

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

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

<b>Client Company Name / Parent Company: Sime Darby Plantation Berhad</b>
Client Company / Parent Company Address: Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia
Certification Unit: <b>Strategic Operating Unit (SOU 19) - Pagoh Palm Oil Mill</b>
Location of Certification Unit: Lot 2159, Ladang Pagoh, Mukim Jalan Bakri, Muar, 84309 Johor, Malaysia
Date of Final Report: 16/11/2023

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## Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	Sime Darby Plantation Berhad		
<b>RSPO Membership Number</b>	1-0008-04-000-00	<b>Membership Approval Date</b>	07/09/2004
<b>Address</b>	Level 11, Main Block, Plantation Tower No.2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia.		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Strategic Operating Unit (SOU 19) Pagoh Palm Oil Mill		
<b>Location / Address</b>	Lot 2159, Ladang Pagoh, Mukim Jalan Bakri, Muar, 84309 Johor, Malaysia		
<b>Website</b>	<a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a>		
<b>Management Representative</b>	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, Group Sustainability Department (GSD))	<b>E-mail</b>	<a href="mailto:Shylaja.vasudevan@simedarbyplantation.com">Shylaja.vasudevan@simedarbyplantation.com</a>
<b>Telephone</b>	+(603) 78484000 (HQ)	<b>Facsimile</b>	-

2. Certification Information			
<b>Certificate Number</b>	RSPO 600305	<b>Certificate Start Date</b>	28/01/2024
<b>Date of First Certification</b>	28/01/2014	<b>Certificate Expiry Date</b>	27/01/2029
<b>Scope of Certification</b>	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
<b>Visit Objectives</b>	<ul style="list-style-type: none"> <li>Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> <li>Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</li> </ul>		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre-Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 2) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
<b>Supply Chain Module</b>	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	45 MT/HR
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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<b>Is this a remote audit or on-site audit</b>	<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 685822	MS 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	11/12/2027
MSPO 682037	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills		11/12/2027
MSPO 714136	MSPO Supply Chain Certification Standard 2018		04/09/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Pagoh Palm Oil Mill	Lot 2159, Ladang Pagoh, Mukim Jalan Bakri 84309 Muar, Johor.	2° 04' 40.62" N	102° 43' 07.30" E
Pagoh Estate	Lot 2159, Ladang Pagoh, Mukim Jalan Bakri 84309 Muar, Johor.	2° 04' 40.62" N	102° 43' 07.30" E
Lanadron Estate	Panchor 84500 Muar, Johor	2° 10' 48.70" N	102° 44' 04.00" E
Pengkalan Bukit Estate	Mukim Jalan Bakri 84309 Muar, Johor	2° 07' 29.80" N	102° 44' 32.00" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pagoh Estate	1,988.02	9.10	328.81	2,325.93	85%
Lanadron Estate	1,561.96	19.41	117.22	1,698.59	92%
Pengkalan Bukit Estate	*2,935.92	2.87	**173.62	3,112.41	95%
<b>Total</b>	<b>6,485.90</b>	<b>31.38</b>	<b>619.65</b>	<b>7,136.93</b>	

**Note:**

- \*Reduce by 25.68 ha compared to last year (2,961.60 ha) due to resurvey conducted by GIS Department in January 2023. Adjustment has been made to remove vacant area from planted area that may affect Yield/Ha performance.

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2. \*\*Increase by 25.68 ha (Other – vacant Area) due Internal adjustment in area from resurvey conducted by GIS Department in January 2023.

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Pagoh Estate	434.40	1,150.17	760.53	590.82	2,501.52	434.4
Lanadron Estate	113.00	288.33	1,160.63	0.00	1,448.96	113.00
Pengkalan Bukit Estate	228.93	1,033.36	586.63	139.10	1,759.09	228.93
<b>Total (ha)</b>	<b>776.33</b>	<b>2,471.86</b>	<b>2,507.79</b>	<b>729.92</b>	<b>5,709.57</b>	<b>776.33</b>

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 2023 – Dec 2023)	Actual (Oct 2022 – Sept 2023)		Forecast (Jan 2024 – Dec 2024)
		Previous license period (Oct 2022 – Dec 2022)	Current license period (Jan 2023 – Sept 2023)	
Pagoh Estate	37,952.00	6,400.17	24,842.15	30,847.56
Lanadron Estate	26,964.42	4,486.22	16,255.49	28,000.00
Pengkalan Bukit Estate	41,695.92	5,596.16	26,386.73	50,966.95
<b>Total</b>	<b>106,612.34</b>	<b>83,966.92</b>		<b>109,814.51</b>

Note: The actual yield was verified and confirmed based on Sime Darby 2023 recruitment planning which will reduce harvester to area ratio and increase harvesting rounding, 2022 rain fall pattern and consideration of prime age of the OP.

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 2023 – Dec 2023)	Actual (Oct 2022 – Sept 2023)		Forecast (Jan 2024 – Dec 2024)
		Previous license period (Oct 2022 – Dec 2022)	Current license period (Jan 2023 – Sept 2023)	
Tangkah Estate		0.00	91.00	
Muar River Estate		0.00	54.43	
Sg Senarut Estate		0.00	74.86	
Welch Estate		0.00	11.29	
<b>Total</b>		<b>231.58</b>		

Note: Crop diversion from sister estate under Sime Darby Plantation Berhad.

<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Jan 2023 – Dec 2023)	Actual (Oct 2022 – Sept 2023)		Forecast (Jan 2024 – Dec 2024)
		Previous license period (Oct 2022 – Dec 2022)	Current license period (Jan 2023 – Sept 2023)	
Supplier AA	-	116.77	762.14	-
Supplier AB	-	0.00	74.43	-
Supplier AC	-	318.81	0.00	-
Supplier AD	-	405.67	0.00	-
Supplier AE	-	1,942.55	7,175.27	-
Supplier AF	-	90.53	521.30	-
Supplier AG	-	0.00	266.51	-
Supplier AH	-	2,728.02	11,199.63	-
Supplier AI	-	1,432.79	5,908.05	-
Supplier AJ	-	-	99.36	-
Supplier AK	-	-	140.56	-
<b>Total</b>	<b>-</b>	<b>33,182.39</b>		<b>-</b>

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Oct 2022	5,462.22	3,059.41	8,521.63
2	Nov 2022	5,209.70	1,009.67	6,219.37
3	Dec 2022	5,810.63	2,966.06	8,776.69
4	Jan 2023	4,828.62	1,344.01	6,172.63
5	Feb 2023	4,095.75	1,369.71	5,465.46
6	Mar 2023	3,425.32	1,406.05	4,831.37
7	Apr 2023	4,719.52	1,705.63	6,425.15
8	May 2023	7,740.47	4,352.09	12,092.56
9	June 2023	7,888.75	3,405.87	11,294.62
10	July 2023	11,102.70	4,090.84	15,193.54
11	Aug 2023	12,416.25	3,803.73	16,219.98
12	Sept 2023	11,498.57	4,669.32	16,167.89
	<b>TOTAL</b>	<b>84,198.50</b>	<b>33,182.39</b>	<b>117,380.89</b>

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<b>10. Summary of Certified Tonnage (MT) (not applicable for ISS)</b>			
<b>Estimated last year (Jan 2023 – Dec 2023)</b>	<b>Actual (Oct 2022 – Sept 2023)</b>		<b>Forecast (Jan 2024 – Dec 2024)</b>
	Previous license period (Oct 2022 – Dec 2022)	Current license period (Jan 2023 – Sept 2023)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
106,612.34 mt	16,482.55 mt	67,715.95 mt	109,814.51 mt
	<b>TOTAL</b>	84,198.50 mt	
<b>CPO (OER: 21.80%)</b>	<b>CPO (OER: 18.96%)</b>		<b>CPO (OER: 21.80%)</b>
23,241.49 mt	2,898.97 mt	13,063.76 mt	23,939.56 mt
	<b>TOTAL</b>	15,962.74 mt	
<b>PK (KER: 5.37%)</b>	<b>PK (KER: 5.02%)</b>		<b>PK (KER: 5.01%)</b>
5,725.08 mt	814.47 mt	3,410.18 mt	5,490.72 mt
	<b>TOTAL</b>	4,224.65 mt	

**Note:** Low FFB processed and production resulting to low CPO and PK production due to low crop received supplying estate (Shortage of harvester, Increase of harvesting round, and interference of rainfall pattern). The forecast yield was verified and confirmed based on Sime Darby 2023 recruitment planning which will reduce harvester to area ratio ranging 1:16-20 (Current ratio was 1:23-28) since January 2023 and increase harvesting rounding, 2022 rain fall pattern and consideration of prime age of the OP for FFB sent to the Mill.

<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (MT)</b>	<b>Certified PK (MT)</b>
1	Oct 2022	962.122	277.507
2	Nov 2022	924.004	266.761
3	Dec 2022	1012.851	270.199
4	Jan 2023	880.053	227.943
5	Feb 2023	784.716	188.992
6	Mar 2023	641.433	175.854
7	Apr 2023	925.098	241.212
8	May 2023	1518.366	395.964
9	June 2023	1551.066	405.745
10	July 2023	2129.112	557.147
11	Aug 2023	2405.244	628.223
12	Sept 2023	2228.675	589.099
	<b>TOTAL</b>	<b>15,962.74</b>	<b>4,224.65</b>

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<b>11. Summary of Actual Volume sold</b>					
<b>Current License period (Jan 2023 – Sept 2023)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	395.93	-	-	12,181.26	12,577.19
<b>PK (MT)</b>	228.01	-	-	3,131.12	3,359.13
<b>Credits</b>	-	-	-	-	-
<b>Previous License period (Oct 2022 – Dec 2022)</b>					
<b>CPO (MT)</b>	1,356.38	-	-	1,902.81	3,259.19
<b>PK (MT)</b>	77.60	-	-	639.67	717.27
<b>Credits</b>	-	-	-	-	-

<b>11A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Buyer A	TR-XXXXXXXX-XXXX	1,752.31	-
2	Buyer B	TR-XXXXXXXX-XXXX	-	305.61
<b>TOTAL</b>			<b>1,752.31</b>	<b>305.61</b>

**Note:** Data is consolidated, and each transaction were verified against PalmTrace

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

<b>11C. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Buyer AA	14,084.07	-
2	Buyer BB	-	3,770.79
<b>TOTAL</b>		<b>14,084.07</b>	<b>3,770.79</b>

Note: This Operating Unit has a system in place to remove CSPO sold as conventional at their respective time interval which was not at this particular audit.



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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
1	NA	NA	NA
<b>TOTAL</b>			<b>NA</b>

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			
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)
1	NA	NA	NA	NA	NA	NA
<b>TOTAL</b>		<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>

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

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

## Section 2: Assessment Process

### Certification Body:

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

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **09-12/10/2023**. 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. 30 days prior to audit, public notification posted in the BSI website as per the following link: [https://rspo.org/wp-content/uploads/RSPO-Public-Notification\\_Recertification\\_Sime-Darby\\_SOU-19-Pagoh-POM-Supply-Base\\_English.pdf](https://rspo.org/wp-content/uploads/RSPO-Public-Notification_Recertification_Sime-Darby_SOU-19-Pagoh-POM-Supply-Base_English.pdf)

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

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

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

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

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

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.

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification 2)</b>	<b>Year 2 (ASA2_1)</b>	<b>Year 3 (ASA2_2)</b>	<b>Year 4 (ASA2_3)</b>	<b>Year 5 (ASA2_4)</b>
Pagoh POM	√	√	√	√	√
Pagoh Estate	√	√	√	√	√
Lanadron Estate	√	√	√	√	√
Pengkalan Bukit Estate	√	√	√	√	√

**Tentative Date of Next Visit: October 14, 2024 - October 17, 2024**

**Total Number of Mandays: 12 Mandays**

**2.2 BSI Assessment Team**

<b>Name</b>	<b>Role</b>	<b>Competency</b>
Nor Halis Abu Zar (NHA)	Team Leader	<p><b>Education:</b> Holds a Bachelor of Science in Plantation Technology and Management, University Technology Mara</p> <p><b>Work Experience:</b> He has 6 years' experience in Oil Palm Estate Management with Kulim Plantations Sdn. Bhd. The last position held was Assistant Manager. His experience includes the day-to-day estate operations and ensures the implementation of RSPO, ISCC and MSPO certification. He is a qualified Lead Auditor for MSPO and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p><b>Training attended:</b> He has completed ISO IMS 9001 and 14001 Lead Auditor Course, MSPO 2530:2013 Lead Auditor Course, Endorsed RSPO Lead Auditor Course, Endorsed RSPO SCC Lead Auditor Course, ISO 45001 Lead Auditor Course, ISO 9001:2015 Lead Auditor Course, MSPO SCCS Auditor Course, RSPO Independent Smallholder (IHS) Auditor Training by RSPO Secretariat and SMETA Requirement Training.</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of Occupation Health Safety requirement, HIRARC, Environment responsibility, training, and RSPO SCC.</p> <p><b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English</p>
Mohd Razaleigh bin Mohamad (MRM)	Team Member	<p><b>Education:</b> Holds a Bachelor Degree in Plantation Management and Agrotechnology, University Technology Mara (UiTM).</p> <p><b>Work Experience:</b> He has 5 years' experience in Oil Palm Estate Management with Tradewinds Plantation Berhad. The last position held was</p>

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		<p>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&amp;C, MSPO P&amp;C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements.</p> <p><b>Training attended:</b> He has completed ISO 9001:2015 Lead Auditor Course, ISO14001:2015 Lead Auditor Course, ISO45001:2018 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed MSPO P&amp;C Lead Auditor Course, Social Accountability SA8000 Auditor Course, RSPO Independent Smallholder (IHS) Auditor Training by RSPO Secretariat and Endorsed RSPO P&amp;C and SCCS Refresher Training.</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of legal, Social and Stakeholder consultation.</p> <p><b>Language proficiency:</b> He is fluent in both verbal/written in Bahasa Malaysia and English.</p>
<p>Amir Bahari (AB)</p>	<p>Team Member</p>	<p><b>Education:</b> Holds a Bachelor of Science (Hons) in Chemistry, University Science Malaysia &amp; a Diploma in Palm Oil Milling Tech/Management, Malaysian Palm Oil Board.</p> <p><b>Work Experience:</b> He has more than 30 years of plantation experience including managing rubber factories, palm oil mills and estates. Since 2014 he has started auditing professionally for varies scheme including RSPO and MSPO for varies accredited certification body.</p> <p><b>Training attended:</b> He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course Endorsed RSPO P&amp;C Refresher Training, HCV Awareness for RSPO/ MSPO auditors and RSPO HCV Audit Guidelines.</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, Smallholders inclusion, legal requirements, environment, and HCV.</p> <p><b>Language proficiency:</b> He is fluent in both verbal/written in Bahasa Malaysia and English.</p>
<p>Dr. Suhaili Sahari</p>	<p>Peer Reviewer</p>	<p><b>Education:</b> Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato’ Mohd Muda.</p> <p><b>Work Experience:</b> Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group</p>

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		<p>of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p><b>Training attended:</b></p> <ol style="list-style-type: none"> <li>1. ISO 9001:2015 Lead Auditor and Internal Auditor</li> <li>2. ASI reviewer training</li> <li>3. Safety and Health</li> <li>4. ISO 14001:2015 Standard</li> <li>5. RSPO Standards: RSPO P&amp;C 2018 MY-NI 2019</li> <li>6. MSPO Standards: MS 2530: 2013 part 1, 2, 3 and 4</li> <li>7. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS</li> <li>8. HACCP MS 1480:2019</li> <li>9. GAP Standard: GLOBALGAP, Euro GAP</li> </ol>
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**Accompanying Persons:**

Name	Role
N/A	N/A

**2.3 Assessment Plan**

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

Date	Time	Subjects	Auditor		
			NHA	MRM	AB
Sunday 08/10/2023	-	Audit Team Travel from Kuala Lumpur to Muar	√	√	√
Monday, 09/10/2023 Pagoh Estate	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize Audit plan</li> </ul>	√	√	√
	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/ Break	√	√	√

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Date	Time	Subjects	Auditor		
			NHA	MRM	AB
	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.	√	√	√
Tuesday, 10/10/2023 Pagoh POM	09.00 – 12.30	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.  Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
	10.00 – 12.00				
	12.30 – 13.30	Lunch/ Break	√	√	√
	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.	√	√	√
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Wednesday 11/10/2023 Lanadron Estate	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/ Break	√	√	√
	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.)	√	√	√

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Date	Time	Subjects	Auditor		
			NHA	MRM	AB
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Thursday 12/10/2023 Pengkalan Bukit Estate	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/ Break	√	√	√
	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 13/10/2023	-	Audit Team Travel back to Kuala Lumpur	√	√	√



### 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?	Sime Darby Plantation Berhad TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.  On 16/01/2020, Sime Darby Plantation Berhad under its subsidiary Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation – Liberia) to Mano Palm Oil Industries Ltd (MPOI): <a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations">http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</a>	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	Generally, all estates and mills excepted stated below or in the TBP are certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As of Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 01/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently Sime Darby Plantation Berhad have no control in the management. Refer TBP approval dated 13/07/2023.	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.	There are no new acquisitions. There is new propose on 2024 for Land legalization still in progress dated approval by RSPO on 13 Julai 2023 for these Estate. <ol style="list-style-type: none"> <li>1. Ladang Panjang Estate-1,796.19 ha</li> <li>2. Rantau Panjang Estate, Napal Estate / Karang Ringin Estate- 1,843.73 ha.</li> <li>3. Mangun Jaya Estate- 1,398.55 ha</li> <li>4. Sungai Jernih Estate- 851.57 ha</li> <li>5. Pelanjau Estate (PT BAL) &amp; Beturus Estate (PT BAL)- 4,071.76ha</li> <li>6. Karya Palma Estate (PT SNP)-476.70 Ha</li> <li>7. West and East Estate- 1,452.93 ha</li> </ol>	Complied

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<p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p>	<p>Although there is deviation has been identified at those Indonesia management units but it has been justified and approved by RSPO Secretariat on 13/07/2023 that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties were sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: <a href="http://www.rspo.org/certification/public-announcement">www.rspo.org/certification/public-announcement</a></p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): <a href="http://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations">www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations</a>. ACOP 2020 has been cross-referenced as below: <a href="http://www.rspo.org/members/29">www.rspo.org/members/29</a></p>	<p>Complied</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised</p>	<p>Although there are lapses has been identified at those Indonesia management units, but it has been justified and approved by the RSPO Secretariat on 13/07/2023 that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>	<p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.</p>	<p>Complied</p>

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<b>Un-Certified Units or Holdings</b>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&amp;C criterion 7.12.</p>	<p>Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/2023.</p>	<p>Complied</p>
<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification.</p> <ol style="list-style-type: none"> <li>1. NBPOL (Poliamba Limited) 23/05/2020 – no comments  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-plantation-berhad-nbpol-poliamba-limited">https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-plantation-berhad-nbpol-poliamba-limited</a></li> <li>2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd</a></li> <li>3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-ramu-agri-industries-ltd">https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-ramu-agri-industries-ltd</a></li> <li>4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd-ramu-agri-industries-limited">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd-ramu-agri-industries-limited</a></li> <li>5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd-higaturu-oil-palms">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd-higaturu-oil-palms</a></li> <li>6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-poliamba-limited-lamawan-png">https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-poliamba-limited-lamawan-png</a></li> <li>7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website</li> </ol>	<p>Complied</p>

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	<p><a href="https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-poliamba-limited-lamendauen-png">https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-poliamba-limited-lamendauen-png</a></p> <p>8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-roka-mini-estate">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-roka-mini-estate</a></p> <p>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-j-estate">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd.-j-estate</a></p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-limited-higaturu-oil-palm">https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-limited-higaturu-oil-palm</a></p> <p>11. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc-new-planting-assessment">https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc-new-planting-assessment</a></p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc.-new-planting-assessment-1">https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc.-new-planting-assessment-1</a></p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website  <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc.-new-planting-assessment">https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc.-new-planting-assessment</a></p> <p>Management units for 11 – 13 above were disposed</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancies between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited,</p>	<p>Complied</p>

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	<p>there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of August 2023, 16 out of 19 management units in Indonesia operations completed LUCA review with 1 Concept note (covering all 19 affected manage units) has been endorsed by RSPO.</p> <p>As per Internal Audit conducted in 27 – 28/06/2022, 01 – 06/08/2022 and 23/10/2022, all issues of are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about land conflict has been lodge by stakeholders as at the day of audit.</p>	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 4.2</p>	<p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.</p> <p>As per Internal Audit conducted in 27 – 28/06/2022, 01 – 06/08/2022 and 23/10/2022, no labor dispute issues were reported.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about labour dispute has been lodge by stakeholders as at the day of audit.</p> <p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism</p>	<p>Complied</p>
<p>Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>Sime Darby Plantation maintains corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country. It has been further verified through RSPO complaint tracker, Internet (Media) which there is no issue on noncompliance being addressed as at the day of audit.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issues are mainly awaiting for Land Titles. The last audit was conducted in July 2022. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance. HCV Assessment has been conducted</p>	<p>Complied</p>

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	for all SDP operations since 2010, there has been no clearance of HCV areas after the HCV Assessment has been conducted and verified during the annual RSPO External and Internal Audit reports. The liability happened as there were no HCV Assessment done at the time of planting for the cases which were entered into the RACP process.	
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company	Complied

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

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?  OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable as there is no smallholder scheme under SOU 19 Pagoh Certification Unit.	Not Applicable

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**Approved Time Bound Plan**

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	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 (Only applicable when revision is made)			
								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
Manggala	Indonesia	Manggala Mill	13.836	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -1 Estate	4.919	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -2 Estate	4.922	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -3 Estate	3.995	Certified	Not Applicable	23-Nov-10					
Alur Dumai	Indonesia	Alur Dumai Mill	3.759	Certified	Not Applicable	16-Jan-12					
	Indonesia	Alur Dumai Estate	3.759	Certified	Not Applicable	16-Jan-12					
Teluk Siak	Indonesia	Teluk Siak Mill	11,555.31	Certified	Not Applicable	11-Oct-11					
	Indonesia	Teluk Siak Estate	3,321.20	Certified	Not Applicable	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	3,799.21	Certified	Not Applicable	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	448.00	Not Certified	2023	NA		Yes	2024	Land legalization process for 448 ha at Pinang Sebatang Estate is still in process.	13-Jul-23
	Indonesia	Aneka Persada Estate	4,434.90	Certified	Not Applicable	11-Oct-11					
Blang Simpo	Indonesia	Blang Simpo Mill	8,777.22	Certified	Not Applicable	3-May-13					
	Indonesia	Blang Simpo -1 Estate	3,460.06	Certified	Not Applicable	3-May-13					

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	Indonesia	Blang Simpo -2 Estate	2,677.83	Certified	Not Applicable	3-May-13					
	Indonesia	Tamiang (PT PPP) Estate	1,451.99	Certified	Not Applicable	3-May-13					
	Indonesia	Batang Ara (PT PSK) Estate	1,187.34	Certified	Not Applicable	3-May-13					
Teluk Bakau	Indonesia	Teluk Bakau Mill	13,317.81	Certified	Not Applicable	11-Oct-11					
	Indonesia	Teluk Bakau Estate	4,025.07	Certified	Not Applicable	11-Oct-11					
	Indonesia	Nusa Lestari Estate	3,456.74	Certified	Not Applicable	11-Oct-11					
	Indonesia	Nusa Perkasa Estate	5,836.00	Certified	Not Applicable	11-Oct-11					
Mandah	Indonesia	Mandah Mill	12,366.18	Certified	Not Applicable	1-Apr-14					
	Indonesia	Mandah Estate	5,053.18	Certified	Not Applicable	1-Apr-14					
	Indonesia	Rotan Semelur Estate	7,313.00	Certified	Not Applicable	1-Apr-14					
Sungai Pinang	Indonesia	Sungai Pinang Mill	6.513	Certified	Not Applicable	11-Sep-12					
	Indonesia	Sungai Pinang Estate	3,374.42	Certified	Not Applicable	11-Sep-12					
	Indonesia	Bukit Pinang Estate	3,138.58	Certified	Not Applicable	11-Sep-12					
Ladang Panjang	Indonesia	Ladang Panjang Mill	1,202.04	Certified	Not Applicable	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,202.04	Certified	Not Applicable	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,796.19	Not Certified	2023	NA		Yes	2024	Land legalization process for 1,796.19 ha is still in progress.	13-Jul-23
Rantau Panjang	Indonesia	Rantau Panjang Mill	10,139.91	Certified	Not Applicable	16-Mar-12					
Rantau Panjang	Indonesia	Bumi Ayu Estate	2,960.98	Certified	Not Applicable	16-Mar-12					
	Indonesia	Rantau Panjang Estate	2,679.74	Certified	Not Applicable	16-Mar-12					



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	Indonesia	Rantau Panjang Estate	1,843.73	Not Certified	2023	NA		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Napal Estate/Karang Ringin	4,359.74	Certified	Not Applicable	16-Mar-12					
	Indonesia	Napal Estate/Karang Ringin	1,843.73	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Mangun Jaya Estate	139.45	Certified	Not Applicable	16-Mar-12					
	Indonesia	Mangun Jaya Estate	1,398.55	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1398.55 ha is still in process.	13-Jul-23
	Indonesia	Sungai Jernih Estate	851.57	Not Certified	2023	N/A		Yes	2024	Land legalization process of 851.57 ha is still in process.	13-Jul-23
Angsana	Indonesia	Angsana Mill	15,151.19	Certified	Not Applicable	6-Jul-11					
	Indonesia	Angsana Estate	3,250.06	Certified	Not Applicable	6-Jul-11					
	Indonesia	Gunung Sari Estate	2,826.94	Certified	Not Applicable	6-Jul-11					

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Mustika	Indonesia	Mustika Mill	14,840.76	Certified	Not Applicable	3-Jul-13					
	Indonesia	Mustika Estate	3,648.74	Certified	Not Applicable	3-Jul-13					
	Indonesia	Pantai bonati Estate	2,534.00	Certified	Not Applicable	6-Jul-11					
Gunung Aru	Indonesia	Gunung Aru Mill	12,740.54	Certified	Not Applicable	5-Jul-11					
	Indonesia	Gunung Aru Estate	2,684.41	Certified	Not Applicable	5-Jul-11					
	Indonesia	Gunung Kemas Estate	3,511.36	Certified	Not Applicable	5-Jul-11					
	Indonesia	Laut Timur Estate	3,207.28	Certified	Not Applicable	5-Jul-11					
	Indonesia	Pantai Timur Estate	3,337.49	Certified	Not Applicable	5-Jul-11					
Ungkaya	Indonesia	Ungkaya Mill	4,145.00	Certified	Not Applicable	10-Jul-12					
	Indonesia	Ungkaya Estate	4,145.00	Certified	Not Applicable	10-Jul-12					
Rantau	Indonesia	Rantau Mill	24,169.56	Certified	Not Applicable	30-Dec-11					
	Indonesia	Rantau Estate	4,638.00	Certified	Not Applicable	30-Dec-11					
	Indonesia	Matalok Estate	3,082.00	Certified	Not Applicable	30-Dec-11					
	Indonesia	Selabak Estate ( PT SAA)	3,757.67	Certified	Not Applicable	16-Mar-12					
	Indonesia	Randi Estate (PT SAA)	2,882.98	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sangkoh Estate (PT SAA)	3,789.34	Certified	Not Applicable	16-Mar-12					
	Indonesia	Lanting Estate (PT LMR)	3,249.27	Certified	Not Applicable	16-Mar-12					
Betung	Indonesia	Betung Mill	7,579.57	Certified	Not Applicable	1-Apr-14					
	Indonesia	Betung Estate	4,266.00	Certified	Not Applicable	1-Apr-14					
	Indonesia	Sekayu Estate	3,313.57	Certified	Not Applicable	1-Apr-14					
Bebunga	Indonesia	Bebunga Mill	14,274.77	Certified	Not Applicable	16-Mar-12					
	Indonesia	Bebunga Estate	3,958.43	Certified	Not Applicable	16-Mar-12					

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	Indonesia	Bakau Estate	5,342.14	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sungai Cengal Estate	4,974.20	Certified	Not Applicable	16-Mar-12					
Pondok Labu	Indonesia	Pondok Labu Mill	15,876.20	Certified	Not Applicable	16-Mar-12					
	Indonesia	Pondok Labu Estate	3,569.53	Certified	Not Applicable	16-Mar-12					
	Indonesia	Binturung Estate	4,072.01	Certified	Not Applicable	16-Mar-12					
	Indonesia	Rampa Estate	3,656.20	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sesulung Estate	4,578.46	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sekunyir Mill	7,734.59	Certified	Not Applicable	23-Nov-10					
Sekunyir	Indonesia	Sekunyir Estate	3,555.19	Certified	Not Applicable	23-Nov-10					
	Indonesia	Seruyan Estate	4,179.40	Certified	Not Applicable	23-Nov-10					
	Indonesia	Sukamandang Mill	14,779.92	Certified	Not Applicable	5-Jul-11					
Sukamandang	Indonesia	Sukamandang Estate	3,936.56	Certified	Not Applicable	5-Jul-11					
	Indonesia	Sapiri Estate	3,530.90	Certified	Not Applicable	5-Jul-11					
	Indonesia	Baras Danum Estate	3,664.60	Certified	Not Applicable	5-Jul-11					
	Indonesia	Kuala Kuayan Estate	3,647.86	Certified	Not Applicable	5-Jul-11					
	Indonesia	Pemantang Mill	16,601.66	Certified	Not Applicable	5-Jul-11					
Pemantang	Indonesia	Pemantang Estate	3,857.91	Certified	Not Applicable	5-Jul-11					
	Indonesia	Kawan Batu Estate	4,400.00	Certified	Not Applicable	5-Jul-11					
	Indonesia	Hatantiring Estate	3,811.00	Certified	Not Applicable	5-Jul-11					
	Indonesia	Batang Garing Estate	4,532.75	Certified	Not Applicable	5-Jul-11					
	Indonesia	Lembiru Mill	9,409.07	Certified	Not Applicable	3-Jul-14					
Lembiru	Indonesia	Lembiru Estate	4,929.49	Certified	Not Applicable	3-Jul-14					

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	Indonesia	Awatan Estate	3,476.79	Certified	Not Applicable	3-Jul-14					
	Indonesia	Pelanjau Estate (PT BAL)	1,002.79	Certified	Not Applicable	3-Jul-19					
	Indonesia	Pelanjau Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Beturus Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Karya Palma Estate (PT SNP)	476.70	Not Certified	2023	N/A		Yes	2024	Land legalization process for 476.70 ha is still in process.	13-Jul-23
Bukit Ajong	Indonesia	Bukit Ajong Mill	11,498.82	Certified	Not Applicable	18-Oct-10					
	Indonesia	West Estate	4,562.34	Certified	Not Applicable	18-Oct-10					
	Indonesia	West Estate	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha (West and East Estate) is still in process.	13-Jul-23
	Indonesia	East Estate	2,665.48	Certified	Not Applicable	18-Oct-10					
	Indonesia	East Estate/Sei Mawang	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha	13-Jul-23

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										(West and East Estate) is still in process.	
Sg. Dingin	Malaysia	Sungai Dingin Oil Mill	19,517.17	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Anak Kulim Estate	1,523.35	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Sungai Dingin Estate	4,244.03	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Somme Estate	941.56	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Bukit Selarong Estate	3,896.17	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Padang Buluh Estate	4,008.47	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Bukit Hijau Estate	2,725.00	Certified	Not Applicable	12-Aug-10	19-20 July 21				
	Malaysia	Jentayu Estate	2,178.59	Certified	Not Applicable	12-Aug-10	19-20 July 21				
Chersonese	Malaysia	Chersonese Oil Mill	11,099.36	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Chersonese Estate	3,293.72	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Kalumpong Estate	2,716.80	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Tali Ayer Estate	3,756.10	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Holyrood Estate	1,332.74	Certified	Not Applicable	5-Oct-11	19-20 July 21				
Elphil	Malaysia	Elphil Oil Mill	6,814.60	Certified	Not Applicable	18-Jun-11	19-20 July 21				
	Malaysia	Kamuning Estate	3,888.43	Certified	Not Applicable	18-Jun-11	19-20 July 21				
	Malaysia	Elphil Estate	1,865.43	Certified	Not Applicable	18-Jun-11	19-20 July 21				
	Malaysia	Kinta Kellas Estate	1,060.74	Certified	Not Applicable	18-Jun-11	19-20 July 21				
Flemington	Malaysia	Flemington Oil Mill	11,226.23	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Flemington Estate	1,906.84	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Bagan Datoh Estate	3,781.86	Certified	Not Applicable	5-Oct-11	19-20 July 21				

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	Malaysia	Sabak Bernam Estate	2,511.79	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Sg. Samak Estate	3,025.74	Certified	Not Applicable	5-Oct-11	19-20 July 21				
Seri Intan/Selaba	Malaysia	Seri Intan Oil Mill	14,474.29	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Selaba Oil Mill	1,549.75	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Seri Intan (+ Selaba) Estate	4,013.16	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Sabrang Estate	3,945.23	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Sogomana Estate	2,214.08	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Sg. Wangi Estate	2,226.66	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Bikam Estate	2,075.16	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Malaysia	Cluny (+ Bedford) Estate	1,549.75	Certified	Not Applicable	3-Mar-11	19-20 July 21				
	Tennamaram	Malaysia	Tennamaram Oil Mill	10,706.26	Certified	Not Applicable	3-Mar-11	19-20 July 21			
Malaysia		Tennamaram Estate	1,981.60	Certified	Not Applicable	3-Mar-11	19-20 July 21				
Malaysia		Sungai Buluh Estate	5,152.22	Certified	Not Applicable	3-Mar-11	19-20 July 21				
Malaysia		Bukit Talang Estate	3,572.44	Certified	Not Applicable	3-Mar-11	19-20 July 21				
Bukit Kerayong	Malaysia	Bukit Benut Oil Mill	6,346.90	Certified	Not Applicable	15-Apr-11	19-20 July 21				
	Malaysia	Bukit Benut Estate	2,699.28	Certified	Not Applicable	15-Apr-11	19-20 July 21				
	Malaysia	Bukit Cheraka Estate	3,647.62	Certified	Not Applicable	15-Apr-11	19-20 July 21				
East	Malaysia	East Oil Mill	10,902.94	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	East Estate	5,634.45	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Sepang Estate	2,092.28	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Dusun Durian Estate	3,176.21	Certified	Not Applicable	19-May-10	19-20 July 21				

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West	Malaysia	West Oil Mill	5,912.69	Certified	Not Applicable	19-May-10	19-20 July 21			
	Malaysia	West Estate	5,912.69	Certified	Not Applicable	19-May-10	19-20 July 21			
Bukit Puteri	Malaysia	Bukit Puteri Oil Mill	3,875.80	Certified	Not Applicable	7-Jul-11	19-20 July 21			
	Malaysia	Bukit Puteri Estate	3,875.80	Certified	Not Applicable	7-Jul-11	19-20 July 21			
Kerdau	Malaysia	Kerdau Oil Mill	13,781.50	Certified	Not Applicable	7-Jul-11	19-20 July 21			
	Malaysia	Kerdau Estate	5,683.04	Certified	Not Applicable	7-Jul-11	19-20 July 21			
	Malaysia	Mentakab Estate	3,266.49	Certified	Not Applicable	7-Jul-11	19-20 July 21			
	Malaysia	Chenor Estate	2,834.98	Certified	Not Applicable	7-Jul-11	19-20 July 21			
	Malaysia	Sg Mai Estate	1,996.99	Certified	Not Applicable	7-Jul-11	19-20 July 21			
Jabor	Malaysia	Jabor Oil Mill	2,332.92	Certified	Not Applicable	7-Jul-11	19-20 July 21			
	Malaysia	Jabor Estate	2,332.92	Certified	Not Applicable	7-Jul-11	19-20 July 21			
Labu	Malaysia	Labu Oil Mill	4,529.72	Certified	Not Applicable	30-Dec-11	19-20 July 21			
	Malaysia	Labu Estate	4,529.72	Certified	Not Applicable	30-Dec-11	19-20 July 21			
Tanah Merah	Malaysia	Tanah Merah Oil Mill	6,203.87	Certified	Not Applicable	19-May-10	19-20 July 21			
	Malaysia	Tanah Merah Estate	4,341.73	Certified	Not Applicable	19-May-10	19-20 July 21			
	Malaysia	Bukit Pelandok Estate	1,862.14	Certified	Not Applicable	19-May-10	19-20 July 21			
Sua Betong	Malaysia	Sua Betong Oil Mill	18,457.27	Certified	Not Applicable	18-Feb-14	19-20 July 21			
	Malaysia	Sua Betong Estate	2,870.75	Certified	Not Applicable	18-Feb-14	19-20 July 21			
	Malaysia	Sengkang Estate	2,831.51	Certified	Not Applicable	18-Feb-14	19-20 July 21			
	Malaysia	Bradwall Estate	3,828.34	Certified	Not Applicable	18-Feb-14	19-20 July 21			
	Malaysia	PD Lukut Estate	1,523.79	Certified	Not Applicable	18-Feb-14	19-20 July 21			
	Malaysia	Tampin Linggi Estate	2,106.71	Certified	Not Applicable	18-Feb-14	19-20 July 21			

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	Malaysia	Sg. Bahru Estate	1,427.31	Certified	Not Applicable	18-Feb-14	19-20 July 21				
	Malaysia	Salak Estate	3,868.86	Certified	Not Applicable	18-Feb-14	19-20 July 21				
Kok Foh	Malaysia	Kok Foh Oil Mill	14,852.64	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Muar River Estate	1,584.62	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Sg. Senarut Estate + Sg Gemas Estate	2,958.38	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Kok Foh Estate	2,275.84	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Bukit Pilah Estate	3,667.31	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	St. Helier Estate	1,992.65	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Sungai Sabaling Estate	1,321.35	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Malaysia	Pertang Estate	1,052.49	Certified	Not Applicable	7-Jul-11	19-20 July 21				
	Kempas	Malaysia	Kempas Oil Mill	11,828.51	Certified	Not Applicable	20-May-10	19-20 July 21			
Malaysia		Kempas Estate	4,505.45	Certified	Not Applicable	20-May-10	19-20 July 21				
Malaysia		Tangkah Estate	2,537.78	Certified	Not Applicable	20-May-10	19-20 July 21				
Malaysia		Kemuning Estate	2,671.05	Certified	Not Applicable	20-May-10	19-20 July 21				
Malaysia		Serkam Estate	2,114.23	Certified	Not Applicable	20-May-10	19-20 July 21				
Diamond Jubilee	Malaysia	Diamond Jubilee Palm Oil Mill	7,356.19	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Diamond Jubilee Estate	2,836.19	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Bukit Asahan Estate	3,072.18	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Welch Estate	1,447.82	Certified	Not Applicable	5-Oct-11	19-20 July 21				
Pagoh	Malaysia	Pagoh Oil Mill	7,418.59	Certified	Not Applicable	28-Jan-14	19-20 July 21				
	Malaysia	Pagoh Estate	2,325.93	Certified	Not Applicable	28-Jan-14	19-20 July 21				



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	Malaysia	Lanadron Estate	1,964.44	Certified	Not Applicable	28-Jan-14	19-20 July 21				
	Malaysia	Pengkalan Bukit Estate	3,128.22	Certified	Not Applicable	28-Jan-14	19-20 July 21				
Chaah	Malaysia	Chaah Oil Mill	8,699.93	Certified	Not Applicable	18-Nov-10	19-20 July 21				
	Malaysia	Chaah Estate	2,795.36	Certified	Not Applicable	18-Nov-10	19-20 July 21				
	Malaysia	Sg. Simpang Kiri Estate	2,371.66	Certified	Not Applicable	18-Nov-10	19-20 July 21				
	Malaysia	North Labis Estate	3,532.91	Certified	Not Applicable	18-Nov-10	19-20 July 21				
Gunung Mas	Malaysia	Gunung Mas Oil Mill	12,305.54	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Gunung Mas Estate	3,466.17	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Kempas Klebang Estate	2,473.06	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Bukit Paloh Estate	3,390.90	Certified	Not Applicable	19-May-10	19-20 July 21				
	Malaysia	Yong Peng Estate	2,975.41	Certified	Not Applicable	19-May-10	19-20 July 21				
Bukit Benut	Malaysia	Bukit Benut Oil Mill	8,495.13	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Bukit Benut Estate	2,799.78	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	Lambak Elaeis Estate	3,740.16	Certified	Not Applicable	5-Oct-11	19-20 July 21				
	Malaysia	CEP Nyior Estate	1,955.19	Certified	Not Applicable	5-Oct-11	19-20 July 21				
Ulu Remis	Malaysia	Ulu Remis Oil Mill	17,115.58	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Ulu Remis Estate	2,598.25	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Cenas Estate	1,974.06	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Bukit Badak Estate	3,234.25	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Tun Dr. Ismail Estate	4,271.44	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Pekan Estate	3,258.70	Certified	Not Applicable	11-Apr-11	19-20 July 21				
	Malaysia	Sembrong Estate	1,778.88	Certified	Not Applicable	11-Apr-11	19-20 July 21				

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Hadapan	Malaysia	Hadapan Oil Mill	11,371.82	Certified	Not Applicable	29-Mar-11	19-20 July 21				
	Malaysia	Sri Pulai Estate	2,049.87	Certified	Not Applicable	29-Mar-11	19-20 July 21				
	Malaysia	Kulai Estate	3,023.42	Certified	Not Applicable	29-Mar-11	19-20 July 21				
	Malaysia	Layang Estate	3,258.90	Certified	Not Applicable	29-Mar-11	19-20 July 21				
	Malaysia	CEP Renggam Estate	3,039.63	Certified	Not Applicable	29-Mar-11	19-20 July 21				
Sandakan Bay	Malaysia	Sandakan Bay Oil Mill	16,764.34	Certified	Not Applicable	1-Oct-08	19-20 July 21				
	Malaysia	Tun Tan Siew Sin Estate	3,125.60	Certified	Not Applicable	1-Oct-08	19-20 July 21				
	Malaysia	Tunku Estate	3,199.05	Certified	Not Applicable	1-Oct-08	19-20 July 21				
	Malaysia	Tigowis Estate	2,074.02	Certified	Not Applicable	1-Oct-08	19-20 July 21				
	Malaysia	Sentosa Estate	3,545.54	Certified	Not Applicable	1-Oct-08	19-20 July 21				
	Malaysia	Segaliud Estate	4,820.13	Certified	Not Applicable	1-Oct-08	19-20 July 21				
Melalap	Malaysia	Melalap Oil Mill	5246.18	Certified	Not Applicable	21-Jan-11	19-20 July 21				
	Malaysia	Melalap Estate	2,096.73	Certified	Not Applicable	21-Jan-11	19-20 July 21				
	Malaysia	Sapong Estate	3,149.45	Certified	Not Applicable	21-Jan-11	19-20 July 21				
Binuang	Malaysia	Binuang Oil Mill	11,659.58	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Binuang Estate	3,271.08	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Sungang Estate	3,407.98	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Tingkeyu Estate	1,881.08	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Jeleta Bumi Estate	3,099.44	Certified	Not Applicable	16-Jan-09	19-20 July 21				
Giram	Malaysia	Giram Oil Mill	8,345.02	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Giram Estate	4,166.98	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Mostyn Estate	4,178.04	Certified	Not Applicable	16-Jan-09	19-20 July 21				

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Merotai	Malaysia	Merotai Oil Mill	11,545.71	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Merotai Estate	3,052.66	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Imam Estate	3,773.56	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Tiger Estate	2,497.86	Certified	Not Applicable	16-Jan-09	19-20 July 21				
	Malaysia	Table Estate	2,221.63	Certified	Not Applicable	16-Jan-09	19-20 July 21				
Lavang	Malaysia	Lavang Oil Mill	24,836.54	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Lavang Estate	4,363.83	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Rasan Estate	3,454.00	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Belian Estate	2,847.00	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Kelida Estate	2,460.00	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Lavang (Special) Estate	included under Lavang Estate Ha	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Pekaka Estate	2,626.14	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Ruai Estate	2,460.96	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Dulang Estate	2,548.00	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Charquest Estate	1,448.71	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Paroh Estate	2,627.90	Certified	Not Applicable	30-Dec-11	19-20 July 21				
Rajawali	Malaysia	Rajawali Oil Mill	14,104.45	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Rajawali Estate	6,087.27	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Samudera Estate	3,308.60	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Semarak Estate	2,248.68	Certified	Not Applicable	30-Dec-11	19-20 July 21				

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	Malaysia	Bayu Estate	2,459.90	Certified	Not Applicable	30-Dec-11	19-20 July 21				
Derawan	Malaysia	Derawan Oil Mill	9,528.83	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Derawan Estate	2,490.79	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Sahua Estate	2,644.00	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Takau Estate	2,107.00	Certified	Not Applicable	30-Dec-11	19-20 July 21				
	Malaysia	Damai Estate	2,287.04	Certified	Not Applicable	30-Dec-11	19-20 July 21				
Guadalcanal Plains Palm Oil Limited (GPPOL)	Solomon Islands	Tetere Oil Mill	9,025.69	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Tetere Estate	2,947.79	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Ngalimbiu Estate	2,498.65	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Mbalisuna Estate	2,868.47	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Smallholders – West Zone (83)	245.50	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Smallholders – Central Zone (53)	181.71	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Smallholders – MBA East Zone (59)	180.80	Certified	Not Applicable	18-Mar-11	19-20 July 21				
	Solomon Islands	Smallholders – MBE East Zone (37)	102.77	Certified	Not Applicable	18-Mar-11	19-20 July 21				
Milne Bay Estates (MBE)	Papua New Guinea	Hagita Oil Mill	16,508.59	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Giligili Estate	1,095.47	Certified	Not Applicable	15-Feb-13	19-20 July 21				

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	PNG	Hagita Estate	2,450.02	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Waigani Estate	2,341.13	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Sagarai Estate	2,864.55	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Padipadi Estate	4,517.67	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Mariawatte Estate	1,680.14	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Smallholders - East Gurney Estate (259)	450.59	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Smallholders - West Gurney Estate (231)	479.13	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Smallholders - East Sagarai Estate (156)	283.93	Certified	Not Applicable	15-Feb-13	19-20 July 21				
	PNG	Smallholders - West Sagarai Estate (212)	345.96	Certified	Not Applicable	15-Feb-13	19-20 July 21				
Poliamba (POL)	Papua New Guinea	Poliamba Oil Mill	10,720.53	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Kara Estate	1,032.10	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Nalik Estate	2,666.75	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	West Coast Estate	627.60	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Noatsi Estate	2,064.10	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Madak Estate	1,517.11	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Smallholders -North Division (615)	1,022.12	Certified	Not Applicable	19-Mar-12	19-20 July 21				
	PNG	Smallholders- Division (866) South	1,257.21	Certified	Not Applicable	19-Mar-12	19-20 July 21				

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	PNG	Smallholders -West Division (309)	533.54	Certified	Not Applicable	19-Mar-12	19-20 July 21				
Ramu Agricultural Industries Ltd (RAIL)	Papua New Guinea	Gusap Mill	14,606.08	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Gusap East (Gusap) Estate	2,856.45	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Gusap West (Paddock) Estate	3,019.09	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Surinam Estate	2,154.14	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Dumpu Estate	2,254.36	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Ngaru Estate	854.33	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	J Estate (Jephcott) Estate	2,824.01	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Smallholders - Madang VOPs (71)	360.00	Certified	Not Applicable	5-Aug-10	19-20 July 21				
	PNG	Smallholders - Morobe VOPs (253)	283.70	Certified	Not Applicable	5-Aug-10	19-20 July 21				
Higaturu Oil Palm (HOP)	Papua New Guinea	Sangara Oil Mill		Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Mamba Oil Mill		Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Embi Estate	1,737.78	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Ambogo Estate	2,040.00	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Sangara Estate	1,780.00	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Sumbiripa Estate	2,545.00	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Mamba Estate	4,013.10	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Sambogo Estate	2,637.85	Certified	Not Applicable	1-Feb-13	19-20 July 21				

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	PNG	Scheme Smallholder Sorovi Division (2019)	3,940.21	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Scheme Smallholder Saiho Division (842)	1,493.06	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Scheme Smallholder Aeka Division (911)	1,474.23	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Scheme Smallholder Igora Division (1367)	2,940.15	Certified	Not Applicable	1-Feb-13	19-20 July 21				
	PNG	Scheme Smallholder Ilimo Division (671)	1,063.66	Certified	Not Applicable	1-Feb-13	19-20 July 21				
West New Britain (WNB)	Papua New Guinea	Mosa Oil Mill		Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Kumbango Oil Mill		Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Kapiura Mill		Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Numundo Mill		Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Waraston Mill		Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Bebere Estate	2,226.71	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Kumbango Estate	2,610.80	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Togulo Estate	1,509.20	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Dami Estate	1,507.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Waisisi Estate	1,090.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Kautu Estate	4,280.60	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Karausu Estate	2,387.64	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Moroa Estate	848.16	Certified	Not Applicable	10-Sep-08	19-20 July 21					

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PNG	Bilomi Estate	2,011.70	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Loata Estate	562.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Haella Estate	4,220.30	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Garu Estate	3,709.60	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Daliavu Estate	2,484.10	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Sapuri Estate	2,180.90	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Malilimi Estate	3,837.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Rigula Estate	3,720.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Nomundo Estate	2,645.17	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Navarai / Karato ME /KDC EU Estate	1,103.77	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Volupai / Lotomgam / Natupi / Goruru Estate	1,992.59	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Lolokoru Estate	2,453.10	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Ove Estate	3,541.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Tamare Estate	1,362.70	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Smallholders LSS Mosa (1822)	5,008.53	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Smallholders VOP East (1817)	5,324.37	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Smallholders VOP Central (1964)	5,756.57	Certified	Not Applicable	10-Sep-08	19-20 July 21				
PNG	Smallholders VOP West (1279)	2,804.10	Certified	Not Applicable	10-Sep-08	19-20 July 21				



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	PNG	Smallholders LSS Kapiura (551)	551.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Smallholders VOP Kapiura (850)	847.00	Certified	Not Applicable	10-Sep-08	19-20 July 21				
	PNG	Smallholders Kaulong/Akami/Pushiki/R epamira/Sakapei (20)	700.37	Certified	Not Applicable	10-Sep-08	19-20 July 21				
Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Papua New Guinea	Erap Mill	5,399.40	Certified	Not Applicable	27-Mar-20	19-20 July 21			There is total area for NPP: 710.30 ha which is currently excluded from the certification scope of MFCL until the NPP is approved.	
	PNG	Munum Estate	1,734.57	Certified	Not Applicable	27-Mar-20	19-20 July 21				
	PNG	Maralumi Estate	2,427.15	Certified	Not Applicable	27-Mar-20	19-20 July 21				
	PNG	Erap Estate	1,237.68	Certified	Not Applicable	27-Mar-20	19-20 July 21				

### 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 zero (0) Critical; one (1) Minor nonconformities and zero (0) Opportunity For Improvement raised. The Strategic Operating Unit (SOU 19) – Pagoh 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 below is the summary of the non-conformity raised during this assessment.

Non-conformity			
<b>NCR Ref #</b>	2404720-202310-N1	<b>Issued Date</b>	12/10/2023
<b>Due Date</b>	Next Assessment ASA2_1	<b>Closure Date</b>	Next Assessment ASA2_1
<b>Indicator &amp; Category (Critical / Minor)</b>	3.3.2 Minor		
<b>Statement of Nonconformity:</b>	Chemical Safety Management Procedure not consistently implemented.		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures is in place.		
<b>Objective Evidence:</b>	<p>During site visit at Chemical store Pengkalan Bukit Estate, it was found the SDS chemical was available only 1 language either English or Bahasa Malaysia. Further verification at Workshop, Greases and Lubricant SDS was available in English language however based on interview found foreman was not able to understand the instruction in the SDS and prefer in Bahasa Malaysia. It was not inline with Chemical Safety Management Procedures dated 09/03/2021, Section 6.3.1(a) Chemicals supplied shall be furnished with complete and updated SDS. SDS shall be in English and Accepted national language.</p> <p>During site visit at Manuring Area Pagoh Estate, it was found that SDS for fertilizer NKC was not available in the field. It was not in line with Chemical Safety Management Procedures dated 09/03/2021, Section 6.2.2 (a) Transportation and handling of chemicals: Emergency equipment, i.e first aid kit, soap, clean water and SDS. And 6.5 Handling of Chemicals cross with CHRA Recommendation 5.2.1 (d)(4) Continue to place SDS of the chemical used at the workplace and easily accessible.</p> <p>During site visit at Pagoh POM, it was found that the availability grease and lubricant used by contractor AXXX LXXX for maintenance work and temporary storage at Mill workshop. However, it was found this chemical not equipped with SDS. It was not in line with Chemical Safety Management Procedures dated 09/03/2021, Section 6.2.2 (a) Transportation and handling of chemicals: Emergency equipment, i.e first aid kit, soap, clean water and SDS. And 6.5 Handling of Chemicals cross with CHRA Recommendation 5.2.1 (d)(4) Continue to place SDS of the chemical used at the workplace and easily accessible.</p>		
<b>Corrections:</b>	1. OU has displayed SDS that consist of two languages which are English and Malay in the chemical store and at the workshop.		

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	<ol style="list-style-type: none"> <li>2. Management has provide extra copy of SDS which keep at store for mandore use and bring together at field during operation.</li> <li>3. Mill had immediately obtained the relevant SDS, printed it and displayed it at the temporary storage area.</li> </ol>
<b>Root Cause Analysis:</b>	The Chemical Safety Management Procedure not consistently implemented due to No monitoring from estate management to ensure the foreman and storekeeper understand about the importance of SDS. No monitoring from estate management especially to check manuring mandore bring together with the SDS during manuring activity and No monitoring from mill management especially for maintenance contractor which does not bring respective SDS for grease and lubricant as the contractor not aware to bring SDS to carried out overhaul work.
<b>Corrective Actions:</b>	<p>Pangkalan Bukit Estate</p> <ol style="list-style-type: none"> <li>1. Continuous monitoring by estate management to ensure all staff and mandore incharge understand the importance of SDS especially for storekeeper and foremen. Assistant Manager incharge will check from time to time to ensure staff incharge and upkeep mandore comply with the Chemical Safety Management Procedure</li> <li>2. Management will conduct annual training with training evaluation and frequent briefing on SDS understanding in both languages which are English and Malay.</li> </ol> <p>Pagoh Estate</p> <ol style="list-style-type: none"> <li>1. Refresher training with training evaluation on SDS given to all mandore on 10/10/23.</li> <li>2. Estate has made SDS booklet with pocket size for easy carry by mandore at field which endorse by estate manager.</li> <li>3. Daily reminder during morning muster by staff incharge and ensure the mandore bring together the SDS. Assistant Manager incharge will check from time to time to ensure staff incharge and upkeep mandore comply with the Chemical Safety Management Procedure.</li> </ol> <p>Pagoh Mill</p> <ol style="list-style-type: none"> <li>1. Mill will constantly check especially all contractor working at the mill premises to bring necessary SDS prior to start work. Respective PIC from Mill will check accordingly.</li> <li>2. Mill will give training with training evaluation to respective new contractor when conduct maintenance at the mill on the importance of SDS.</li> <li>3. A Working Instruction had been issued to Mill Executive, Mill Security and Maintenance team In-Charge to inspect all and ensure SDS is available and attached to Permit-To-Work for future jobs carried out by external contractors</li> </ol>
<b>Assessment Conclusion:</b>	The CAP submitted found adequate to address the non-conformity. The effectiveness of CAP implementation will be assessed during next assessment.

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>OFI 1</b>	N/A

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Positive Findings	
PF #	Description
PF 1	Good arrangement for audit visit and high commitment by Sustainability Department and unit's person in charge.
PF 2	Good positive relationship maintained and highlighted by internal and external stakeholders

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

Non-conformity			
<b>NCR Ref #</b>	2261869-202210-M1	<b>Issued Date</b>	14/10/2022
<b>Due Date</b>	11/01/2023	<b>Closure Date</b>	10/01/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	3.8.12 (Critical)		
<b>Statement of Nonconformity:</b>	Mass Balance Records were not accurately computed, and the Mill has oversold CSPK more than the volume in stock.		
<b>Requirement Reference:</b>	Record keeping i) For Mass Balance Module, the mill: 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.)		
<b>Objective Evidence:</b>	<p>Nonconformities on the implementation of Supply Chain Records and Transactions were verified as below.</p> <ol style="list-style-type: none"> <li>Based on the verification of the Mill's Production and Sales Registered in RSPO PalmTrace for the period under review (Oct 2021 to Sept 2022), it was found that the mill has oversold 2,356.89 mt of RSPO certified PK (as of Sept 2022) more than its stock balance. Negative stock was documented for 9 consecutive months.</li> <li>The mass balance account was not documented accurately as it did not show the correct volume for 'Balance' and 'Carry Forward' for CPO &amp; PK.</li> </ol>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>The Mill has halted dispatch of certified sustainable PK (CSPK) effective from 14/10/2022.</li> <li>The oversold CSPK was communicated to the PIC in GTM for their attention on 17/10/2022.</li> <li>The ceasing of dispatch of CSPK will continue for approximately 6 months (until end of license period) to recover the volume of CSPK.</li> <li>The Mass Balance Sheet has been revised to contain correct formula for stock balance from certified volume.</li> </ol>		
<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>The uploading in RSPO Palm Trace for KKS Pagoh was done by Global Trading Marketing (GTM) at Group level.</li> <li>The Mill only Dispatch PK as per sales contract given by GTM.</li> <li>The monitoring of the outgoing product from the Mill is being done through a mass balance sheet. Nonetheless the MB sheet contain misleading formula for stock balance for certified sustainable CPO and PK.</li> </ol>		

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<b>Corrective Actions:</b>	<p>4. The actual stock balance in Mill was not communicated to GTM.</p> <ol style="list-style-type: none"> <li>1. The Mill Management to monitor outgoing product through a revised MB Sheet</li> <li>2. The Mill Management to identify any short sell and to recover within 3 months.</li> <li>3. The Mill Management to communicate to GTM &amp; RSQM for negative stock balance for CSPO and CSPK.</li> </ol>
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. Based on the recent Palm Trace transactions, there were no sales of CSPK from Pagoh Palm Oil Mill. The last shipment was dated 15/10/2022. Mill Despatch records were also verified and there were no sales of CSPK recorded as well.</li> <li>2. The mill has informed GTM on the non-conformity raised and the oversale of CSPK. This was verified in the email dated 17/10/2022. Email dated 20/12/2022 stated that all CSPK despatch is halted and will resume based on production trend in 2023.</li> <li>3. The mill has amended the Mass balance Record and has been verified to contain the accurate information of CSPO and CSPK Production, Sales and Balances.</li> <li>4. A Shared folder has been created between the mill and GTM so that they can simultaneously monitor the production and balance of CPO and PK to ensure that no contracts are done for volumes that are not available or that cannot be recovered within 3 months.</li> <li>5. A Mass Balance Monitoring Training has been conducted on 09/12/2022 for SCCS related personals. The training records were available for verification. Prior to the verification, the certification unit have provided all relevant documents in relation to the correction and corrective actions that they have implemented. The lead Auditor has reviewed the documents and found them sufficient to be able to close the raised critical nonconformities. The remote offsite assessment conducted via Microsoft teams and Whatsapp Video Calls were to remotely visit the site for site inspection and to interview the sampled workers on implementation of the corrective action plans. The implementation of the correction and corrective action plan was deemed to be able to address the raised non-conformity. Hence the Critical Non-conformity was closed on 10/01/2023.</li> </ol>
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	<p>Pagoh POM have kept all records and maintained balance of RSPO certified FFB and CPO and PK Deliveries. Certified CPO and PK despatch that are delivered was deducted from the material accounting system. Pagoh POM has delivered Mass balance from a positive stock. Verified through Mass Balance sheet and Palm Trace transaction. Refer Mass Balance Sheet Oct 2022 until Sept 2023. Communication with Global trading Department has been made on monthly basis in order to communicate the transaction of CPO and PK. Sighted evidence of email correspondence. Thus Major NC was remained closed.</p>

Non-conformity			
<b>NCR Ref #</b>	2261869-202210-M2	<b>Issued Date</b>	14/10/2022
<b>Due Date</b>	11/01/2023	<b>Closure Date</b>	10/01/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	7.3.1 (Critical)		

<b>Statement of Nonconformity:</b>	Waste Management Plan found to be inadequately documented and implemented
<b>Requirement Reference:</b>	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.
<b>Objective Evidence:</b>	<p>Pengkalan Bukit Estate</p> <ol style="list-style-type: none"> <li>1. Waste Management Plan stated that Household Waste (Housing Compound) disposed via arrangement of contractor to collect domestic waste from worker housing complex. During the site visit at the housing complex, it was verified that the domestic waste was also disposed to a pit opposite the housing compound.</li> <li>2. Visit to the mentioned pit at Pengkalan Bukit Estate, sighted that waste were not segregated prior to them being disposed at the pit. Items such as Containers contaminated with mineral oil, recyclable waste such as plastic containers, tires, fertilizer bags and plastic bottles were seen disposed at the pit. This was not in accordance with the Waste management Plan. Due to this being a reoccurrence of non-conformity under the same indicator, a critical non-conformity was raised.</li> </ol>
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Waste segregation was done into degradable waste, scheduled waste and recyclable waste.</li> <li>2. The management had closed the pit hole on 13/10/2022 after completing the waste segregation.</li> <li>3. Scheduled wastes were transferred and stored in a scheduled wastes store.</li> <li>4. Recyclable wastes were disposed in a recycle bin</li> </ol>
<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>1. The mentioned pit was an ex deboling pit for Ganoderma palm which was not completely closed. There was inadequate training on waste management to the worker on the proper waste disposal area.</li> <li>2. The linesite sweeper was using this pit to dispose garden waste (dry leaves). Eventually due to lack of awareness and understanding on segregation practices by the Estate Management, he had also disposed waste including recyclable waste during a cleaning activity at workers housing complex.</li> </ol>
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. The Estate Management to brief all workers on estates' waste management plan that have been implemented.</li> <li>2. The Estate Management will monitor through Person in Charge of Accommodation (PIOA) to ensure waste management is in line with waste management plan.</li> </ol>
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. The management were able to provide pictorial evidence of cleaning and closure of the pits. The waste has been segregated and disposed in accordance with the Waste Management Plans. Records of disposal were also available for verification. During the remote assessment, the site was remotely visited via Whatsapp Video Call and it was verified that the pit has been closed and there were no evidence of waste being disposed at the location.</li> <li>2. The estate management has briefed all estate workers on the waste management plan and Schedule waste management. The briefing was conducted on 28/10/2022 at the master ground. Records of training was available entitled "Penerangan RSPO/MSPO Berkenaan Pengurusan Sisa Berjadual". Interview conducted remotely to the Linesweeper indicated that</li> </ol>

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	<p>she was aware that the waste are to be segregated and disposed in accordance with the environmental SOPs that have been established by the estate.</p> <p>3. Weekly inspection was conducted by the Person In Charge of Accommodation (PIOA) at the housing complex and its surroundings. The inspection form entitled "Housing Complex/ NEST/ Community Hall Weekly Inspection (PIOA) was available for verification. Sighted that the form has included the checklist such as "proper disposal of rubbish and no illegal dumping waste". The checklist dated 05/10/2022, 21/10/2022, 29/10/2022, 15/11/2022 and 26/11/2022 was available for verification. Prior to the verification, the certification unit have provided all relevant documents in relation to the correction and corrective actions that they have implemented.</p> <p>The lead Auditor has reviewed the documents and found them sufficient to be able to close the raised critical nonconformities. The remote offsite assessment conducted via Microsoft teams and Whatsapp Video Calls were to remotely visit the site for site inspection implementation of the corrective action plans. The implementation of the correction and corrective action plan was deemed to be able to address the raised non-conformity. Hence the Critical Non-conformity was closed on 10/01/2023.</p>															
<p><b>Effectiveness Closure (for previous audit closed Critical NC):</b></p>	<p>All the 3 estates and Pagoh Mill had made disposal to Majlis Daerah Segamat landfill beginning April 2023. Services of collection and transportation made via a Contractor MTJJ Enterprise</p> <table border="1" style="width: 100%; text-align: center;"> <thead> <tr> <th>Estate</th> <th>Site</th> <th>Schedule</th> </tr> </thead> <tbody> <tr> <td>Pagoh Estate</td> <td>MDSegamat</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>Lanadron Estate</td> <td>MDSegamat</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>Pg Bukit Estate</td> <td>MDSegamat</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>Pagoh POM</td> <td>MDSegamat</td> <td>Collection with Pagoh Estate</td> </tr> </tbody> </table> <p>Evidences of collection were verified through the payment made to the Contractor e.g bill no</p> <ul style="list-style-type: none"> <li>• Pagoh Estate ref 128828 - 02/09/23 &amp; ref 129065 - 04/09/23</li> <li>• Lanadron Estate ref 30311 - 15/09/23 &amp; ref 131114 - 23/09/23</li> <li>• Pengkalan Bukit Estate ref 637401 - 30/08/23</li> </ul> <p>There were no more landfills in the estates and mill in SOU 19. Thus, Major NC was remained closed.</p>	Estate	Site	Schedule	Pagoh Estate	MDSegamat	Collection 2/3 x week	Lanadron Estate	MDSegamat	Collection 2/3 x week	Pg Bukit Estate	MDSegamat	Collection 2/3 x week	Pagoh POM	MDSegamat	Collection with Pagoh Estate
Estate	Site	Schedule														
Pagoh Estate	MDSegamat	Collection 2/3 x week														
Lanadron Estate	MDSegamat	Collection 2/3 x week														
Pg Bukit Estate	MDSegamat	Collection 2/3 x week														
Pagoh POM	MDSegamat	Collection with Pagoh Estate														

Non-conformity			
<b>NCR Ref #</b>	2261869-202210-M3	<b>Issued Date</b>	14/10/2022
<b>Due Date</b>	11/01/2023	<b>Closure Date</b>	10/01/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	3.6.1 (Critical)		
<b>Statement of Nonconformity:</b>	Mitigation plans and implementation of procedures on risks and hazards were not effectively demonstrated.		

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<b>Requirement Reference:</b>	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.
<b>Objective Evidence:</b>	<p>Pengkalan Bukit Estate</p> <ol style="list-style-type: none"> <li>1. During site visit at Manuring Operation, Field 16F Division Pagoh, it was found 1 manurer was wearing surgical mask instead N95 mask while apply Manuring Activities type NK Compact 10.5/30. It was not in line with HIRARC dated 13/08/2021; Activity 5 - Applying Fertilizer, with the hazard of dusty fertilizer and the existing risk control of sufficient clean water supply, long sleeve shirt, cotton gloves, facemask N95, apron and eye goggle.</li> <li>2. During site visit at field P08B main Division, harvesting area, it was seen the loose fruit attendant standing on the fully jacked scissor-lift hopper. It was not in line with "Prosedur Kerja Tatacara Kerja Pemandu Kenderaan (Traktor, Mini Traktor, JAMSA, LG) with reference PBE/OC/SOP-13, Semasa Memandu: (10) Jangan Sekali-kali membenarkan sesiapa berada di atas muatan yang anda bawa samaada sewaktu anda sedang berhenti atau sedang bergerak"</li> <li>3. At the same field, it was noticed that 2 scissors lift mini tractor driver were wearing wellington boots instead of safety shoes. It was not in line with "Prosedur Kerja Tatacara Kerja Pemandu Kenderaan (Traktor, Mini Traktor, JAMSA, LG) with reference PBE/OC/SOP-13, Di larang menggunakan selipar / capal atau kasut yang tidak menepati ciri-ciri keselamatan yang di tetapkan. Pemakaian PPE seperti kasut keselamatan, topi keselamatan, penutup telinga dan jaket pemantul cahaya adalah diwajibkan".</li> </ol> <p>Pagoh POM</p> <p>During site visit at the steriliser station, it was found the operator was not wearing earplugs while in operation. It was not in line with Prosedur Kerja Selamat; Sterilization Mill Chargehand / Operator, Section 1 - Pastikan pekerja yang bertugas di stesen ini menggunakan PPE yang sesuai seperti berikut: Topi Keselamatan, Sarung Tangan, Ear Plug and Safety Boots.</p> <p>Pagoh Estate</p> <p>During site inspection at Pagoh Estate - Workshop, found 2 bottles of used lubricant and 1 bottle of Kerosine were stored in the containers without any label. It was not in line with CHRA Recommendation on Organisation Control Section 5.2 (c) Labelling and Relabelling (USECHH 2000, Regulation 20 &amp; 21), (3) If the chemicals are transferred to a smaller container, relabelling is required with the chemical name or trade name as written on the original label.</p>
<b>Corrections:</b>	<p>Pengkalan Bukit</p> <ol style="list-style-type: none"> <li>1. Correction has been taken immediately to workers by providing N95 to manurers.</li> <li>2. Correction has been taken immediately to machine attendant by providing rake with longer handle to clear any clogged debris at trailer.</li> <li>3. Correction has been taken immediately to instruct workers to use safety shoes provided by the management.</li> </ol> <p>Pagoh POM</p> <p>Immediate action has been taken by mill management by informing the said employee to take and wear new sets of ear plugs. A warning letter has been issued to the said employee. Refresher briefing has been conducted immediately the next day morning to all sterilizer operators (both shifts) on 14/10/2022 on the importance</p>



	<p>of PPE usage with inspection on individual PPE availability during morning toolbox. Another round of briefing has been conducted to all employees on 17/10/2022 with a set of PPE inspection checklist.</p> <p>Pagoh Estate The containers used to contain chemical/ lubricant was relabelled as per requirement.</p>
<p><b>Root Cause Analysis:</b></p>	<p>Pengkalan Bukit</p> <ol style="list-style-type: none"> <li>1. Lack of awareness on the usage of N95 mask. There was inadequate training on PPE. There was no monitoring of PPE usage by the Management.</li> <li>2. There is no clear SOP and proper tool to clear the clogged loose fruits. There was inadequate training to the worker on the risk and hazard of standing on the hopper.</li> <li>3. Lack of training/ awareness among workers on PPE Usage even after the management has provided PPE.</li> </ol> <p>Pagoh POM Mill management has provided PPE to every employee and record of PPE issuance is available. There is an absence of PPE availability monitoring for each individual employee. Based on immediate investigation done on the same day, the employee said his ear plugs were damaged and he has yet to take new sets available from the store. This shows the lack of awareness on the importance of wearing hearing protection among the said employees.</p> <p>Pagoh Estate</p> <ol style="list-style-type: none"> <li>1. Lack of awareness on relabeling when transfer to different container. There was inadequate training on the requirement for relabeling for container.</li> <li>2. Lack of monitoring by the Management on unlabeled containers.</li> </ol>
<p><b>Corrective Actions:</b></p>	<p>Pengkalan Bukit Estate:</p> <ol style="list-style-type: none"> <li>1. To do monitoring of PPE usage during morning muster.</li> <li>2. To review SOP &amp; HIRARC for the activity. To do briefing on the SOP.</li> <li>3. To do monitoring of PPE Usage during morning muster</li> </ol> <p>Pagoh POM Mill management has come out with daily PPE inspection checklist. Assistants Manager and Supervisors will check the usage of PPE including ear plugs/ earmuffs to all workers during morning toolbox briefing.</p> <p>Pagoh Estate Estate will provide small container with permanent labelled sticker to use as temporary container to transfer lubricant/ kerosine from large container. To provide training to workshop operators on the relabeling requirement. To do intervention using Sime Card for any unsafe condition/act.</p>
<p><b>Assessment Conclusion:</b></p>	<p>Pengkalan Bukit Estate</p> <ol style="list-style-type: none"> <li>1. The estate has established a checklist where the PPEs that are supposed to be used by the respective workers are inspected during the morning master itself. Verified the "Daily Safety Briefing &amp; Personal Protective Equipment (PPE) Checklist" dated 15/11/2022 and 16/11/2022.</li> </ol>

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2. The SOP Tata Kerja Mengangkat Beg Biji Kelapa Sawit (Reference Number: PBE/OC/ SOP-LOADER) has been reviewed and was available for verification. The SOP has included the safe working procedures during loose fruit collection and loading works.
3. The HIRARC for Loose Fruit Loaders were reviewed on 15/10/2022 and available for verification. The HIRARC has stated the safe working controls that are to be implemented while loose fruit loading is being done. The management have issued rakes to the loose fruit loaders on 15/10/2022. Records of issuance was available for verification in the "Tool Use" document. Training on PPE usage and Method for loading Loose Fruits was conducted for related workers on 12/10/2022 and records were available for verification.
4. Records for issuance of mask and safety shoes were available for verification. PPE training has been conducted on 12/10/2022 for all workers at the master ground.
5. Interview has been conducted remotely via Microsoft Teams. The interview concluded that the related workers have been provided training on PPE and they are now aware of the importance of using appropriate PPEs during operations.

**Pagoh POM**

1. A warning letter dated 13/10/2022 has been issued to the identified worker due to not wearing ear plugs during work. The warning letter was available for verification.
2. A Personal Protective Equipment (PPE) Refresher Training has been conducted on 14/10/2022 to remind all workers to wear the appropriate and complete PPEs at each stations. The refresher training records were available for verification.
3. The mill has established a Personal Protective Equipment (PPE) Checklist to monitor the PPE usage in the mill. The daily PPE Checklist for 17/10/2022 – 23/10/2022 was available for verification.
4. Interview has been conducted remotely via Microsoft Teams. The interview concluded that the related workers have been provided training on PPE and they are now aware of the importance of using appropriate PPEs during operations.

**Pagoh Estate**

1. The management have transferred the lubricant into a proper container and relabelled it accordingly. The appropriate symbols have also been placed on the labels and verified accordingly.
2. A training has been conducted for all workshop Personals on 20/10/2022. Verified the training record entitled "Briefing on labelling and use of right container for lubricants".
3. The estate has established a checklist entitled "Pemantauan Penyelidikan Bengkel Ladang" as a monitoring method to regularly monitor the works and implementations at the workshop to be in accordance with Sime Darby's SOP and the estate's best practice.

Prior to the verification, the certification unit have provided all relevant documents in relation to the correction and corrective actions that they have implemented. The lead Auditor has reviewed the documents and found them sufficient to be able to close the raised critical nonconformities. The remote offsite assessment conducted via Microsoft teams and Whatsapp Video Calls were to remotely visit the site for site

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	inspection and to interview the sampled workers on implementation of the corrective action plans. The implementation of the correction and corrective action plan was deemed to be able to address the raised non-conformity. Hence the Critical Non-conformity was closed on 10/01/2023.
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	Awareness on PPE usage has been made during safety training. Sighted evidence of training material, attendance and photos. Monitoring on PPE has been made during muster call by Staff and Mandore. Sighted evidence of monitoring checklist. Sighted evidence of PPE issuance record 2023 to workers based on their job task. Sample verification during site visit at Manuring Operation, Spraying Operation and Harvesting Operation found the usage of PPE was accordance with Procedure. Sample interview conducted with workers found their awareness and understanding of PPE usage was satisfactory. Thus, Major NC was remained closed.

<b>Opportunity for Improvement</b>	
<b>OFI#</b>	<b>Description</b>
<b>OFI 1</b>	<b>OFI Statement:</b> N/A <b>Verification / Follow-up actions:</b> N/A

**3.3.2 Summary of the Nonconformities and Status**

<b>CAR Ref.</b>	<b>Category (Critical / Minor)</b>	<b>P&amp;C Indicator</b>	<b>Issued Date</b>	<b>Status &amp; Date (Closure)</b>
2404720-202310-N1	Minor	3.3.2	12/10/2023	Open

**3.4 Stakeholders and previous landowner / user consultation**

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Strategic Operating Unit (SOU 19) – Pagoh 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)
Union	NUPW- Representative	Phone call
Government agencies	Jabatan Alam Sekitar	Phone call
Contractor	Kebun Abah Enterprise	Phone call
Government agencies	Sekolah Jenis Kebangsaan Jenis Cina Kim Kee	Phone call
Local communities.	Kampung Paya Panjang	Phone call

Stakeholders comment	
<b>1</b>	<p><b>Feedback:</b> National Union Plantation Workers (NUPW)- Representative            One of the representatives for NUPW has been contacted and has been confirmed that good relationship has been maintained between NUPW and all operating units under SOU 19 Pagoh. He also mentioned that NUPW often invited for meeting and most of the workers registered as a member of NUPW. There are no negative issues has been highlighted as per conversation.</p> <p><b>Audit Team verification and response:</b> No further verification required.</p>
<b>2</b>	<p><b>Feedback:</b> Jabatan Alam Sekitar Muar            Jabatan Alam Sekitar Muar has been contacted where she mentioned that she is the person in charge for all palm oil mill in Muar district. As far as she concerns, there is 1 notice has been issued to Pagoh POM in May 2023 and verification has been done which action has been promptly taken by the POM management. Good relationships have been maintained between both parties and there is no negative issues highlighted.</p> <p><b>Audit Team verification and response:</b> No further verification required.</p>
<b>3</b>	<p><b>Feedback:</b> Kebun Abah Enterprise            Kebun Abah Enterprise is a decanter solid buyer and has been registered as a vendor since 2019. As per respond there is no issues in term of communication between both parties and he aware about consultation and communication procedure for Sime Darby Plantations Berhad.</p> <p><b>Audit Team verification and response:</b> No further verification required.</p>
<b>4</b>	<p><b>Feedback:</b> Sekolah Jenis Kebangsaan Jenis Cina Kim Kee            Sekolah Jenis Kebangsaan Jenis Cina Kim Kee located nearby to Pengkalan Bukit Estate. As per interview with the headmaster, all operating units under SOU 19 Pagoh provided good assistance and contribution to the school. Any request for assistance has been responded such as assistance for grass cutting or any repair.</p> <p><b>Audit Team verification and response:</b> No further verification required.</p>
<b>5</b>	<p><b>Feedback:</b> Kampung Paya Panjang            Interview with the head village confirmed that good relationship has been established by the management with local communities surrounding the estates. There are no issues of land since clear identification has been made by both parties. It also has been confirmed that contribution has been made such as grass cutting, providing equipment for local communities' activities and others.</p> <p><b>Audit Team verification and response:</b> No further verification required.</p>

<b>List of landowner / user contacted</b>					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not applicable as the estates have undergone 2 <sup>nd</sup> cycle of replanting.					



<b>Previous landowner / user comment</b>	
	<b>Feedback: N/A</b>
	<b>Audit Team verification and response: N/A</b>

### 3.5 Impartiality and conflict of interest

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

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

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Strategic Operating Unit SOU 19 Pagoh Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&amp;C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Strategic Operating Unit SOU 19 Pagoh Palm Oil Mill is remain certified.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> <b>NOR HALIS ABU ZAR</b>	<b>Name:</b> Shylaja Devi Vasudevan Nair
<b>Company Name:</b> <b>BSI SERVICES MALAYSIA SDN BHD</b>	<b>Company Name:</b> Sime Darby Plantation Bhd
<b>Title:</b> <b>CLIENT MANAGER</b>	<b>Title:</b> Head, Sustainability Compliance Unit, Group Sustainability Dept.
<b>Signature:</b> 	<b>Signature:</b> <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
<b>Date:</b> 28/10/2023	<b>Date:</b> 14/11/2023

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1:</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>There is evidence that all documents that has been specified in the RSPO P&amp;C has been made available to public. It has been verified based on the management systems that has been established through procedure which each operating units need to respond of any information request received. Each operating units need to verify and justify each request base on types of concerns. Process of request has been stipulated in the Standard operating manual (SOM) subsection 5.5; Procedure for external communication issuance date 01/04/2008. Other than that, policy of the company has been made available in the Sime Darby Plantation website.</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>All the document/information has been established in both Bahasa Malaysia and English. As per conversation with the management, if there is any request from the stakeholder who need explanation, the management of each operating unit is responsible to explain the information to the stakeholders.</p>	Complied
1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>There is no information request has been received for all operating units and has been verified based on the records and interview with stakeholders where there is only request for assistance recorded. As per interview, any information request will be recorded in the logbook.</p>	Complied

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1.1.4	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>Documented in the standard operating manual (SOM) subsection 5.5, management responsibility; appendix 5.5.3.2, Procedure for external communication. There is evidence that the SOPs has been communicated to stakeholders during the stakeholders meeting conducted on 17/08/2023 for all operating units under SOU 19, Pagoh.</p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>List of stakeholders has been maintained and will be updated on annual basis or if there is any amendment of the stakeholders. Sighted information for the stakeholders has been maintained such as address and contact number.</p>	Complied
<p><b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantations Berhad has established ethical conduct policy which documented in the document code of business conduct policy that has been signed by Mohamad Helmy Othman Basha Group Managing Director. Stated in the policy that Sime Darby Plantation uphold 5 core values in all business transaction which are integrity, respect &amp; responsibilities, enterprise and excellence.</p> <p>The latest Group Sustainability &amp; Quality Policy Statement also includes the clause 'promoting good governance and transparency: abiding by the Group Policies &amp; Authorities (GPA) and the Code of Business Conduct (COBC) signed by Group Managing Director on 02/12/2019.</p>	Complied
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>SDPB established Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The code established in Bahasa Malaysia and English.</p> <p>SDPB's Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 also includes the clause</p>	Complied



		<p>'promoting good governance and transparency: abiding by the Group Policies &amp; Authorities (GPA) and the Code of Business Conduct (COBC).</p> <p>Tendering process has been established where tendering process will be initiated by operating units and will be approved by regional office. Once approve, the document will be forwarded to tendering committee and selection. There are some cases that direct awarded will be done due to certain circumstances such as insufficient supplier submitted quotation and others. Sample has been taken for the tendering process and compliance with the policy that has been established.</p>	
<p><b>Principle 2: Operate legally and respect rights</b></p>			
<p><b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
<p>2.1.1</p>	<p><b>(C)</b> The Unit of Certification complies with legal requirements          - Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad SOU 19 Pagoh POM 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><u>Pagoh Estate:</u></p> <ol style="list-style-type: none"> <li>1. MPOB License #508589902000 valid from 01/05/2023 until 30/04/2024</li> <li>2. Nursery Licence MPOB #597369011000 valid from 01/05/2023 until 30/04/2024</li> <li>3. Diesel Licence 18,000 L, #MR/PD/SK-1079@SKS 199 valid from 08/08/2021 until 02/08/2024</li> <li>4. Air compressor #MK PMT 722 valid until 26/01/2024</li> </ol>	<p>Complied</p>

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		<p>5. Water Abstraction Licence #BAKAJ:334/300/05/0/06/1 valid until 31/12/2023</p> <p>6. Air Receiver #JH PMT 22514 valid until 08/07/2023</p> <p><u>Pengkalan Bukit Estate:</u></p> <p>1. MPOB License #518941002000 valid from 01/03/2023 until 29/02/2024</p> <p>2. Nursery Licence MPOB #620445011000 valid from 01/09/2023 until 31/08/2024</p> <p>3. Air Compressor Tank #MK PMT 1884 valid until 16/11/2023</p> <p>4. Diesel licence #MR/PD/SK-0072@SKS101 valid from 14/09/2021 until 13/09/2024</p> <p>5. Water abstraction licence #BAKAJ:334/300/05/03/07/4 valid until 31/12/2023</p> <p><u>Lanadron Estate:</u></p> <p>1. MPOB License #522273002000 valid from 01/08/2023 to 31/07/2024</p> <p>2. Petrol Permit 100 L/Day #PK/2023/B/J-000294 valid from 20/07/2023 until 19/07/2024</p> <p>3. Diesel permit #MR/PD/P-0007/13@SKS5 valid from 18/06/2021 until 17/06/2024</p> <p>4. Water Abstraction licence #BAKAJ:334/300/05/03/07/1 valid until 31/12/2023</p> <p>5. Air Compressor Receiver #MK PMT 1881 valid until 17/07/2024</p> <p>6. Air Compressor Receiver #MK PMT 1873 valid until 17/07/2024</p> <p><u>Pagoh POM:</u></p> <p>1. MPOB Licence #565809104000 valid from 01/11/2022 until 31/10/2023</p>	
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		<p>2. Water Abstraction Licence #BAKAJ:334/300/05/03/08/2 valid until 31/12/2023</p> <p>3. Weighbridge calibration #DE18010332 inspected by De Metrology dated 30/11/2022</p> <p>4. Jadual Pematuhan DOE Licence #006387 with reference file JAS.CHQ 600-3/1/83(SK04) valid from 01/07/2023 to 30/06/2024</p> <p>5. Inclined Stereliser #JH PMT 20179 valid until 14/11/2023</p> <p>6. Air Compressor #JH PMT 16778 valid until 14/11/2023</p> <p>7. Deaerator Storage tank #JH PMT 20169 valid until 14/11/2023</p> <p>8. Competence person CePSWaM #CePSWaM/2217801 to Assistant Engineer NRIC 8707XX-XX-XXXX valid until 12/01/2023. Field training report (FTR) has been submitted for renewal.</p> <p>9. Competence person CePPOME #CePPOME/00005 to Manager NRIC 8208XX-XX-XXXX.</p> <p>Engine Driver / Steam 1<sup>st</sup> Grade #J.66/99 to Boiler Man dated 17/09/1999</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad SOU 19 Pagoh POM Certification Units has ensured legal compliance is in place. Refer Legal Other Requirement Register (LORR) Summary of Compliance updated July 2023. Refer Appointment letter to person in charge dated April 2023 to Assistant Manager Mill and Estate, that stated on monitor LORR and legal requirements. The system purposely to track changes to the laws and regulations. Among the latest updated laws were:</p> <ul style="list-style-type: none"> <li>• Minimum wages order 2022</li> <li>• Noise Regulation 2019</li> <li>• Fire Services Act 1988 (Act 341) Amendment 2018</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Employees’ Social Security (Amendment) Act 2022</li> <li>• Employment Insurance System (EIS) (Amendment) Act 2022</li> <li>• Employment (Amendment) Act 2022</li> <li>• Emergency (Employee’s Minimum Standards of Housing, Accommodations and Amenities) Ordinance 2021</li> </ul>																																				
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>The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 3 estates, during the field inspection confirmed that they were clearly marked and maintained. Trenches were constructed at most areas.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Field</th> <th>Neighbouring</th> <th>Field</th> <th>Neighbouring</th> </tr> </thead> <tbody> <tr> <td>Pagoh</td> <td>PR23A</td> <td>Smallholder Nasuha</td> <td>P07</td> <td>Ext Nursery</td> </tr> <tr> <td>Pagoh</td> <td>P18A</td> <td>Cattle Farm</td> <td>P19A</td> <td>Smallholder</td> </tr> <tr> <td>Lanadron</td> <td>P07NA</td> <td>Smallholder</td> <td>P18A</td> <td>TNB Rentice</td> </tr> <tr> <td>Lanadron</td> <td>P07M</td> <td>Smallholder</td> <td>P01A</td> <td>Kg Parit Medan</td> </tr> <tr> <td>P Bukit</td> <td>P16E</td> <td>Pagoh Industrial</td> <td>P08C</td> <td>Kg Paya Redang</td> </tr> <tr> <td>P Bukit</td> <td>PR23A</td> <td>Kg Panjang Sari</td> <td>P13A</td> <td>Kg Subasu</td> </tr> </tbody> </table>	Estate	Field	Neighbouring	Field	Neighbouring	Pagoh	PR23A	Smallholder Nasuha	P07	Ext Nursery	Pagoh	P18A	Cattle Farm	P19A	Smallholder	Lanadron	P07NA	Smallholder	P18A	TNB Rentice	Lanadron	P07M	Smallholder	P01A	Kg Parit Medan	P Bukit	P16E	Pagoh Industrial	P08C	Kg Paya Redang	P Bukit	PR23A	Kg Panjang Sari	P13A	Kg Subasu	Complied
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<p><b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>																																						
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>The list of contracted parties available as per stakeholder list 2023. Both the estates and the mill continued to maintain the stakeholders information (address, contact number, nominated representatives) which included the contractors, vendors/suppliers, foreign recruitment agencies, embassy, government agencies, schools, local communities, CPO/PK customers, etc. The list was updated</p>	Complied																																			

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respectively comprises of various parties, neighbouring communities and Government Agencies.

Classification	No of stakeholder			
	PE	LE	PBE	PPOM
	03/7/23	1/1/23	10/23	5/9/23
Government Agencies - MPOB/ KPDNHEP PDRM/Immigration	18	15	22	25
School / Local Community	4	2	8	18
Smallholders / OCP	41	3	-	5
Suppliers/Vendor	10	15	12	59
Contractors	5	4	4	7
Others /Buyers / Refinery	6	-	-	26
Total	84	34	46	140

The subjects discussed during the meeting with the presence management including stakeholders among others on the following;

- a) Company Policies and SOP
- b) Issues relating to neighborhood and concerns
- c) Fire prevention control / prohibition
- d) RSO/MSPO compliance and guidelines
- e) Vendor / suppliers legal compliance

There is no major course of concern/issues highlighted during the meeting.

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<p>2.2.2</p>	<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>The agreements (selectively sampled) have included clauses in relation to requirement to meeting legal among others:</p> <table border="1" data-bbox="1142 443 1921 1125"> <thead> <tr> <th></th> <th>Contractor</th> <th>Services</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>DXXXXX TXXXXXX</td> <td>Pagoh -Transport FFB to mill</td> <td>22/02/22</td> </tr> <tr> <td>2</td> <td>DXXXXXX FXXXXX</td> <td>Pagoh - Replanting 2023A/B</td> <td>02/01/23</td> </tr> <tr> <td>3</td> <td>NX SXX LXXX</td> <td>Pagoh - JCB Rental</td> <td>01/01/23</td> </tr> <tr> <td colspan="4"> </td> </tr> <tr> <td>1</td> <td>SM AXXXXX</td> <td>Lanadron - Machine</td> <td>31/12/23</td> </tr> <tr> <td>2</td> <td>KXX TXXXXXXXX</td> <td>Lanadron - FFB Transport Mill</td> <td>06/09/23</td> </tr> <tr> <td colspan="4"> </td> </tr> <tr> <td>1</td> <td>KXX TXXXXXXXX</td> <td>Pg Bukit - FFB Transport Mill</td> <td>06/09/23</td> </tr> <tr> <td>2</td> <td>DXXXXXX FXXXXX</td> <td>Pg Bukit - Replanting 2023A/B</td> <td>02/01/23</td> </tr> <tr> <td>3</td> <td>MXXX Enterprise</td> <td>Pg Bukit - Domestic waste transp</td> <td>01/01/23</td> </tr> <tr> <td colspan="4"> </td> </tr> <tr> <td>1</td> <td>TXX TXXX KXXX SB</td> <td>PPOM - CPO Transportation</td> <td>12/12/20</td> </tr> <tr> <td>2</td> <td>LXXXX TXX Enterprise</td> <td>PPOM - Grass Cutting</td> <td>05/01/23</td> </tr> </tbody> </table> <p>It stated that the agreement is governed among others by the following responsibilities and compliance:</p> <ul style="list-style-type: none"> <li>Clause 5 - Labour &amp; Human Rights</li> <li>Clause 6 - Environment Occupational Safety Health</li> <li>Clause 7 - Ethic &amp; Management Practices</li> <li>Compliance with applicable laws and guidelines</li> </ul>		Contractor	Services	Date	1	DXXXXX TXXXXXX	Pagoh -Transport FFB to mill	22/02/22	2	DXXXXXX FXXXXX	Pagoh - Replanting 2023A/B	02/01/23	3	NX SXX LXXX	Pagoh - JCB Rental	01/01/23					1	SM AXXXXX	Lanadron - Machine	31/12/23	2	KXX TXXXXXXXX	Lanadron - FFB Transport Mill	06/09/23					1	KXX TXXXXXXXX	Pg Bukit - FFB Transport Mill	06/09/23	2	DXXXXXX FXXXXX	Pg Bukit - Replanting 2023A/B	02/01/23	3	MXXX Enterprise	Pg Bukit - Domestic waste transp	01/01/23					1	TXX TXXX KXXX SB	PPOM - CPO Transportation	12/12/20	2	LXXXX TXX Enterprise	PPOM - Grass Cutting	05/01/23	<p>Complied</p>
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		<ul style="list-style-type: none"> <li>i. To comply with all applicable laws, by-laws, rules, regulations</li> <li>ii. Not limited to laws in relation to employment, environment, OSH, anti bribery, anti slavery, human traffic</li> <li>iii. Laws and SOP on COVID 19 pandemic</li> </ul> <p>Company’s Guidelines, Policies and Principles</p> <ul style="list-style-type: none"> <li>i. Obligations towards the Representative</li> <li>ii. All contractors are subject to KPI monthly evaluation</li> <li>iii. General Commitment towards RSPO MSPO certification standards</li> </ul> <p>Failure to provide the services and/or comply with laws and guidelines</p> <ul style="list-style-type: none"> <li>i. Special obligations, covenants and undertaking of the transporter</li> <li>ii. Applicable Laws</li> <li>iii. All contractors have signed (IIV - Ikrar Integriti Vendor) of respective dates and region.</li> </ul>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>The contract signed with contractors as sighted in Pagoh Estate, Lanadron Estate and Pagoh POM with contractors, therein have included under clause 5.8 abolishment of child labour &amp; protecting the rights of children available in the Vendor COBC and Human Rights Charter protecting the rights of children.</p>	Complied
<p><b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> </ul>	<p>The mill received crop from the SDP estates 70 % mainly within the SOU 19, and external crop of 30% (OCP), if any are from diversion from the sister mill as results of breakdown or annual maintenance. All the estates from the same SOU 19 possessed the following information sighted and verified during the audit.</p>	Complied

	<ul style="list-style-type: none"> <li>Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>SDP estates comprises of the following among others;</p> <ol style="list-style-type: none"> <li>Pagoh Estate / Pengkalan Bukit Estate</li> <li>Lanadron Estate / Kempas Estate</li> <li>Kemuning Estate / Tangkak Estate / Welch Estate</li> </ol> <p>Outside crop were received from the following suppliers/traders among others;</p> <ol style="list-style-type: none"> <li>KXXXXX MXXXX Sdn Bhd</li> <li>JXXXX LXXX Sdn Bhd</li> <li>GXX Estate</li> <li>SXX CXXX JXX / AX GXXXXX</li> </ol> <p>All the estates from the same SOU 19 possessed the following information sighted and verified during the audit.</p> <ol style="list-style-type: none"> <li>All FFB from the estates supported by the delivery documents.</li> <li>Valid land title with ownership status (refer indicator 4.4.1)</li> <li>Valid MPOB licence (refer criteria indicator 2.1.1)</li> </ol> <p>All delivery documents were verified with volumes of FFB received by the mill.</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 Indicator2.3.1.</p> <p>- Minor compliance -</p>	<p>As per RSPO Announcement dated 15 February 2022 on Interim Measure for Fulfilment of Indicator 2.3.2 of the 2018 RSPO Principles &amp; Criteria — On Legality of Indirect FFB Supplies, Sime Darby Plantation has submitted the indicator 2.3.2 Case Register to RSPO as per communication email dated 11/11/2022 and acknowledge and registered into the system by RSPO Secretariat as per communication email dated 24/11/2022. Sime Darby Plantation targeted to fulfil the requirement by November 2023 as per Stepwise Plan for Compliance to Indicator 2.3.2 established. Verification has been made during the audit found that there were several data for indirect sourced FFB has been collected and the mill</p>	Complied



		is still in the process of collecting the information as described in 2.3.1.	
<b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b>			
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The business plan for the mill is reflected in the form of an annual budget (MPLAN) and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX.</p> <p>The business or management plan for the estates were presented in the form of annual budget (MPLAN) with 5 years projection (2023 – 2027). The annual budget contains the crop projection and the finance allocation for field operation and administration. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p> <p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. In the 5 years business plan include items as follows:</p> <ul style="list-style-type: none"> <li>a) Palm oil mill <ul style="list-style-type: none"> <li>i. Mill intake – FFB input</li> <li>ii. Production of CPO</li> <li>iii. Production of PK</li> <li>iv. Total Palm Oil Extraction</li> <li>v. Total Palm Kernel Extraction</li> <li>vi. Mill cost</li> </ul> </li> <li>b) Oil Palm Estate <ul style="list-style-type: none"> <li>i. Total crop projection and yield potential</li> </ul> </li> </ul>	Complied

		<ul style="list-style-type: none"> <li>ii. Activity direct cost               <ul style="list-style-type: none"> <li>a. Mature upkeep</li> <li>b. Manuring</li> <li>c. Harvesting and collection</li> <li>d. Transportation</li> <li>e. Nursery</li> </ul> </li> <li>iii. Estate administration               <ul style="list-style-type: none"> <li>a. Admin Cost</li> </ul> </li> <li>iv. Labour overhead</li> <li>v. Road and bridges</li> <li>vi. Cost of production.</li> </ul> <p>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2027) and well documented upon request.</p>																									
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>Pagoh POM Supply Base has established a long-range replanting programme until FY 2028. Replanting is planned for the fields older than 25 years, non-performance fields (yield) and Ganoderma infected palms. The total Ha for the projected replanting of Pagoh Estate are as follows:</p> <table border="1" data-bbox="1137 1091 1930 1375"> <thead> <tr> <th>Estate</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> <th>2028</th> </tr> </thead> <tbody> <tr> <td>Pagoh Estate</td> <td>78.70</td> <td>166.96</td> <td>100.28</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Lanadron Estate</td> <td>114.69</td> <td>100.75</td> <td>74.83</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>Pengkalan Bukit Estate</td> <td>227.11</td> <td>77.21</td> <td>123.02</td> <td>127.36</td> <td>65.48</td> </tr> </tbody> </table>	Estate	2024	2025	2026	2027	2028	Pagoh Estate	78.70	166.96	100.28	0.00	0.00	Lanadron Estate	114.69	100.75	74.83	0.00	0.00	Pengkalan Bukit Estate	227.11	77.21	123.02	127.36	65.48	Complied
Estate	2024	2025	2026	2027	2028																						
Pagoh Estate	78.70	166.96	100.28	0.00	0.00																						
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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.          - Minor compliance -</p>	<p>Pagoh POM Operating Unit held management reviews at their respective sites on a yearly basis. Among the matters discussed during the management review are as follows: -</p> <ol style="list-style-type: none"> <li>1. Results of Internal Audit</li> <li>2. Customer Feedback</li> <li>3. Status of preventive and corrective action plans</li> <li>4. Follow Up actions for management reviews</li> <li>5. Changes that could affect the management system</li> <li>6. Recommendations for improvement</li> </ol> <p>The minutes of the meeting indicated that Internal audit findings were each thoroughly examined, and the corrective action plan were discussed. The management review was conducted at the respective operating units as follows:</p> <p>Pagoh estate: 26/09/2023          Lanadron Estate: 06/09/2023          Pagoh POM: 18/09/2023          Pengkalan Bukit Estate: 05/10/2023</p>	<p>Complied</p>
<p><b>Criterion 3.2:</b> The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			

<p>3.2.1</p>	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>In consideration to of environmental and social impact, the operating units has established continuous improvement plan. Reviewed the sampled established FY 2023 as follows:</p> <p>Pagoh Estate</p> <table border="1" data-bbox="1151 517 1928 826"> <tr> <td>Improvement Issue</td> <td>Action plan</td> </tr> <tr> <td rowspan="4">Operational</td> <td>Introduction of team based harvesting system</td> </tr> <tr> <td>Mechanised circle spraying using St Geo machine</td> </tr> <tr> <td>Tarmac Road from FPE and nursery</td> </tr> <tr> <td>Construction of 12 units workers housing</td> </tr> </table> <p>Lanadron Estate</p> <table border="1" data-bbox="1151 879 1928 1189"> <tr> <td>Improvement Issue</td> <td>Action plan</td> </tr> <tr> <td rowspan="2">Operational</td> <td>8 land surf has been used in order for replacing wheelbarrow to assist on minimizing the usage of human energy for FFB in field evacuation in newly mature area.</td> </tr> <tr> <td>Mechanised circle spraying using Ginga Spraying Machine</td> </tr> </table> <p>Pengkalan Bukit Estate</p> <table border="1" data-bbox="1151 1241 1928 1315"> <tr> <td>Improvement Issue</td> <td>Action plan</td> </tr> </table>	Improvement Issue	Action plan	Operational	Introduction of team based harvesting system	Mechanised circle spraying using St Geo machine	Tarmac Road from FPE and nursery	Construction of 12 units workers housing	Improvement Issue	Action plan	Operational	8 land surf has been used in order for replacing wheelbarrow to assist on minimizing the usage of human energy for FFB in field evacuation in newly mature area.	Mechanised circle spraying using Ginga Spraying Machine	Improvement Issue	Action plan	<p>Complied</p>
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Improvement Issue	Action plan												
Housing Inspection	Distribute 14-unit meat safe and 5 unit metal cabinet to workers With OPP Barcode scans than has been installed on every housing for reporting												
Mill	HACCP certification for food safety system to ensure the products comply with all food safety requirements. Reactivation of FFB splitter to ensure better steam penetration into the inner layer of FFB												
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b>          The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p>	<p>The Certification Unit has completely its RSPO metrics template version 2.1 and submitted to the CB prior to this assessment. The input data was found to be accurate based on the following records verification:</p> <ul style="list-style-type: none"> <li>• SAP accounting system</li> <li>• Land titles</li> </ul>	Complied										

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	<p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<ul style="list-style-type: none"> <li>• Complaints &amp; grievance records</li> <li>• Dept. of Safety &amp; Health’s JKPP8 form</li> </ul>	
<p><b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
<p>3.3.1</p>	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedures (SOPs) for the estate and mill has been established. Sime Darby SOP issued dated 02/01/2008 and Agricultural Reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units as a guidance document to conduct estate operation. The estate also holds the Safety Work Procedure. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc.</p> <p>Palm Mill holds two SOPs: Sustainable Plantation Management System (SPMS) version 1 dated 1/11/2008 and Mill Quality Management System version 1 dated 1/11/2008 as a guidance document to operate the mill.</p> <p>For Health, Safety and Environment, both mill and estates, Sime Darby has issued Health, Safety and Environment (HSE) Management System and Standard Operating Procedures. Sime Darby continuously updated the SOP established. Among the updated SOP FY 2022 as follows:</p> <ol style="list-style-type: none"> <li>1. UM HSE Management System Manual, UM/HSE/MS/01</li> <li>2. First Aid in Workplace Procedure, UM/HSE/OCP/01</li> <li>3. Safety Harvesting Procedure, UM/HSE/OCP/02</li> <li>4. Personal Protective Equipment Procedure, UM/HSE/OCP/03</li> <li>5. Chemical Safety Management Procedure, UM/HSE/OCP/04</li> <li>6. Permit to Work (PTW) Procedure, UM/HSE/OCP/05</li> <li>7. OSH Risk Management Procedure, UM/HSE/SE/01</li> </ol>	<p>Complied</p>

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<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place.          - Minor Compliance -</p>	<p>A mechanism on checking the consistency of estate and mill implementation of their procedures were in place. Among the mechanism such as Performance Monitoring Visit, SORA/SCRA visit, Agronomist visit and Internal Audit.</p> <p>Chemical Safety Management Procedure was not consistently implemented.</p> <p>During site visit at Chemical store Pengkalan Bukit Estate, it was found the SDS chemical was available only 1 language either English or Bahasa Malaysia. Further verification at Workshop, Greases and Lubricant SDS was available in English language however based on interview found foreman was not able to understand the instruction in the SDS and prefer in Bahasa Malaysia. It was not inline with Chemical Safety Management Procedures dated 09/03/2021, Section 6.3.1(a) Chemicals supplied shall be furnished with complete and updated SDS. SDS shall be in English and Accepted national language.</p> <p>During site visit at Manuring Area Pagoh Estate, it was found that SDS for fertilizer NKC was not available in the field. It was not in line with Chemical Safety Management Procedures dated 09/03/2021, Section 6.2.2 (a) Transportation and handling of chemicals: Emergency equipment, i.e first aid kit, soap, clean water and SDS. And 6.5 Handling of Chemicals cross with CHRA Recommendation 5.2.1 (d)(4) Continue to place SDS of the chemical used at the workplace and easily accessible.</p> <p>During site visit at Pagoh POM, it was found that the availability grease and lubricant used by contractor AXXX LXXX for maintenance work and temporary storage at Mill workshop. However, it was found this chemical not equipped with SDS. It was not in line with Chemical Safety Management Procedures dated 09/03/2021, Section 6.2.2 (a) Transportation and handling of</p>	<p>Non-compliance</p>
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		<p>chemicals: Emergency equipment, i.e first aid kit, soap, clean water and SDS. And 6.5 Handling of Chemicals cross with CHRA Recommendation 5.2.1 (d)(4) Continue to place SDS of the chemical used at the workplace and easily accessible.</p> <p>Thus, Minor NC was raised.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>The operating units maintain all the records of monitoring and actions taken for all issues raised during the visit. Reviewed the monitoring records as follows:</p> <p><u>Pagoh POM</u></p> <ol style="list-style-type: none"> <li>1. Internal Audit Report: 24/08/2023.</li> <li>2. Structured Oil Recovery Assessment (SORA): 31/07-04/08/2023.</li> </ol> <p><u>Pagoh Estate</u></p> <ol style="list-style-type: none"> <li>1. Internal Audit Report dated 23/08/2023.</li> <li>2. Structured Crop Recovery Assessment Report (SCRA), Mature Upkeep Assessment (MUA) report dated 04/08/2023.</li> <li>3. Performance Monitoring Visit Summary dated 28/07/2023</li> </ol> <p><u>Lanadron Estate</u></p> <ol style="list-style-type: none"> <li>1. Internal Audit Report dated 22/08/2023.</li> <li>2. Structured Crop Recovery Assessment Report (SCRA), Mature Upkeep Assessment (MUA) report dated 04/08/2023.</li> <li>3. Performance Monitoring Visit Summary dated 28/07/2023</li> </ol> <p><u>Pengkalan Bukit Estate</u></p> <ol style="list-style-type: none"> <li>1. Internal Audit Report dated 21/08/2023.</li> <li>2. Structured Crop Recovery Assessment Report (SCRA), Mature Upkeep Assessment (MUA) report dated 30/01-03/02/2023.</li> <li>3. Performance Monitoring Visit Summary dated 25/01/2023.</li> </ol>	Complied



<p><b>Criterion 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>		
<p>3.4.1</p>	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>Social impact assessment done and documented in the document title "Social impact assessment (SIA) Report for all operating units under SOU 19; Pagoh which included Pagoh Estate, Lanadron Estate, Pengkalan Bukit Estate and Welch Estate conducted on 05-08/05/2023 by GSD (FORMERLY KNOWN AS PSQM) department with composition of assessor with different background. Information collection and assessment has been done base on interview with stakeholders (workers, contractors, government agencies, local communities etc), document review and site visit. As per interview done, there are respond received. Details as per below</p> <p><u>Pagoh Estate</u></p> <p>Positive findings from all the stakeholders that has been interviewed where good relationships has been maintained and 2 ways communication has been established between both parties.</p> <p><u>Lanadron Estate</u></p> <p>As per interview with foreign workers, there is some workers required for briefings regards to their entitlement which related to Human resources such as payslips, transportation, leave and others.</p> <p><u>Pengkalan Bukit Estate</u></p> <p>There are respond from local communities, Kampung Panjang Sari which located to field 2000C, the management of Pengkalan Bukit Estate has plan to construct trenches along the border.</p> <p>For Lanadron Estate, there is addendum assessment has been done due to movement of workers from Nordanal Division to Lanadron Estate since the division has been handed over to Sime</p>

Complied

		<p>Darby Property which affected total 25 workers. The assessment has been done on 28/09/2023 by Madam Tharani Malar David base on consultation with workers, and site visit.</p> <p>During the stakeholders meeting conducted on 02/08/2023 there is an issue that has been highlighted by Kampung Hujung Tambak requested to clean up and maintain road to water plant and TNB.</p> <p>The aspect and impact analysis for all the mill/estate operations are documented and revised annually on respective dates in 2023. In the comprehensive report, the study of aspect and impact are aimed to;</p> <ul style="list-style-type: none"> <li>a) Plan to avoid negative impact and to promote positive impacts.</li> <li>b) Reduction disposal of waste taking into consideration of social responsibilities.</li> <li>c) Plan to reduce pollution and release of GHG</li> <li>d) Development and implementations.</li> </ul> <p>The plans and impact assessments relating to environmental impacts based on documents for both estates and the mill are elaborated in the following records:</p> <ul style="list-style-type: none"> <li>a) Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, (<i>version 1; year 2008 Issue no. 1; dated 1 April 2009 Register</i>)</li> <li>b) Appendix 5.4.1c - Environmental Aspect and Impact Identification form (<i>version 1; year 2008 Issue no. 1; dated 1 April 2009; MR-01/EIA</i>)</li> <li>c) Appendix 5.4.1d - Environmental Impacts Evaluation form (<i>version 1; year 2008 issue no. 1; dated 1 April 2009; MR-02/EIE</i>)</li> </ul> <p>The EIA as detailed in the estates register covers all estates activities/operations. The latest register being reviewed as shown</p>	
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		<p>in 3.4.3 below. The significant environmental aspects related to the estates operation among others include the following;</p> <ul style="list-style-type: none"> <li>a) FFB transportation to the mill.</li> <li>b) Movement of vehicles/transportation of estates machines and tractors.</li> <li>c) Herbicide/pesticides spraying</li> <li>d) Anti-malaria fogging</li> <li>e) Road resurfacing &amp; grading</li> <li>f) Grass cutting / construction activities</li> <li>g) harvesting, pest and disease,</li> <li>h) upkeep programme</li> <li>i) nursery / replanting</li> </ul> <p>Similarly, the environmental aspects for the mill are tabulated in the EIA master list (<i>EIA/MOM/2013/001—1ME to EIA/2015/MOM/020</i>) updated on respective dates in 2023. Among others the EIAs are divided into the all stations in the mill processing as listed below.</p> <ul style="list-style-type: none"> <li>a) Mill Office Operations</li> <li>b) Boiler stack emission, black smoke</li> <li>c) palm oil mill effluent (POME) discharge and water contamination,</li> <li>d) Activities related to managing of scheduled wastes and general waste.</li> <li>e) Activities of all operations beginning from the mill entrance ending to the effluent, EFB operations.</li> <li>f) Workshop Operations / Power Generation</li> <li>g) Laboratory / Stores / Facilities</li> </ul>	
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The documents are maintained, sighted and verified  
 The estates and mill had also made plan /projects in relation to the enhancement to social and environmental initiatives among others as shown below;

	Areas	Project Details - Pagoh Estate	Expenditure
1	Welfare	Installation water tank 16000 gallons	RM142K- 2023
2	Welfare	12 units workers quarters	RM88.7K- 2023
3	Operation	Fertilizer spreader	RM35K - 2023
4	Welfare	Premix road leading housing complex	RM752K - 2023
5	Operation	MERBA - Rat Baiting Machine	RM50K - 2023
6	Environ	Replace asbestos ceiling AM b/low	RM20K - 2023
7	Environ	Flooring for fertilizer store	RM60K - 2023
8	Welfare	Premix road continuation	RM490K - 2024

	Areas	Project Details - Lanadron Estate	Expenditure
1	Welfare	Community Hall with badminton court	RM727K - 2023
2	Operation	Fertilizer Store	RM424K - 2023
3	Welfare	Surau upgrading	RM35K - 2023
4	Welfare	Concrete Road	RM182K - 2023
5	Environ	Concrete drain upgrading 150m	RM22.5K- 2023
6	Environ	Closure of 13 units ETP Pond ex Mill	RM450K - 2023

	Areas	Project Details - Pengkalan Bkt Estate	Expenditure
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3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Management plan for addendum assessment that has been established for Lanadron Estate has been established documented "Management plan on social impact assessment". One of the management plan is to conduct road maintenance programme to ensure transportation from for local workers that living outside the estate housings.</p> <p>Social management plan has been established for all issues that has been highlighted and documented and latest updated on 19/08/2023. One the management plan is to identified alternative</p>	Complied																																																				

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		<p>roads that can be utilized by Kampung Hujung Tambak communities.</p> <p>While for Pagoh POM, social management plan has been established and sighted for year 2023. Several issues sighted which the information/respond collected from the various meeting conducted such as Union Meeting, Social dialogue, stakeholders meeting and gender meeting. One of the issues highlighted is complaint from union representative regards to overflow of septic tank at the housing and unavailable of drain sump cover. Management has include the issues and management plan has been established.</p> <p>For Pengkalan Bukit Estate, social management plan established and updated on 07/10/2023 prepared by Mohd Azizi B Abd Rahim. The management plan for all issues that has been highlighted by stakeholders, has been established and there is evidence it has been done based of participation of related parties.</p> <p>Both Environmental and Social Management Plan 2023 were reviewed with the participation of its stakeholders and related forums as described in 3.4.1 above.</p> <p>a) Areas of concern/key findings were identified together with the action plan, person in charge and respective completion date.</p> <p>b) There is evidence that the areas of concern /key findings were developed with the consultation of affected parties.</p>	
3.4.3	<p><b>(C)</b> 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>For Lanadron Estate, Communication on the entitlement for workers has been conducted for newly recruited workers on 28/02/2023 for newly recruited Indonesian workers and on 18/05/2023 for local workers. Briefing for all workers conducted on 12/07/2023 during the morning muster briefing.</p>	Complied

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		<p>While for Pagoh POM, issues that has been highlighted in the management plan has been implemented. For the issues raised from union representative regards to overflow of septic tank at the housing and unavailable of drain sump cover, the management has resolve the issues on 04/10/2023 where MHN B Reka Sdn Bhd has been appointed. Further verification has been done by auditor to confirm the implementation during the site visit.</p> <p>Pengkalan Bukit Estate, there is evidence that the management plan has been implemented for the issues that has been highlighted issues regards to poor drainage systems at the boundary of Kampung Sari Baru with the Sime Darby Property and request from Kampung Panjang Sari to construct bund. Drainage clearing has been done by the estate management as initial action. As for now, the management of the estate still waiting respond from Jabatan Air dan Saliran Negeri Johore.</p> <p>The Social/Environmental Action Plan available for each units were available having information i.e issues, management plan, PIC and time frame. The input are gathered from the meeting minutes</p> <ul style="list-style-type: none"> <li>a) Gender Committee, NUPW,</li> <li>b) ESH Meeting,</li> <li>c) Complaint &amp; Request from internal &amp; external stakeholders and muster briefing).</li> <li>d) EIA management - review held respectively for all the estates and mill with date as shown below</li> </ul> <table border="1" data-bbox="1137 1209 1915 1391"> <thead> <tr> <th></th> <th>OU</th> <th>Review date</th> <th>Update</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pagoh Estate</td> <td>12/06/2023</td> <td>No changes</td> </tr> <tr> <td>2</td> <td>Lanadron Estate</td> <td>22/08/2023</td> <td>No changes</td> </tr> <tr> <td>3</td> <td>Pg Bukit Estate</td> <td>22/08/2023</td> <td>New spraying machine ASP</td> </tr> </tbody> </table>		OU	Review date	Update	1	Pagoh Estate	12/06/2023	No changes	2	Lanadron Estate	22/08/2023	No changes	3	Pg Bukit Estate	22/08/2023	New spraying machine ASP	
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		4	Pagoh POM	10/08/2023	LORR updated	
<b>Criterion 3.5:</b> A system for managing human resources is in place.						
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable. - Minor Compliance -	There is no changes compare to last year where Sime Darby Plantations adopt the same procedure that has been established by Human Resource Department in document Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019 and Workforce Management Unit Liaison & Recruitment procedure (WMU/LR-SOPP/MARCH2016, Rev. 0 dated 30/03/2016) to explain the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries.				Complied
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	<p><u>Pagoh Estate</u></p> <p>Newly recruited workers on 06/03/2023 for general workers and sighted application form that has been submitted by the workers on 28/02/2023 and interviewed has been conducted 02/03/2023 by Account and admin Officer, Mohd Sabrul Zaizal and previous assistant manager, Mr Gapar Jantan and both recommend for recruitment. Sighted offer letter has been provided signed by Mr Rosli bin Mohamad, estate manager. Further interviewed unable to be done with the worker since the worker caught by the police due to drug cases. Until the day of audit, the management of estate is still waiting investigation from the Balai Polis Daerah Muar for further action. Notification to regional human resources has been done by the management.</p> <p>Sample of repatriation has been taken for workers that has applied for checkout memo and has been registered under ePLKS and repatriated on 24/07/2023. Verification has been Borang PA 2/13 and checkout memo reference number 1010011230717175150234</p>				Complied



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		<p><u>Pengkalan Bukit Estate</u></p> <p>Sample of newly recruited workers has been taken for 1 local 3 foreign that has been recruited in year 2023. There is 1 female worker recruited on 03/05/2023. Application for works has been received 05/04/2023 and medical check-up has been done on 19/04/2023 and has been declared as fit to works. Application for works has been received 05/04/2023. While for repatriation, sighted documentation for repatriation dated 27/07/2023 and repatriated on 07/08/2023</p>	
<p><b>Criterion 3.6:</b> An occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad have established OSH Risk Management Procedure UM/HSE/SP/01 effective date 09 March 2021. Risks were identified and assessed in accordance with the established HIRARC an also incompliance to legal requirements as stated below.</p> <p><u>Pagoh POM</u></p> <ol style="list-style-type: none"> <li>1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Boiler and Kernel Plant. Verification done on the documentations and operations indicated that all the risk controls were adhered to. Last updates sighted on 08/09/2023.</li> <li>2. Chemical Health Risk Assessment was conducted in the mill in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000. CHRA Report Reference Number: HQ/15/ASS/00/363-2023-0034; CHRA Assessor by NXXXXXX CXXXXXXX with DOSH Reg Number: HQ/15/ASS/00/363; Date of Assessment: 07/04/2023.</li> </ol>	<p>Complied</p>

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		<ol style="list-style-type: none"> <li>3. Medical Surveillance Programme has been performed successfully for the year 2023 for the mill workers exposed to hazardous chemicals and fumes. A total of 20 workers have been examined on 10-12/05/2023 at KXXXXX KXXX Sdn Bhd. The results indicated that all workers were declared fit to work.</li> <li>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. Noise Risk Assessment (NRA) has been conducted by PXX TXXXXXX &amp; CXXXXXXX Sdn Bhd dated 19/05/2020. NRA Report (Report Number: HQ/09/PEB/00/67-2020/014) available for verification. The recommendation stated by the assessor have been affectively addressed as verified.</li> <li>5. An audiometric testing was done on August 2023 by KXX BXXXXX MXXXXXXX Specialist for 74 mill employees deemed to be exposed to excessive noise in the mill. The report indicated 6 workers have NIHL, 7 workers have hearing impairment and no workers had Standard threshold shift. The mill has reported the cases via JKKP7.</li> </ol> <p><u>Lanadron Estate</u></p> <ol style="list-style-type: none"> <li>1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Harvesting, Workshop and Rat Baiting. Verification done on the documentations and operations indicated that all the risk controls were adhered to. Last updates sighted on 20/06/2023.</li> <li>2. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The Chemical Health Risk</li> </ol>	
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		<p>Assessment Report (Ref. Number: HQ/15/ASS/00/363-2020-070 conducted by NXXXXXX CXXXXXXXXX (DOSH Registration: JH/04/04/318) on 05/06/2020 was available for verification.</p> <p>3. Medical Surveillance were conducted in the estate based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.</p> <p>The medical surveillance programme for the year 2023 has been performed on 01/08/2023 at KXXXXX PXXXX for 21 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work.</p> <p>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the sampled sites. The recommendation stated by the assessor have been affectively addressed as verified.</p> <p>Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety &amp; Health (Noise Exposure) Regulations 2019 in the estates. The assessment was conducted on 25/07/2020 by EXXXXX (M) Sdn Bhd. The assessment report (Ref. No: HQ/LPROYKPEB/20/00183) was available for verification.</p> <p>5. Audiometric Testing was done in the estate dated 14/10/2022 based on the recommendation provided in the Noise Risk Assessment in compliance with OSHA 1994 – OSH (NOISE Exposure) Regulations 2019. It was done on for 16 workers deemed to be exposed to excessive noise in the estate. The results indicated that 3 workers had hearing loss, 1 worker with hearing impairment and 3 workers with standard</p>	
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		<p>threshold sift. Retest has been conducted for the workers with STS on 20/01/2023. Latest audiometric test has been conducted on 26/09/2023 and report yet to receive.</p> <p><u>Pengkalan Bukit Estate</u></p> <ol style="list-style-type: none"> <li>1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Machine specialist, Pruner and Driver. Verification done on the documentations and operations indicated that all the risk controls were adhered to. Last updates sighted on 20/06/2023.</li> <li>2. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The Chemical Health Risk Assessment Report (Ref. Number: HQ/15/ASS/00/363-2020-071 conducted by NXXXXXX CXXXXXXXXX (DOSH Registration: JH/04/04/318) on 04/06/2020 was available for verification.</li> <li>3. Medical Surveillance were conducted in the estate based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.  The medical surveillance programme for the year 2023 has been performed on 01/08/2023 at KXXXXX PXXXX for 26 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work.</li> <li>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the</li> </ol>	
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		<p>sampled sites. The recommendation stated by the assessor have been affectively addressed as verified.</p> <p>Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety &amp; Health (Noise Exposure) Regulations 2019 in the estates. The assessment was conducted on 03/08/2020 by EXXXXX (M) Sdn Bhd. The assessment report (Ref. No: HQ/LPROYKPEB/20/00225) was available for verification.</p> <p>5. Audiometric Testing was done in the estate dated 18/08/2022 based on the recommendation provided in the Noise Risk Assessment in compliance with OSHA 1994 – OSH (NOISE Exposure) Regulations 2019. It was done on for 28 workers deemed to be exposed to excessive noise in the estate. The results indicated that 10 workers had hearing loss, 3 workers with hearing impairment and no workers with standard threshold sift. Sighted evidence ok JKPP 7 report that has been submitted. Additional Audiometric test for machine specialist has been conducted on 29/05/2023.</p> <p><u>Pagoh Estate</u></p> <p>1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Pruning and Tractor Driver. Verification done on the documentations and operations indicated that all the risk controls were adhered to. Last updates sighted on 31/03/2023.</p> <p>2. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate. The Chemical Health Risk Assessment Report (Ref. Number: HQ/15/ASS/00/363-2020-</p>	
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		<p>066 conducted by NXXXXXX CXXXXXXXXX (DOSH Registration: JH/04/04/318) on 04/06/2020 was available for verification.</p> <p>3. Medical Surveillance were conducted in the estate based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.</p> <p>The medical surveillance programme for the year 2023 has been performed on 09, 10, 15, &amp; 22/08/2023 at KXX MXXXXX Specialist Hospital for 22 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work.</p> <p>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. The NRA Report were available for verification at all the sampled sites. The recommendation stated by the assessor have been affectively addressed as verified.</p> <p>Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety &amp; Health (Noise Exposure) Regulations 2019 in the estates. The assessment was conducted on 14/07/2020 by EXXXXX (M) Sdn Bhd. The assessment report (Ref. No: HQ/LPROYKPEB/20/00182) was available for verification.</p> <p>5. Audiometric Testing was done in the estate dated 01/08/2023 based on the recommendation provided in the Noise Risk Assessment in compliance with OSHA 1994 – OSH (NOISE Exposure) Regulations 2019. It was done on for 17 workers deemed to be exposed to excessive noise in the estate. The results indicated that 8 workers had hearing loss, 1 worker with hearing impairment and 1 worker with standard threshold</p>	
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		sift. Retest has been conducted for the workers with STS on 26/01/2023.	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Annual Health and Safety Plan available for the estate and mill are mostly implemented through Annual Training Program 2023 and monitored via inspections to address the identified health and safety risks. The emphasis is on safe work by providing:</p> <ul style="list-style-type: none"> <li>▪ Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk.</li> <li>▪ Awareness and understanding of workplace hazards and how to identify, report, and control them.</li> <li>▪ Specialized training when their work involves unique hazards.</li> </ul> <p>Besides formal classroom training, other means include on-the-job training and worksite demonstrations to effectively convey safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.</p> <p>The safety performance of each Operating Unit is monitored via:</p> <ul style="list-style-type: none"> <li>• Internal Audit conducted by the Group Sustainability Department.</li> <li>• Work Site Inspection (WSI) by site OSH Committee.</li> <li>• Direct involvement of supervisor and rounds by Asst Manager.</li> <li>• Safety incidents reporting via Rapid4.</li> <li>• Health / medical surveillance.</li> <li>• Chemical exposure monitoring, and</li> <li>• Audiometric Monitoring</li> <li>• Daily Monitoring Checklist such as PPE Checklist</li> </ul>	Complied

		The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken.	
<b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units visited has conducted training need analysis for all employee, management, and contractors. The need analysis was conducted based on the job designation and training required by the job type.</p> <p>Trainings was identified for management, employee and contractors and programmed throughout FY 2023. The training identified covers the safety and health, environmental and social aspect.</p> <p>Means implemented by SOU 19 certification units were to assess understanding of participants include:</p> <ul style="list-style-type: none"> <li>• Participants completing post-training evaluation/feedback form and give suggestions.</li> <li>• Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended.</li> </ul> <p>Random interviews with workers showed that they understood what RSPO is, the several company's and SDP policies, what does their work/job SOP states and the consequences if deviated, the need to put on PPE and demonstrate donning PPE and when it should be changed, the use of fire extinguishers, understanding workplace hazards, risks and needed control measures, Safe Practices. etc.</p>	Complied



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<p>3.7.2</p>	<p>Records of training are maintained. - Minor Compliance -</p>	<p>The operating units maintained the training records conducted. Reviewed the training records as follows:</p> <p><u>Pagoh POM</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>PPE &amp; 5's Training</td> <td>06/02/2023</td> </tr> <tr> <td>E Sime and Pre Start Checklist Training</td> <td>16/02/2023</td> </tr> <tr> <td>Safety Induction Training</td> <td>28/02/2023</td> </tr> <tr> <td>LOTO and PTW Training</td> <td>16/03/2023</td> </tr> <tr> <td>Chemical Handling Training</td> <td>07/08/2023</td> </tr> <tr> <td>Noise Risk Assessment Training</td> <td>22/12/2022</td> </tr> <tr> <td>Working At Height Training</td> <td>01/12/2022</td> </tr> <tr> <td>Supply Chain Training</td> <td>26/09/2022</td> </tr> <tr> <td>ERP Training</td> <td>26/09/2022</td> </tr> <tr> <td>First Aid Training</td> <td>10&amp;11/01/2023</td> </tr> </tbody> </table> <p><u>Lanadron Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Fire Drill Training</td> <td>06/04/2023</td> </tr> <tr> <td>Harvesting Training</td> <td>12/09/2023</td> </tr> <tr> <td>First aid training</td> <td>10/08/2023</td> </tr> <tr> <td>Tall palm harvester training</td> <td>10/08/2023</td> </tr> <tr> <td>Trunk Injection Training</td> <td>04/07/2023</td> </tr> </tbody> </table>	Training	Date	PPE & 5's Training	06/02/2023	E Sime and Pre Start Checklist Training	16/02/2023	Safety Induction Training	28/02/2023	LOTO and PTW Training	16/03/2023	Chemical Handling Training	07/08/2023	Noise Risk Assessment Training	22/12/2022	Working At Height Training	01/12/2022	Supply Chain Training	26/09/2022	ERP Training	26/09/2022	First Aid Training	10&11/01/2023	Training	Date	Fire Drill Training	06/04/2023	Harvesting Training	12/09/2023	First aid training	10/08/2023	Tall palm harvester training	10/08/2023	Trunk Injection Training	04/07/2023	<p>Complied</p>
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		Palm Cutter Machine Training	04/05/2023	
		Inter Pump Training	17/04/2023	
		Maintenance Vehicle training	27/03/2023	
		PPE Inspection and Training	27/03/2023	
		<u>Pengkalan Bukit Estate</u>		
		Training	Date	
		Inter Spraying Technique	13/09/2023	
		Schedule waste management training	04/09/2023	
		First Aid Training (BOFA)	07-08/09/2023	
		Pruning Training	06/09/2023	
		Safety and health training for sprayers	20/07/2023	
		Training Driver and Operator	11/07/2023	
		Water treatment training	14/06/2023	
		PPE Training	02-03/06/2023	
		ERP Training by BOMBA	26/05/2023	
		<u>Pagoh Estate</u>		
		Training	Date	
		Schedule waste Management Briefing	22/08/2023	
		Mechanical Buffalo training	01/08/2023	
		Safety – OSH Golden Rules	09/09/2023	

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		<table border="1"> <tr> <td>Basic First Aid Training</td> <td>07-09/09/2023</td> </tr> <tr> <td>Safety Chemical Handling</td> <td>17/08/2023</td> </tr> <tr> <td>HIRARC and Audiometric Training</td> <td>27/06/2022</td> </tr> <tr> <td>Contractor Compliance Training</td> <td>12/04/2023</td> </tr> <tr> <td>Harvesting Training</td> <td>15/03/2023</td> </tr> <tr> <td>Fire drill (ERP) Training</td> <td>09/02/2023</td> </tr> <tr> <td>Manuring Training</td> <td>03/02/2023</td> </tr> <tr> <td>Sexual Harassment Training</td> <td>14/04/2023</td> </tr> <tr> <td>Medical Access Procedure</td> <td>01/06/2023</td> </tr> <tr> <td>Nursery Training</td> <td>16/06/2023</td> </tr> </table>	Basic First Aid Training	07-09/09/2023	Safety Chemical Handling	17/08/2023	HIRARC and Audiometric Training	27/06/2022	Contractor Compliance Training	12/04/2023	Harvesting Training	15/03/2023	Fire drill (ERP) Training	09/02/2023	Manuring Training	03/02/2023	Sexual Harassment Training	14/04/2023	Medical Access Procedure	01/06/2023	Nursery Training	16/06/2023	
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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 conducted from time to time to all personnel critical in SCCS effective implementation. Latest training was conducted by Regional Sustainability &amp; Quality Management (RSQM) personnel, attended Pagoh Mill Manager, Assistant Mill Manager, Lab Supervisor, Lab Despatch Operator, Weighbridge Clerk and Auxiliary Police. Refer Training record dated 26/09/2023.</p>	Complied																				
<p><b>Criterion 3.8:</b> Supply chain requirement for mills (note: All supply chain requirements are considered as <b>Critical (C)</b>. However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>																							
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p>	<p>Pagoh POM is under mass balance module. Thus, this indicator is not applicable.</p>	Not Applicable																				

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	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.								
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>	Pagoh 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.	<p>The registration of PalmTrace will be carried out by the Marketing Department in HQ. Company has registered in PalmTrace system as follows:</p> <table border="1"> <tr> <td>Member Name</td> <td>Strategic Operating Unit (SOU 19) – Pagoh Palm Oil Mill</td> </tr> <tr> <td>Member ID</td> <td>RSPO_AC1000001061</td> </tr> <tr> <td>RSPO Membership Number</td> <td>1-0008-04-000-00 (Sime Darby Plantation Berhad)</td> </tr> </table>	Member Name	Strategic Operating Unit (SOU 19) – Pagoh Palm Oil Mill	Member ID	RSPO_AC1000001061	RSPO Membership Number	1-0008-04-000-00 (Sime Darby Plantation Berhad)	Complied
Member Name	Strategic Operating Unit (SOU 19) – Pagoh Palm Oil Mill								
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Type of Business	Oil mill						
Issued On	07/02/2023						
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ul>	<p>Documented Procedures were made available for verification and the requirements have been adhered to as follows:</p> <ul style="list-style-type: none"> <li>a) Refer Sustainable Supply chain and Traceability Procedure dated 01/06/2022 with reference number SD/SDP/GSD/SCCS/0522/01.</li> <li>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.</li> <li>c) Mill have identified and appointed the Mill Manager as the PIC for RSPO Supply Chain Certification Standard requirements as stated in Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 4.0 Responsibilities.</li> <li>d) Procedures for receiving and processing certified and non-certified FFBs were addressed in the Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 7.0 Receiving FFB at the Mill.</li> </ul>	Complied				
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> <li>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b. Effectively implements and maintains the standard requirements within its organisation.</li> </ul> </li> </ul>	<p>The procedure to conduct annual internal audit is addressed in the Sustainable Supply chain and Traceability Procedure dated 01/06/2022. Refer section 18.0 Internal Audit.</p> <p>Refer latest SCCS Internal Audit dated 26/09/2023. Based on the internal audit report and checklist, the elements of RSPO supply chain were adequately covered including the RSPO Market Communications and Claims elements. There was no non-conformity raised from the internal audit. Should there be any non-</p>	Complied				

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	<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>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>Pagoh 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>Certified Supply Base</p> <p>Company: Sime Darby Plantation Berhad</p> <ul style="list-style-type: none"> <li>• Estate: Pagoh Estate</li> <li>• Certified No: RSPO 600305</li> <li>• Date: 31/05/2023</li> <li>• Ticket Number: 176XXX</li> <li>• Vehicle Number: MBX2523</li> <li>• Field / Block: P 2018C</li> <li>• FFB Weight: 11.27 MT</li> </ul> <p>Certified Supply Base</p> <p>Company: Sime Darby Plantation Berhad</p> <ul style="list-style-type: none"> <li>• Estate: Tangkah Estate</li> <li>• Certified No: RSPO PC 00101</li> <li>• Date: 24/08/2023</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>• Ticket Number: 21XX</li> <li>• Vehicle Number: MCR8956</li> <li>• Field / Block: P 2012 A</li> <li>• FFB Weight: 15.01 MT</li> </ul> <p>Non-Certified 3<sup>rd</sup> Party FFB</p> <ul style="list-style-type: none"> <li>• Company: EXX HXXX LXXXX CXXXXXXXXX SDN</li> <li>• Estate: EXX HXXX LXXXX Estate</li> <li>• Date: 18/08/2023</li> <li>• Ticket Number: 178XXX</li> <li>• Vehicle Number: KFQ 6638</li> <li>• FFB Weight: 17.44 MT</li> </ul> <p>Non-Certified 3<sup>rd</sup> Party FFB</p> <ul style="list-style-type: none"> <li>• Company: SXX CXXX JXX SDN BHD</li> <li>• Estate: SXX CXXX JXX Estate</li> <li>• Date: 23/08/2023</li> <li>• Ticket Number: 178XXX</li> <li>• Vehicle Number: JTS 6833</li> <li>• FFB Weight: 20.01 MT</li> </ul> <p>Mechanism to handle non-conforming FFB and documents has been detailed up in the Procedure Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 11.0.</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</p>	<p>Pagoh POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p>	Complied

	<p>information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<p>CPO - MB</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer; BUYERXXXXXX</li> <li>b) The name and address of the seller; Pagoh POM</li> <li>c) The loading or shipment / delivery date; 09/09/2023</li> <li>d) The date on which the documents were issued; 09/09/2023</li> <li>e) RSPO Certificate Number: RSPO 600305</li> <li>f) A description of the product: CPO MB</li> <li>g) The quantity of the products delivered; 41.88 Mt</li> <li>h) Any related transport documentation; JHG 40XX</li> <li>i) A unique identification number: 014XXX</li> </ul> <p>PK - MB</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer; BUYERXXXXXX</li> <li>b) The name and address of the seller; Pagoh POM</li> <li>c) The loading or shipment / delivery date; 25/08/2022</li> <li>d) The date on which the documents were issued; 25/08/2022</li> <li>e) RSPO Certificate Number: RSPO 600305</li> <li>f) A description of the product: PK MB</li> <li>g) The quantity of the products delivered; 32.10 Mt</li> <li>h) Any related transport documentation; SMG 34XX</li> <li>i) A Unique identification number: 014XXX</li> </ul>	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> <li>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding</li> </ul>	<p>Pagoh POM has established Standard Operating Procedure related Outsourcing Activities. Refer Sustainable Supply chain and Traceability Procedure dated 01/06/2022 with reference number SD/SDP/GSD/SCCS/0522/01 Section 13.0.</p>	<p>Complied</p>



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	<p>the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</li> </ul>	<ul style="list-style-type: none"> <li>i. Stated in the SOP, CPO mill cannot outsource processing activities like refining or crushing. Outsourcing activities for Pagoh POM was for CPO and PK transportation.</li> <li>ii. Sighted the contract agreement between Sime Darby Plantation Berhad and contractor: <ul style="list-style-type: none"> <li>a) Pagoh POM has legal ownership of all input material to be included in the outsourced process. Refer listing of FFB Supplier Certified and Non-Certified. The contract agreement and details like MPOB licence were kept in the file.</li> <li>b) Refer Contract Agreement between Sime Darby Plantation Berhad and TXX TXXX KXXX Sdn. Bhd. – Agreement on the Transportation of Crude Palm Oil (CPO) for Sime Darby Plantation Berhad’s Peninsular Malaysia Oil Mills; Initial term: 3 years commencing from 1/11/2020 and expiring on 31/10/2023.</li> <li>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.</li> <li>d) The contract agreements specified that all transporters are required to fulfil and comply with applicable legal requirements. Refer Section 8.0 Obligation, Undertakings and Covenants Of The Transporter.</li> </ul> </li> </ul>	
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>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. The independent third parties involve in Mill operation is only transportation services for CPO and PK.</p>	Complied

3.8.11	<p>The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.</p>	<p>There are no new contractors used for the handling of certified CPO and PK. As per stated in the procedure Section 13.5 "The Mill shall inform in advance the outsourced contractors if audit is deemed necessary by Certification Bodies (CB) and ensure that the contractors engaged provide relevant access for the CBs to their respective operations, system, and any and all information, when this is announced in advance."</p>	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> <li>• The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</li> <li>• Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</li> <li>• For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>• For Mass Balance Module, the mill:             <ol style="list-style-type: none"> <li>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</li> <li>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</li> <li>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.</li> </ol> </li> </ul>	<p>Record Keeping</p> <ol style="list-style-type: none"> <li>i) All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible.</li> <li>ii) The retention period for maintaining the traceability records is 3 years as stated in the Section 5.4 in Sustainable Supply Chain and Traceability Procedure (2022); Document ID: SD/SDP/GSD/SCCS/0522/01.</li> <li>iii) NA as the mill is using MB model.</li> <li>iv) For Mass Balance Module:             <ol style="list-style-type: none"> <li>a. Pagoh POM have kept all records and maintained balance of RSPO certified FFB and CPO and PK Deliveries.</li> <li>b. Certified CPO and PK despatch that are delivered was deducted from the material accounting system.</li> <li>c. Pagoh POM has delivered Mass balance from a positive stock. Verified through Mass Balance sheet and Palm Trace transaction.</li> </ol> </li> </ol>	Complied

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3.8.13	<p><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Verified OER and KER as below.</p> <table border="1" data-bbox="1153 443 1921 544"> <thead> <tr> <th>Month</th> <th>OER</th> <th>KER</th> </tr> </thead> <tbody> <tr> <td>Oct 2022 – Sept 2023</td> <td>18.96</td> <td>5.02</td> </tr> </tbody> </table>	Month	OER	KER	Oct 2022 – Sept 2023	18.96	5.02	Complied
Month	OER	KER							
Oct 2022 – Sept 2023	18.96	5.02							
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Pagoh POM derives the extraction rates based on the actual extraction rate produced in the mill. Therefore, the accuracy is continuously maintained.</p>	Complied						
3.8.15	<p><b>Processing</b></p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>NA as the mill is using MB module.</p>	Complied						
3.8.16	<p><b>Registration of Transactions</b></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><b>Registration of transactions</b></p> <p>i) The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Verified the registration of CPO Sale and PK Sale.</p> <p>ii) RSPO Certified Volumes Sold under as different scheme or unconventional was not able to be confirmed its shipping announcement by the buyer. However, we have indicated this to the client, and they have a system in place to remove the stocks at their respective time interval which was not at this particular audit. Refer correspondence email between Representative HQ with Global Trading Department dated 16/10/2023 titled "Palmtrace CSPO &amp; CSPK Volume Removal for month of October and November 2023".</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 used. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied
<b>General corporate communications</b>			
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>The Sime Darby Plantation Berhad website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil. The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications.</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>a. Display its RSPO membership status</li> <li>b. Display the RSPO web address (<a href="http://www.rspo.org">www.rspo.org</a>)</li> <li>c. State that the member supports the work of the RSPO</li> <li>d. State the member's history with regard to the RSPO.</li> <li>e. Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at <a href="http://www.rspo.org">www.rspo.org</a>' where the link must lead to the member's profile page.</p>	<p>The Sime Darby Plantation Berhad website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil.</p> <p>The website had not displayed the RSPO website and had not display any RSPO Trademark.</p>	Complied
4.3	<p>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.</p>	<p>The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications and selling of its oils are considered RSPO certified.</p>	Complied
4.4	<p>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.</p>	<p>The Sime Darby Plantation Berhad website was reviewed and confirm the communications are mainly on the efforts and commitments of SDP towards production of sustainable palm oil. The website has published reports, statements, policies,</p>	Complied

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		procedures and performances of such implementation. The website did not specifically publish its product as RSPO certified product.	
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 Pagoh POM and verified through document and site review (notice board, business card, shipping documentation, etc.	Complied
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. 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 746403. Verified the documents found that the supply chain model and certificate number were stated on the ticket.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.	Not applicable since Pagoh POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable

	b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
<b>MODULE B – MASS BALANCE SPECIFIC RULES</b>			
<b>Minimum Mass Balance content</b>			
	95% or above of the oil palm content must be RSPO MB-certified.	Oil palm content for CPO and PK is 100% RSPO MB certified. Non-certified FFB is come from external crop and since Pagoh POM is using Mass Balance module, the non-certified volume is covered in the Mass Balance sheet.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Pagoh POM only applies MB model, and the conventional CPO are downgraded from MB whenever demanded. Non-certified FFB is come from external crop and since Pagoh POM is using Mass Balance module, the non-certified volume is covered in the Mass Balance sheet.	Complied
<b>Labelling and trademark (MB)</b>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>• The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</li> <li>• The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>• Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the</li> </ul>	Pagoh POM is producing crude palm product and does not involve in any labelling of end product.	Complied

	<p>trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</p> <ul style="list-style-type: none"> <li>In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications &amp; Claims document.</li> </ul>		
<b>Messaging (MB)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>[Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain.</li> <li>The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</li> </ul> <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> <li>Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</li> </ul>	<p>No RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product. No messaging involved since Pagoh POM is producing crude palm product and does not involve in any labelling of end product.</p>	<p>Complied</p>
<b>Principle 4: Respect community and human rights and deliver benefits</b>			
<b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the</p>	<p>Sime Darby Plantation Berhad has established human right charter as commitment to respect human right updated on June 2023. Commitment of Sime Darby Plantations has been outline in clause 3.2 which included but not limited to equal opportunities, respecting</p>	<p>Complied</p>

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	<p>unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>freedom of association, combating modern slavery, enhancing health and safety, protecting the right of children, and eliminating violence and harassment. Other than that, Sime Darby Plantation Berhad has been established other policy regards to human right defender in the document "Policy on the Protection of Human Rights Defenders (HRDs)" updated 2020 which clearly stated in clause 3.2 that in the course of their engagement with SDP shall be protected from violence, threats and all forms of retaliation.</p> <p>Communication of the policy sighted based on briefing records for each operating units and further verified based on interview with the stakeholders and workers which can demonstrate their understanding on the policy that has been established.</p> <ol style="list-style-type: none"> <li>1. <u>Pagoh Estate</u> Communication of the policy has been conducted to all the workers during the morning muster call on 24/07/2023 done by Rosli bin Mohamad, estate manager.</li> <li>2. <u>Lanadron Estate</u> Communication of the policy has been conducted to all the workers during the morning muster call on 06/01/2023.</li> <li>3. <u>Pagoh POM</u> Communication of the policy has been conducted to all the workers during the morning muster call on 06/06/2023 by Tn Ahmad Junaidy Jaapar, assistant manager for Pagoh POM</li> <li>4. <u>Pengkalan Bukit Estate</u></li> <li>5. Communication of the policy has been conducted to all the workers during the morning muster call on 28/06/2023 and 13/07/2023 by Tn Azizi, Senior Assistant Manager.</li> </ol>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p>	<p>As per verification through interview and documentation, there is evidence that all operating units under SOU 19, Pagoh did instigate</p>	<p>Complied</p>



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	- Minor compliance -	violence or use any form or harassment There is no cases of harassment included sexual harassment, bullying and abuse has been reported and identified by auditor during the audit.	
<b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	Grievance procedure has been established Grievance Response Standard Operating Procedure updated on 18/07/2022 where the management of has established several methods to make any complaint such as workers representative meeting (social dialogue on monthly basis), gender committee meeting every 2 months, online platform (suara kami, whistleblowing) and also through email that will be handle by Grievance units. The procedure also classified the cases for complainer that required to maintain anonymous or not.	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	There is evidence that the procedure has been made available and in place where their procedure has been communicated to all workers during morning mustercall on weekly basis. Other than that, it has been posted at the housing quarters, muster round and office. QR for suara kami has been pasted at the safety helmet for each worker. As per interview, workers and stakeholders can demonstrate their understanding on procedures. There is no illiterate parties has been identified for each operating units.	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>	There is evidence that any grievance that has been raised by workers/stakeholders has been responded in timely manner. As per interview with the workers, the management of each operating units is responsive for all complaint/grievance receive. Total 8 grievances have been received for SOU 19 Pagoh Operating Units which has been responded within 3 months which some of the cases where anonymous and required investigation.	Complied

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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>Sime Darby Plantation Berhad has implemented Grievances Response Standard Operating Procedure dated 18/07/2022 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p>	Complied
<b>Criterion 4.3:</b> 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>Lanadron Estate</p> <ul style="list-style-type: none"> <li>• Assistance to clean up SXX (T) LXXXXX NXXXXX, SMK KXXXXX UXX, and SXXXXX KXXXXX GXXXX on 16/03/2023.</li> <li>• Contribution for black soil to SXX (T) LXXXXX NXXXXX on 15/08/2023</li> </ul> <p>Pagoh Estate</p> <ul style="list-style-type: none"> <li>• Gotong royong activities at SXXXXX KXXXXXX PXXX PXXXXXX at 10/09/2023</li> </ul> <p><u>Pengkalan Bukit Estate</u></p> <ul style="list-style-type: none"> <li>• Contribution to SX SXXXX AXXXXX RXXXX SXXXX for cross countries event dated 10/05/2023</li> <li>• Borrowing tent for weeding from PXXX SXXXXX binti HXXXX on 07/04/2023</li> <li>• Borrowing JCBs for SX SXXX PXXXXXX on 01/12/2022</li> </ul>	Complied

<b>Criterion 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Copies of land titles were accessible and duly authenticated, providing specific information about the land titles that substantiated the legal entitlement to utilize the land, as depicted below. The required quit rents were promptly remitted. No indications were found of any portion of the land conflicting with the claims of customary landholders</p>	Complied
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>There is no evidence of any use local community land that requires negotiations or agreements detailing FPIC processes. Land title has been verified by the auditor to confirm there is no negotiation and agreement. All palms that have been planted has entered 2<sup>nd</sup> cycle of planting. Therefore, this indicator is not applicable.</p>	Not Applicable
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>There is no evidence of any local community land that requires discussions or with affected community groups. Land historical ownership has been verified in based on the land title for each operating unit. Therefore, this indicator is not applicable.</p>	Not Applicable
4.4.2b	<p>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.</p> <p>- Minor compliance -</p>	<p>There is no evidence of any local community land that requires discussions or with affected community groups. Land historical ownership has been verified in based on the land title for each operating unit. Therefore, this indicator is not applicable.</p>	Not Applicable
4.4.2c	<p>Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	<p>There is no evidence of any local community land that requires discussions or with affected community groups. Land historical ownership has been verified in based on the land title for each operating unit. Therefore, this indicator is not applicable.</p>	Not Applicable

	- Minor compliance -		
4.4.3	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	There is no evidence of any local community land that requires maps of appropriate scale showing the extent of recognized legal, customary or user rights affected local communities. Therefore, this indicator is not applicable.	Not Applicable
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	All available relevant documents have been verified by the auditor such as land title which show legal ownerships of each operating units above. There is no land conflict involved and no proposed benefit sharing nor legal arrangements. All palms that have been planted has entered 2 <sup>nd</sup> cycle of planting. Therefore, this indicator is not applicable.	Not Applicable
4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	There is no evidence of any local community land involved and so this indicator is not applicable.	Not Applicable
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>	There is no evidence of any local community land involved and so this indicator is not applicable.	Not Applicable
<p><b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	Copies of land titles were accessible and duly authenticated, providing specific information about the land titles that substantiated the legal entitlement to utilize the land, as depicted below. The required quit rents were promptly remitted. No indications were found of any portion of the land conflicting with the claims of customary landholders	Complied

4.5.2	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting for all operating units under SOU Pagoh. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.</p>	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>There is no new planting for all operating units under SOU Pagoh. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.</p>	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>There is no new planting for all operating units under SOU Pagoh. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.</p>	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>There is no new planting for all operating units under SOU Pagoh. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.</p>	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 -	There is no new planting for all operating units under SOU Pagoh. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.	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 -	There is no new planting for all operating units under SOU Pagoh. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.	Complied
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no new planting for all operating units under SOU Pagoh. It has been verified by the auditor through Global Risk Assessment Services System (GRASS) and interview with local communities and neighbouring estate.	Complied
<b>Criterion 4.6:</b> Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Sime Darby Plantation Berhad established a Flowchart and Procedures for Managing Land Disputes, with the initial version dated 01/11/2008. This comprehensive procedure outlines the steps to be taken in the event of reported land dispute issues from local communities. The resolution process begins with negotiations, involving Estate Management, Land Management Department, Regional Heads, Zone Heads, and potentially third-party stakeholders. The Land Management Department is responsible for determining the calculation and distribution of compensation to the affected parties.	Complied
4.6.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented,	Sime Darby Plantation Berhad established a Flowchart and Procedures for Managing Land Disputes, with the initial version dated 01/11/2008. This comprehensive procedure outlines the steps	Complied

	<p>monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>to be taken in the event of reported land dispute issues from local communities. The resolution process begins with negotiations, involving Estate Management, Land Management Department, Regional Heads, Zone Heads, and potentially third-party stakeholders. The Land Management Department is responsible for determining the calculation and distribution of compensation to the affected parties.</p>	
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>There are no scheme smallholdings supplying to Pagoh POM.</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Hence there were no needs for negotiated agreements, compensation and payments to any affected parties. Hence, this indicator is not applicable.</p>	Complied
<p><b>Criterion 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad established a Flowchart and Procedures for Managing Land Disputes, with the initial version dated 01/11/2008. This comprehensive procedure outlines the steps to be taken in the event of reported land dispute issues from local communities. The resolution process begins with negotiations, involving Estate Management, Land Management Department, Regional Heads, Zone Heads, and potentially third-party stakeholders. The Land Management Department is responsible for determining the calculation and distribution of compensation to the affected parties.</p>	Complied

4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad established a Flowchart and Procedures for Managing Land Disputes, with the initial version dated 01/11/2008. This comprehensive procedure outlines the steps to be taken in the event of reported land dispute issues from local communities. The resolution process begins with negotiations, involving Estate Management, Land Management Department, Regional Heads, Zone Heads, and potentially third-party stakeholders. The Land Management Department is responsible for determining the calculation and distribution of compensation to the affected parties.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>There are no customary right all operating units under SOU Pagoh. It has been confirmed through interview with local communities and neighbouring estate.</p>	Complied
<p><b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>There are no customary right lands all operating units under SOU Pagoh. It has been confirmed through interview with local communities and neighbouring estate</p>	Complied
4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p>	<p>There are no customary right lands all operating units under SOU Pagoh. It has been confirmed through interview with local communities and neighbouring estate</p>	Complied



	- Critical (Major) compliance -		
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	There are no customary right lands all operating units under SOU Pagoh. It has been confirmed through interview with local communities and neighbouring estate	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	There are no customary right lands all operating units under SOU Pagoh. It has been confirmed through interview with local communities and neighbouring estate	Complied
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	The prices for Fresh Fruit Bunches (FFB) are clearly outlined in Schedule 3 of the Contract Agreement between Sime Darby Plantation Berhad and the FFB Suppliers. All FFB suppliers possess a copy of this contract agreement for their convenient reference. In the event of any discrepancies in terms of weight or payment rates, a grievance procedure has been established, allowing such concerns to be addressed with the mill management.  Moreover, the current and previous period prices are made accessible to FFB suppliers as they are publicly posted at the weighbridge office for their reference. These prices are determined using the MPOB (Malaysian Palm Oil Board) Monthly Average and Mill Oil Extraction Rate (OER) & Kernel Extraction Rate (KER). There have been no alterations from the previous report in this regard.	Complied

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5.1.2	<p><b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).          - Critical (Major) compliance -</p>	<p>Pagoh 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. Not applicable since there is no direct smallholders has supplying FFB to Pagoh POM base on hectarage requirement by RSPO (50Ha).</p>	Complied
5.1.3	<p><b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.          - Critical (Major) compliance -</p>	<p>The pricing is determined by the MPOB Monthly Average Price for CPO and PK, as well as the OER and KER ratings assigned by Pagoh POM, which has been confirmed through the validation of self-billed invoices from FFB suppliers. As per interview with the management, FFB pricing will be calculated based on daily MPOB pricing for both CPO and PK including other cost such as CESS MPOB, transport costs, storage cost and processing cost.</p>	Complied
5.1.4	<p><b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.          - Critical (Major) compliance -</p>	<p>Pagoh 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. Not applicable since there is no direct smallholders has supplying FFB to Pagoh POM base on hectarage requirement by RSPO (50Ha).</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.          - Minor compliance -</p>	<p>Contract agreement sighted for FFB suppliers and stated in the agreement on agreed timeframe and there is also evidence that the contract is legal, fair and transparent based on the verification done on the sampled contract agreement. Sample has been taken for 2 FFB supplier which are AX GXXXXX and GXX EXXXXX.</p>	Complied
5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.          - Critical (Major) compliance -</p>	<p>Pagoh POM guarantees that all agreed payments to external Fresh Fruit Bunch (FFB) suppliers are promptly disbursed in accordance with the contract agreement, specifically on or before the 10th day of the subsequent month. Payments are issued at 30-day intervals.</p>	Complied

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		Samples has been taken for 2 FFB supplier for month June'23 and July'23 and there is evidence that payment has been payment before 10 <sup>th</sup> . Payment document also specified all information such as price and weight of FFB.	
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Pagoh POM conducts regular calibration on their weighbridges used to determine the FFB tonnage for all FFB suppliers. Latest calibration was done on 1/12/2022 by MXXXXXXX CXXXXXXX MXXXXX Sdn Bhd.	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Pagoh 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. Not applicable since there is no direct smallholders has supplying FFB to Pagoh POM base on hectarage requirement by RSPO (50Ha).	Not Applicable
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Pagoh 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. Not applicable since there is no direct smallholders has supplying FFB to Pagoh POM base on hectarage requirement by RSPO (50Ha).	Not Applicable
<b>Criterion 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Pagoh 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. Not applicable since there is no direct smallholders has supplying FFB to Pagoh POM base on hectarage requirement by RSPO (50Ha).	Not Applicable

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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 -	Pagoh 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. Not applicable since there is no direct smallholders has supplying FFB to Pagoh POM base on hectare requirement by RSPO (50Ha).	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Pagoh 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. Not applicable since there is no direct smallholders has supplying FFB to Pagoh POM base on hectare requirement by RSPO (50Ha).	Not Applicable
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Pagoh 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. Not applicable since there is no direct smallholders has supplying FFB to Pagoh POM base on hectare requirement by RSPO (50Ha).	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Pagoh 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. Not applicable since there is no direct smallholders has supplying FFB to Pagoh POM base on hectare requirement by RSPO (50Ha).	Not Applicable
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic	Documented in the human right charter revised in year 2020 which clearly stated that Sime Darby Plantation Berhad will not tolerate	Complied

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	<p>origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. As per verification for each operating units, there is evidence that there is no discrimination has been practices. Foreign workers from different origin, different gender has been treated equally and has been given same opportunities. This has been verified by the auditor through interview with the workers from different origin, races, gender.</p>	
6.1.2	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>There is evidence that there are no parties has been discriminated by the management where it has been confirmed through interview, site visit and records review. Sample has been taken for women workers where they have been treated equally as other workers where there has been paid equally with other workers which work as same job scope and entitle with the same benefits. All foreign workers have been allocated at the same housing compound and received same benefits regardless of the origin. There are no recruitment fees has been charged to all foreign workers that has been recruited in year 2023. It has been confirmed through interview with the new recruited workers.</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>There is evidence that operating units has demonstrate that recruitment base on capabilities and qualities which has been verified during the interview by the operating units and for foreign workers at the origin countries.</p> <p><u>Pagoh Estate</u></p> <p>Newly recruited workers on 06/03/2023 for general workers and sighted application form that has been submitted by the workers on 28/02/2023 and interviewed has been conducted 02/03/2023 by Account and admin Officer, MXXXX SXXXXI ZXXXX and previous assistant manager, Mr GXXXX JXXXX and both recommend for</p>	Complied

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		<p>recruitment. Sighted offer letter has been provided signed by Mr RXXX bin MXXXXXX, estate manager. Further interviewed unable to be done with the worker since the worker caught by the police due to drug cases. Until the day of audit, the management of estate is still waiting investigation from the BXXXX PXXXX DXXXX MXXX for further action. Notification to regional human resources has been done by the management.</p> <p><u>Pengkalan Bukit Estate</u></p> <p>Sample of newly recruited workers has been taken for 1 local 3 foreign that has been recruited in year 2023. There is 1 female worker recruited on 03/05/2023. Application for works has been received 05/04/2023 and medical check-up has been done on</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 has been conducted for all operating units where identification of pregnancy for female workers has been done based on information provided by the workers itself.</p>	Complied
6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Gender committee has been established under SOU 19- Pagoh which all operating units need to send representative to participate in the committee. Gender committee has been chaired by Pn. Fara Noor Rahella binti Buang and sighted organization committee from different operating units. Meeting will be conducted 2 months once and latest meeting conducted on 14/06/2023, 11/08/2023 and 04/10/2023. Issues related to female. One of the issues that has been highlighted is related to request by female workers to construct toilet near to the nursery at Pengkalan Bukit Estate.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>There is evidence that all workers have been paid equally as per Minimum Wages Order 2022 and also MAPA/NUPW agreement. It has been verified based on sample of payslip on March 2023, June</p>	Complied

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		2023 and September 2023. It has been further confirmed through interview with the workers itself.	
<b>Criterion 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Collective agreement between Sime Darby Plantations Berhad and national union of plantation workers (NUPW) for Palm Oil Mill Employees, 2020 registered 09/03/2020 valid until December 2022 reference number COG. NO: 057/2020. Other than all operating units complies with Minimum Wage Order 2022 at rate RM1500/months, RM57.69/day or RM7.21/hour</p>	Complied
6.2.2	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Payment details and employment terms are clearly outlined and formally recorded in employment contracts provided to all employees. These contracts encompass various aspects, such as the employment duration, working hours, overtime policies, annual and medical leave entitlements, public holiday arrangements, mutual termination provisions, maternity benefits, and more. Importantly, these terms are in strict adherence to the Employment Act of 1955, the Minimum Wages Order of 2020, the SOCSO Act of 1969, the EPF Act of 1991, the EIS Act of 2017, and the MAPA/NUPW agreement.</p> <p>Additionally, payroll documents, specifically payslips, provide accurate and comprehensive information regarding compensation for all labor performed. This encompasses individuals receiving daily-rated wages, piece-rated wages, payments for any overtime work, and remuneration for public holidays. Furthermore, our examination of sampled payslips confirms that all wages were disbursed in full compliance with the applicable national legal requirements. Salary deductions and overtime payments align with the stipulations of the relevant laws, including SOCSO, EPF, EIS, and are also in accordance with Labor Office permits. It is</p>	Complied

		noteworthy that none of the sampled employees had family members engaged in any work within this context.	
6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	For all operating units, stated in the employment contract working hours, deduction, overtime and leave entitlement. Mentioned in the employment contract that entitlement of leave is depending on the length of service. For workers less than 2 years services, they are entitled for 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.	Complied
6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	There is 96 workers housing in Pagoh Estate which has been provided to all workers for free. There are 2 types of houses in Pagoh Estate which are 14 units with 3 rooms and other is 2 rooms house. Line site inspection has been conducted on weekly basis base on the requirement in the checklist "Pemeriksaan mingguan unit perumahan/nest/dewan serbaguna" conducted on 17/09/2023, 29/09/2023 and 06/10/2023. As per site visit, there is evidence that housing has been maintained in good condition. There is clinic with medical assistant shared with Pagoh POM. Water supply has been provided SXXXXXXXX AXJ JXXXX with subsidy of 35 gallon per house and electricity supplied by TXXXXXX NXXXXX BXXXXX based on the metre reading. All workers with kids will be provided with RM35/kids for transports allowances to school which located at KXXXXXX PXXXX PXXXXXXX.	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	There are sundry shops located in the estates compound and the estates are nearby to the nearest town. The workers can easily access to adequate, sufficient and affordable foods and goods. Price of goods were displayed at the sundry shops. Workers' interview confirmed that they can easily purchase foods at the nearest shop or choose to go nearest town away from the estate by using their	Complied



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		transport until the main guard post and public transport to the nearest town.	
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO</i></p>	<p>Sime Darby Plantation Berhad – Pagoh POM has provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. It includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. It has been verified by auditor base on the sample payslips for each operating units showed that the salary received complied with the minimum wage order 2020 and 2022 and the decent living wage set up by the group which is foreign worker is RM1,928.95/worker and local RM1,899.13/worker.</p> <p>The management conducted Prevailing Wage Assessment based on check-roll worker for period of March to May 2023. Denominator of total headcount; Worker: 714; Local worker: 98; Foreign worker: 616.</p>	Complied

	<p>will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> <li>• The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers 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>The core job in SOU 19 Pagoh POM and supply bases are exclusively carried out by permanent, full-time employees. No temporary or contract workers have been engaged in these operations. The estate has, however, enlisted the services of a contractor for the transportation of Fresh Fruit Bunches (FFB), and these workers maintain a permanent presence within the estate's operations.</p>	Complied
<p><b>Criterion 6.3:</b> The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Stated in the Human Right Charter year 2020, commitment of Sime Darby Plantation Berhad to practices freedom of association as per stated in clause 3.2.4, Sime Darby Plantation will respect freedom of association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, we will provide alternative means of employee engagement and grievance redressal. During the interview with</p>	Complied

		workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join union	
6.3.2	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. - Minor compliance -	NUPW Committee was established in Pagoh POM and supply bases and sighted minutes meeting for latest meeting. Management plan was developed for the issues raised by the NUPW representatives and action has been taken accordingly. Interviewed with the NUPW representatives confirmed that the issues raised during the meeting were resolved. He informed that there is no any further pending issue reported during the time of audit.	Complied
6.3.3	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. - Minor compliance -	Interviewed with the NUPW representatives and the workers confirmed that the election of the representatives were elected freely by the workers without any interference of management	Complied
<b>Criterion 6.4:</b> Children are not employed or exploited.			
6.4.1	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. - Minor compliance -	Sime Darby Plantations Berhad has established policy for children protection in the Human Right Charter year 2020 in where commitment to protect children outline in clause 3.3 Respect and Uphold Children’s Rights revision 2020. Stated that, Sime Darby Plantation Berhad recognise that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography. Stated clause 3.3.1, the management commitment to eradicate child labour in our supply chain and will not employ anyone under the age of 18 years.	Complied

6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liaison &amp; Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</p>	Complied
6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There is no young worker employed in Pagoh POM certification unit. It has been confirmed through interview with sample workers, site visit to housing compound, operations and verification from the workers masterslist.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>There is evidence that the policy has been communicated to stakeholders during the stakeholders meeting conducted on 17/08/2023 for all operating units under SOU 19, Pagoh. It has been further confirmed through interview with the stakeholders itself.</p>	Complied
<p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes compare to last year where Sime Darby Plantations Berhad adopt the Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>Stated in the policy that the management committed to respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ol style="list-style-type: none"> <li>1. Eliminating Violence and Sexual Harassment:</li> <li>2. Eradicating any form of Exploitation</li> </ol> <p>There are no cases of any harassment that has been identified and happen in all operating units which has been confirmed based on</p>	Complied

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		<p>interview with the workers.</p> <p>Communication of the policy sighted based on briefing records for each operating units and further verified based on interview with the stakeholders and workers which can demonstrate their understanding on the policy that has been established.</p> <ol style="list-style-type: none"> <li>1. <u>Pagoh Estate</u>            Communication of the policy has been conducted to all the workers during the morning muster call on 24/07/2023 done by Rosli bin Mohamad, estate manager.</li> <li>2. <u>Lanadron Estate</u>            Communication of the policy has been conducted to all the workers during the morning muster call on 06/01/2023.</li> <li>3. <u>Pagoh POM</u>            Communication of the policy has been conducted to all the workers during the morning muster call on 06/06/2023 by Tn Ahmad Junaidy Jaapar, assistant manager for Pagoh POM</li> <li>4. <u>Pengkalan Bukit Estate</u>            Communication of the policy has been conducted to all the workers during the morning muster call on 28/06/2023 and 13/07/2023 by Tn Azizi, Senior Assistant Manager.</li> </ol>	
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Stated in the Human Right Charter year 2020, commitment of Sime Darby Plantation Berhad in protecting reproductive right and has been clearly outline in clause 3.2.5. There is evidence that the policy has been implemented where there is no restriction by the management for pregnancy and there is no pregnant/breastfeeding women handling with chemical. It has been further confirmed through interview with the female workers.</p> <p>Communication of the policy sighted based on briefing records for each operating units and further verified base on interview with the</p>	Complied

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		<p>stakeholders and workers which can demonstrate their understanding on the policy that has been established.</p> <p><u>Pagoh Estate</u>            Communication of the policy has been conducted to all the workers during the morning muster call on 24/07/2023 done by Rosli bin Mohamad, estate manager.</p> <p><u>Lanadron Estate</u>            Communication of the policy has been conducted to all the workers during the morning muster call on 06/01/2023.</p> <p><u>Pagoh POM</u>            Communication of the policy has been conducted to all the workers during the morning muster call on 06/06/2023 by Tn Ahmad Junaidy Jaapar, assistant manager for Pagoh POM</p> <p><u>Pengkalan Bukit Estate</u>            Communication of the policy has been conducted to all the workers during the morning muster call on 28/06/2023 and 13/07/2023 by Tn Azizi, Senior Assistant Manager.</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>There is no new mother has been identified for all operating units.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has implemented Grievances Response Standard Operating Procedure dated 18/07/2022. The complaints and grievances are open to effected parties including internal and external stakeholders. The time frame to deal with internal and external communications has been detailed in the Section 2.2. Flow chart procedure and 3.3 The time scale of investigation.</p>	Complied

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		<p>Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in <a href="https://www.simedarby.com/operating-responsibly/whistleblowing">https://www.simedarby.com/operating-responsibly/whistleblowing</a></p> <p>Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p> <p>Interview conducted on-site with sampled internal stakeholders among all workforce confirmed that the information on grievance mechanism, which respects anonymity and protects complainants where requested, is established, and communicated to them.</p> <p>No grievance issues that require the implementation of the mechanism occurs in all operating units within SOU 19 since the last audit.</p>	
<b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> </ul>	<p>Based on interviews with the workers, and observations made, the following were verified:</p> <ol style="list-style-type: none"> <li>a. 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 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.</li> <li>b. Charging of recruitment fee: Workers are not charged any recruitment fees. Interviews conducted with workers also</li> </ol>	Complied

	<ul style="list-style-type: none"> <li>• Withholding of wages</li> <li>- Critical (Major) compliance -</li> </ul>	<p>confirmed that they have not been charged any recruitment fees.</p> <p>c. Involuntary overtime: Based on interviews conducted with the workers, all overtime work was carried out on a voluntary basis. Workers are free to decline any offers for overtime work. Sighted written consent from workers to work overtime for Pagoh POM and estates.</p> <p>d. Lack of freedom to resign: Workers are free to resign as per stated in their employment contracts. This was confirmed during interviews with workers. There is no term and condition for any resignation and the flight tickets will bear by the operating units.</p> <p>e. Debt bondage: There is no evidence of any incidence of debt bondage. It has been verified based on sample of pay slips where there is no deduction of salary for debt. Further verification has been done through interview where there is no loan/borrowing money has been given by the management to the workers. There is also no recruitment fee has been charged to the workers hence confirmed that there is debt bondage implement.</p> <p>f. Withholding of wages: There is no evidence of withholding of wages. Workers' wages have been paid by account and can be withdraw at the nearest bank and sighted evidence of payment that has been signed by the workers. There is evidence that there no workers' wages have been withheld. It has been further confirmed through interview.</p>	
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>There are migrant workers has been recruited from India, Indonesia and Bangladesh to work in SOU Pagoh POM. As a commitment to manage migrant workers in a good manner and compliance to the requirement Sime Darby Plantations Berhad has adopted Sime</p>	Complied



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		<p>Darby's Human Rights Charter, wherein they have made the following commitments:</p> <ul style="list-style-type: none"> <li>a. Ensuring equal opportunities for all.</li> <li>b. Respecting the freedom of association.</li> <li>c. Eradicating any manifestations of exploitation.</li> <li>d. Ensuring the provision of favorable working conditions.</li> <li>e. Enhancing safety and health measures.</li> </ul> <p>As per verification, there is evidence that the policy has been implemented where each process of recruitment has been done such as signing employment contract, interview and consultation with migrant workers at origin countries and One Stop Centre. As per interview, it has been confirmed that all facilities and benefits has been provided equally for all foreign workers. Passport has been kept by the workers itself. There is no evidence of contract substitution where all migrant workers have been explained the content of the employment contract at the origin countries. It has been confirmed through interview with the workers itself.</p>	
<b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager. The mill and estates manager has been appointed as person responsible for safety and health cum chairman for safety and health as per Appointment letter dated 01/01/2023 by Regional General Manager Southern Region. All correspondence was sighted and verified. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report,</p>	Complied

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		<p>workplace inspection, and training. Concerns on issue related health, safety and welfare were discussed at these meetings and recorded. The OSH Committee meeting for Estate was conducted on quarterly basis. Reviewed the latest minutes meeting FY 2023 and FY2022 as follows:</p> <table border="1" data-bbox="1137 531 1928 780"> <thead> <tr> <th>OSH Meeting 2023</th> <th>Pagoh Estate</th> <th>Lanadron Estate</th> </tr> </thead> <tbody> <tr> <td>1<sup>st</sup> Quarter</td> <td>13/03/2023</td> <td>21/03/2023</td> </tr> <tr> <td>2<sup>nd</sup> Quarter</td> <td>09/06/2023</td> <td>21/06/2023</td> </tr> <tr> <td>3<sup>rd</sup> Quarter</td> <td>05/09/2023</td> <td>19/09/2023</td> </tr> <tr> <td>4<sup>th</sup> Quarter</td> <td>TBC</td> <td>TBC</td> </tr> </tbody> </table> <table border="1" data-bbox="1137 831 1928 1110"> <thead> <tr> <th>OSH Meeting 2023</th> <th>Pagoh POM</th> <th>Pengkalan Bukit Estate</th> </tr> </thead> <tbody> <tr> <td>1<sup>st</sup> Quarter</td> <td>29/03/2023</td> <td>18/01/2023</td> </tr> <tr> <td>2<sup>nd</sup> Quarter</td> <td>19/06/2023</td> <td>14/04/2023</td> </tr> <tr> <td>3<sup>rd</sup> Quarter</td> <td>18/09/2023</td> <td>12/07/2023</td> </tr> <tr> <td>4<sup>th</sup> Quarter</td> <td>TBC</td> <td>06/10/2023</td> </tr> </tbody> </table> <p>Workplace inspections are made prior to the ESH meeting. Latest workplace inspection was conducted on the month of June and August 2023.</p>	OSH Meeting 2023	Pagoh Estate	Lanadron Estate	1 <sup>st</sup> Quarter	13/03/2023	21/03/2023	2 <sup>nd</sup> Quarter	09/06/2023	21/06/2023	3 <sup>rd</sup> Quarter	05/09/2023	19/09/2023	4 <sup>th</sup> Quarter	TBC	TBC	OSH Meeting 2023	Pagoh POM	Pengkalan Bukit Estate	1 <sup>st</sup> Quarter	29/03/2023	18/01/2023	2 <sup>nd</sup> Quarter	19/06/2023	14/04/2023	3 <sup>rd</sup> Quarter	18/09/2023	12/07/2023	4 <sup>th</sup> Quarter	TBC	06/10/2023	
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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</p>	<p>Refer Emergency Preparedness &amp; Response Procedures dated 17/11/2021 with reference number UM/HSE/SP/02. Procedures were available in the estates and mills to address potential emergencies such as Flood, Fire, Chemical Spillage, Poisoning, Earthquake/landslide, Accidents, Storm, and Wild/ Poisonous</p>	Complied																														

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	<p>equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Animal Attacks. The plans have been posted at notice boards in the mills and estates and communicated to the workers. Emergency contact numbers have been posted at the notice boards and provided to the workers as well. Interview with the workers such as mandores and store attendants indicated that the workers are aware on the available emergency response plans. Trainings were conducted in the mill and estates to provide awareness to the workers on emergency responses. The trainings were sighted as below.</p> <table border="1" data-bbox="1137 662 1921 909"> <thead> <tr> <th>Estate/ Mill</th> <th>ERP Training date</th> </tr> </thead> <tbody> <tr> <td>Pagoh POM</td> <td>26/09/2023</td> </tr> <tr> <td>Pagoh Estate</td> <td>09/02/2023</td> </tr> <tr> <td>Lanadron Estate</td> <td>06/04/2023</td> </tr> <tr> <td>Pengkalan Bukit Estate</td> <td>26/05/2023</td> </tr> </tbody> </table> <p>First aiders were present in the operating units. They have been trained and obtained certificates as the PIC to address first aid in the operating units. Visit to the mill and estates indicated each station and gangs were equipped with first aid kits. Interview with the respective first aid holders indicated that they were well aware on the methods to use the items in the first aid boxes. The boxes are regularly monitored by the mill and estate Hospital Assistants to replenish the used items and replace expired items. Records of items used were also maintained and available in the boxes. Latest inspection as follows:</p> <table border="1" data-bbox="1137 1252 1921 1380"> <thead> <tr> <th>Estate/ Mill</th> <th>First Aid Training date</th> <th>Latest First Aid Monitoring Record</th> </tr> </thead> <tbody> <tr> <td>Pagoh POM</td> <td>10-11/01/2023</td> <td>23/09/2023</td> </tr> </tbody> </table>	Estate/ Mill	ERP Training date	Pagoh POM	26/09/2023	Pagoh Estate	09/02/2023	Lanadron Estate	06/04/2023	Pengkalan Bukit Estate	26/05/2023	Estate/ Mill	First Aid Training date	Latest First Aid Monitoring Record	Pagoh POM	10-11/01/2023	23/09/2023	
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		Pagoh Estate	07-09/09/2023	23/09/2023	
		Lanadron Estate	10/08/2023	07/10/2023	
		Pengkalan Bukit Estate	07-08/09/2023	29/09/2023	
		<p><u>Pagoh Estate</u>            Accident records were maintained and updated monthly at the estate. The JKPP 8 form has been submitted for the year ending 2022 on 29/01/2023 with reference number JKPP8/140607/2022. There were 1 accident recorded with 180 days TLA.</p> <p><u>Pengkalan Bukit Estate</u>            Accident records were maintained and updated monthly at the estate. The JKPP 8 form has been submitted for the year ending 2022 on 27/01/2023 with reference number JKPP8/134694/2022. There were 3 accident recorded with 22 days TLA.</p> <p><u>Lanadron Estate</u>            Accident records were maintained and updated monthly at the estate. The JKPP 8 form has been submitted for the year ending 2022 on 29/01/2023 with reference number JKPP8/117905/2022. There were 4 accidents recorded with 22 days TLA.</p> <p><u>Pagoh POM</u>            Accident records were maintained and updated monthly at the mill. The JKPP 8 form have been submitted for the year ending 2022 on 12/01/2023 with reference number JKPP8/126561/2022. There were 4 accidents reported with 25 TLA. Reported 11 cases of Poisoning Occupational Disease report to JKPP 7.</p>			

<p>6.7.3</p>	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>Refer PPE Issuance record for the year 2023. Based on the HIRARC carried out at the estates/mill the PPE types for the various activities has been identified and implemented.</p> <table border="1" data-bbox="1137 504 1926 852"> <thead> <tr> <th>Category</th> <th>PPE provided</th> </tr> </thead> <tbody> <tr> <td>Tractor Driver</td> <td>Safety Helmet, Safety Shoes, Ear Plug, Safety Vest.</td> </tr> <tr> <td>Sprayers</td> <td>Respirator, nitrile glove, goggles, wellington boots, apron.</td> </tr> <tr> <td>Manuring</td> <td>Apron, wellington boots, dust mask, nitrile glove.</td> </tr> <tr> <td>Harvester</td> <td>Safety helmet, Goggle, sickle cover, hand glove, wellington boots</td> </tr> </tbody> </table> <p>Similarly, the mill issued PPE to its employees for their protection at the workplace. Records of PPE issued are maintained individually to all employees. PPE issued to the workers is safety helmets, safety shoes. Special PPE for workers assigned to height, confined space. Safety shoes issued on a 6 monthly basis and recorded.</p> <table border="1" data-bbox="1137 1062 1926 1391"> <thead> <tr> <th>Category</th> <th>PPE provided</th> </tr> </thead> <tbody> <tr> <td>Mill operator</td> <td>Safety boots, earmuff, safety vest, helmet, cotton glove</td> </tr> <tr> <td>Water treatment Plant Operator</td> <td>Safety boots, earmuff, safety vest, helmet, cotton glove, dust mask.</td> </tr> <tr> <td>Workshop</td> <td>Safety Helmets, Goggles, Leather Gloves, safety Shoes.</td> </tr> </tbody> </table>	Category	PPE provided	Tractor Driver	Safety Helmet, Safety Shoes, Ear Plug, Safety Vest.	Sprayers	Respirator, nitrile glove, goggles, wellington boots, apron.	Manuring	Apron, wellington boots, dust mask, nitrile glove.	Harvester	Safety helmet, Goggle, sickle cover, hand glove, wellington boots	Category	PPE provided	Mill operator	Safety boots, earmuff, safety vest, helmet, cotton glove	Water treatment Plant Operator	Safety boots, earmuff, safety vest, helmet, cotton glove, dust mask.	Workshop	Safety Helmets, Goggles, Leather Gloves, safety Shoes.	<p>Complied</p>
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		<p>The mill and estates visited provided appropriate PPE to all workers according to the job type. The PPE given as per HIRARC and Personal Protective Equipment (PPE) Procedure, UM/HSE/OCP/03 dated 09/03/2021.</p> <p>All workers have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge. During the field visit to the Spraying Gang and Manuring Gang and visit to the stores of the respective estates and mill, it was sighted that PPEs were worn by the personals.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition.</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>All workers are provided with medical care which is borne by the operating units management. Each operating unit has its own dispensary managed by a certified Hospital Assistant. There are no restrictions for workers to obtain medical aid from the dispensary. In case of major injuries or health issues, workers are referred to private clinics or hospitals which is totally borne by the management as well.</p> <p>All workers are protected via insurance in accordance with Malaysian Law via SOCSO contribution. The monthly contribution was evident via the PERKESO Monthly Salary Contribution (Form 8A) for the workers as following.</p> <table border="1" data-bbox="1137 1161 1926 1390"> <thead> <tr> <th>Operating Units</th> <th>Month</th> <th>Total Workers</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Pagoh POM</td> <td>May 2023</td> <td>100</td> <td>RM5,XXX.XX</td> </tr> <tr> <td>Aug 2023</td> <td>106</td> <td>RM6,XXX.XX</td> </tr> <tr> <td>Pagoh Estate</td> <td>May 2023</td> <td>175</td> <td>RM6,XXX.XX</td> </tr> </tbody> </table>	Operating Units	Month	Total Workers	Amount	Pagoh POM	May 2023	100	RM5,XXX.XX	Aug 2023	106	RM6,XXX.XX	Pagoh Estate	May 2023	175	RM6,XXX.XX	Complied
Operating Units	Month	Total Workers	Amount															
Pagoh POM	May 2023	100	RM5,XXX.XX															
	Aug 2023	106	RM6,XXX.XX															
Pagoh Estate	May 2023	175	RM6,XXX.XX															

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			Aug 2023	175	RM6,XXX.XX	
		Lanadron Estate	May 2023	159	RM5,XXX.XX	
			Aug 2023	177	RM5,XXX.XX	
		Pengkalan Bukit Estate	May 2023	263	RM9,XXX.XX	
			Aug 2023	282	RM10,XXX.XX	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Occupational Injuries were recorded as below:				Complied
		Operating Unit	2022		Hours worked	Average Days Worked
			Cases	TLA		
		Pagoh POM	4	25	250,024	100
		Pagoh Estate	1	180	296,000	125
		Lanadron Estate	2	22	303,784	127
		Pengkalan Bukit Estate	3	22	502,213	211
<b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b>						
<b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.						
7.1.1	<b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	The estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans. a) The estates had in place documented the IPM plan which				Complied

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		<p>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 by SOP dated Dec 2016 index no 17.10 beneficial plant protocol.</p> <p>b) In order to minimize use of insecticides on leaf-eating pest, the estates planted beneficial plants such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, along the roadsides and designated points in the fields and also within the nursery perimeter.</p> <p>c) The plan also advocated single layer EFB 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.</p> <p>d) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year were recommended by the GM /Agronomist. Baiting is continued until bait acceptance threshold level.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>This is not practiced in the estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM. The estates have declared this compliance in the status of IPM species invasiveness.</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 land preparation in SOU 19 Mill and Estates by burning ever since SDPB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> <li>• Compliance to Responsible Agriculture Charter</li> <li>• EQMS-SOP-Section B2 - Under felling/clearing &amp; land preparation.</li> </ul> <p>SDP has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in</p>	Complied



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		the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.																			
<b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																					
7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	The written justification in Standard Operating Procedure (SOP) of all agrochemicals are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Berhad. Refer to Sime Darby Plantation Agricultural Reference Manual, Issue No:2 dated June 2021. The manual already classified the type of weed, herbicide to used, rate/dosage and dilution rate as a guidance based on the field conditions. Addition or reduction of rounds and dosage will be considered in consultation with the respective head of units or agronomist.	Complied																		
7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. Sighted the sampled records of pesticides usage (A.I.) per ha at estates visited FY 2023 (to date) as follows:</p> <p>Pagoh Estate</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Quantity (a.i./Ha)</th> <th>Quantity (a.i/FFB)</th> </tr> </thead> <tbody> <tr> <td>Jan 2023</td> <td>1.697</td> <td>2.128</td> </tr> <tr> <td>Feb 2023</td> <td>2.404</td> <td>3.773</td> </tr> <tr> <td>Mar 2023</td> <td>2.981</td> <td>5.904</td> </tr> <tr> <td>Apr 2023</td> <td>2.967</td> <td>4.085</td> </tr> <tr> <td>May 2023</td> <td>3.645</td> <td>2.645</td> </tr> </tbody> </table>	Month	Quantity (a.i./Ha)	Quantity (a.i/FFB)	Jan 2023	1.697	2.128	Feb 2023	2.404	3.773	Mar 2023	2.981	5.904	Apr 2023	2.967	4.085	May 2023	3.645	2.645	Complied
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		June 2023	4.237	2.975	
		July 2023	4.578	2.162	
		Aug 2023	4.637	1.945	
		Sept 2023	5.986	2.853	
		Lanadron Estate			
		Month	Quantity (a.i./Ha)	Quantity (a.i/FFB)	
		Jan 2023	0.029	0.031	
		Feb 2023	0.082	0.107	
		Mar 2023	0.027	0.054	
		Apr 2023	0.068	0.070	
		May 2023	0.160	0.116	
		June 2023	0.125	0.094	
		July 2023	0.178	0.106	
		Aug 2023	0.156	0.088	
		Sept 2023	0.141	0.075	
		Pengkalan Bukit Estate			
		Month	Quantity (a.i./Ha)	Quantity (a.i/FFB)	
		Jan 2023	0.153	0.147	
		Feb 2023	2.011	0.341	
		Mar 2023	0.141	0.140	

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		Apr 2023	0.274	0.064	
		May 2023	0.544	0.084	
		June 2023	0.403	0.090	
		July 2023	0.520	0.072	
		Aug 2023	0.572	0.076	
		Sept 2023	0.603	0.066	
7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5. The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. Paraquat was eliminated. In replace, alternatives such as Glyphosate is used instead.</p>			Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There is no prophylactic use of pesticides in all estates visited.</p>			Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p>	<p>The Chemical Registers for the mill and sampled estates were available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations.</p> <p>The register showed that only class III &amp; IV pesticides were used at the mill and estates. Paraquat and Monocrotophos was eliminated.</p>			Complied

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	<p>The due diligence refers to:</p> <ul style="list-style-type: none"> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> <li>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> </ul> <p>- Minor compliance -</p>	<p>In its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.</p>											
<p>7.2.6</p>	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides operators have been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly health surveillance done by the Medical Assistant. Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms. Reviewed the training records as per criteria 3.7.2. Sampled the training conducted for pesticide handlers as below: -</p> <p><u>Pagoh POM</u></p> <table border="1" data-bbox="1137 1058 1912 1158"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Chemical Handling Training</td> <td>07/08/2023</td> </tr> </tbody> </table> <p><u>Lanadron Estate</u></p> <table border="1" data-bbox="1137 1208 1912 1351"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Trunk Injection Training</td> <td>04/07/2023</td> </tr> <tr> <td>Inter Pump Training</td> <td>17/04/2023</td> </tr> </tbody> </table>	Training	Date	Chemical Handling Training	07/08/2023	Training	Date	Trunk Injection Training	04/07/2023	Inter Pump Training	17/04/2023	<p>Complied</p>
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		<p><u>Pengkalan Bukit Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Inter Spraying Technique</td> <td>13/09/2023</td> </tr> <tr> <td>Safety and health training for sprayers</td> <td>20/07/2023</td> </tr> </tbody> </table> <p><u>Pagoh Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Safety Chemical Handling</td> <td>17/08/2023</td> </tr> </tbody> </table>	Training	Date	Inter Spraying Technique	13/09/2023	Safety and health training for sprayers	20/07/2023	Training	Date	Safety Chemical Handling	17/08/2023	
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7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.          - Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and all estate’s Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the storekeeper was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety Data Sheet were available.</p>	Complied										

7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>The procedure SD/SDP/GSD (FORMERLY KNOWN AS PSQM) (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established.</p> <p>a) Collection of SW is made by PXXXXX FXXXX (Melaka) Sdn Bhd a licensed vendor registered with DOE.</p> <p>b) Empty containers were tripled rinsed, pierced and delivered to a registered recycler company M/s SX SXXXX TXXXXXXX Enterprise</p> <p>Details of disposal as shown below:</p> <table border="1" data-bbox="1155 692 1839 1011"> <thead> <tr> <th></th> <th>Estate</th> <th>Pagoh</th> <th>Lanadron</th> <th>Pg Bukit</th> </tr> </thead> <tbody> <tr> <td></td> <td>Date</td> <td>02/10/23</td> <td>25/09/23</td> <td>07/10/23</td> </tr> <tr> <td>1</td> <td>20 L Container</td> <td>80 pcs</td> <td>48 pcs</td> <td>50 pcs</td> </tr> <tr> <td>2</td> <td>Rat Bat Boxes</td> <td>100 kg</td> <td>-</td> <td>-</td> </tr> <tr> <td>3</td> <td>Ally Bottle</td> <td>35 kg</td> <td>20 kg</td> <td>10</td> </tr> <tr> <td>4</td> <td>Fertilizer Bags</td> <td>2010 kg</td> <td>3080 kg</td> <td>730 kg</td> </tr> <tr> <td>5</td> <td>Kenlon 20 L</td> <td>-</td> <td>4 pcs</td> <td>5 pcs</td> </tr> </tbody> </table>		Estate	Pagoh	Lanadron	Pg Bukit		Date	02/10/23	25/09/23	07/10/23	1	20 L Container	80 pcs	48 pcs	50 pcs	2	Rat Bat Boxes	100 kg	-	-	3	Ally Bottle	35 kg	20 kg	10	4	Fertilizer Bags	2010 kg	3080 kg	730 kg	5	Kenlon 20 L	-	4 pcs	5 pcs	Complied
	Estate	Pagoh	Lanadron	Pg Bukit																																		
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7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Verification through interview with management and site verification, there is no aerial spraying of pesticide using aerial spraying or drone activity in the SOU 19 Pagoh Certification Units.</p>	Complied																																			
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>The CHRA of each operating units have recommended the necessity of annual medical surveillance for pesticide applicators exposed to pesticides that are classified as organophosphates. Medical Surveillance were conducted in the mill and estates based on the</p>	Complied																																			

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		<p>recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.</p> <p>Pagoh POM - Medical Surveillance Programme has been performed successfully for the year 2023 for the mill workers exposed to hazardous chemicals and fumes. A total of 20 workers have been examined on 10-12/05/2023 at KXXXXX KXXX Sdn Bhd. The results indicated that all workers were declared fit to work.</p> <p>Lanadron Estate - The medical surveillance programme for the year 2023 has been performed on 01/08/2023 at KXXXXX PXXXX for 21 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work.</p> <p>Pengkalan Bukit Estate - The medical surveillance programme for the year 2023 has been performed on 01/08/2023 at KXXXXX PXXXX for 26 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work.</p> <p>Pagoh Estate - The medical surveillance programme for the year 2023 has been performed on 09, 10, 15, &amp; 22/08/2023 at KXX MXXXXXXX SXXXXXXX Hospital for 22 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work.</p>	
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has established Gender Policy on Motherhood Responsibilities and Reproductive Rights on prohibition of all confirmed pregnant and breast-feeding woman to work with pesticides. The policy has been communicated to the workers through induction training for new workers, morning briefing, iCARE Safety and Health Townhall meeting, and displayed at various notice board within the estate.</p>	Complied

		<p>The estates visited prohibited all confirmed pregnant and breast-feeding woman to work with pesticides as per internal memo signed by the Assistant Manager. The memo has been displayed on the notice board at few strategic places in the estate.</p>															
<p><b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>																	
<p>7.3.1</p>	<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>SOU 19 Pagoh Mill and all the 3 estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2023 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1146 727 1912 1059"> <thead> <tr> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle &amp; generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td> </tr> <tr> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) &amp; boiler quenching water and blow down</td> </tr> <tr> <td>Land</td> <td>Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.</td> </tr> </tbody> </table> <p>All waste and pollution are identified and documented in the Environmental Management Plan 2023. The waste generated from the mill/estates operations as shown below:</p> <table border="1" data-bbox="1146 1235 1912 1353"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> </tbody> </table>	Receptor	Sources	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down	Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.		Type of waste	Details	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	<p>Complied</p>
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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>In Pagoh POM and the estates in SOU 19, procedure SD/SDP/GSD (FORMERLY KNOWN AS PSQM) (ESH)/203-EN1 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <ul style="list-style-type: none"> <li>a) Management and disposal of wastewater 2023 has been established compiled by Assistant Engineer/Assistants/Staff.</li> <li>b) Waste Management Plan 2023 has been established prepared by QA and verified by the Assistant Engineer/Assistants/Staff.</li> <li>c) Waste Management Plan 2023 has been established in Jan 2023.</li> <li>d) Based on Environmental Impact Evaluation (file no: SM/5.2/EIE) and Environment Aspect and Impact Identification (file no: SM/5.2/EIA) improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination.</li> <li>e) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.</li> </ul>	Complied																		

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f) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is disposed to the following vendors registered with DOE. Used lubricants oil and used batteries were collected by SXX upon completion of every vehicles/engines servicing. DOE has made approval to authorize SXX via letter dated 06/9/2011. DOE letter of authority was sighted and verified. SW 404 is dispatched to KXXXXX AXXXX Sdn Bhd.

Estate	Date	SW410	SW409	SW305	SW404
Pagoh	22/08/23	0.0525	-	0.2705	-
Pagoh	03/04/23	-	0.074	0.400	-
Pagoh	27/04/23	-	-	-	0.0017
Pg Bukit	11/07/23	0.063	0.076	0.2925	-
Pg Bukit	19/03/23	0.030	0.0360	0.2160	-
Pg Buki	25/08/23	-	-	-	0.0011
Pg Bukit	30/03/23	-	-	-	0.0028
Lanadron	02/10/23	0.585	0.021	0.0085	-
Lanadron	21/07/23	1.390	-	0.0570	-
Lanadron	24/08/23	-	-	-	0.0011

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	Date	SW322	SW305	SW110	SW109
PPOM	26/09/23	0.1709	0.2120	0.0106	0.0201
PPOM		SW324	SW409	SW410	
PPOM	26/09/23	0.0730	0.3017	0.2300	
PPOM		SW102	SW410	SW324	SW305
PPOM	22/03/23	0.1049	0.2454	0.0592	0.0906
PPOM		SW109	SW110	SW409	SW322
PPOM	22/03/23	0.0520	0.0210	0.3384	0.2614

The CU scheduled waste is disposed to the following vendors registered with DOE.

OU	Date	SW Buyers/Vendor
SOU 19 Estates	30/4/24	PXXXXX FXXXX Sdn Bhd
	30/4/24	KXXXXX MXXXXXXXX Sdn Bhd
	30/4/24	SXXX DXXXXX IXXXXXXXX Sdn Bhd
Pagoh POM	30/4/24	KXXXXXXXX AIXX Sdn Bhd

Empty containers were disposed empty container to SST SXXX TXXXXXXXX Enterprise. Details as shown in 7.2.8 above.

The domestic waste is disposed as follows. The estates appoint a Contractor MXXXX EXXXXXXXX for the transportation to the municipal landfill MXXXX DXXXX SXXXXX

Estate	Site	Schedule

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		<table border="1"> <tr> <td>Pagoh Estate</td> <td>MX SXXXXXX</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>Lanadron Estate</td> <td>MX SXXXXXX</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>Pg Bukit Estate</td> <td>MX SXXXXXX</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>Pagoh POM</td> <td>MX SXXXXXX</td> <td>Collection with Pagoh Estate</td> </tr> </table> <p>Evidences of collection were verified through the payment made to MXXXXXX DXXXXXX SXXXXXX e.g bill no</p> <ul style="list-style-type: none"> <li>• Pagoh Estate ref 128828 - 02/09/23 &amp; ref 129065 - 04/09/23</li> <li>• Lanadron Estate ref 30311 - 15/09/23 &amp; ref 131114 - 23/09/23</li> <li>• Pg Bukit Estate ref 637401 - 30/08/23</li> </ul>	Pagoh Estate	MX SXXXXXX	Collection 2/3 x week	Lanadron Estate	MX SXXXXXX	Collection 2/3 x week	Pg Bukit Estate	MX SXXXXXX	Collection 2/3 x week	Pagoh POM	MX SXXXXXX	Collection with Pagoh Estate	
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Pagoh POM	MX SXXXXXX	Collection with Pagoh Estate													
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	<p>There was no land preparation in SOU 19 Mill and Estates by burning ever since Sime Darby Plantation Berhad practiced zero burning as per the Sime Darby Plantation Berhad practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> <li>• Compliance to Responsible Agriculture Charter</li> <li>• EQMS-SOP-Section B2 - Under felling/clearing &amp; land preparation</li> </ul> <p>As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal.</p>	Complied												
<b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.															
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	SOU 19 continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which	Complied												

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		<p>involved safety, health, environmental, quality, employees, etc. had followed the established SOP.</p> <ul style="list-style-type: none"> <li>a) Agriculture Reference Manual (ARM) dated 01/07/2011,</li> <li>b) Estate Quality Management System (EQMS) Manual dated 01/11/2008,</li> <li>c) Safety Standard Operating Procedures (SSOP) dated 10/6/2023</li> <li>d) Sustainable Plantation Management System Manual (SPMS),</li> <li>e) "Guidelines On River Management" Manual, ESH Management System Manual dated April 2014</li> <li>f) Occupational Safety and Health Manual dated 01/01 2021</li> <li>g) Pictorial Safety Standards and Security Guidelines (PSS).</li> <li>h) Plantations/Mill Quality Management System (PQMS/MQMS) standard operating manual</li> </ul> <p>All the estates and mill operations were guided through the manuals and SOP. The procedures as documented in the Agriculture Reference Manual were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The ARM included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Responsible Agricultural Charter the care for their safety and health and the environment.</p>	
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.	Periodic tissue and soil sampling were carried out in the Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided	Complied

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<p>- Minor compliance -</p>		<p>the indication of soil health and monitors the changes in the organic carbon and total nitrogen. For all 4 estates Agronomic assessment and fertilizer recommendation was conducted by Sime Darby Research Plant Nutrition &amp; Protection Unit PNP Southern Region to formulate the 2023 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca &amp; B had been carried out in all estates. The latest being:</p> <table border="1" data-bbox="1126 638 1919 823"> <thead> <tr> <th></th> <th><i>Estate</i></th> <th><i>Report Date</i></th> <th><i>Report No</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pagoh Estate</td> <td>06-07/10/2022</td> <td>S/N 1667871154</td> </tr> <tr> <td>2</td> <td>Lanadron Estate</td> <td>29/06/2022</td> <td>S/N 1687008030</td> </tr> <tr> <td>3</td> <td>Pg Bukit Estate</td> <td>15/06/2022</td> <td>S/N 1668657588</td> </tr> </tbody> </table> <p>Soil analysis for PH, Org C, Total N, Total P, Avail P, Exch K, Exch Ca &amp; Exch Mg was carried out on a 5 year cycle basis and last carried out as follows:</p> <table border="1" data-bbox="1126 938 1919 1123"> <thead> <tr> <th></th> <th><i>Estate</i></th> <th><i>Report Date</i></th> <th><i>Report No</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pagoh Estate</td> <td>25/09/2018</td> <td>S67/2018</td> </tr> <tr> <td>2</td> <td>Lanadron Estate</td> <td>09/04/2018</td> <td>S22/2018</td> </tr> <tr> <td>3</td> <td>Pg Bukit Estate</td> <td>21/03/2022</td> <td>S18/2022</td> </tr> </tbody> </table> <p>All foliar and soil sampling &amp; analysis was conducted by Sime Darby Research Plant Nutrition &amp; Protection Unit PNP Central West Region. Soil analysis is made on a 5-year cycle. This year the estates had a resampling soil beginning 2023 respectively. At the time of audit the report has yet to be released.</p>		<i>Estate</i>	<i>Report Date</i>	<i>Report No</i>	1	Pagoh Estate	06-07/10/2022	S/N 1667871154	2	Lanadron Estate	29/06/2022	S/N 1687008030	3	Pg Bukit Estate	15/06/2022	S/N 1668657588		<i>Estate</i>	<i>Report Date</i>	<i>Report No</i>	1	Pagoh Estate	25/09/2018	S67/2018	2	Lanadron Estate	09/04/2018	S22/2018	3	Pg Bukit Estate	21/03/2022	S18/2022	
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7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>The Estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching. In addition, during replanting, palms were felled, chipped, windowed and left to decompose. Records showed that the estates had applied EFB at 40 tons/ha and records showed that EFB metric ton in 2022/23 was as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th>Estate</th> <th>Field no</th> <th>Ha</th> <th>Mt</th> <th>Month</th> </tr> </thead> <tbody> <tr> <td>Pagoh</td> <td>P09 A</td> <td>84.75</td> <td>3390</td> <td>Nov/ Dec</td> </tr> <tr> <td>Pagoh</td> <td>P17A</td> <td>71.63</td> <td>2865</td> <td>Jun/Aug</td> </tr> <tr> <td>Pagoh</td> <td>P20A</td> <td>91.23</td> <td>3649</td> <td>Jan/Mac</td> </tr> <tr> <td>Lanadron</td> <td>Nil</td> <td>Nil</td> <td>Nil</td> <td>-</td> </tr> <tr> <td>Pg Bukit</td> <td>P08A</td> <td>65.78</td> <td>2631</td> <td>Oct / Nov</td> </tr> <tr> <td>Pg Bukit</td> <td>P11A</td> <td>32.23</td> <td>1289</td> <td>May /June</td> </tr> <tr> <td>Pg Bukit</td> <td>P10C</td> <td>64.04</td> <td>2516</td> <td>Jan/Feb</td> </tr> </tbody> </table>	Estate	Field no	Ha	Mt	Month	Pagoh	P09 A	84.75	3390	Nov/ Dec	Pagoh	P17A	71.63	2865	Jun/Aug	Pagoh	P20A	91.23	3649	Jan/Mac	Lanadron	Nil	Nil	Nil	-	Pg Bukit	P08A	65.78	2631	Oct / Nov	Pg Bukit	P11A	32.23	1289	May /June	Pg Bukit	P10C	64.04	2516	Jan/Feb	Complied
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7.4.4	<p>Records of fertiliser inputs are maintained.                  - Minor compliance -</p>	<p>Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc. Records of programs and applications of fertilizers were reviewed by auditors. Review of the records revealed that the actual fertilizers applied in 2022/23 was in line with the program. The following fertilizers were applied in SOU 19 estates subject to the recommendation by the Agronomist.</p> <table border="1" data-bbox="1137 603 1930 979"> <thead> <tr> <th></th> <th>Fertiizer</th> <th>Kg/palm</th> <th>application month</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Borate</td> <td>0.10</td> <td>May/Nov</td> </tr> <tr> <td>2</td> <td>NK C1/C2</td> <td>3.00-4.00</td> <td>Sept/Feb</td> </tr> <tr> <td>3</td> <td>R Phosphate</td> <td>1.75 - 2.00</td> <td>April /May</td> </tr> <tr> <td>4</td> <td>GML</td> <td>2.50</td> <td>April</td> </tr> <tr> <td>5</td> <td>Kieserite</td> <td>1.50-1.75</td> <td>April</td> </tr> <tr> <td>6</td> <td>Compound 45</td> <td>1.25-2.25</td> <td>Jan - Dec</td> </tr> <tr> <td>7</td> <td>Compound 65</td> <td>1.50</td> <td>Feb</td> </tr> </tbody> </table>		Fertiizer	Kg/palm	application month	1	Borate	0.10	May/Nov	2	NK C1/C2	3.00-4.00	Sept/Feb	3	R Phosphate	1.75 - 2.00	April /May	4	GML	2.50	April	5	Kieserite	1.50-1.75	April	6	Compound 45	1.25-2.25	Jan - Dec	7	Compound 65	1.50	Feb	Complied
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<p><b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.</p>																																			
7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.                  - Critical (Major) compliance -</p>	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. The soil series in the estates were classified as follows:</p> <table border="1" data-bbox="1137 1171 1930 1353"> <thead> <tr> <th></th> <th>Pagoh Estate</th> <th>Lanadron Estate</th> <th>Pg Bukit Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bkt Temiang</td> <td>Briah</td> <td>Holyrood</td> </tr> <tr> <td>2</td> <td>Holyrood</td> <td>Selangor</td> <td>Local Alluvium</td> </tr> <tr> <td>3</td> <td>Jitra</td> <td>Jawa</td> <td>Malacca</td> </tr> </tbody> </table>		Pagoh Estate	Lanadron Estate	Pg Bukit Estate	1	Bkt Temiang	Briah	Holyrood	2	Holyrood	Selangor	Local Alluvium	3	Jitra	Jawa	Malacca	Complied																
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7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Like all SDPB Estates, the estates visited in SOU 19 continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ul style="list-style-type: none"> <li>a) Reclassification of conservation set aside (CSA) For Upstream Operations dated 31/05/2019 ref no GSQM/PLS/CSA-GD01</li> <li>b) Land Preparation - Construction of terraces in ARM Manual dated June 2021 Pg 6 of 27.</li> </ul> <p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, EFB application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in immature areas. The cover crop <i>mucuna bracteata</i> had been planted along some slopes by management. Large areas with</p>	Complied																																					

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		<p><i>neprolepis biserrata</i> in the inter rows were sighted during the visit. The slope maps for the titled ha were provided by the R&amp;D Precision Agriculture Unit Oct 2017 with details as follows:</p> <table border="1" data-bbox="1144 467 1895 842"> <thead> <tr> <th>No</th> <th>Topography</th> <th>Pagoh</th> <th>Lanadron</th> <th>Pg Bukit</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0-2</td> <td>18.24</td> <td>67.96</td> <td>17.01</td> </tr> <tr> <td>2</td> <td>2-6</td> <td>57.65</td> <td>29.54</td> <td>54.49</td> </tr> <tr> <td>3</td> <td>6-12</td> <td>22.26</td> <td>2.49</td> <td>26.02</td> </tr> <tr> <td>4</td> <td>12-20</td> <td>1.74</td> <td>0.01</td> <td>2.37</td> </tr> <tr> <td>5</td> <td>20-25</td> <td>0.07</td> <td>0.00</td> <td>0.11</td> </tr> <tr> <td>6</td> <td>&gt;25</td> <td>0.04</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td></td> <td>Total</td> <td>100%</td> <td>100%</td> <td>100%</td> </tr> </tbody> </table>	No	Topography	Pagoh	Lanadron	Pg Bukit	1	0-2	18.24	67.96	17.01	2	2-6	57.65	29.54	54.49	3	6-12	22.26	2.49	26.02	4	12-20	1.74	0.01	2.37	5	20-25	0.07	0.00	0.11	6	>25	0.04	0.00	0.00		Total	100%	100%	100%	
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7.5.3	<p>There is no new planting of oil palm on steep terrain.          - Minor compliance -</p>	<p>This compliance being addressed in the following stating the following among others:</p> <p>a) Reclassification of conservation set aside (CSA) For Upstream Operations dated 31/05/2019 ref no GSQM/PLS/CSA-GD01.</p> <p>b) Land Preparation - Construction of terraces in ARM Manual dated June 2021 Pg 6 of 27.</p> <p>"Slope of &gt;25 degree to be excluded from any new plantation development and replanting program. For slope &lt;25 degree the existing crop all vegetative shall be maintained accordingly".</p>	Complied																																								
<p><b>Criterion 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>																																											
7.6.1	<p><b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p>	<p>Soil surveys are made and available in a soil map at the estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates. The Soil Series Map issued by the AAT – Precision Agriculture Unit dated</p>	Complied																																								

	- Critical (Major) compliance -	respectively for individual estates. However, the auditor verified there is no new planting activity in the estates visited. Hence, the criteria are not applicable	
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	This is addressed in the Sime Darby Plantation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2 I.e to avoid Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. However, the auditor verified there is no new planting activity in the estates visited. Hence, the criteria are not applicable	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 are made and available in a soil map at the estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates. No new plantings in sampled Estate. As per slope map prepared by R&D-TTAS Precision Agriculture Unit dated November 2018, topography information sampled Estates7.8.2 was available as verified under indicator 7.5.2.	Complied
<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil at SOU 19 estates. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. <b>PROCEDURAL NOTE:</b> 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).	There is no peat soil or soil categorized as marginal or fragile soil at SOU 19 estates. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.	Complied

	- Minor compliance -		
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil at SOU 19 estates. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.	Complied
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place. - Critical (Major) compliance -	<p>There is no peat soil or soil categorized as marginal or fragile soil at SOU 19 estates. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p> <p>Nevertheless, the water and ground cover management programme is documented in the Sime Darby Agricultural Reference Manual (Water Management in Coastal and Peat lands) issued on 01.07.2011. Details are described in 7.8.1. individual estates and mill had their respective water management plan mainly to monitor among others the following:</p> <ul style="list-style-type: none"> <li>a) Monitor the quality of main water inlet/outlet for pollutants from estate’s operations.</li> <li>b) Contingency during water shortage.</li> <li>c) Field water management - side pit construction</li> <li>d) Adequate field drains</li> <li>e) Reuse/recycle wastewater.</li> <li>f) Peat soil water management</li> </ul> <p>Management strategy for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils) is based on the established ARM, section 10: Water Management In Coastal and Peat Plantings.</p> <p>There were 2 management strategies.</p> <ul style="list-style-type: none"> <li>a) optimal water level monitoring.</li> <li>b) and flushing of acid rainwater.</li> </ul>	Complied

7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at SOU 19 estates. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Complied
7.7.6	<p><b>(C)</b> 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 at SOU 19 estates. The auditor verified there is no new planting activity in the estates visited. Hence, the criteria are not applicable.</p>	Complied
7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at SOU 19 estates. The auditor verified there is no new planting activity in the estates visited. Hence, the criteria are not applicable.</p>	Complied
<p><b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.</p>			

<p>7.8.1</p>	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <ul style="list-style-type: none"> <li>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</li> <li>b) Workers have adequate access to clean water.</li> </ul> <p>- Minor compliance -</p>	<p>SOU 19 Mill /estates had established its Water Management Plan 2023 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <ul style="list-style-type: none"> <li>a) Implementation of rainwater harvest,</li> <li>b) Construction of water gate and scheduled water pumping for effective management of field drains and field water level.</li> <li>c) daily monitoring of bund / scheduled maintenance</li> <li>d) Establishment of <i>mucuna bracteata</i> to prevent erosion,</li> <li>e) Side drain at field road to control water, frond stacking,</li> <li>f) Enhancement of ground vegetation at bare ground area.</li> </ul> <p>The water sources are as shown below:</p> <table border="1" data-bbox="1137 823 1921 1289"> <thead> <tr> <th></th> <th>Water source</th> <th>Usage</th> <th>Monitoring &amp; measurement</th> <th>Freq</th> <th>PIC</th> <th>Review status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SAJ</td> <td>Purchased for domestic consumption</td> <td>Monitoring water supply</td> <td>Mth</td> <td>AM Mgr</td> <td>Liaison with Authority</td> </tr> <tr> <td>2</td> <td>Rain water</td> <td>Domestic use Workshop Chemical mixing</td> <td>Rain fall data</td> <td>On-going</td> <td>AM Mgr</td> <td>Water harvesting for general washing</td> </tr> <tr> <td>3</td> <td>Water tank</td> <td>Emergency water supply</td> <td>-</td> <td>-</td> <td>AM Mgr</td> <td>Request water supply from other estates</td> </tr> </tbody> </table> <p>The contingency plan during water shortage</p> <table border="1" data-bbox="1137 1337 1921 1378"> <thead> <tr> <th></th> <th>Area/incident</th> <th>Action steps</th> <th>PIC</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		Water source	Usage	Monitoring & measurement	Freq	PIC	Review status	1	SAJ	Purchased for domestic consumption	Monitoring water supply	Mth	AM Mgr	Liaison with Authority	2	Rain water	Domestic use Workshop Chemical mixing	Rain fall data	On-going	AM Mgr	Water harvesting for general washing	3	Water tank	Emergency water supply	-	-	AM Mgr	Request water supply from other estates		Area/incident	Action steps	PIC	Status						<p>Complied</p>
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		1	Water shortage/ prolonged dry season	To obtain water from local authority /Mill catchment To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP	Mgr AM/Mill Engineer	As and when required	
		2	Severe water pollution/ Contamination	To obtain water from SAJ To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP	Mgr AM//Mill Engineer	As and when required	
		<p>The Estates had implemented water managements plans which covered:</p> <ul style="list-style-type: none"> <li>a) Water shortage contingencies</li> <li>b) Water pollution prevention</li> <li>c) Reduce wastage</li> <li>d) Identification &amp; management of waste waters</li> <li>e) Monitoring rainfall</li> <li>f) Regular water quality analysis.</li> </ul> <p>Water management plan review date was sighted and verified with records as follows:</p>					

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	Estate/Mill	Review date	Issues	
1	Pagoh Estate	25/07/2023	Nil	
2	Lanadron Esatte	05/01/2023	Nil	
3	Pg Bukit Estate	09/01/2023	Nil	
4	Pagoh POM	30/09/2023	Nil	

The water reduction plan is shown below;

	Issues/Areas	Action Steps	PIC	Status
1	Rainwater collection	Large containers are to be placed at strategic locations to collect rainwater. The rainwater shall be recycled for washing heavy machinery	AM/Field staff	On-going
2	Leakage on plumbing system	Frequent inspection to detect leakage. Fix any leakage	AM/Field staff	On-going
3	Water compartment alization	To conserve level of soil moisture To minimize water stress during dry season	AM/Field staff	On-going
4	Handling of chemicals	To recycle water spillage while mixing of chemical at mixing area	AM/Field staff	On-going
5	education	Avoid excessive usage during cleaning Close pipe to prevent water dripping	AM/Field staff	On-going



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		6	Re-streaming	Re stream from sterilizer condensate pit for dilution	Mill engineer	On-going	
The Mill Identification & Management of Wastewater							
			location	Wastewater produced	Treatment/containment	Reuse/recycle/disposal method	
		1	Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system	
		2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain	
			Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain	
		3	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain	
		4	Lab	Cleaning water	Process drain	Monsoon drain	
		5	Wash room	Toilet water, cleaning water	Septic tank	Collection by licensed contractor.	

<p>7.8.2</p>	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Reclassification of conservation set aside (CSA) for Upstream Operations dated 31/05/2019. The buffer zones established are as follows:</p> <p>The signboards were displayed accordingly at the site where applicable. During the field visit there was no spraying activities or signs left in such an area. Among others parameters are;</p> <table border="1" data-bbox="1137 821 1926 1169"> <thead> <tr> <th></th> <th><i>River width</i></th> <th><i>Buffer zone</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>&gt; 40 m</td> <td>50 m</td> </tr> <tr> <td>2</td> <td>20 - 40 m</td> <td>40 m</td> </tr> <tr> <td>3</td> <td>10 - 20 m</td> <td>20 m</td> </tr> <tr> <td>4</td> <td>5 - 10 m</td> <td>10 m</td> </tr> <tr> <td>5</td> <td>&lt; 5 m</td> <td>5 m</td> </tr> </tbody> </table> <table border="1" data-bbox="1137 1225 1926 1394"> <thead> <tr> <th></th> <th>parameter</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>6-9</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>3</td> </tr> </tbody> </table>		<i>River width</i>	<i>Buffer zone</i>	1	> 40 m	50 m	2	20 - 40 m	40 m	3	10 - 20 m	20 m	4	5 - 10 m	10 m	5	< 5 m	5 m		parameter	Standard	1	pH	6-9	2	BOD	3	<p>Complied</p>
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		3	COD	25
		4	SS	50
		5	AN	0.3
		6	DO	5-7
			parameter	Standard
		1	Aldrin	0.02 ppb
		2	Dieldrin	0.02 ppb
		3	t-DDT	0.1 ppb
		4	BHC	2 ppb
		5	Heptachlor	0.05 ppb
		6	lindane	2 ppb
		7	endosulfan	10 ppb
		8	Chlordane	0.08 ppb
			The buffer zones identified at the estates are as follows.	
			Estate	Buffer zone area
		1	Pagoh Estate	Water catchment - nursery

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		2	Lanadron Estate	Sg Muar - Areas along Estate property	
		3	Pg Bukit Estate	Water Catchment P02 / P08C	
		5	Pagoh POM	Watre Water Catchment	
		<p>Samples are taken from the mill and estates for detection of any pollution arising from the mill and estates activities.</p> <p>Among others management plan taken:</p> <ul style="list-style-type: none"> <li>a) Regular inspection at buffer/HCV areas</li> <li>b) Monitor water from surrounding areas</li> <li>c) Track, measure and report all activities around river</li> <li>d) Train and educate workers.</li> </ul> <p>The sampling sites taken as follows. There were no major issues on the water quality. Variation if any is investigated as per the SOP.</p>			
			OU	Sampling sites	Frequency
		1	Pagoh Estate	Nil	4x/year
		2	Lanadron Estate	Sg Muar 3 points	4x/year
		3	Pg Bukit Estate	Stream 3 pts - Main & Pagoh Div	4x/year
		4	Pagoh POM	Sg Sarang Buaya	Monthly

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		<p>Analysis results were sighted and verified and in within the specification.</p> <p>a) Pagoh Estate dated 24/07/2023, 10/04/2023 &amp; 03/01/2023  b) Lanadron Estate dated 26/09/23, 27/06/23 &amp; 29/03/23  c) Pengakalan Bukit dated 07/09/2023, 2206/23 &amp; 15/03/23</p> <p>Sg Muar is approx 100 m wide and surrounded by other communities.</p> <p>In addition Pengkalan Bukit Estate had 2 divisions with facilities of own internal treatment. Samples were take monthly basis for domestic use standard.</p> <p>Samples were taken monthly from the estate reservoir before and treatment and workers quarters. Among others dates of analysis were sighted and verified below i.e 07/09/23, 17/06/23, 05/0523.</p> <p>Mainly off spec as shown is pH below 6 and being resampled and investigated and documented. All records were sighted and verified.</p> <table border="1" data-bbox="1137 975 1924 1367"> <thead> <tr> <th></th> <th>parameter</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>6-9</td> </tr> <tr> <td>2</td> <td>TDS</td> <td>1000</td> </tr> <tr> <td>3</td> <td>Turbidity</td> <td>5</td> </tr> <tr> <td>4</td> <td>Chloride</td> <td>250</td> </tr> <tr> <td>5</td> <td>Aluminium</td> <td>0.2</td> </tr> <tr> <td>6</td> <td>Coli</td> <td>Absent</td> </tr> <tr> <td>7</td> <td>Coliform</td> <td>Absent</td> </tr> </tbody> </table>		parameter	Standard	1	pH	6-9	2	TDS	1000	3	Turbidity	5	4	Chloride	250	5	Aluminium	0.2	6	Coli	Absent	7	Coliform	Absent	
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		<p>PPOM made the following water analysis leading to the outlet Sg Sarang Buaya as per DOE Jadual Pematuhan requirement. Details as follows. All units in mg/l except for pH.</p> <table border="1" data-bbox="1137 475 1926 1002"> <thead> <tr> <th colspan="3"></th> <th colspan="2">21/09/23</th> <th colspan="2">23/08/23</th> </tr> <tr> <th colspan="3"></th> <th>Hulu</th> <th>Hilir</th> <th>Hulu</th> <th>Hilir</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>6-9</td> <td>6.56</td> <td>6.87</td> <td>6.46</td> <td>6.92</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>3</td> <td>2</td> <td>2</td> <td>2</td> <td>1</td> </tr> <tr> <td>3</td> <td>COD</td> <td>25</td> <td>24</td> <td>20</td> <td>28</td> <td>12</td> </tr> <tr> <td>4</td> <td>A Nitrogen</td> <td>0.3</td> <td>&lt;1</td> <td>&lt;1</td> <td>&lt;1</td> <td>&lt;1</td> </tr> <tr> <td>5</td> <td>DO</td> <td>5-7</td> <td>5.58</td> <td>5.49</td> <td>3.89</td> <td>4.01</td> </tr> <tr> <td>6</td> <td>Oil &amp; Grease</td> <td>5.0</td> <td>3</td> <td>2</td> <td>1</td> <td>1</td> </tr> <tr> <td>7</td> <td>S Solids</td> <td>50</td> <td>4</td> <td>6</td> <td>10</td> <td>20</td> </tr> <tr> <td>8</td> <td>Total N</td> <td>-</td> <td>2</td> <td>2</td> <td>2</td> <td>2</td> </tr> </tbody> </table>				21/09/23		23/08/23					Hulu	Hilir	Hulu	Hilir	1	pH	6-9	6.56	6.87	6.46	6.92	2	BOD	3	2	2	2	1	3	COD	25	24	20	28	12	4	A Nitrogen	0.3	<1	<1	<1	<1	5	DO	5-7	5.58	5.49	3.89	4.01	6	Oil & Grease	5.0	3	2	1	1	7	S Solids	50	4	6	10	20	8	Total N	-	2	2	2	2	
			21/09/23		23/08/23																																																																				
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7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>Based on Jadual Pematuhan PPOM disposed effluent on water discharge final point exit to Sg Sarang Buaya (Distance approx 35 km) via Pagoh Estate field. Sighted quarterly report has been submitted to DOE license no 006387 validity period of 01/7/23-30/6/24 by quarterly basis. Submission for to DOE on May for period April - June 2023. Among others the indicators were:</p> <table border="1" data-bbox="1137 1241 1926 1375"> <thead> <tr> <th colspan="2"></th> <th>July - Sept 23</th> <th>STD</th> <th>July</th> <th>08/08/23</th> <th>05/09/23</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>5-9</td> <td>-</td> <td>-</td> <td>7.81</td> <td>8.55</td> </tr> <tr> <td>2</td> <td>BOD mg/l</td> <td>20</td> <td>-</td> <td>-</td> <td>18</td> <td>14</td> </tr> </tbody> </table>			July - Sept 23	STD	July	08/08/23	05/09/23	1	pH	5-9	-	-	7.81	8.55	2	BOD mg/l	20	-	-	18	14	Complied																																																	
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		<table border="1"> <tr> <td>3</td> <td>A Nitrogen</td> <td>20</td> <td>-</td> <td>5</td> <td>1</td> </tr> <tr> <td>4</td> <td>Total N</td> <td>200</td> <td>-</td> <td>94</td> <td>21</td> </tr> <tr> <td>5</td> <td>Oil &amp; Grease</td> <td>5.0</td> <td>-</td> <td>18</td> <td>2</td> </tr> <tr> <td>6</td> <td>Total Solids</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>7</td> <td>S Solids</td> <td>200</td> <td>-</td> <td>184</td> <td>170</td> </tr> </table> <p>All parameters tested complied with regulatory standards except for marginal Oil &amp; Grease level. The mill has made a resampling with sample tested by an external EXXXXX Sdn Bhd on 14/08/23. The results show a level of &lt; 1. Month of July no discharge of effluent due to feeding to the biogas plant (nearby joint venture SDP) coupled with low production.</p>	3	A Nitrogen	20	-	5	1	4	Total N	200	-	94	21	5	Oil & Grease	5.0	-	18	2	6	Total Solids	-	-	-	-	7	S Solids	200	-	184	170																
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.          - Minor compliance -</p>	<p>The mill processing water are obtained from the SAJ and water catchment adjacent to the mill complex. The water usage monitoring is made on a monthly basis. The usage in 2022 is as follows;</p> <table border="1"> <thead> <tr> <th></th> <th>Month</th> <th>Water/mt</th> <th>FFB /mt</th> <th>Water /FFB</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jan</td> <td>10160</td> <td>8097</td> <td>1.25</td> </tr> <tr> <td>2</td> <td>Feb</td> <td>9311</td> <td>8450</td> <td>1.10</td> </tr> <tr> <td>3</td> <td>Mac</td> <td>14402</td> <td>12391</td> <td>1.16</td> </tr> <tr> <td>4</td> <td>Apr</td> <td>16291</td> <td>15046</td> <td>1.08</td> </tr> <tr> <td>5</td> <td>May</td> <td>13206</td> <td>13672</td> <td>0.97</td> </tr> <tr> <td>6</td> <td>Jun</td> <td>20841</td> <td>17785</td> <td>1.17</td> </tr> <tr> <td>7</td> <td>July</td> <td>16440</td> <td>14793</td> <td>1.11</td> </tr> <tr> <td>8</td> <td>Aug</td> <td>10070</td> <td>7783</td> <td>1.29</td> </tr> </tbody> </table>		Month	Water/mt	FFB /mt	Water /FFB	1	Jan	10160	8097	1.25	2	Feb	9311	8450	1.10	3	Mac	14402	12391	1.16	4	Apr	16291	15046	1.08	5	May	13206	13672	0.97	6	Jun	20841	17785	1.17	7	July	16440	14793	1.11	8	Aug	10070	7783	1.29	Complied
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8	Aug	10070	7783	1.29																																												

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		9	Sep	11674	8135	1.43	
		10	Oct	10420	8522	1.22	
		11	Nov	8846	6219	1.42	
		12	Dec	10839	8777	1.23	
			Total	152500	129670	1.18	
<p>A slightly higher water usage noted, due to the proportionate reduction in volume of FFB being processed. There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc.</p>							

**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>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report 2023. The document was reviewed/updated on Jan 2023. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1"> <thead> <tr> <th></th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Backhoe tractor</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel</td> </tr> <tr> <td>2</td> <td>Van / Supervisory vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.</td> </tr> </tbody> </table>		Target	Objective	Action plan	1	Backhoe tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel	2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.	Complied
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3	Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources Usage of solar streetlight	
The utilization of fossil fuel in 2022 is being monitored with records shown below in Diesel L/FFB mt:				
Mth	Pagoh	Lanadron	Pg Bukit	Pagoh POM
Jan	1.36	2.29	1.28	0.10
Feb	1.36	1.59	1.34	0.10
Mac	1.35	1.35	1.47	0.10
Apr	1.55	1.59	1.58	0.08
May	1.47	1.60	1.60	0.07
Jun	1.96	1.98	1.26	0.04
July	1.81	2.14	1.50	0.09
Aug	1.91	2.00	1.52	0.17
Sep	1.59	1.75	1.20	0.27
Oct	1.78	1.72	2.05	0.12
Nov	1.99	2.16	2.17	0.16
Dec	2.15	1.65	1.68	0.11
<i>Total</i>	47757	35267	43680	13626
<i>B/line</i>	1.75	1.54	2.05	0.12
The estates and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running. Performance variation in view of several factors i.e.				

		<p>a) Infrastructure of estates,  b) Community size / no of gen-sets,  c) No. of vehicles / age of machine.  d) Weather interference / crop production volume</p> <p>There is no opportunity for the estates to capitalize the utilization of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p> <p>Pagoh Mill and SOU 19 Estates</p> <p>A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2023 identified in the following:</p> <p>a) Environmental Aspect Identification Summary FY 2023 reviewed accordingly.  b) Environmental Impact Evaluation Summary FY 2023 reviewed accordingly.</p> <p>Renewable energy usage &amp; diesel consumption 2021 was established and monitored by monthly basis. Among others effort to reduce diesel usage includes the following;</p> <p>a) By maintenance of the boiler &amp; machinery to ensure at optimum level,  b) to monitor diesel usage,  c) provide training to workers regarding reduce fuel and diesel usage for boiler.</p>	
<p><b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			

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7.10.1	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 19 Mill and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <p>a) The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment.</p> <p>b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.</p>	Complied						
7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>SOU 19 has calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1. There is no new development within the SOU 19 estates.</p>	Complied						
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EIA) records i.e. (SM/5.2/EIA) and (SM/5.2/EIE) which covers estates and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1137 1276 1912 1383"> <thead> <tr> <th></th> <th>Receptors</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Air emissions –from boiler stack (smoke &amp; particulate), vehicle &amp; generator (smoke and gases).</td> </tr> </tbody> </table>		Receptors	Source	1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases).	Complied
	Receptors	Source							
1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases).							

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		GHG emission from anaerobic processes (ETP, EFB dumping).																
2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down																
3	land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.																
<p>Pagoh Mill conducted boiler stack sampling for each of the boiler stack by PXXXXXX EXXXXXXXXX (M) Sdn Bhd. Results were within the acceptable limit.</p> <table border="1"> <thead> <tr> <th></th> <th>Details</th> <th>Date</th> <th>Results</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Boiler no 1 PMD 1426</td> <td>15/06/23</td> <td>84.2 mg/m3</td> <td>150 gm/m3</td> </tr> <tr> <td>1</td> <td>Boiler no 1 PMD 1426</td> <td>15/12/22</td> <td>128.2 mg/m3</td> <td>150 gm/m3</td> </tr> </tbody> </table> <p>The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS was found to be in functional condition. Data from the stack is connected online to DOE’s office. Boiler smoke emission data are within the DOE limit.</p> <p>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent.</p> <p>‘Pollution prevention plan and waste management action plan’ is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly. Among of action has been taken by CU were:</p>					Details	Date	Results	Standard	1	Boiler no 1 PMD 1426	15/06/23	84.2 mg/m3	150 gm/m3	1	Boiler no 1 PMD 1426	15/12/22	128.2 mg/m3	150 gm/m3
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		<ul style="list-style-type: none"> <li>a) Scheduled wastes – were disposed to KXXXXXX AXXXX Sdn Bhd, (SW404), PXXXX FXXXX (MXXXX) Sdn Bhd Domestic waste are disposed at Majlis Daerah Segamat landfill 2/3x a week accumulated at designated area</li> <li>b) Full compliance to zero burning practices.</li> </ul>	
<b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>There was no land preparation of existence or new planting in SOU 19 and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> <li>a) Compliance to Responsible Agriculture Charter</li> <li>b) EQMS-SOP-Section B2 - Under felling/clearing &amp; land preparation</li> </ul> <p>As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>This is established in the following among others:</p> <ul style="list-style-type: none"> <li>a) <i>Pencegahan dan Langkah Kawalan Kebakaran di SDP</i></li> <li>b) <i>Larangan melakukan pembakaran terbuka di kawasan SDP</i></li> <li>c) <i>Pemantauan Kawasan Hotspot</i></li> <li>d) 5km radius zero burning commitment</li> <li>e) ERP procedure</li> </ul> <p>Therein containing</p> <ul style="list-style-type: none"> <li>i. Objective</li> <li>ii. Activity and prevention.</li> <li>iii. Function of Fire and Rescue Team</li> </ul>	Complied

		<p>iv. Emergency Evacuation Plan / Drill</p> <p>The procedure was formalized by RSQM/GSD for use in all operating units in SDP Estates and mills. Training related to fire drill / prevention are conducted annually.</p> <table border="1" data-bbox="1162 536 1915 767"> <thead> <tr> <th></th> <th>Estate / Mill</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pagoh Estate</td> <td>09/02/23</td> <td>13/02/23</td> </tr> <tr> <td>2</td> <td>Lanadron Estate</td> <td>06/01/23</td> <td>06/04/23</td> </tr> <tr> <td>3</td> <td>Pg Bukit Estate</td> <td>19/09/23</td> <td>15/06/23</td> </tr> <tr> <td>4</td> <td>Pagoh POM</td> <td>06/02/23</td> <td>12/09/23</td> </tr> </tbody> </table>		Estate / Mill	Date	Date	1	Pagoh Estate	09/02/23	13/02/23	2	Lanadron Estate	06/01/23	06/04/23	3	Pg Bukit Estate	19/09/23	15/06/23	4	Pagoh POM	06/02/23	12/09/23	
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7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Both the estates and the mill in SOU 19 held engagement with the adjacent stakeholders via briefing sessions during the stakeholders meeting. Among others slides relating to;</p> <ul style="list-style-type: none"> <li>a) Pengenalan RSPO / MSPO</li> <li>b) Amalan Pengurusan Lestari</li> <li>c) Inisiatif Kawalan Kebakaran</li> <li>d) Sime Darby Hotspot Dashboard</li> <li>e) On The Ground Fire Prevention Team</li> <li>f) Fire control Team / Facilities - Simulation Training</li> <li>g) Signboard On Fire Awareness</li> </ul> <ul style="list-style-type: none"> <li><i>i. Pencegahan dan Langkah Kawalan Kebakaran di SDP</i></li> <li><i>ii. Larangan melakukan pembakaran terbuka di kawasan SDP</i></li> <li><i>iii. Pemantauan Kawasan Hotspot</i></li> <li><i>iv. 5km radius zero burning commitment</i></li> </ul>	Complied																				

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		<p>v. Compliance to Responsible Agriculture Charter</p> <p>vi. <i>Program Simulasi Kebakaran</i> Lampiran A Fire Prevention and Control Measure.</p> <ul style="list-style-type: none"> <li>- Objective</li> <li>- Activity and prevention.</li> <li>- Function of Fire and Rescue Team</li> <li>- Emergency Evacuation Plan / Drill</li> <li>- Compliance to related legislative requirement</li> </ul> <p>All stakeholders being briefed in the respective stakeholders meetings. This is inclusive on the fire prevention and control measures akin to the earlier session in meetings.</p> <table border="1" data-bbox="1151 799 1839 1029"> <thead> <tr> <th></th> <th>OU</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pagoh Estate</td> <td>17/08/2023</td> <td>02/08/2022</td> </tr> <tr> <td>2</td> <td>Lanadron Estate</td> <td>17/08/2023</td> <td>02/08/2022</td> </tr> <tr> <td>3</td> <td>Pg Bukit Estate</td> <td>17/08/2023</td> <td>02/08/2022</td> </tr> <tr> <td>4</td> <td>Pagoh POM</td> <td>17/08/2023</td> <td>02/08/2022</td> </tr> </tbody> </table>		OU	Date	Date	1	Pagoh Estate	17/08/2023	02/08/2022	2	Lanadron Estate	17/08/2023	02/08/2022	3	Pg Bukit Estate	17/08/2023	02/08/2022	4	Pagoh POM	17/08/2023	02/08/2022	
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<p><b>Criterion 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>																							
7.12.1	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting in all the 3 estates as concluded from this audit. This is made through checking of the area and ha statement and also the 5 year budget plan. Site visit and interview with the management of both estates further confirmed statement. Thus, this indicator was not applicable.</p>	Not Applicable																				

<p>7.12.2</p>	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b>          Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).          - Critical (Major) compliance -</p>	<p>The HCV re-assessment was compiled by GSD (FORMERLY KNOWN AS PSQM) team on Aug 2016 for Estates of SOU 19. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <p>a) Overview of HCV assessment</p> <p>b) Description of assessment area</p> <ul style="list-style-type: none"> <li>- Landscape context</li> <li>- biodiversity &amp; conservation values</li> <li>- ecosystem service / social &amp; cultural values</li> </ul> <p>c) HCV criteria &amp; application to agriculture</p> <ul style="list-style-type: none"> <li>- Visual observation &amp; supporting information</li> <li>- Wildlife in plantation</li> <li>- decision on HCV status</li> </ul> <p>d) HCV management / Monitoring.</p> <p>The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein. The HCV areas presence as identified by the estates within SOU 19 are given below;</p> <table border="1" data-bbox="1160 1109 1877 1380"> <thead> <tr> <th></th> <th>Description</th> <th>Location</th> <th>Ha</th> <th>Type</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>River Reserve (Muar River)</td> <td>Lanadron Estate</td> <td>19.41</td> <td>HCV4</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>2</td> <td>Water Catchment</td> <td>Pagoh Estate</td> <td>5.10</td> <td>HCV4</td> </tr> <tr> <td>3</td> <td>Water Catchment</td> <td>Pagoh Estate</td> <td>2.80</td> <td>HCV4</td> </tr> <tr> <td>4</td> <td>Water Catchment</td> <td>Pagoh Estate</td> <td>1.20</td> <td>HCV4</td> </tr> </tbody> </table>		Description	Location	Ha	Type	1	River Reserve (Muar River)	Lanadron Estate	19.41	HCV4						2	Water Catchment	Pagoh Estate	5.10	HCV4	3	Water Catchment	Pagoh Estate	2.80	HCV4	4	Water Catchment	Pagoh Estate	1.20	HCV4	<p>Complied</p>
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7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not Applicable		Not Applicable																			

<p>7.12.4</p>	<p><b>(C)</b> 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). - Critical (Major) compliance -</p>	<p>The HCV re-assessment was compiled by GSD (FORMERLY KNOWN AS PSQM) team on Sept 2016 for Estates of SOU 19. The report therein contained information relating to HCV identification and management. The details among others as extracted below.</p> <ul style="list-style-type: none"> <li>a) Overview of HCV assessment</li> <li>b) Description of assessment area             <ul style="list-style-type: none"> <li>- Landscape context</li> <li>- biodiversity &amp; conservation values</li> <li>- ecosystem service / social &amp; cultural values</li> </ul> </li> <li>c) HCV criteria &amp; application to agriculture             <ul style="list-style-type: none"> <li>- Visual observation &amp; supporting information</li> <li>- Wildlife in plantation</li> <li>- decision on HCV status</li> </ul> </li> <li>d) HCV management / Monitoring.</li> </ul> <p>The report is given in details to provide the existence of HCV, complete with photo and description The conservation and management of such identified areas are also detailed therein.</p> <p>All areas were sighted and verified. Hectare for the re-categorized areas has not affected the others category including the planted areas. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented. The HCVs, conservation areas/environmentally sensitive areas e.g. bund along the stretches of river/straits which passes bordering through the estate had been identified and being monitored.</p> <p>All stakeholders being briefed in the respective stakeholders meetings. This is inclusive on the RSPO/MSPO SDP compliance and efforts akin to the earlier session in meetings.</p>	<p>Complied</p>
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7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>The audit findings have confirmed that there is no rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018 in SOU 19 estates. Hence, the requirement under this indicator does not apply.</p>	Complied																				
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>Based on the biodiversity report, there was no RTE species found in all the estates. Nonetheless, the monitoring plan of wildlife was established and implemented. Education about the status of RTE has been given to workforce through a muster briefing from time to time. Signage to restrict hunting and intrusion have been put up at many places at the estates especially at the points of entry to create awareness among the workers and surrounding communities.</p> <p>All the HCVs were maintained by the management of estates and mill. This exercise has taken into consideration all aspects of</p>	Complied																				

		<p>environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented.</p> <p>The monitoring was done monthly by respective estates recent being as follows;</p> <table border="1" data-bbox="1176 507 1883 694"> <thead> <tr> <th></th> <th>Estate</th> <th>Monitoring Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pagoh</td> <td>04/10/2023</td> </tr> <tr> <td>2</td> <td>Lanadron</td> <td>02/10/2023</td> </tr> <tr> <td>3</td> <td>Pengkalan Bukit</td> <td>13/09/2023</td> </tr> </tbody> </table>		Estate	Monitoring Date	1	Pagoh	04/10/2023	2	Lanadron	02/10/2023	3	Pengkalan Bukit	13/09/2023	
	Estate	Monitoring Date													
1	Pagoh	04/10/2023													
2	Lanadron	02/10/2023													
3	Pengkalan Bukit	13/09/2023													
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>The CU management has established a standard monitoring document. Details provided include the following information;</p> <p>a) Area b) Field no and GPS coordinate c) Observation</p> <ul style="list-style-type: none"> <li>- Encroachment /sign of trespassing</li> <li>- Wildlife issues/conflicts/sighting</li> <li>- Pollution /erosion issues</li> </ul> <p>d) Maintenance of signage / fence</p> <p>The monitoring being made by the AP during the security rounds in the estate complex. The field staff/Assistant also played a role in providing information during their daily rounds in the fields. Records furnished by the APs were sighted and verified.</p> <table border="1" data-bbox="1153 1200 1908 1359"> <thead> <tr> <th></th> <th>Action steps</th> <th>Action Plan</th> <th>Date</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Inspection of HCV</td> <td>Continuous inspection and recommendation To liaise with related agency</td> <td>On-going</td> <td>Estate mgmt</td> </tr> </tbody> </table>		Action steps	Action Plan	Date	PIC	1	Inspection of HCV	Continuous inspection and recommendation To liaise with related agency	On-going	Estate mgmt	Complied		
	Action steps	Action Plan	Date	PIC											
1	Inspection of HCV	Continuous inspection and recommendation To liaise with related agency	On-going	Estate mgmt											

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		2	Protection or conservation & monitoring of biodiversity area.	To continuously collaborate with R& D to monitor the status & health of trees	On-going	Estate mgmt	
		3	Protection & conservation of mangrove forests area.	To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation.	On-going	Estate mgmt	
		5	Rehabilitation & habitat enhancement	To participate in tree planting divers tree species to enhance the surrounding biodiversity.	On-going	Estate mgmt	
		6	Interface with animals	Raise awareness of HCV/RTE to employees Employees are taught not to disturbed/hunt wildlife. Liaison with <i>Jabatan Perhilitan</i> on wildlife encounter/discovery	On-going	Estate mgmt	
		7	Education and awareness	Educate employees on importance of biodiversity. Encourage research on specific biodiversity To erect signage No fishing/no hunting/no swimming	On-going	Estate mgmt	

7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 19 estates. Hence, the requirement under this indicator does not apply.</p>	Complied
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**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in 2022 for Pagoh 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 2022 for Pagoh POM and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.72
PKO	0.72

Extraction	%
OER	18.70
KER	5.16

Production	t/yr
FFB Process	129670.05
CPO Produced	24249.90
PKO Produced	6687.21

Land Use	Ha
OP Planted Area	8904.77
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>8904.77</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	61,574.10	0.85	54.17	1.14	0.00	0.00	61,628.27	0.85
CO <sub>2</sub> Emission from fertilizer	8,302.90	0.11	7.37	0.15	0.00	0.00	8,310.27	0.11
NO <sub>2</sub> Emission	4,311.78	0.06	3.61	0.08	0.00	0.00	4,315.39	0.06
Fuel Consumption	21.33	0.00	0.01	0.00	0.00	0.00	21.35	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	-58,364.05	-0.81	-51.34	-1.08	0.00	0.00	-58,415.39	-0.81
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>15,846.06</b>	<b>0.22</b>	<b>13.82</b>	<b>0.29</b>	<b>6,311.57</b>	0.00	<b>22,171.45</b>	<b>0.22</b>

*\*Note: Includes both estates and smallholders*

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**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	0.00	0.00
Fuel Consumption	2.36	0.00
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>2.36</b>	<b>0.00</b>

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

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

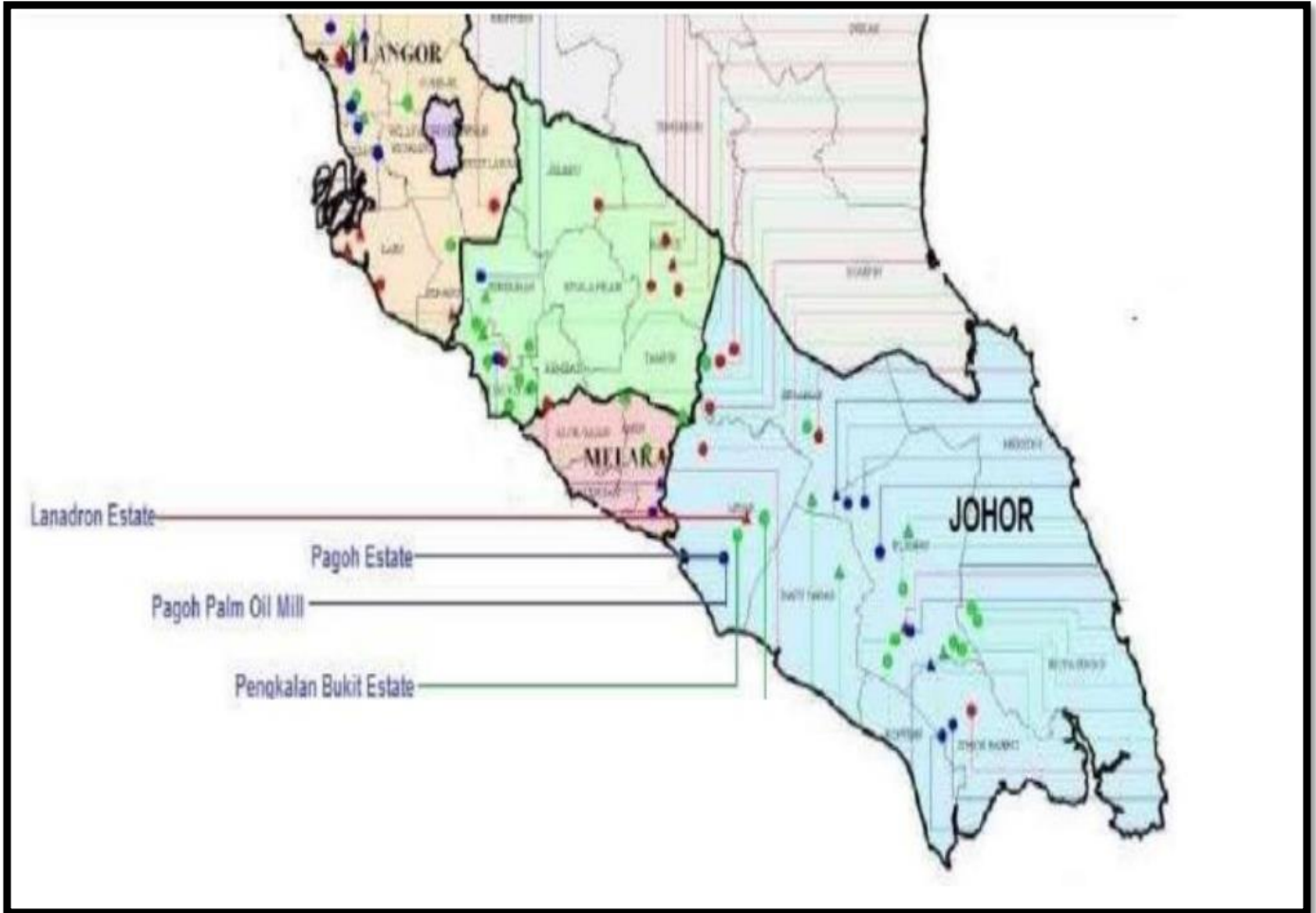
\*This mill has no kernel crusher operation.

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

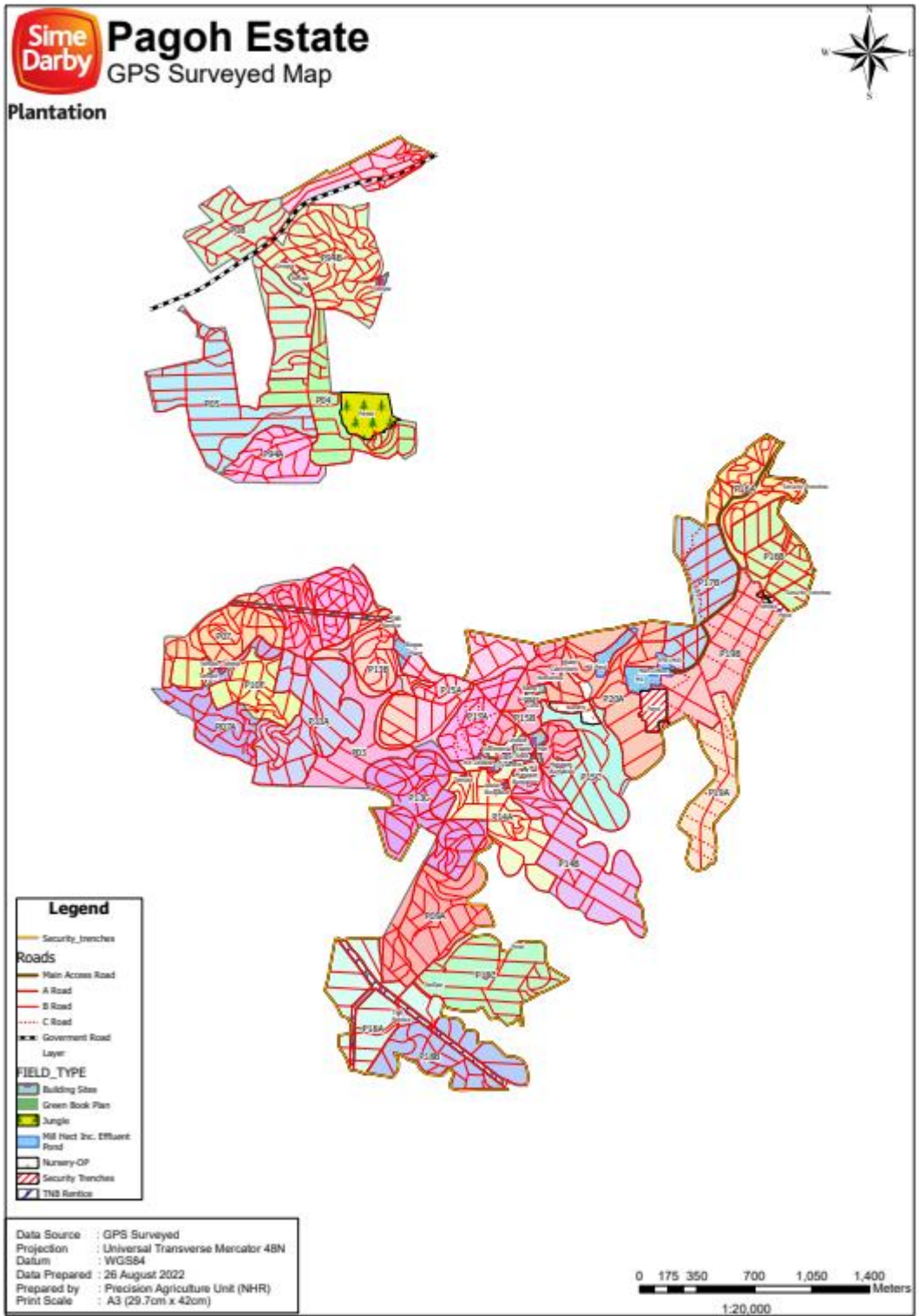
<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

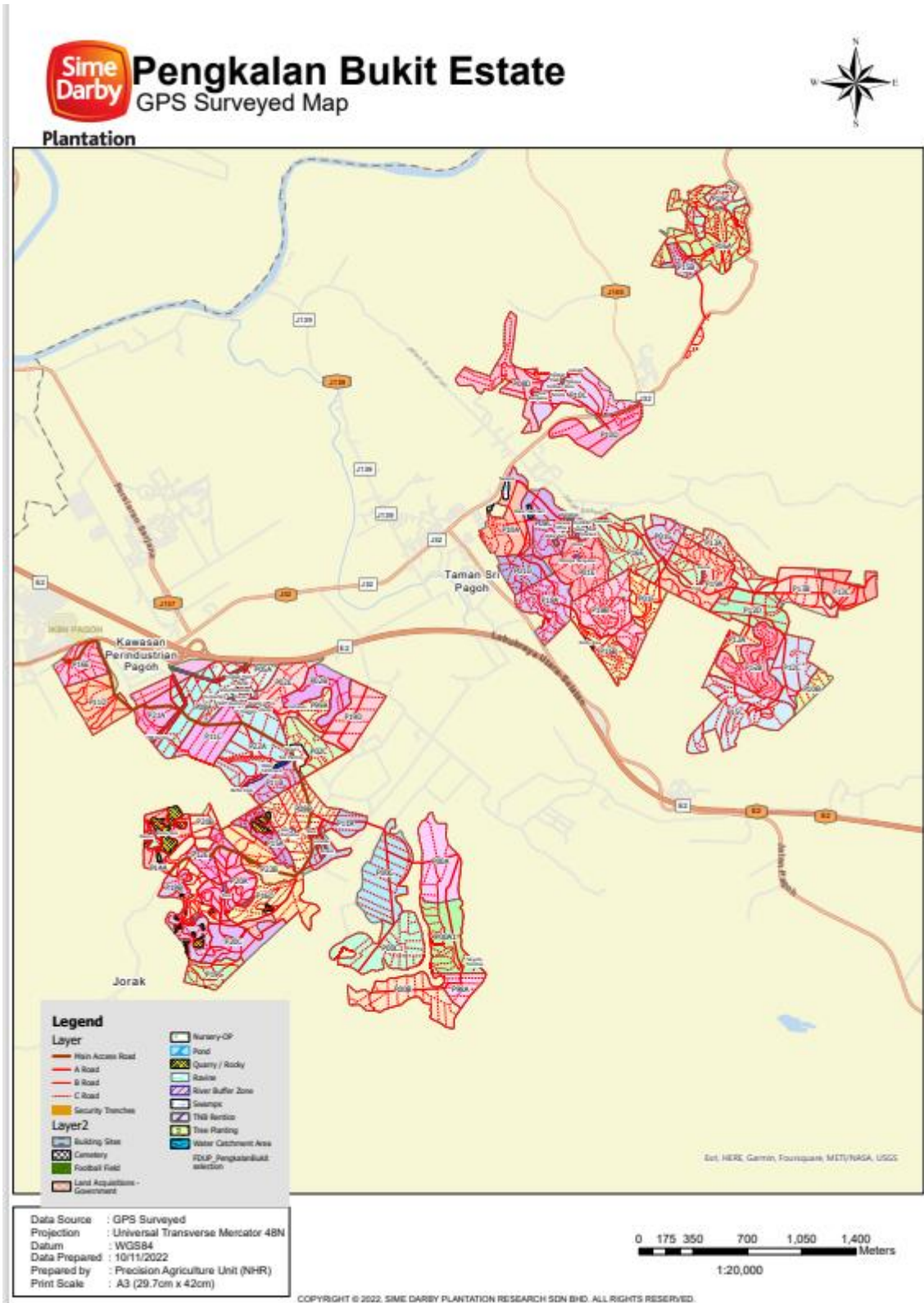


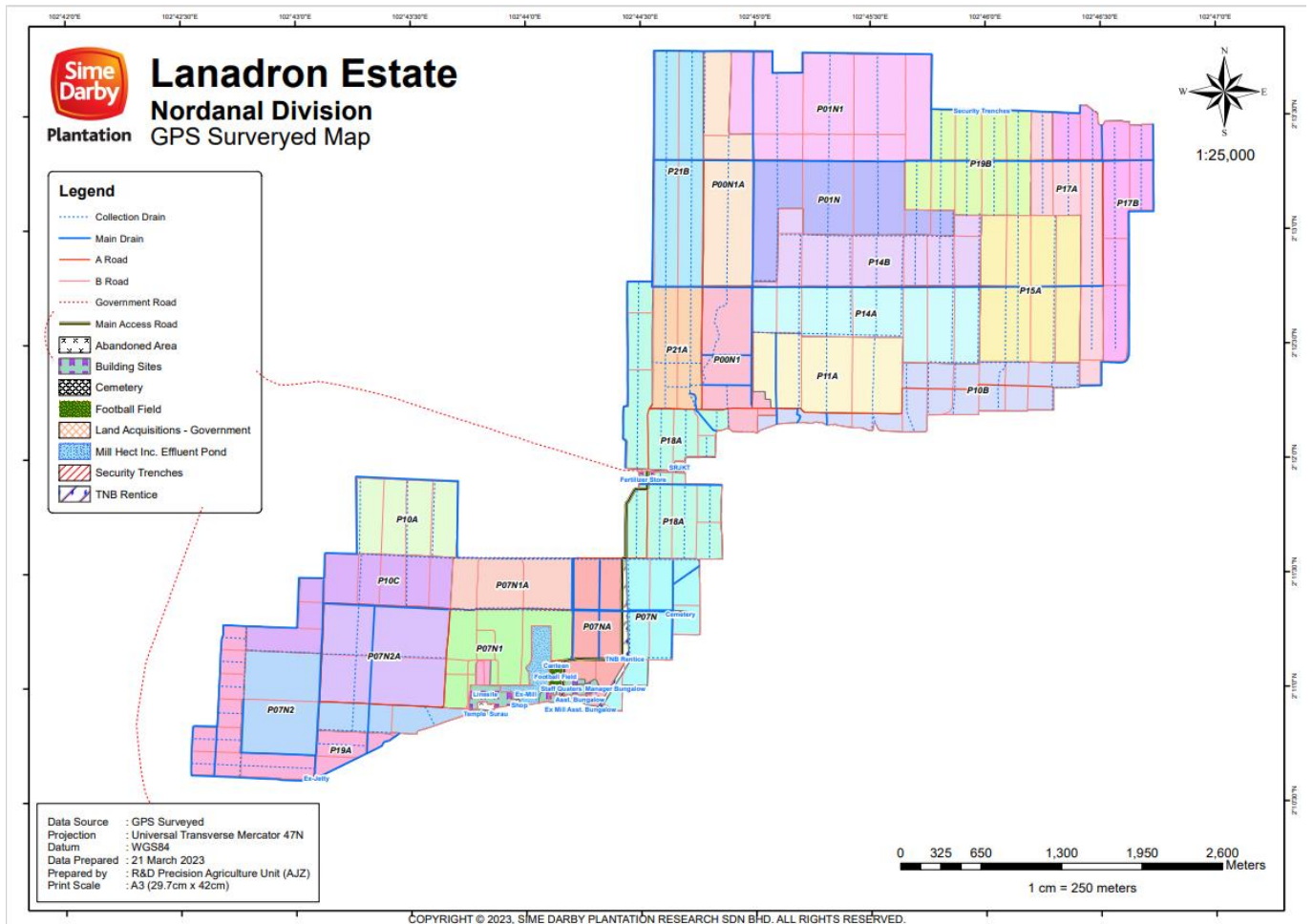
**Appendix C: Location Map of Certification Unit and Supply bases**



**Appendix D: Estate Field Map**







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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			
Not Applicable									
<b>Total</b>									
Note:									

## 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