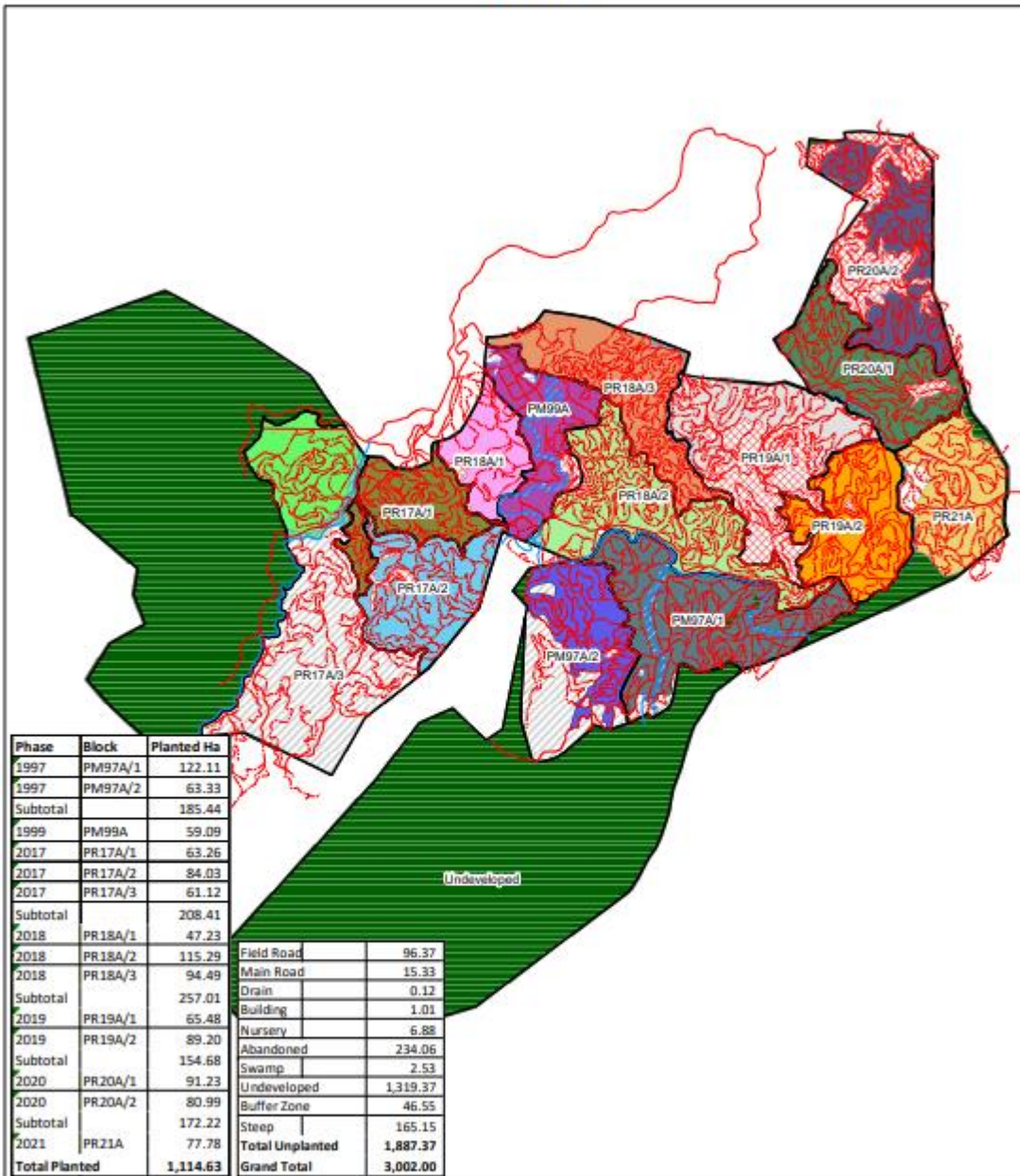
Prepared By: AAD
 Map Date: 12 Jul 2022
 Projection: UTM N48 WGS84

Pelong Estate



TDM PLANTATION SDN. BHD.
 AGRONOMY & ADVISORY DEPARTMENT

Ladang Pelung



Prepared By: AAD
 Map Date: 12 Jul 2022
 Projection: UTM N48 WGS84

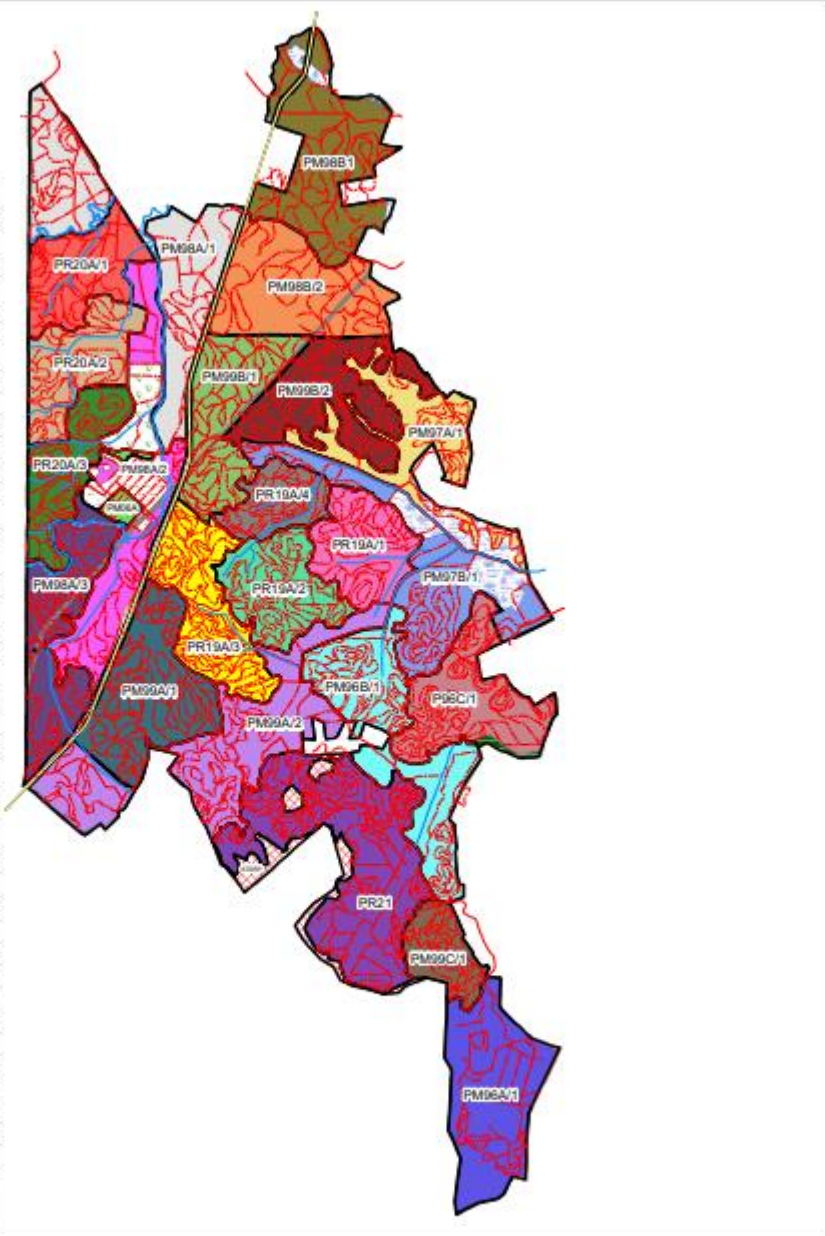
Taylor Estate



TDM PLANTATION SDN. BHD.
 AGRONOMY & ADVISORY DEPARTMENT

Ladang Taylor

Phase	Block	Planted Ha
1996	PM96A/1	103.66
1996	PM96B/1	104.12
1996	P96C/1	76.90
Subtotal		284.68
1997	PM97A/1	69.89
1997	PM97B/1	79.35
Subtotal		149.24
1998	PM98A/1	127.53
1998	PM98A/2	70.47
1998	PM98A/3	77.00
1998	PM98B/2	95.43
1998	PM98B/1	109.64
Subtotal		480.07
1999	PM99A/1	93.99
1999	PM99A/2	128.47
1999	PM99B/1	69.44
1999	PM99B/2	83.21
1999	PM99C/1	34.32
Subtotal		409.43
2006	PM06A	7.96
2019	PR19A/1	57.82
2019	PR19A/2	62.37
2019	PR19A/3	71.91
2019	PR19A/4	36.16
Subtotal		228.26
2020	PR20A/1	61.32
2020	PR20A/2	62.35
2020	PR20A/3	55.96
Subtotal		179.63
2021	PR21	155.73
Total Planted		1,895.00
Field Road		134.37
Main Road		29.06
JKR Road		0.67
Drain		6.66
Building		22.01
TNB Rentice		17.07
Nursery		20.45
Encroachment		1.24
Swamp		42.93
Undeveloped		4.70
Buffer Zone		15.74
Steep		30.02
Total Unplanted		324.92
Grand Total		2,219.92

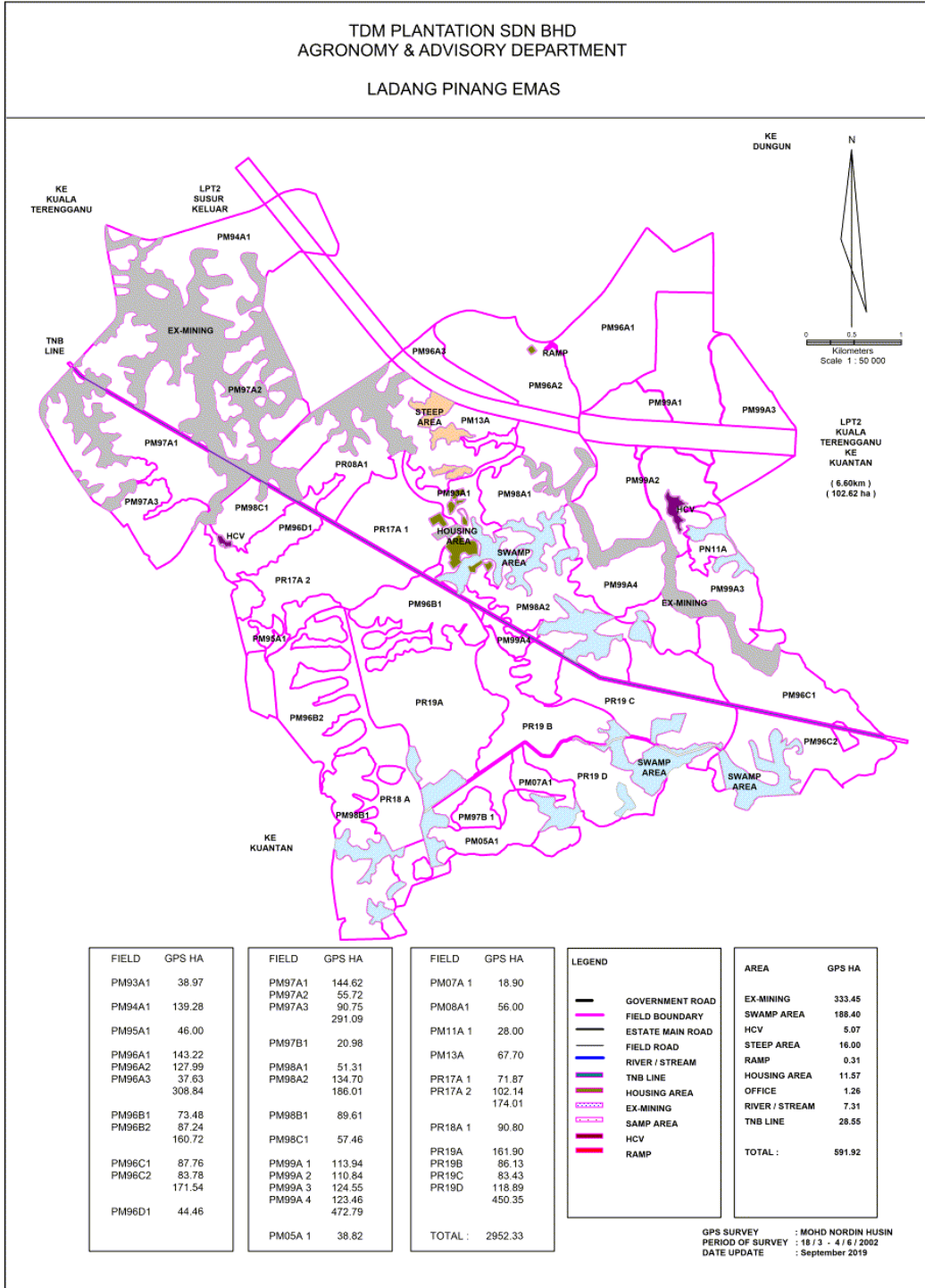


Legend			
Field Road	Buffer Zone	Govt Infra	Swamp
Main Road	Building	Nursery / Orchard	Undeveloped
Drain / River	Encroachment	Steep	
Govt Road			

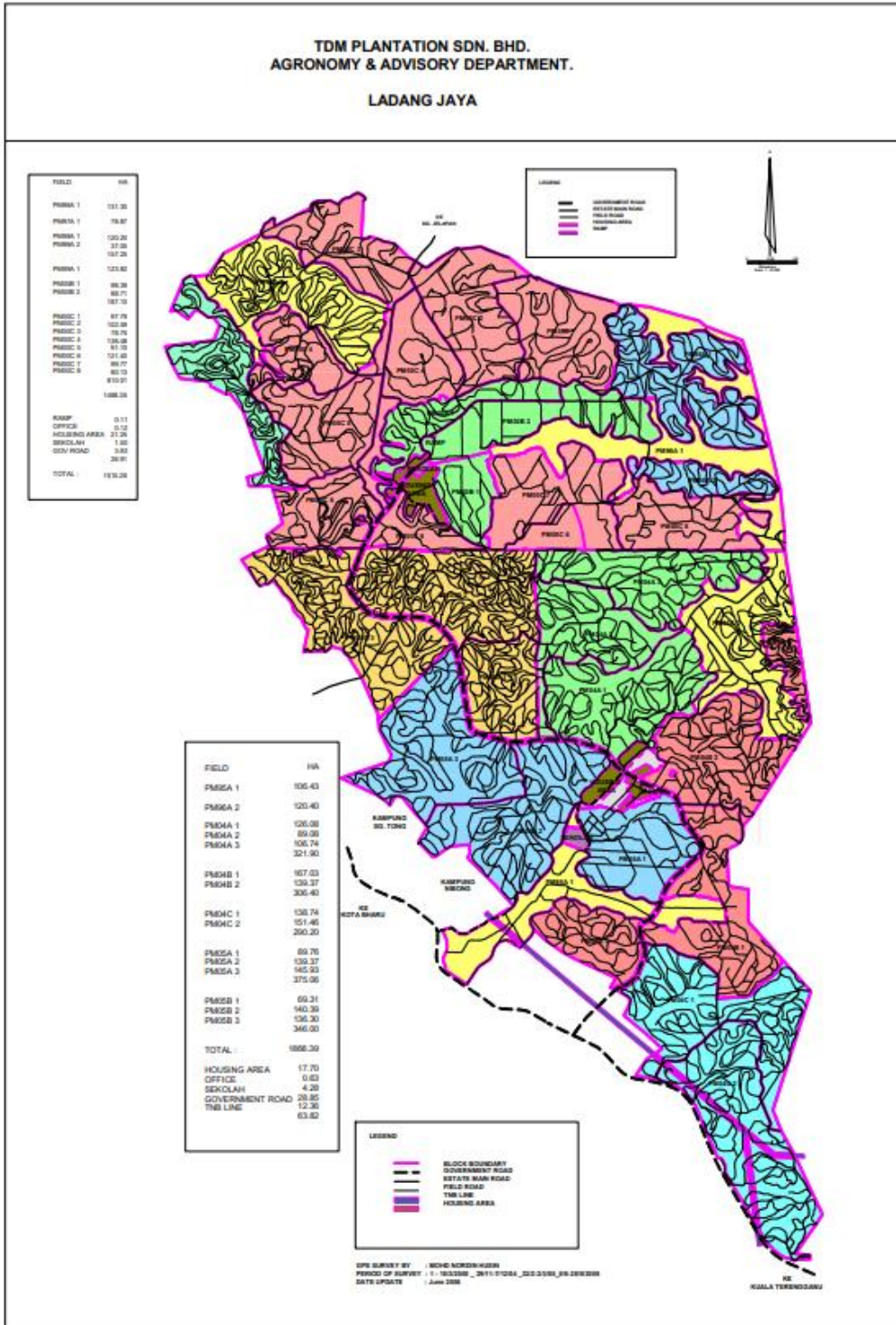


Prepared By: AAD
 Map Date: 12 Jul 2022
 Projection: UTM N48 WGS84

Pinang Emas Estate



Jaya Estate



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Appendix E: List of Smallholder Registered and/or sampled

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

Note: * are smallholders sampled in this audit.

Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure