

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (2_3)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company Name / Parent Company: Sime Darby Plantation Berhad
Client Company / Parent Company Address: Level 11, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 20) - Chaah Palm Oil Mill
Location of Certification Unit: KM 16, Jalan Labis, 85400 Chaah, Johor, Malaysia
Date of Final Report: 01/12/2023

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Sime Darby Plantation Berhad		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	07/09/2004
Address	Level 11, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 20) - Chaah Palm Oil Mill		
Location / Address	KM 16, Jalan Labis, 85400 Chaah, Johor, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, Group Sustainability Department (GSD))	E-mail	Shylaja.vasudevan@simedarbyplantation.com
Telephone	+(603) 74844000 (HQ)	Facsimile	-

2. Certification Information			
Certificate Number	RSPO 548299	Certificate Start Date	18/11/2020
Date of First Certification	18/11/2010	Certificate Expiry Date	17/11/2025
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	30 MT/HR
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)
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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 685287	MSPO 2530-4:2013 General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	27/12/2027
MSPO 692047	MSPO 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders		27/12/2027
MSPO 714134	MSPO Supply Chain Certification Standard 2018		03/09/2024

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

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Chaah Estate	2,730.83	0.47	64.53	2,795.83	97.68
North Labis Estate	3,225.23	40.8	266.88	3,532.91	91.29
Sg. Simpang Kiri Estate	2,095.25	29.42	246.99	2,371.66	88.35
Total	8,051.31	70.69	578.40	8,700.40	92.54

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6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Chaa Estate	367.73	260.03	770.48	1,332.59	2,363.10	367.73
North Labis Estate	427.24	1241.43	822.32	734.24	2,797.99	427.24
Sg. Simpang Kiri Estate	390.94	354.48	1,349.83	-	1,704.31	390.94
Total (ha)	1,185.91	1,855.94	2,942.63	2,066.83	6,865.40	1,185.91

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Nov 2022 – Oct 2023)	Actual (Aug 2022 – July 2023)		Forecast (Nov 2023 – Oct 2024)
		Previous license period (Aug 2022 – Oct 2022)	Current license period (Nov 2022 – July 2023)	
Chaa Estate	39,456.01	4,533.84	23,555.70	46,883.24
North Labis Estate	49,321.83	5,838.23	13,021.31	49,227.30
Sg. Simpang Kiri Estate	31,604.00	44.25	3,495.99	22,295.00
Total	120,381.84	50,489.32		118,405.54

Note: *the forecast 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 (Nov 2022 – Oct 2023)	Actual (Aug 2022 – July 2023)		Forecast (Nov 2023 – Oct 2024)
		Previous license period (Aug 2022 – Oct 2022)	Current license period (Nov 2022 – July 2023)	
Yong Peng Estate		6,962.620	21,543.400	
Bukit Paloh Estate		-	162.390	
Gunung Mas Estate		-	711.340	
Kempas Klebang Estate		-	77.520	
Total		29,457.270		

Note: Crop Diversion for Chaah POM, crop diversion from SOU 21 Gunung Mas POM involved Yong Peng Estate, Bukit Paloh Estate, Gunung Mas Estate and Kempas Klebang Estate.

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Nov 2022 – Oct 2023)	Actual (Aug 2022 – July 2023)		Forecast (Nov 2023 – Oct 2024)
		Previous license period (Aug 2022 – Oct 2022)	Current license period (Nov 2022 – July 2023)	
NA	NA	NA	NA	NA
Total				

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Aug 2022	6,103.760	-	6,103.760
2	Sept 2022	5,691.270	-	5,691.270
3	Oct 2022	5,583.910	-	5,583.910
4	Nov 2022	6,593.610	-	6,593.610
5	Dec 2022	8,647.090	-	8,647.090
6	Jan 2023	6,885.820	-	6,885.820
7	Feb 2023	6,496.350	-	6,496.350
8	Mar 2023	8,041.140	-	8,041.140
9	Apr 2023	5,488.430	-	5,488.430
10	May 2023	7,205.800	-	7,205.800
11	June 2023	6,320.010	-	6,320.010
12	July 2023	6,889.400	-	6,889.400
	TOTAL	79,946.590	-	79,946.590

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Nov 2022 – Oct 2023)	Actual (Aug 2022 – July 2023)		Forecast (Nov 2023 – Oct 2024)
	Previous license period (Aug 2022 – Oct 2022)	Current license period (Nov 2022 – July 2023)	
FFB	FFB		FFB
120,381.80 mt	17,378.94 mt	62,567.65 mt	118,405.54 mt
	TOTAL	79,946.59 mt	
CPO (OER: 19.32%)	CPO (OER: 19.05%)		CPO (OER: 20.42%)

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23,257.76 mt	3,198.80 mt	12,081.24 mt	24,178.41 mt
	TOTAL	15,280.04 mt	
PK (KER: 5.18%)	PK (KER: 5.24%)		PK (KER: 5.32%)
6,235.77 mt	877.95 mt	3,329.017 mt	6,299.17 mt
	TOTAL	4,206.971 mt	

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Aug 2022	1,093.705	301.676
2	Sept 2022	1,072.490	290.311
3	Oct 2022	1,032.607	285.967
4	Nov 2022	1,246.091	363.827
5	Dec 2022	1,659.371	469.092
6	Jan 2023	1,327.409	371.117
7	Feb 2023	1,258.473	355.375
8	Mar 2023	1,519.933	405.629
9	Apr 2023	1,059.143	296.262
10	May 2023	1,465.626	402.845
11	June 2023	1,242.296	314.684
12	July 2023	1,302.895	350.186
TOTAL		15,280.039	4,206.971

11. Summary of Actual Volume sold					
Current License period (Nov 2022 – July 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	3,752.81	-	-	8,428.19	12,181.00
PK (MT)	3,117.12	-	-	-	3,117.12
Credits	-	-	-	-	-
Previous License period (Aug 2022 – Oct 2022)					
CPO (MT)	647.06	-	-	2,170.91	2,817.97
PK (MT)	605.39	-	-	-	605.39
Credits	-	-	-	-	-

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11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Buyer A	TR-XXXXXXXX-XXXX	4,399.87	-
2	Buyer B	TR-XXXXXXXX-XXXX	-	3,722.51
TOTAL			4,399.87	3,722.51

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	NA	NA	NA	NA
TOTAL				

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1.	Buyer AA	634.99	-
2.	Buyer BB	76.91	-
3.	Buyer CC	468.42	-
4.	Buyer DD	1,038.38	-
5.	Buyer EE	121.42	-
6.	Buyer FF	6,955.95	-
7.	Buyer GG	1,303.02	-
TOTAL		10,599.1	-

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.

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
N/A	N/A	N/A	N/A
TOTAL			N/A

Note: The credits have been allocated in the RSPO IT Platform with 9,000 MT however the usage of it have not happened in the time of audit ASA2_3 nevertheless no stock was also removed during audit as the physical oil is still in storage.

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (key in period)			Actual (key in period)			Forecast (key in period)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			NA			NA			NA
IS-CSPO	NA	NA		NA	NA		NA	NA	
IS-CSPKO	NA	NA		NA	NA		NA	NA	
IS-CSPKE	NA	NA		NA	NA		NA	NA	
CSPK	NA	NA	NA	NA	NA	NA	NA	NA	

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

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (key in period)							
Credits				NA	NA	NA	NA
Physical	NA	NA	NA				
Previous License period (key in period)							
Credits				NA	NA	NA	NA
Physical	NA	NA	NA	NA			

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **14/08/2023-17/08/2023**. 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.

The Critical NC close out on-site assessment was conducted on **23/10/2023**. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

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

Tentative Date of Next Visit: August 12, 2024 - August 15, 2024

Total Number of Mandays: 12 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Nor Halis Abu Zar (NHA)	Team Leader	<p>Education: Bachelor of Science, Plantation Technology and Management, graduated from UiTM in 2012 and Diploma In Plantation and Industry Management from UiTM in 2009.</p> <p>Work Experience: He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day-to-day plantation operations. In his career at Kulim Plantation. He had accumulated more than 6 years of sustainability implementation experience. He is a qualified Lead Auditor for MS2530:2013 and RSPO Auditor for ENV and OSH and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p>Training attended: He has completed RSPO P&C Lead Auditor Course in Oct 2020, Refresher RSPO P&C Lead Auditor Course in May 2022, RSPO ISH Standard 2019 in December 2021, RSPO SCC 2020 in September 2022, QMS 9001:2015 Lead Auditor Course in April 2019, OSH 45001:2018 Lead Auditor Course in June 2021, IMS (ISO 9001:2015 & ISO 14001:2015) Lead Auditor Course, HCV & HCS Training in August 2022, MSPO 2530:2013 Lead Auditor Course in February 2019, , MSPO SCCS Auditor in February 2019 and also trained in SMETA Requirement Training on May 2021</p>

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		<p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English Language.</p> <p>Aspect covered in this audit: During the assessment he covered on Legal Requirements, Safety and Health, RSPO supply chain requirements.</p>
Hafriazhar bin Mohd Mokhtar (HMM)	Team Member	<p>Education: Bachelor of Engineering (Hons.) Chemical Engineering, UTM</p> <p>Work Experience: Environmental Officer (2002-2003), Mill Engineer (2003-2008), Project Control Engineer (2008-2011), Auditor/Client Manager (2011-present)</p> <p>Training attended: He has completed Social Auditing & SMETA Training (2021), ISO 45001 LA Training (2018), RSPO LA Training (2017), RSPO SCCS LA Training (2016), RSPO P&C LA Training (2015), ISO 9001 LA Training (2013), ISO 50001 LA Training (2012), ISO 14001 LA Training (2011)</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English Language.</p> <p>Aspect covered in this audit: During the assessment he covered on Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land and Legal issue.</p>
Amir Bahari (AB)	Team Member	<p>Education: He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996.</p> <p>Work Experience: He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment, he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry.</p> <p>Training attended: He has completed ISO 9001, ISO 14001, OHSAS 18001, HCV Training & also RSPO</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English Language.</p> <p>Aspect covered in this audit: During the assessment he covered on Economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management, GHG, and HCV.</p>

Accompanying Persons:

Name	Role
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N/A	N/A
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2.3 Assessment Plan

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

Date	Time	Subjects	NHA	HMM	AB
Sunday 13/08/2023	-	Audit Team Travel from Kuala Lumpur to Yong Peng	√	√	√
Monday, 14/08/2023 Chaah Estate	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan 	√	√	√
	09.00 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	12.30 – 13.30	Lunch/ 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.)	√	√	√
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Tuesday, 15/08/2023 North Labis Estate	08.30 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	10.00 – 12.00	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)			
	12.30 – 13.30	Lunch/ Break	√	√	√

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	13.30 – 16.30	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Wednesday 16/08/2023 Simpang Kiri Estate	08.30 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	12.30 – 13.30	Lunch/ 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.)	√	√	√
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Thursday 17/08/2023 Chaah POM	08.30 – 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.	√	√	√
	12.30 – 13.30	Lunch/ Break	√	√	√

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Date	Time	Subjects	NHA	HMM	AB
	13.30 – 16.00	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.	√	√	√
	16.00 – 17.00	Auditor Discussion and preparing for Closing Meeting	√	√	√

Major NC Close Out

Date	Time	Subjects	NHA
Sunday 22/10/2023	-	Auditor Travelling	√
Monday 23/10/2023	08.30 – 09.00	Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Major NC Close Out plan	√
08.30 – 11.30 Sg Simpang Kiri Estate	09.00 – 12.00	<ul style="list-style-type: none"> • Verification on previous Major NC: <ol style="list-style-type: none"> 1. 2380413-202308-M1 • Site observation, workers interview (individual and group session) if necessary • Document review – implemented evidence 	√
	12.00 – 12.30	Closing Meeting	√
	12.30	Auditor travelling	√

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): https://simedarbyplantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/	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 July 2023 for these Estate. 1. Ladang Panjang Estate-1,796.19 ha 2. Rantau Panjang Estate, Napal Estate / Karang Ringin Estate- 1,843.73 ha. 3. Mangun Jaya Estate- 1,398.55 ha 4. Sungai Jernih Estate- 851.57 ha 5. Pelanjau Estate (PT BAL) & Beturus Estate (PT BAL)- 4,071.76ha 6. Karya Palma Estate (PT SNP)-476.70 Ha 7. West and East Estate- 1,452.93 ha	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Although there is deviation has been identified at those Indonesia management units but it has been justified that	Complied

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	these units are still awaiting to receive land titles. Refer TBP approval dated 13/07/2023.	
<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.</p> <p>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 & Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: www.rspo.org/certification/public-announcement</p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations. ACOP 2020 has been cross-referenced as below: www.rspo.org/members/29</p>	Complied
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>Although there are lapses has been identified at those Indonesia management units, but it has been justified that these units are still awaiting to receive land titles. Refer TBP approval dated 13/07/2023.</p>	Complied
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.</p>	Complied
Un-Certified Units or Holdings		

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<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/2023.</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification.</p> <ol style="list-style-type: none"> 1. NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/ 2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/ 3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/ 4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/ 5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/ 6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/ 7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/ 8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/ 	<p>Complied</p>

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	<p>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/</p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/</p> <p>11. NBPOL (Ramu Agri Industries Ltd) 06/03/2012 - no comments captured in RSPO website: https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/</p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/</p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/</p> <p>14. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/</p> <p>Management units for 12 – 14 above were disposed</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) 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, 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</p>	<p>Complied</p>

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	<p>RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&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&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&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.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue are mainly awaiting for Land Titles. The last audit was conducted 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 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.</p>	<p>Complied</p>
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>No critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.</p>	<p>Complied</p>

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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
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3.2 Progress of scheme smallholders and/or outgrowers

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

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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					

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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					
	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

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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					
	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 Ringin Estate/Karang	4,359.74	Certified	Not Applicable	16-Mar-12					
	Indonesia	Napal Ringin Estate/Karang	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						

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	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					
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					

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	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					
	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					
Sekunyir	Indonesia	Sekunyir Mill	7,734.59	Certified	Not Applicable	23-Nov-10					
	Indonesia	Sekunyir Estate	3,555.19	Certified	Not Applicable	23-Nov-10					
	Indonesia	Seruyan Estate	4,179.40	Certified	Not Applicable	23-Nov-10					
Sukamandang	Indonesia	Sukamandang Mill	14,779.92	Certified	Not Applicable	5-Jul-11					

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	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					
Pematang	Indonesia	Pematang Mill	16,601.66	Certified	Not Applicable	5-Jul-11					
	Indonesia	Pematang 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					
Lembiru	Indonesia	Lembiru Mill	9,409.07	Certified	Not Applicable	3-Jul-14					
	Indonesia	Lembiru Estate	4,929.49	Certified	Not Applicable	3-Jul-14					
	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	13-Jul-23

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										Estate is still in process	
	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 (West and East Estate) is still in process.	13-Jul-23
Sg. Dingin	Malaysia	Sungai Dingin Oil Mill	19,517.17	Certified	Not Applicable	12-Aug-10	19-20 July 2021				
	Malaysia	Anak Kulim Estate	1,523.35	Certified	Not Applicable	12-Aug-10	19-20 July 2021				
	Malaysia	Sungai Dingin Estate	4,244.03	Certified	Not Applicable	12-Aug-10	19-20 July 2021				

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	Malaysia	Somme Estate	941.56	Certified	Not Applicable	12-Aug-10	19-20 July 2021			
	Malaysia	Bukit Selarong Estate	3,896.17	Certified	Not Applicable	12-Aug-10	19-20 July 2021			
	Malaysia	Padang Buluh Estate	4,008.47	Certified	Not Applicable	12-Aug-10	19-20 July 2021			
	Malaysia	Bukit Hijau Estate	2,725.00	Certified	Not Applicable	12-Aug-10	19-20 July 2021			
	Malaysia	Jentayu Estate	2,178.59	Certified	Not Applicable	12-Aug-10	19-20 July 2021			
Chersonese	Malaysia	Chersonese Oil Mill	11,099.36	Certified	Not Applicable	5-Oct-11	19-20 July 2021			
	Malaysia	Chersonese Estate	3,293.72	Certified	Not Applicable	5-Oct-11	19-20 July 2021			
	Malaysia	Kalumpong Estate	2,716.80	Certified	Not Applicable	5-Oct-11	19-20 July 2021			
	Malaysia	Tali Ayer Estate	3,756.10	Certified	Not Applicable	5-Oct-11	19-20 July 2021			
	Malaysia	Holyrood Estate	1,332.74	Certified	Not Applicable	5-Oct-11	19-20 July 2021			
Elphil	Malaysia	Elphil Oil Mill	6,814.60	Certified	Not Applicable	18-Jun-11	19-20 July 2021			
	Malaysia	Kamuning Estate	3,888.43	Certified	Not Applicable	18-Jun-11	19-20 July 2021			
	Malaysia	Elphil Estate	1,865.43	Certified	Not Applicable	18-Jun-11	19-20 July 2021			
	Malaysia	Kinta Kellas Estate	1,060.74	Certified	Not Applicable	18-Jun-11	19-20 July 2021			
Flemington	Malaysia	Flemington Oil Mill	11,226.23	Certified	Not Applicable	5-Oct-11	19-20 July 2021			
	Malaysia	Flemington Estate	1,906.84	Certified	Not Applicable	5-Oct-11	19-20 July 2021			
	Malaysia	Bagan Datoh Estate	3,781.86	Certified	Not Applicable	5-Oct-11	19-20 July 2021			
	Malaysia	Sabak Bernam Estate	2,511.79	Certified	Not Applicable	5-Oct-11	19-20 July 2021			
	Malaysia	Sg. Samak Estate	3,025.74	Certified	Not Applicable	5-Oct-11	19-20 July 2021			
Seri Intan/Selaba	Malaysia	Seri Intan Oil Mill	14,474.29	Certified	Not Applicable	3-Mar-11	19-20 July 2021			
	Malaysia	Selaba Oil Mill	1,549.75	Certified	Not Applicable	3-Mar-11	19-20 July 2021			

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	Malaysia	Seri Intan (+ Selaba) Estate	4,013.16	Certified	Not Applicable	3-Mar-11	19-20 July 2021				
	Malaysia	Sabrang Estate	3,945.23	Certified	Not Applicable	3-Mar-11	19-20 July 2021				
	Malaysia	Sogomana Estate	2,214.08	Certified	Not Applicable	3-Mar-11	19-20 July 2021				
	Malaysia	Sg. Wangi Estate	2,226.66	Certified	Not Applicable	3-Mar-11	19-20 July 2021				
	Malaysia	Bikam Estate	2,075.16	Certified	Not Applicable	3-Mar-11	19-20 July 2021				
	Malaysia	Cluny (+ Bedford) Estate	1,549.75	Certified	Not Applicable	3-Mar-11	19-20 July 2021				
Tenamaram	Malaysia	Tenamaram Oil Mill	10,706.26	Certified	Not Applicable	3-Mar-11	19-20 July 2021				
	Malaysia	Tenamaram Estate	1,981.60	Certified	Not Applicable	3-Mar-11	19-20 July 2021				
	Malaysia	Sungai Buluh Estate	5,152.22	Certified	Not Applicable	3-Mar-11	19-20 July 2021				
	Malaysia	Bukit Talang Estate	3,572.44	Certified	Not Applicable	3-Mar-11	19-20 July 2021				
Bukit Kerayong	Malaysia	Chaah Oil Mill	6,346.90	Certified	Not Applicable	15-Apr-11	19-20 July 2021				
	Malaysia	Chaah Estate	2,699.28	Certified	Not Applicable	15-Apr-11	19-20 July 2021				
	Malaysia	Bukit Cheraka Estate	3,647.62	Certified	Not Applicable	15-Apr-11	19-20 July 2021				
East	Malaysia	East Oil Mill	10,902.94	Certified	Not Applicable	19-May-10	19-20 July 2021				
	Malaysia	East Estate	5,634.45	Certified	Not Applicable	19-May-10	19-20 July 2021				
	Malaysia	Sepang Estate	2,092.28	Certified	Not Applicable	19-May-10	19-20 July 2021				
	Malaysia	Dusun Durian Estate	3,176.21	Certified	Not Applicable	19-May-10	19-20 July 2021				
West	Malaysia	West Oil Mill	5,912.69	Certified	Not Applicable	19-May-10	19-20 July 2021				
	Malaysia	West Estate	5,912.69	Certified	Not Applicable	19-May-10	19-20 July 2021				
Bukit Puteri	Malaysia	Bukit Puteri Oil Mill	3,875.80	Certified	Not Applicable	7-Jul-11	19-20 July 2021				
	Malaysia	Bukit Puteri Estate	3,875.80	Certified	Not Applicable	7-Jul-11	19-20 July 2021				

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Kerdau	Malaysia	Kerdau Oil Mill	13,781.50	Certified	Not Applicable	7-Jul-11	19-20 July 2021			
	Malaysia	Kerdau Estate	5,683.04	Certified	Not Applicable	7-Jul-11	19-20 July 2021			
	Malaysia	Mentakab Estate	3,266.49	Certified	Not Applicable	7-Jul-11	19-20 July 2021			
	Malaysia	Chenor Estate	2,834.98	Certified	Not Applicable	7-Jul-11	19-20 July 2021			
	Malaysia	Sg Mai Estate	1,996.99	Certified	Not Applicable	7-Jul-11	19-20 July 2021			
Jabor	Malaysia	Jabor Oil Mill	2,332.92	Certified	Not Applicable	7-Jul-11	19-20 July 2021			
	Malaysia	Jabor Estate	2,332.92	Certified	Not Applicable	7-Jul-11	19-20 July 2021			
Labu	Malaysia	Labu Oil Mill	4,529.72	Certified	Not Applicable	30-Dec-11	19-20 July 2021			
	Malaysia	Labu Estate	4,529.72	Certified	Not Applicable	30-Dec-11	19-20 July 2021			
Tanah Merah	Malaysia	Tanah Merah Oil Mill	6,203.87	Certified	Not Applicable	19-May-10	19-20 July 2021			
	Malaysia	Tanah Merah Estate	4,341.73	Certified	Not Applicable	19-May-10	19-20 July 2021			
	Malaysia	Bukit Pelandok Estate	1,862.14	Certified	Not Applicable	19-May-10	19-20 July 2021			
Sua Betong	Malaysia	Sua Betong Oil Mill	18,457.27	Certified	Not Applicable	18-Feb-14	19-20 July 2021			
	Malaysia	Sua Betong Estate	2,870.75	Certified	Not Applicable	18-Feb-14	19-20 July 2021			
	Malaysia	Sengkang Estate	2,831.51	Certified	Not Applicable	18-Feb-14	19-20 July 2021			
	Malaysia	Bradwall Estate	3,828.34	Certified	Not Applicable	18-Feb-14	19-20 July 2021			
	Malaysia	PD Lukut Estate	1,523.79	Certified	Not Applicable	18-Feb-14	19-20 July 2021			
	Malaysia	Tampin Linggi Estate	2,106.71	Certified	Not Applicable	18-Feb-14	19-20 July 2021			
	Malaysia	Sg. Bahru Estate	1,427.31	Certified	Not Applicable	18-Feb-14	19-20 July 2021			
	Malaysia	Salak Estate	3,868.86	Certified	Not Applicable	18-Feb-14	19-20 July 2021			
Kok Foh	Malaysia	Kok Foh Oil Mill	14,852.64	Certified	Not Applicable	7-Jul-11	19-20 July 2021			
	Malaysia	Muar River Estate	1,584.62	Certified	Not Applicable	7-Jul-11	19-20 July 2021			

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	Malaysia	Sg. Senarut Estate + Sg Gemas Estate	2,958.38	Certified	Not Applicable	7-Jul-11	19-20 July 2021			
	Malaysia	Kok Foh Estate	2,275.84	Certified	Not Applicable	7-Jul-11	19-20 July 2021			
	Malaysia	Bukit Pilah Estate	3,667.31	Certified	Not Applicable	7-Jul-11	19-20 July 2021			
	Malaysia	St. Helier Estate	1,992.65	Certified	Not Applicable	7-Jul-11	19-20 July 2021			
	Malaysia	Sungai Sabaling Estate	1,321.35	Certified	Not Applicable	7-Jul-11	19-20 July 2021			
	Malaysia	Pertang Estate	1,052.49	Certified	Not Applicable	7-Jul-11	19-20 July 2021			
Kempas	Malaysia	Kempas Oil Mill	11,828.51	Certified	Not Applicable	20-May-10	19-20 July 2021			
	Malaysia	Kempas Estate	4,505.45	Certified	Not Applicable	20-May-10	19-20 July 2021			
	Malaysia	Tangkah Estate	2,537.78	Certified	Not Applicable	20-May-10	19-20 July 2021			
	Malaysia	Kemuning Estate	2,671.05	Certified	Not Applicable	20-May-10	19-20 July 2021			
	Malaysia	Serkam Estate	2,114.23	Certified	Not Applicable	20-May-10	19-20 July 2021			
Diamond Jubilee	Malaysia	Diamond Jubilee Palm Oil Mill	7,356.19	Certified	Not Applicable	5-Oct-11	19-20 July 2021			
	Malaysia	Diamond Jubilee Estate	2,836.19	Certified	Not Applicable	5-Oct-11	19-20 July 2021			
	Malaysia	Bukit Asahan Estate	3,072.18	Certified	Not Applicable	5-Oct-11	19-20 July 2021			
	Malaysia	Welch Estate	1,447.82	Certified	Not Applicable	5-Oct-11	19-20 July 2021			
Pagoh	Malaysia	Pagoh Oil Mill	7,418.59	Certified	Not Applicable	28-Jan-14	19-20 July 2021			
	Malaysia	Pagoh Estate	2,325.93	Certified	Not Applicable	28-Jan-14	19-20 July 2021			
	Malaysia	Lanadron Estate	1,964.44	Certified	Not Applicable	28-Jan-14	19-20 July 2021			
	Malaysia	Pengkalan Bukit Estate	3,128.22	Certified	Not Applicable	28-Jan-14	19-20 July 2021			
Chaah	Malaysia	Chaah Oil Mill	8,699.93	Certified	Not Applicable	18-Nov-10	19-20 July 2021			
	Malaysia	Chaah Estate	2,795.36	Certified	Not Applicable	18-Nov-10	19-20 July 2021			

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	Malaysia	Sg. Simpang Kiri Estate	2,371.66	Certified	Not Applicable	18-Nov-10	19-20 July 2021				
	Malaysia	North Labis Estate	3,532.91	Certified	Not Applicable	18-Nov-10	19-20 July 2021				
Gunung Mas	Malaysia	Gunung Mas Oil Mill	12,305.54	Certified	Not Applicable	19-May-10	19-20 July 2021				
	Malaysia	Gunung Mas Estate	3,466.17	Certified	Not Applicable	19-May-10	19-20 July 2021				
	Malaysia	Kempas Klebang Estate	2,473.06	Certified	Not Applicable	19-May-10	19-20 July 2021				
	Malaysia	Bukit Paloh Estate	3,390.90	Certified	Not Applicable	19-May-10	19-20 July 2021				
	Malaysia	Yong Peng Estate	2,975.41	Certified	Not Applicable	19-May-10	19-20 July 2021				
	Malaysia	Chaah Oil Mill	8,495.13	Certified	Not Applicable	5-Oct-11	19-20 July 2021				
Chaah	Malaysia	Chaah Estate	2,799.78	Certified	Not Applicable	5-Oct-11	19-20 July 2021				
	Malaysia	Lambak Elaeis Estate	3,740.16	Certified	Not Applicable	5-Oct-11	19-20 July 2021				
	Malaysia	CEP Nyior Estate	1,955.19	Certified	Not Applicable	5-Oct-11	19-20 July 2021				
	Malaysia	Ulu Remis Oil Mill	17,115.58	Certified	Not Applicable	11-Apr-11	19-20 July 2021				
Ulu Remis	Malaysia	Ulu Remis Estate	2,598.25	Certified	Not Applicable	11-Apr-11	19-20 July 2021				
	Malaysia	Cenas Estate	1,974.06	Certified	Not Applicable	11-Apr-11	19-20 July 2021				
	Malaysia	Bukit Badak Estate	3,234.25	Certified	Not Applicable	11-Apr-11	19-20 July 2021				
	Malaysia	Tun Dr. Ismail Estate	4,271.44	Certified	Not Applicable	11-Apr-11	19-20 July 2021				
	Malaysia	Pekan Estate	3,258.70	Certified	Not Applicable	11-Apr-11	19-20 July 2021				
	Malaysia	Sembrong Estate	1,778.88	Certified	Not Applicable	11-Apr-11	19-20 July 2021				
	Malaysia	Hadapan Oil Mill	11,371.82	Certified	Not Applicable	29-Mar-11	19-20 July 2021				
Hadapan	Malaysia	Sri Pulau Estate	2,049.87	Certified	Not Applicable	29-Mar-11	19-20 July 2021				
	Malaysia	Kulai Estate	3,023.42	Certified	Not Applicable	29-Mar-11	19-20 July 2021				
	Malaysia	Layang Estate	3,258.90	Certified	Not Applicable	29-Mar-11	19-20 July 2021				
	Malaysia										

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	Malaysia	CEP Renggam Estate	3,039.63	Certified	Not Applicable	29-Mar-11	19-20 July 2021				
Sandakan Bay	Malaysia	Sandakan Bay Oil Mill	16,764.34	Certified	Not Applicable	1-Oct-08	19-20 July 2021				
	Malaysia	Tun Tan Siew Sin Estate	3,125.60	Certified	Not Applicable	1-Oct-08	19-20 July 2021				
	Malaysia	Tunku Estate	3,199.05	Certified	Not Applicable	1-Oct-08	19-20 July 2021				
	Malaysia	Tigowis Estate	2,074.02	Certified	Not Applicable	1-Oct-08	19-20 July 2021				
	Malaysia	Sentosa Estate	3,545.54	Certified	Not Applicable	1-Oct-08	19-20 July 2021				
	Malaysia	Segaliud Estate	4,820.13	Certified	Not Applicable	1-Oct-08	19-20 July 2021				
Melalap	Malaysia	Melalap Oil Mill	5246.18	Certified	Not Applicable	21-Jan-11	19-20 July 2021				
	Malaysia	Melalap Estate	2,096.73	Certified	Not Applicable	21-Jan-11	19-20 July 2021				
	Malaysia	Sapong Estate	3,149.45	Certified	Not Applicable	21-Jan-11	19-20 July 2021				
Binuang	Malaysia	Binuang Oil Mill	11,659.58	Certified	Not Applicable	16-Jan-09	19-20 July 2021				
	Malaysia	Binuang Estate	3,271.08	Certified	Not Applicable	16-Jan-09	19-20 July 2021				
	Malaysia	Sungang Estate	3,407.98	Certified	Not Applicable	16-Jan-09	19-20 July 2021				
	Malaysia	Tingkeyu Estate	1,881.08	Certified	Not Applicable	16-Jan-09	19-20 July 2021				
	Malaysia	Jeleta Bumi Estate	3,099.44	Certified	Not Applicable	16-Jan-09	19-20 July 2021				
Giram	Malaysia	Giram Oil Mill	8,345.02	Certified	Not Applicable	16-Jan-09	19-20 July 2021				
	Malaysia	Giram Estate	4,166.98	Certified	Not Applicable	16-Jan-09	19-20 July 2021				
	Malaysia	Mostyn Estate	4,178.04	Certified	Not Applicable	16-Jan-09	19-20 July 2021				
Merotai	Malaysia	Merotai Oil Mill	11,545.71	Certified	Not Applicable	16-Jan-09	19-20 July 2021				
	Malaysia	Merotai Estate	3,052.66	Certified	Not Applicable	16-Jan-09	19-20 July 2021				
	Malaysia	Imam Estate	3,773.56	Certified	Not Applicable	16-Jan-09	19-20 July 2021				
	Malaysia	Tiger Estate	2,497.86	Certified	Not Applicable	16-Jan-09	19-20 July 2021				

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	Malaysia	Table Estate	2,221.63	Certified	Not Applicable	16-Jan-09	19-20 July 2021				
Lavang	Malaysia	Lavang Oil Mill	24,836.54	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Lavang Estate	4,363.83	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Rasan Estate	3,454.00	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Belian Estate	2,847.00	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Kelida Estate	2,460.00	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Lavang (Special) Estate	included under Lavang Estate Ha	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Pekaka Estate	2,626.14	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Ruai Estate	2,460.96	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Dulang Estate	2,548.00	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Charquest Estate	1,448.71	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Paroh Estate	2,627.90	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
Rajawali	Malaysia	Rajawali Oil Mill	14,104.45	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Rajawali Estate	6,087.27	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Samudera Estate	3,308.60	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Semarak Estate	2,248.68	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Bayu Estate	2,459.90	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
Derawan	Malaysia	Derawan Oil Mill	9,528.83	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Derawan Estate	2,490.79	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Sahua Estate	2,644.00	Certified	Not Applicable	30-Dec-11	19-20 July 2021				

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	Malaysia	Takau Estate	2,107.00	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
	Malaysia	Damai Estate	2,287.04	Certified	Not Applicable	30-Dec-11	19-20 July 2021				
Guadalcanal Plains Palm Oil Limited (GPPOL)	Solomon Islands	Tetere Oil Mill	9,025.69	Certified	Not Applicable	18-Mar-11	19-20 July 2021				
	Solomon Islands	Tetere Estate	2,947.79	Certified	Not Applicable	18-Mar-11	19-20 July 2021				
	Solomon Islands	Ngalimbiu Estate	2,498.65	Certified	Not Applicable	18-Mar-11	19-20 July 2021				
	Solomon Islands	Mbalisuna Estate	2,868.47	Certified	Not Applicable	18-Mar-11	19-20 July 2021				
	Solomon Islands	Smallholders – West Zone (83)	245.50	Certified	Not Applicable	18-Mar-11	19-20 July 2021				
	Solomon Islands	Smallholders – Central Zone (53)	181.71	Certified	Not Applicable	18-Mar-11	19-20 July 2021				
	Solomon Islands	Smallholders – MBA East Zone (59)	180.80	Certified	Not Applicable	18-Mar-11	19-20 July 2021				
	Solomon Islands	Smallholders – MBE East Zone (37)	102.77	Certified	Not Applicable	18-Mar-11	19-20 July 2021				
	Milne Bay Estates (MBE)	Papua New Guinea	Hagita Oil Mill	16,508.59	Certified	Not Applicable	15-Feb-13	19-20 July 2021			
Papua New Guinea		Giligili Estate	1,095.47	Certified	Not Applicable	15-Feb-13	19-20 July 2021				
Papua New Guinea		Hagita Estate	2,450.02	Certified	Not Applicable	15-Feb-13	19-20 July 2021				
Papua New Guinea		Waigani Estate	2,341.13	Certified	Not Applicable	15-Feb-13	19-20 July 2021				

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	Papua New Guinea	Sagarai Estate	2,864.55	Certified	Not Applicable	15-Feb-13	19-20 July 2021				
	Papua New Guinea	Padipadi Estate	4,517.67	Certified	Not Applicable	15-Feb-13	19-20 July 2021				
	Papua New Guinea	Mariawatte Estate	1,680.14	Certified	Not Applicable	15-Feb-13	19-20 July 2021				
	Papua New Guinea	Smallholders - East Gurney Estate (259)	450.59	Certified	Not Applicable	15-Feb-13	19-20 July 2021				
	Papua New Guinea	Smallholders - West Gurney Estate (231)	479.13	Certified	Not Applicable	15-Feb-13	19-20 July 2021				
	Papua New Guinea	Smallholders - East Sagarai Estate (156)	283.93	Certified	Not Applicable	15-Feb-13	19-20 July 2021				
	Papua New Guinea	Smallholders - West Sagarai Estate (212)	345.96	Certified	Not Applicable	15-Feb-13	19-20 July 2021				
Poliamba (POL)	Papua New Guinea	Poliamba Oil Mill	10,720.53	Certified	Not Applicable	19-Mar-12	19-20 July 2021				
	Papua New Guinea	Kara Estate	1,032.10	Certified	Not Applicable	19-Mar-12	19-20 July 2021				
	Papua New Guinea	Nalik Estate	2,666.75	Certified	Not Applicable	19-Mar-12	19-20 July 2021				
	Papua New Guinea	West Coast Estate	627.60	Certified	Not Applicable	19-Mar-12	19-20 July 2021				
	Papua New Guinea	Noatsi Estate	2,064.10	Certified	Not Applicable	19-Mar-12	19-20 July 2021				
	Papua New Guinea	Madak Estate	1,517.11	Certified	Not Applicable	19-Mar-12	19-20 July 2021				

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	Papua New Guinea	Smallholders Division (615)	-North	1,022.12	Certified	Not Applicable	19-Mar-12	19-20 July 2021				
	Papua New Guinea	Smallholders-Division (866)	South	1,257.21	Certified	Not Applicable	19-Mar-12	19-20 July 2021				
	Papua New Guinea	Smallholders Division (309)	-West	533.54	Certified	Not Applicable	19-Mar-12	19-20 July 2021				
Ramu Agricultural Industries Ltd (RAIL)	Papua New Guinea	Gusap Mill		14,606.08	Certified	Not Applicable	5-Aug-10	19-20 July 2021				
	Papua New Guinea	Gusap East Estate (Gusap)		2,856.45	Certified	Not Applicable	5-Aug-10	19-20 July 2021				
	Papua New Guinea	Gusap West Estate (Paddock)		3,019.09	Certified	Not Applicable	5-Aug-10	19-20 July 2021				
	Papua New Guinea	Surinam Estate		2,154.14	Certified	Not Applicable	5-Aug-10	19-20 July 2021				
	Papua New Guinea	Dumpu Estate		2,254.36	Certified	Not Applicable	5-Aug-10	19-20 July 2021				
	Papua New Guinea	Ngaru Estate		854.33	Certified	Not Applicable	5-Aug-10	19-20 July 2021				
	Papua New Guinea	J Estate (Jephcott) Estate		2,824.01	Certified	Not Applicable	5-Aug-10	19-20 July 2021				
	Papua New Guinea	Smallholders - Madang VOPs (71)		360.00	Certified	Not Applicable	5-Aug-10	19-20 July 2021				
	Papua New Guinea	Smallholders - Morobe VOPs (253)		283.70	Certified	Not Applicable	5-Aug-10	19-20 July 2021				
Higaturu Oil Palm (HOP)	Papua New Guinea	Sangara Oil Mill			Certified	Not Applicable	1-Feb-13	19-20 July 2021				

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	Papua New Guinea	Mamba Oil Mill		Certified	Not Applicable	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Embi Estate	1,737.78	Certified	Not Applicable	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Ambogo Estate	2,040.00	Certified	Not Applicable	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Sangara Estate	1,780.00	Certified	Not Applicable	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Sumbiripa Estate	2,545.00	Certified	Not Applicable	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Mamba Estate	4,013.10	Certified	Not Applicable	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Sambogo Estate	2,637.85	Certified	Not Applicable	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Scheme Smallholder Sorovi Division (2019)	3,940.21	Certified	Not Applicable	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Scheme Smallholder Saiho Division (842)	1,493.06	Certified	Not Applicable	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Scheme Smallholder Aeka Division (911)	1,474.23	Certified	Not Applicable	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Scheme Smallholder Igora Division (1367)	2,940.15	Certified	Not Applicable	1-Feb-13	19-20 July 2021				
	Papua New Guinea	Scheme Smallholder Ilimo Division (671)	1,063.66	Certified	Not Applicable	1-Feb-13	19-20 July 2021				
West New Britain (WNB)	Papua New Guinea	Mosa Oil Mill		Certified	Not Applicable	10-Sep-08	19-20 July 2021				

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Papua New Guinea	Kumbango Oil Mill		Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Kapiura Mill		Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Numundo Mill		Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Waraston Mill		Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Bebere Estate	2,226.71	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Kumbango Estate	2,610.80	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Togulo Estate	1,509.20	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Dami Estate	1,507.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Waisisi Estate	1,090.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Kautu Estate	4,280.60	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Karaisu Estate	2,387.64	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Moroo Estate	848.16	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Bilomi Estate	2,011.70	Certified	Not Applicable	10-Sep-08	19-20 July 2021				

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Papua New Guinea	Loata Estate	562.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Haella Estate	4,220.30	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Garu Estate	3,709.60	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Daliavu Estate	2,484.10	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Sapuri Estate	2,180.90	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Malilimi Estate	3,837.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Rigula Estate	3,720.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Nomundo Estate	2,645.17	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Navarai / Karato ME /KDC EU Estate	1,103.77	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Volupai / Lotomgam / Natupi / Goruru Estate	1,992.59	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Lolokoru Estate	2,453.10	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Ove Estate	3,541.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Papua New Guinea	Tamare Estate	1,362.70	Certified	Not Applicable	10-Sep-08	19-20 July 2021				

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	Papua New Guinea	Smallholders LSS Mosa (1822)	5,008.53	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Smallholders VOP East (1817)	5,324.37	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Smallholders VOP Central (1964)	5,756.57	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Smallholders VOP West (1279)	2,804.10	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Smallholders LSS Kapiura (551)	551.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Smallholders VOP Kapiura (850)	847.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Smallholders Kaulong/Akami/Pushiki/R epamira/Sakapei (20)	700.37	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
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 2021			There is total area for NPP: 710.30 ha which is currently excluded from the certification scope of MFCL until the NPP is approved.	
	Papua New Guinea	Munum Estate	1,734.57	Certified	Not Applicable	27-Mar-20	19-20 July 2021				

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	Papua New Guinea	Maralumi Estate	2,427.15	Certified	Not Applicable	27-Mar-20	19-20 July 2021				
	Papua New Guinea	Erap Estate	1,237.68	Certified	Not Applicable	27-Mar-20	19-20 July 2021				

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 one (1) Critical; one (1) Minor nonconformities and two (2) Opportunity For Improvement raised. The Strategic Operating Unit (SOU 20) - Chaah Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2380413-202308-M1	Issued Date	17/08/2023
Due Date	15/11/2023	Closure Date	23/10/2023
Indicator & Category (Critical / Minor)	6.7.3 (Major)		
Statement of Nonconformity:	The complete implementation of personal protective equipment (PPE) usage was not fully executed.		
Requirement Reference:	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Objective Evidence:	<p>During site visit at Sg Simpang Kiri Estate, the evidence found as below:</p> <ol style="list-style-type: none"> 1. Harvesting Area Field P05C, found 1 harvester was not bringing and wearing their Safety goggles. It was not in line with Safe Work Procedure Oil Palm Plantation Operation Version 01/2021 dated 13/12/2021 "Wear Complete PPE, Safety helmet, Goggles, Gloves and Shoes). 2. Replanting Area Field P23A, found Tractor Driver was not wearing safety shoes (use normal high cut rubber shoes). It was not in line with PPE Matrix: Required PPE Long Sleeve Shirt, Long Trousers, Safety Helmet and Safety Shoes. 3. Replanting area Field P23A, found 4 workers who distributed ERP and Palm Trees for replanting work was not equipped with Mask, and Nitrile gloves when handling Fertilizer RP. It was not in line with Safe Work Procedure Oil Palm Plantation Operation Version 01/2021 dated 13/12/2021 "Wear Complete PPE". It also mentioned in CHRA Recommendation Section 5.1.4: Use of Approved Personal Protective Equipment (USECHH 2000 Regulation 16) Field Manuring Mandor & General "N95 respirator mask, nitrile gloves, safety helmet, wellington boots and apron.*Safety glasses will be provide for dustiness fertilizer". 		
Corrections:	<ol style="list-style-type: none"> 1. Safety glasses for the said harvester have been replaced immediately. 2. Estate management has instructed all tractor drivers to wear safety shoes. 3. Mask and nitrile glove has been distributed to the 4 workers at replanting area immediately on the same day. 		

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Root Cause Analysis:	<ol style="list-style-type: none"> 1. Mandore’s responsibility to do daily checking on the PPE was not clearly communicated by the Assistant Manager that led to lack of supervision in activity ensuring workers put their PPE during working hour. 2. Lack of enforcement and supervision by Management (staff and assistant manager in charge) and monitoring on the requirement of PPE during the work activity (harvesting, tractor driving and replanting).
Corrective Actions:	<ol style="list-style-type: none"> 1. All mandores will be briefed on their responsibility to ensure that workers wear PPE all the time. 2. Training will be conducted on the PPE requirement for all workforce to ensure full compliance. 3. Enforce immediate stop work and rectification for non-compliances to PPE following IOM dated 20 July 2023 by Chief Executive Officer, Upstream Malaysia on Outcome of ASI- RSPO: RSPO P&C Compliance Assessment and RSPO & MSPO Audits for year 2023 on Health, Safety, Environment Matters in Upstream Malaysia. 4. Enforcement of e-SIME+ System as platform for any non-conforming practices reporting for further action.
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. Training for Mandore, Harvesters and Manurer has been conducted. Refer Refresher Training on PPE for Harvesting, Manuring and Replanting dated 17/08/2023 and 01/09/2023. Sighted evidence of training material, attendance, and photos. Sighted training evaluation has been documented for all participants. 2. Training for Tractor and MB Driver has been conducted on 06/10/2023. Sighted evidence of training material, attendance, and photos. Sighted training evaluation has been documented for all participants. 3. Sighted Inter Office Mail (IOM) dated 20/07/2023 undersigned CEO with reference number CEOUM/HSE/009/07/2023 that mentioned on Enforce immediate stop work and rectification for non-compliances to PPE. Training to management team, staff and mandora has been conducted on 07/08/2023. 4. Monitoring on Unsafe Act and Unsafe condition through e-Sime + system has been conducted. Latest record on 20/10/2023. 5. Sighted evidence of PPE Issuance record to Harvester and Manurer dated 10/08/2023. 6. Verification through interview with Mandore, Tractor Driver, Harvester and Manurer has been conducted at Field P2004 found all of them was equipped with adequate PPE. 7. Interview with estate management confirmed that correction and corrective action has been implemented. <p>Based on the above evidence, the major non-Conformity is closed effectively on 23/10/2023. Continuous implementation will be further verified in the next assessment.</p>

Non-conformity			
NCR Ref #	2380413-202308-N1	Issued Date	17/08/2023
Due Date	Next Assessment Visit	Closure Date	TBC

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Indicator & Category (Critical / Minor)	3.3.2 (Minor)
Statement of Nonconformity:	Procedures for chemical safety management (Relabelled of chemical container & SDS availability) was not consistently implemented.
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.
Objective Evidence:	<p>During site visit at Chaah POM and Sg Simpang Kiri Estate, it was found that 1 unit of bottle contained with Steering Oil were store in the container without any labelled respectively. It was not in line with procedures Chemical Safety Management UM/HSE/OCP/04 dated March 2021 Section 6.5.1 Handling of chemicals shall be done based on the recommendation in Safety data Sheet or any other relevant internal SOP.</p> <p>During site visit at Chaah estate, Field 01A, Spraying activities, there are 3 chemicals used which is Sodium Chloride, Canyon and Wet & Stick. Checking with mandore found no evidence of SDS for Sodium Chloride and Wet Stick was available at spraying area. It was not in line with procedures Chemical Safety Management UM/HSE/OCP/04 dated March 2021 Section 6.5 Handling of chemicals and CHRA Recommendation stated "SDS was displayed at chemical storage area or at location where chemical used".</p>
Corrections:	<p><u>Sg Simpang Kiri Estate</u> The bottle has been replaced with proper container and labelled accordingly.</p> <p><u>Chaah Mill</u> Mill has instructed the said worker to remove the bottle of steering oil immediately since it was for his own use and reminded him to keep any lubricant oil at proper storage area and proper container with label.</p> <p><u>Chaah Estate</u> SDS for all chemicals has been immediately provided to the mandore. Briefing on the SDS and its function has been conducted to the said mandore on the next day.</p>
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Ineffective briefing to workers on chemical labelling on secondary storage/container which led to workers being unaware of the requirement and subsequently stored oil in a container without proper labelling. 2. Lack of monitoring and supervision by the management (staff and assistant manager in charge) on the implementation of chemical management requirement (storage of chemical/lubricant/oil and SDS requirement).
Corrective Actions:	<ol style="list-style-type: none"> 1. Estates and mill will conduct refresher training on chemical safety management as well as SDS requirement with the guidance from RSQM to the staff in charge, mandore and all related workers (related work with chemical/lubricant/oil) with proper training evaluation conducted to ensure adequate understanding on the subject matter. 2. Estates and mill will conduct regular spot check at the Estate and Mill compound to ensure no improper storage of chemical/lubricant/oil and SDS is available at all workplaces on monthly basis. This will also be covered during the weekly housing inspection. <p>Workers to be briefed and encouraged to use e-SIME+ System as platform for any non-conforming practices reporting for further action.</p>
Assessment Conclusion:	The CAP submitted found adequate to address the non-conformity. The effectiveness of CAP implementation will be assessed during next assessment.

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Opportunity for Improvements	
OFI #	Description
OFI 1	<p><u>2380413-202308-I1</u> Indicator : 6.2.4 The maintenance and legibility of records related to implementation of Housing Complex/NEST/Community Hall Weekly Inspections (PIOA) could be enhance further.</p>
OFI 2	<p><u>2380413-202308-I2</u> Indicator : 7.1.1 The planting intensity of beneficial plant in all 3 estates within SOU 20 could be enhance further.</p>

Positive Findings	
PF #	Description
PF 1	Good arrangement for audit visit and high commitment by Sustainability Department and units 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			
NCR Ref #	2240882-202208-N1	Issued Date	25/8/2022
Due Date	17/08/2023	Closure Date	17/08/2023
Indicator & Category (Critical / Minor)	6.2.5 (Minor)		
Statement of Nonconformity:	The effort to improve workers' access to adequate, sufficient and affordable food was not fully ensured its related legal compliance.		
Requirement Reference:	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.		
Objective Evidence:	<p>Chaah Estate has signed a House Agreement with XXXXXXXXXX for tenancy of building for grocery shop provision as part of the efforts to improve workers' access to adequate, sufficient and affordable food. The agreement dated 1/2/2021 has included the acknowledgement by vendor to comply with RSPO requirements and other relevant requirements applied by Sime Darby Plantation including legal requirements as per Vendor Integrity Pledge signing. Also sighted the price list for groceries including food sold in the grocery store for monitoring by the estate management. However it was found that the grocery shop in Chaah Estate sells cooking gas without valid trading license for goods which have been declared as controlled articles under the Control of Supplies Act 1961.</p>		
Corrections:	The grocery shop owner was called to the Chaah Estate office to brief on this issue on 26 August 2022. For the time being, until he gets the approval and permit, he		

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	will only assist in supplying the LPG cylinders from a supplier with a legal permit based on demand and will not keep the LPG cylinders in store.
Root Cause Analysis:	To facilitate the residents of Chaah Estate workers and upon demand, the grocery shop owner stored and sold the LPG cylinders without a valid license.
Corrective Actions:	The grocery shop owner will send the application and get approval from the Fire and Rescue department, followed by applying for the permit from KPDNKK. Estate management will assist the grocery shop owner with the documentation required and frequently follow up.
Assessment Conclusion:	Trailing made for Chaah Estate grocery shop operator based on the latest signed House Agreement between Chaah Estate and #Bxxx (Grocery shop operator) for tenancy of building for grocery shop provision. Due to unsuitable storage compartment in grocery shop, the application to Fire and Rescue department for subsequent application of cooking gas sales & storage permit from KPDNKK unable to be made. Currently, cooking gas supplied to workers via external supplier in Chaah town. Notwithstanding, the Minor NC can be closed since no recurrence of issue.
Effectiveness Closure (for previous audit closed Critical NC):	N/A

Non-conformity			
NCR Ref #	2240882-202208-N2	Issued Date	25/8/2022
Due Date	17/08/2023	Closure Date	17/08/2023
Indicator & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	Disposal of waste material was not according to procedures.		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	i) Job acceptance form no. (17552, 20419, 20420, 20421) dated 22/3/22 by KXXXXXX Malaysia Sdn Bhd for tractor service job (onsite service and waste collection). No license obtained from DOE by KXXXXXX Malaysia Sdn Bhd upon transporting waste onsite during the said disposal date. ii) No evidence to show that copy no.2 of 6th consignment received by the OU within 30 days from date of delivery. At the point of audit, no copy no.2 of 6 th consignment available at North Labis Estate for verification.		
Corrections:	1. Estate shall ensure that all waste generated are properly monitor and transferred into schedule waste store. 2. Estate contacted the SW contractor right away to request the copy number 2 of the 6 th consignment note.		
Root Cause Analysis:	Lapses on monitoring of the schedule waste management due to inconsistency submission of copy no.2 of 6th consignment note to estate within 30 days from the contractor. Lacking on monitoring on spent lubricant (SW305) collection during services job (KXXXXXX Malaysia) by Person in charge.		

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Corrective Actions:	<p>1. Estate to conduct refresher training on Schedule waste management to the Person in-charge</p> <p>2. Estate to monitor and recorded all waste generated in Scheduled waste inventory monthly.</p> <p>3. The Person in charge will monitor all documentation received from the contractor.</p>																																																												
Assessment Conclusion:	<p>1. Estate to conduct refresher training on Scheduled waste management to the Person in-charge.</p> <p>All the 3 estates and the mill held respective training on scheduled waste to all level of employees either at muster ground or at fields during operations. Inclusive are also subjects in relation to chemical management and protection of buffer zone /biodiversity/HCV awareness.</p> <p>The PIC are the storekeeper in charge of the SW storage and dispatch under supervision of an Assistant Managers and Assistant Engineers for the mill Inclusive are also subjects in relation to chemical management</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Subject</th> <th>Chaah</th> <th>N Labis</th> <th>SSKE</th> <th>CPOM</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Chemical handling /Spillage</td> <td>17/02/23</td> <td>15/05/23</td> <td>20/06/23</td> <td>02/08/23</td> </tr> <tr> <td>2</td> <td>SW management</td> <td>28/07/23</td> <td>25/05/23</td> <td>17/06/23</td> <td>18/05/23</td> </tr> <tr> <td>3</td> <td>EIA / EIE</td> <td>-</td> <td>17/05/23</td> <td>18/04/23</td> <td>10/08/23</td> </tr> <tr> <td>4</td> <td>SDP policies for employees</td> <td>31/03/23</td> <td>25/02/23</td> <td>06/03/23</td> <td>18/04/23</td> </tr> <tr> <td>5</td> <td>HCV</td> <td>11/07/23</td> <td>09/05/23</td> <td>16/03/23</td> <td>10/08/23</td> </tr> <tr> <td>6</td> <td>Spraying Buffer Zone</td> <td>15/04/23</td> <td>15/04/23</td> <td>15/04/23</td> <td>-</td> </tr> <tr> <td>7</td> <td>Chemical management</td> <td>17/02/23</td> <td>18/01/23</td> <td>12/02/23</td> <td>12/06/23</td> </tr> <tr> <td>8</td> <td>ERP - Fire Drill</td> <td>12/07/23</td> <td>14/06/23</td> <td>24/07/23</td> <td>07/02/23</td> </tr> <tr> <td>9</td> <td>ETP Management</td> <td>-</td> <td>-</td> <td>-</td> <td>02/02/23</td> </tr> </tbody> </table> <p>2. Estate to monitor and recorded all waste generated in Scheduled waste inventory monthly.</p> <p>All the 3 estates and Chaah POM maintained monthly records for the inventory as sighted and verified during the audit. The Person in charge will monitor all documentation received from the contractor.</p> <p>All documentation in relation to the SW legislative requirement are maintained and filed / recorded. Consignment note copy no 1,2, 5 and 6 being maintained accordingly. This being verified during the audit.</p> <p>Verified that implementation of CAP was conducted thus Minor NC was effectively closed on 17/08/2023</p>		Subject	Chaah	N Labis	SSKE	CPOM	1	Chemical handling /Spillage	17/02/23	15/05/23	20/06/23	02/08/23	2	SW management	28/07/23	25/05/23	17/06/23	18/05/23	3	EIA / EIE	-	17/05/23	18/04/23	10/08/23	4	SDP policies for employees	31/03/23	25/02/23	06/03/23	18/04/23	5	HCV	11/07/23	09/05/23	16/03/23	10/08/23	6	Spraying Buffer Zone	15/04/23	15/04/23	15/04/23	-	7	Chemical management	17/02/23	18/01/23	12/02/23	12/06/23	8	ERP - Fire Drill	12/07/23	14/06/23	24/07/23	07/02/23	9	ETP Management	-	-	-	02/02/23
	Subject	Chaah	N Labis	SSKE	CPOM																																																								
1	Chemical handling /Spillage	17/02/23	15/05/23	20/06/23	02/08/23																																																								
2	SW management	28/07/23	25/05/23	17/06/23	18/05/23																																																								
3	EIA / EIE	-	17/05/23	18/04/23	10/08/23																																																								
4	SDP policies for employees	31/03/23	25/02/23	06/03/23	18/04/23																																																								
5	HCV	11/07/23	09/05/23	16/03/23	10/08/23																																																								
6	Spraying Buffer Zone	15/04/23	15/04/23	15/04/23	-																																																								
7	Chemical management	17/02/23	18/01/23	12/02/23	12/06/23																																																								
8	ERP - Fire Drill	12/07/23	14/06/23	24/07/23	07/02/23																																																								
9	ETP Management	-	-	-	02/02/23																																																								
Effectiveness Closure (for previous audit closed Critical NC):	N/A																																																												

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

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1944861-202008-M1	Critical	6.2.2	14/08/2020	Closed on 05/11/2020
1944861-202008-M2	Critical	3.6.1	14/08/2020	Closed on 05/11/2020
1944861-202008-M3	Critical	3.8.4	14/08/2020	Closed on 05/11/2020
1944861-202008-M4	Critical	3.2.1	14/08/2020	Closed on 05/11/2020
2095494-202108-N1	Minor	2.2.2	24/08/2021	Closed on 25/08/2022
2095494-202108-N2	Minor	7.3.1	24/08/2021	Closed on 25/08/2022
2155450-202201-N1	Minor	2.2.2	21/01/2022	Upgraded into Major
2155450-202201-N2	Minor	3.4.2	21/01/2022	Closed on 25/08/2022
2155450-202201-N3	Minor	4.2.2	21/01/2022	Closed on 25/08/2022
2240882-202208-M1	Critical	2.2.2	25/08/2022	Closed on 26/10/2022
2240882-202208-N1	Minor	6.2.5	25/08/2022	Closed on 17/08/2023
2240882-202208-N2	Minor	7.3.2	25/08/2022	Closed on 17/08/2023
2380413-202308-M1	Major	6.7.3	17/08/2023	Closed on 23/10/2023
2380413-202308-N1	Minor	3.3.2	17/08/2023	Open

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Strategic Operating Unit (SOU 20) - Chaah Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each

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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)
Workers' union representatives	Chaah Estate NUPW Chairman Chaah POM NUPW Secretary Simpang Kiri Estate NUPW Chairman	Face to face
Estate vendors	#Cxxx (Chaah Estate supplier)	Face to face
School	SK Desa Temu Jodoh representative	Face to face
Local communities	Kampung Haji Kamisan Cattle owners	Face to face
Gender committee	Gender committee representative	Face to face

Stakeholders comment	
1	<p>Feedbacks: Workers' union representatives Workers allowed to join union (NUPW) as members. Company subsidized monthly NUPW fees. NUPW representatives elected by members without interference by company's management. No issue among workers on salary and accommodation. Housing repair request system very convenient and efficient.</p> <p>Audit Team verification and response: No further issue</p>
2	<p>Feedbacks: Estate vendors No issue with company on price and payments. Long relationship with company since past 10 years. Good support by company for local business owners.</p> <p>Audit Team verification and response: No further issue</p>
3	<p>Feedbacks: School Good relationship with company's management both mill and estate. Company's management always attended invitation to involve in school programs. Company contributed a lot including back to school programs school bags give away.</p> <p>Audit Team verification and response: No further issue</p>
4	<p>Feedbacks: Local communities Company contributed a lot to villagers including food basket during PKP, flood relief and community service. Company contributed foods and clothes during recent flood event in January 2023 and send people to help clean affected villagers' house. Company's management and staff always maintained good relationship with villagers. Some villagers also work in the mill and estate.</p> <p>Audit Team verification and response: No further issue</p>

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5	<p>Feedbacks: Gender committee</p> <p>Women workers given equal opportunity in mill and estate employment with priority for lighter work suitable. Gender committee allowed to conduct program known as women empowerment involving all female employees and women spouse of male employees.</p>
	<p>Audit Team verification and response:</p> <p>No further issue</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Not Applicable as the estates have undergone first cycle of replanting.					

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



3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Strategic Operating Unit (SOU 20) - Chaah Palm Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Strategic Operating Unit (SOU 20) - Chaah Palm Oil Mill is certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: NOR HALIS ABU ZAR	Name: Shylaja Devi Vasudevan Nair
Company Name: BSI SERVICES MALAYSIA SDN BHD	Company Name: Sime Darby Plantation Bhd
Title: CLIENT MANAGER	Title: Head, Sustainability Compliance Unit, GSD
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 23/10/2023	Date: 1/12/2023

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the Estate Quality Management System; Sub-Section 5.5 Management Responsibility; Appendix 5.5.3.2 Procedure for External Communication; Version 1; Issue date: 1/1/2008, documents specified for mill and all estates within SOU 20 Certification Unit made available as per sample as following:</p> <ul style="list-style-type: none"> - Land titles/user rights - Occupational health and safety plans - Plans and impact assessments relating to environmental and social impacts - HCV documentation - Pollution prevention and reduction plans - Details of complaints and grievances - Continuous improvement plans - Public summary of certification assessment report - Group Sustainability Policy - Record of CSR programs and contributions to local communities 	Complied

		<p>All operating units have individual documents and records to demonstrate compliance to this indicator.</p> <p>Other publicly available documents such as policies, company statement and annual reports were made available in the website link as following: http://www.simedarbyplantation.com/.</p> <p>For CSR related activities, information relating to social program on education, environment, community and health, etc, Yayasan Sime Darby as the Foundation has expanded its wings from offering scholarships to outstanding and deserving individuals to funding impactful conservation, outreach and development programmes. The events are published in the Yayasan Sime Darby website, http://www.yayasansimedarby.com/.</p>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>As a group of company, SDPB established communication to continue to use the internet to disseminate public information relating to sustainability policies and statements via website address at https://simedarbyplantation.com/sustainability/reports-policies-and-statements/.</p> <p>SOU 20 provided information in appropriate languages and accessible to relevant stakeholders upon request and during stakeholder consultation meetings. Information provided as per sample records of combined SOU 20 operating units consist of Chaah POM, Chaah Estate & Sg. Simpang Kiri Estate Stakeholders Consultation Meeting conducted on 17/1/2023 at Chaah Estate Community Hall. Meeting attended by operating units Managers and Assistant Managers and external stakeholders among local authorities, neighbouring village heads, neighbouring smallholders/cattle owners, school representatives, and vendors. No negative feedback received from stakeholders attended during the meeting.</p>	Complied

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		A separate stakeholders consultation meeting was conducted by North Labis Estate dated on 8/6/2023.	
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 20 maintained records of requests for information and responses Request by stakeholders conducted through stakeholders meeting, visitor books, letter and forms. The operating units maintain records of all requests and responses.</p> <p>Social Dialogue conducted as per Guidance for Workers Representative Social Dialogue; Ref. # SD Guidance 2/2023_July-SWS.</p> <p>Request by stakeholders conducted through stakeholders meeting, visitor books, letters and forms. The mill and estates maintain the records of all request and response. Sighted the sample records of request from the stakeholders maintained by SOU 20 as following:</p> <ul style="list-style-type: none"> - Chaah Estate Workers’ Social Dialogue; Latest conducted date: 7/8/2023; Minutes recorded with response to previous Social Dialogue conducted date: 17/7/2023 - Chaah POM DOE Visit Field Citation request date: 17/7/2023; Response by mill to DOE letter date: 21/7/2023 - Chaah POM DOSH Mill Inspection Visit request date: 17/7/2023; Response by mill to with payment of inspection invoice to DOSH date: 21/7/2023 <p>All requests found to be responded within short time by respective recipients.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p>	<p>Consultation and communication procedure documented as the Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 for handling communication regarding social issues. Additionally,</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>there's Mill Quality Management System Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>Procedures were briefed to external stakeholders during the consultation meeting and to all workers during workers meeting and assembly sessions from time to time.</p> <p>Sample communication as per records of Communication and Complain Logbook by Stakeholder and Workers. Among external communication records sighted as per samples as following:</p> <ul style="list-style-type: none"> - Chaah Estate Workers' Social Dialogue; Latest conducted date: 7/8/2023; Minutes recorded with response to previous Social Dialogue conducted date: 17/7/2023 - Chaah POM DOE Visit Field Citation request date: 17/7/2023; Response by mill to DOE letter date: 21/7/2023 - Chaah POM DOSH Mill Inspection Visit request date: 17/7/2023; Response by mill to with payment of inspection invoice to DOSH date: 21/7/2023 	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>The latest Stakeholders Lists for all operating units within SOU 20 sighted available as updated in July 2023. Information of stakeholders' details available included person in charge, address, e-mail and contact number for various stakeholders' category among internal and external stakeholders including local communities, authorities, vendors and neighbours etc. Current list of contact and details of stakeholders and their nominated representatives as per register of stakeholder and letter of appointment as Official PIC on Social Matters as following:</p>	Complied

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		<ul style="list-style-type: none"> - Chaah POM: Assistant Manager; Appointment letter date: 1/1/2023 - Chaah Estate: Sr. Assistant Manager; Appointment letter date: 1/3/2023 - Simpang Kiri Estate: Assistant Manager Appointment letter date: 1/1/2022 - North Labis Estate: Chief Clerk; Appointment letter date: 15/1/2021 	
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
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>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 & Quality Policy Statement signed by Group Managing Director on 02/12/2019 also includes the clause ‘promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC).</p> <p>Besides, policies were briefed to external stakeholders during the stakeholder meeting conducted on 17/1/2023 at Chaah Estate as host together with Chaah POM and Simpang Kiri Estate while at North Labis Estate on 8/6/2023. Ethical code of conduct and vendor integrity pledge signed by vendor prior to contract work agreement as per latest Sime Darby Plantation Berhad Vendor Code of Business Conduct (VCOBC) February 2023 as per samples as following:</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> - #Xxxx (Chaah Estate Renovation & Construction Contractor); Date: 16/6/2023 - #Pxxx (Simpang Kiri Estate FFB Transporter); Date: 1/1/2022 	
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 & Quality Policy Statement signed by Group Managing Director on 02/12/2019 also includes the clause ‘promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of Business Conduct (COBC).</p> <p>Besides, policies were briefed to external stakeholders during the stakeholder meeting conducted on conducted on 17/1/2023 at Chaah Estate as host together with Chaah POM and Simpang Kiri Estate while at North Labis Estate on 8/6/2023. A system is in place to monitor compliance and the implementation through internal audit from 12/6/2023 to 16/6/2023.</p> <p>Additionally, SOU 20 conducted assessment for all contractors in each operating units and retained documentations of contractors’ workers Employment Contract/Work Agreement, Payslip, Wages Calculation, SOCSO & EPF Contribution.</p> <p>The assessment was conducted by Site Safety & Sustainability Officer (SSSO) of SOU 20 and Reviewed by Regional Sustainability and Quality Management (RSQM) personnel.</p>	Complied
<p>Principle 2: Operate legally and respect rights</p>			

Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad SOU 20 Chaah 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>Chaah Estate:</u></p> <ol style="list-style-type: none"> 1. MPOB License #518848002000 valid from 01/03/2023 to 29/02/2024 2. MPOB License Nursery #617601011000 valid from 01/09/2022 to 31/08/2023 3. Portable Air Receiver #MK PMT 1885 valid until 08/07/2023 4. Weighbridge #DE18010362 inspected on 07/05/2023 by De Metrology Sdn Bhd. 5. Diesel Permit #JH(SGT)0123/05 PSK valid from 07/08/2023 to 06/08/2024 <p><u>North Labis Estate:</u></p> <ol style="list-style-type: none"> 1. MPOB License #520479102000 valid from 01/05/2023 to 30/04/2024 2. Diesel permit #JH(SGT)0028/83 PSK valid from 11/06/2021 to 10/06/2024 3. Portable Air Receiver #MK PMT 1888 valid until 25/08/2023 (Application for renewal has been made on 17/06/2023) 	Complied

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		<p>4. Air Compressor Receiver #JH PMT 2909 valid until 25/08/2023(Application for renewal has been made on 17/06/2023)</p> <p>5. Diesel Permit #BPGK JH (KLU) 0031 SK valid from 29/07/2021 to 28/07/2023</p> <p>6. Wages Deduction permit for electricity bill #BHG.PU/9/129 JLD 33(53) dated 06/07/2017</p> <p><u>Sq Simpang Kiri Estate:</u></p> <p>1. MPOB License #532593002000 valid from 01/10/2022 to 30/09/2023</p> <p>2. MPOB License Nursery #543698011000 valid from 01/11/2022 to 31/10/2023</p> <p>3. Diesel permit #JH(SGT)0155/10 PSK valid from 05/01/2023 to 04/01/2026</p> <p>4. Petrol permit #SKK/10-16/B(545) valid from 09/01/2023 to 08/01/2024</p> <p>5. Weighbridge #DE17005671 inspected by De Metrology Sdn Bhd dated 18/05/2023</p> <p>6. Air Receiver #JH PMT 27205 valid until 12/01/2024</p> <p><u>Chaah POM:</u></p> <p>1. MPOB Licence #518940004000 valid from 01/03/2023 to 29/02/2024</p> <p>2. Jadual Pematuhan DOE Licence #004721 with reference file JAS.CHQ 600-3/1/2/31(SK03) valid from 01/07/2023 to 30/06/2024</p>	
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		<ol style="list-style-type: none"> 3. Air Compressor Receiver tank #JH PMT 1694 valid until 16/10/2024 4. Boiler #JH PMD 80145 valid until 26/09/2024 5. Steriliser #JH PMT 21639 valid until 16/10/2024 6. License for Abstraction water #BAKAJ/334/300/05/05/08/1 valid until 31/12/2023 7. Energy Commission Electricity permits #57974 Serial No: 2022/03000 valid until 11/11/2023 8. Weighbridge with serial number C015286546, Sticker number DE18010313 inspected on 06/09/2023 9. Competence person CePSWaM #CePSWaM/2319630 to Assistant Engineer NRIC 9414XX-XX-XXXX valid until 16/01/2024 10. Competence person CePPOME #CePPOME/00123 to Assistant Engineer NRIC 8601XX-XX-XXXX 11. Steam Engineer 1st Grade #047/2008 to Manager NRIC7102XX-XX-XXXX dated 05/05/2008 	
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 20 Chaah 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 Jan 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"> • Minimum wages order 2022 • Employees’ Social Security (Amendment) Act 2022 	Complied

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		<ul style="list-style-type: none"> • Employment Insurance System (EIS) (Amendment) Act 2022 • Employment (Amendment) Act 2022 • Emergency (Employee’s Minimum Standards of Housing, Accommodations and Amenities) Ordinance 2021 																																											
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.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Field</th> <th>Neighbouring</th> <th>Field</th> <th>Neighbouring</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Chaah</td> <td>P02D</td> <td>Maokil Forest</td> <td>P01C</td> <td>Smallholder</td> </tr> <tr> <td>2</td> <td>Chaah</td> <td>P99D</td> <td>Smallholder</td> <td>P22D</td> <td>Ldg Sejangong</td> </tr> <tr> <td>3</td> <td>N Labis</td> <td>P09B</td> <td>Smallholder</td> <td>P 09B</td> <td>Smallholder Rubber</td> </tr> <tr> <td>4</td> <td>N Labis</td> <td>P02D</td> <td>Tmn Gatom</td> <td>P 99A</td> <td>KTM Railway track</td> </tr> <tr> <td>5</td> <td>SSKE</td> <td>P06</td> <td>Kg Kamisan</td> <td>P06A</td> <td>Smallholder</td> </tr> <tr> <td>6</td> <td>SSKE</td> <td>P04A</td> <td>Ldg Sindora</td> <td>P06A</td> <td>Kg Sepakat</td> </tr> </tbody> </table>		Estate	Field	Neighbouring	Field	Neighbouring	1	Chaah	P02D	Maokil Forest	P01C	Smallholder	2	Chaah	P99D	Smallholder	P22D	Ldg Sejangong	3	N Labis	P09B	Smallholder	P 09B	Smallholder Rubber	4	N Labis	P02D	Tmn Gatom	P 99A	KTM Railway track	5	SSKE	P06	Kg Kamisan	P06A	Smallholder	6	SSKE	P04A	Ldg Sindora	P06A	Kg Sepakat	Complied
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<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>																																													
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>The list of contracted parties available as per stakeholder list.</p> <p>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 on</p>	Complied																																										

		<p>14/06/2023 comprises of various parties, neighbouring communities and Government Agencies.</p> <table border="1" data-bbox="1160 443 1912 823"> <thead> <tr> <th rowspan="2">Classification</th> <th colspan="4">No of stakeholder</th> </tr> <tr> <th>NLE</th> <th>CE</th> <th>SSKE</th> <th>CPOM</th> </tr> </thead> <tbody> <tr> <td>Government Agencies - MPOB/KPDNHEP PDRM/Immigration</td> <td>40</td> <td>55</td> <td>51</td> <td>46</td> </tr> <tr> <td>Local Community</td> <td>3</td> <td>3</td> <td>3</td> <td>3</td> </tr> <tr> <td>Suppliers/Vendor</td> <td>12</td> <td>20</td> <td>15</td> <td>32</td> </tr> <tr> <td>Contractors</td> <td>2</td> <td>4</td> <td>2</td> <td>2</td> </tr> <tr> <td>Total</td> <td>57</td> <td>82</td> <td>71</td> <td>83</td> </tr> </tbody> </table> <p>The subjects discussed during the meeting with the presence management including stakeholders among others discussed on the following;</p> <ul style="list-style-type: none"> a) Company Policies and SOP b) Issues relating to neighborhood and concerns c) Fire prevention control / prohibition d) RSPO/MSPO compliance and guidelines e) Vendor / suppliers legal compliance <p>There is no major course of concern of issues highlighted during the meeting.</p>	Classification	No of stakeholder				NLE	CE	SSKE	CPOM	Government Agencies - MPOB/KPDNHEP PDRM/Immigration	40	55	51	46	Local Community	3	3	3	3	Suppliers/Vendor	12	20	15	32	Contractors	2	4	2	2	Total	57	82	71	83	
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2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.	<p>The agreements (selectively sampled) have included clauses in relation to requirement to meeting legal among others;</p> <table border="1" data-bbox="1144 1342 1917 1391"> <thead> <tr> <th>Contractor</th> <th>Services</th> <th>Validity</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Contractor	Services	Validity				Complied																												
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<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>	1	Perniagaan KXXXXXX SXXXX	Chaah Estate-Transporting FFB to mill	31/12/23
	2	XXX Renovation Construction SB	Chaah Estate - Upgrading roofing / ceiling nest	08/09/23
	3	XXXX Brothers	SSKE/Chaah Estate - Desilting, bund heightening and sanitation work	31/12/23
	4	RXXXXXXXX Setia	NLE - Transporting of FFB to mill	31/12/23
	5	MXXXXX Enterprise	NLE - Supply of Contract Labour	31/07/24
	6	Perniagaan KXXXXXX SXXXX	SSKE - Equipment & Machinery workers	31/12/23
	7	Sykt WXXXXX (MXXXX)	CPOM - Transportation of CPO	31/12/23
	<p>It stated that the agreement is governed among others by the following;</p> <p>Clause 5 (A) - Compliance with applicable laws and guidelines</p> <ul style="list-style-type: none"> i. To comply with all applicable laws, by-laws, rules, regulations ii. Not limited to laws in relation to employment, environment, OSH, anti-bribery, anti-slavery, human trafficking laws iii. Laws and SOP on COVID 19 pandemic <p>Clause 5 (B) - Company's Guidelines, Policies and Principles</p>			

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		<ul style="list-style-type: none"> i. Obligations towards the Representative ii. All contractors are subject to KPI monthly evaluation iii. General Commitment towards RSPO MSPO certification standards <p>Clause 5 (K) Failure to provide the services and/or comply with laws and guidelines</p> <ul style="list-style-type: none"> i. Special obligations, covenants and undertaking of the transporter ii. Applicable Laws <p>All contractors have signed (IIV - Ikrar Integriti Vendor) of respective dates and region.</p> <p>As per sample:</p> <ul style="list-style-type: none"> - Form of Agreement (Contract # ED/off/077/2023/STR): Proposed Upgrading Roofing and Ceiling NEST at Chaah Estate, Johor; Contractor: XXX Renovation & Construction Sdn. Bhd.; Effective Date: 16/6/2023; Completion date: 8/9/2023 - Letter of Award for Fresh Fruit Bunch Transportation Services for Sime Darby Plantation Berhad's Estates; Transporter: Perniagaan KXXXXX SXXXX; Contract period: 1/1/2022 – 31/12/2023 	
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>All OU contracts/Agreement have generic clauses in relation to disallowing child, forced and trafficked labour as described in the Vendor Integrity Pledge (VIP).</p> <p>All contracted parties/vendors were required to signed Vendor Integrity Pledge (VIP) and to comply with para;</p> <ul style="list-style-type: none"> - a (i); Vendor Code of Business Conduct (VCOBC) 	Complied

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		<ul style="list-style-type: none"> - a (ii); all applicable laws and regulations related anti-bribery, fraud and corruption. - Contractors workers compliance requirements (passport, permit & employment terms 	
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>The mill received only crop from the SDP estates, mainly within the SOU 20, others if any are from diversion from the sister mill as results of breakdown or annual maintenance. All the estates from the same SOU 20 possessed the following information sighted and verified during the audit</p> <ul style="list-style-type: none"> a) All FFB from the SDP estates supported by the delivery documents. b) Valid land title with ownership status (refer indicator 4.4.1) c) Valid MPOB licence (refer criteria indicator 2.1.1) <p>All delivery documents were verified with volumes of FFB received by the mill.</p>	Complied
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>There is no smallholders crop received or processed in Chaah Palm Oil Mill.</p>	Not Applicable
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			

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<p>3.1.1</p>	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The 3 estates continued to commit to long term economic and financial viability. The annual budgets for 2023 to 2027 were sighted. The budget covers activities for upkeep, cultivation, harvesting & evacuation, welfare, capital expenditure, RSPO compliance etc. The budget also included projections on yield/ha, and total cost of production per m ton & per ha and CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses. The estates adopted the following format for the annual budget.</p> <table border="1" data-bbox="1142 667 1915 1265"> <thead> <tr> <th>Year</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>Mature Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Immature Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Total Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>N Labis FFB /mt</td> <td>45,833</td> <td>44,083</td> <td>53,312</td> <td>55,056</td> <td>57,571</td> </tr> <tr> <td>N Labis YPH</td> <td>15.90</td> <td>14.38</td> <td>18.26</td> <td>17.96</td> <td>18.43</td> </tr> <tr> <td>Chaah FFB / mt</td> <td>38,166</td> <td>47,142</td> <td>49,476</td> <td>48,727</td> <td>45,652</td> </tr> <tr> <td>Chaah YPH</td> <td>16.15</td> <td>20.50</td> <td>20.97</td> <td>21.35</td> <td>21.83</td> </tr> <tr> <td>SSK FFB /mt</td> <td>28,258</td> <td>38,809</td> <td>38,874</td> <td>39,310</td> <td>28,787</td> </tr> <tr> <td>SSK YPH</td> <td>16.58</td> <td>21.00</td> <td>21.05</td> <td>21.08</td> <td>16.65</td> </tr> <tr> <td>RM/mt FFB</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM/ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> </tbody> </table> <p>Similarly, the mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains;</p>	Year	2023	2024	2025	2026	2027	Mature Ha	x	x	x	x	x	Immature Ha	x	x	x	x	x	Total Ha	x	x	x	x	x	N Labis FFB /mt	45,833	44,083	53,312	55,056	57,571	N Labis YPH	15.90	14.38	18.26	17.96	18.43	Chaah FFB / mt	38,166	47,142	49,476	48,727	45,652	Chaah YPH	16.15	20.50	20.97	21.35	21.83	SSK FFB /mt	28,258	38,809	38,874	39,310	28,787	SSK YPH	16.58	21.00	21.05	21.08	16.65	RM/mt FFB	x	x	x	x	x	RM/ha	x	x	x	x	x	<p>Complied</p>
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		<p>a) FFB yield & CPO production forecast b) Extraction Ratios – OER / KER, c) Cost of production - administration / labour overhead - processing cost labour, maintenance, consumables - depreciation and head office charges d) EVIT running accounts e) CAPEX - capital expenditure.</p> <table border="1" data-bbox="1131 774 1915 1268"> <thead> <tr> <th>Year</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>FFB processed</td> <td>89,474</td> <td>112,308</td> <td>108,454</td> <td>109,859</td> <td>115,281</td> </tr> <tr> <td>OER</td> <td>20.05</td> <td>20.52</td> <td>20.70</td> <td>21.45</td> <td>21.42</td> </tr> <tr> <td>KER</td> <td>5.39</td> <td>5.30</td> <td>5.40</td> <td>5.50</td> <td>5.50</td> </tr> <tr> <td>Administration</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Processing cost</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Depreciation</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>H Q charges</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM/mt FFB</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>RM/mt CPO</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> </tbody> </table>	Year	2023	2024	2025	2026	2027	FFB processed	89,474	112,308	108,454	109,859	115,281	OER	20.05	20.52	20.70	21.45	21.42	KER	5.39	5.30	5.40	5.50	5.50	Administration	x	x	x	x	x	Processing cost	x	x	x	x	x	Depreciation	x	x	x	x	x	H Q charges	x	x	x	x	x	RM/mt FFB	x	x	x	x	x	RM/mt CPO	x	x	x	x	x	
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3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	The long-range replanting programs (LRRP) until 2028 were sighted on all 3 estates. The program was reviewed once a year and	Complied																																																												

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	<p>- Minor compliance -</p>	<p>incorporated into their annual financial budget. The program sighted for the next 5 years in hectares is as follows:</p> <table border="1" data-bbox="1144 464 1917 662"> <thead> <tr> <th>Year</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> <th>2028</th> </tr> </thead> <tbody> <tr> <td>NLE</td> <td>277.93</td> <td>134.59</td> <td>118.76</td> <td>152.96</td> <td>131.86</td> </tr> <tr> <td>CE</td> <td>186.07</td> <td>95.15</td> <td>91.01</td> <td>116.92</td> <td>133.43</td> </tr> <tr> <td>SSKE</td> <td>44.15</td> <td>152.78</td> <td>79.20</td> <td>76.26</td> <td>95.41</td> </tr> </tbody> </table>	Year	2024	2025	2026	2027	2028	NLE	277.93	134.59	118.76	152.96	131.86	CE	186.07	95.15	91.01	116.92	133.43	SSKE	44.15	152.78	79.20	76.26	95.41							
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<p>3.1.3</p>	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>The Management Review was held as follows chaired by the respective Managers:</p> <table border="1" data-bbox="1160 767 1924 1038"> <thead> <tr> <th></th> <th>Estate</th> <th>Date</th> <th>Attendee</th> <th>Date</th> <th>Attendee</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>NLE</td> <td>15/07/23</td> <td>17</td> <td>17/06/22</td> <td>16</td> </tr> <tr> <td>2</td> <td>CE</td> <td>23/06/23</td> <td>15</td> <td>08/09/22</td> <td>15</td> </tr> <tr> <td>3</td> <td>SSKE</td> <td>23/07/23</td> <td>10</td> <td>16/08/22</td> <td>9</td> </tr> <tr> <td>4</td> <td>CPOM</td> <td>03/08/23</td> <td>14</td> <td>09/08/22</td> <td>13</td> </tr> </tbody> </table> <p>The agenda discussed among others includes the following;</p> <ul style="list-style-type: none"> a) Results of internal audits b) Customer feedback c) Process performance and product conformity d) Status of preventive & corrective actions e) Follow up action from management review 		Estate	Date	Attendee	Date	Attendee	1	NLE	15/07/23	17	17/06/22	16	2	CE	23/06/23	15	08/09/22	15	3	SSKE	23/07/23	10	16/08/22	9	4	CPOM	03/08/23	14	09/08/22	13	<p>Complied</p>
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		<p>f) Changes that could affect the management system</p> <p>g) Recommendation for improvement</p> <p>Minutes of meeting for all 3 estates and the mill were sighted and verified. No major issues were highlighted during the meeting. Main focus is on the forthcoming external RSPO audit in Aug 2023.</p>					
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>							
<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>This has been established in the Continuous Improvement Plan 2023 updated in Jan 2023 respectively for both the Mill and Estate. This compilation was made with subject to the consideration of the main social and environmental impacts. These include to continue engagement with relevant stakeholders (workers, surrounding communities, government agencies, agencies, suppliers and contractors. Management documents related to environmental plans and impact assessments maintained available. Among the documents were:</p> <p>(a) Environmental Aspect Identification (EIA) and Environmental Impact Evaluation (EIE) registers.</p> <p>(b) Environmental Improvement Plan 2023</p> <p>(c) Pollution Prevention Plan 2023</p> <p>(d) Water Management Plan 2023</p> <p>(e) Waste Management Plan 2023</p> <p>The Continuous Management Plan 2023 for the estate/mill operations among others include the following initiatives;</p> <table border="1" data-bbox="1160 1326 1917 1374"> <thead> <tr> <th data-bbox="1160 1326 1424 1374">Projects</th> <th data-bbox="1424 1326 1917 1374">Details</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Projects	Details			<p>Complied</p>
Projects	Details						

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			Estates	
		1	Chaah - Social	Creche building upgrading RMXXX
		2	Chaah - Social	New lines site piping system 1500m RMXXX
		3	Chaah - Social	New SAJ piping 2000m - RMXXX
		4	Chaah Operation -	Rat Bait mechanized machinery RMXXX
		5	Chaah Operation -	Manuring mechanized machinery RMXXX
		6	Chaah Operation -	Spraying mechanized machinery RMXXX
		1	NLE - Operation	MB 5 units - FFB collection mechanization
		2	NLE - Operation	MB Sprayer mechanization RMXXX
		3	NLE - Operation	1 new van-workers transportation RMXXX
		4	NLE - Social	Children playground upgrading RMXXX
		5	NLE - Social	2 new Volleyball court RMXXX
		6	NLE - Social	Surau upgrading - RMXXX
		1	SSKE - Social	Bathroom upgrading workers Q RMXXX
		2	SSKE - Social	Multi-Purpose Hall RMXXX

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		3	SSKE - Operation	Concrete road 1200 sq meter R RMXXX
		4	SSKE - Operation	Garage Workshop vehicles parking RMXXX
		5	SSKE - Operation	Bund 5000m heightening RMXXX
		6	SSKE - Social	New Surau RMXXX
			Chaah POM	Details
		1	Mill - Operations	10 units new cages - RMXXX
		2	Mill - Operations	Effluent annual desilting RMXXX
		3	Mill - Operations	Repair/Maintenance workers Qrts RMXXX
		4	Mill - Operations	Omega Project - RMXXX machinery/facility
		5	Mil - Operations	EFB yard roofing RMXXX - 2024
		6	Mill - Operations	Furrow rehabilitation RMXXX - 2024
		7	Mill - Operations	Replacement workers qrts roofing RMXXX
				Continuous improvements are established covering the social, environmental and safety impacts in the operating units. The action plan established focusing on:
				a) Communication and whistle blower
				b) Dumping rubbish outside estate landfill.
				c) Increase awareness on safety and health

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		<p>d) resurface road and office compound area with milling waste</p> <p>e) To maintain 5S work standard in all operation</p>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>The Certification Unit has completely filled its RSPO metrics template version 2.1 and submitted to the CB prior to this assessment. The input data was found to be accurate based on the following records verification:</p> <ul style="list-style-type: none"> • SAP accounting system • Land titles • Complaints & grievance records • Dept. of Safety & Health’s JKPP8 form 	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<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>	Complied

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		<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"> 1. UM HSE Management System Manual, UM/HSE/MS/01 2. First Aid in Workplace Procedure, UM/HSE/OCP/01 3. Safety Harvesting Procedure, UM/HSE/OCP/02 4. Personal Protective Equipment Procedure, UM/HSE/OCP/03 5. Chemical Safety Management Procedure, UM/HSE/OCP/04 6. Permit to Work (PTW) Procedure, UM/HSE/OCP/05 7. OSH Risk Management Procedure, UM/HSE/SE/01 	
3.3.2	<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>Procedures for chemical safety management was not consistently implemented.</p> <p>During site visit at Chaah POM and Sg Simpang Kiri Estate, it was found that 1 unit of bottle contained with Steering Oil were store in the container without any labelled respectively. It was not in line with procedures Chemical Safety Management UM/HSE/OCP/04 dated March 2021 Section 6.5.1 Handling of chemicals shall be done based on the recommendation in Safety data Sheet or any other relevant internal SOP.</p>	<p>Non-compliance</p>

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		<p>During site visit at Chaah estate, Field 01A, Spraying activities, there are 3 chemicals use which is Sodium Chloride, Canyon and Wet & Stick. Checking on SDS found no evidence for Sodium Chloride and Wet Stick. It was not in line with procedures Chemical Safety Management UM/HSE/OCP/04 dated March 2021 Section 6.5 Handling of chemicals and CHRA Recommendation stated "SDS was displayed at chemical storage area or at location where chemical used". Thus, Minor NC was raised.</p>	
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available. - 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>Chaah POM</u></p> <ol style="list-style-type: none"> 1. Internal Audit Report: 14/06/2023 2. Structured Oil Recovery Assessment (SORA): 20-24/02/2023 <p><u>Chaah Estate</u></p> <ol style="list-style-type: none"> 1. Performance Monitoring Visit Report dated 08/08/2023 2. Internal Audit Report dated 12/06/2023. 3. Structured Crop Recovery Assessment Report (SCRA), Mature Upkeep Assessment (MUA) report dated 20-24/02/2023 <p><u>North Labis Estate</u></p> <ol style="list-style-type: none"> 1. Performance Monitoring Visit Report dated 09/08/2023 2. Internal Audit Report dated 13/06/2023. 3. Structured Crop Recovery Assessment Report (SCRA), Mature Upkeep Assessment (MUA) report dated 20-24/02/2023 	<p>Complied</p>

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		<p><u>Sg Simpang Kiri Estate</u></p> <ol style="list-style-type: none"> 1. Performance Monitoring Visit Report dated 27/02/2023 2. Internal Audit Report dated 13/06/2023. 3. Structured Crop Recovery Assessment Report (SCRA), Mature Upkeep Assessment (MUA) report dated 27/02/2023 	
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 20 has a separate Social Impact Assessment (SIA) and Environmental Impact Assessment (EIA) reports. It mentioned the objectives, category, action, frequency, person in charge and monitoring period. 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> <ol style="list-style-type: none"> a) Plan to avoid negative impact and to promote positive impacts. b) Reduction disposal of waste taking into consideration of social responsibilities. c) Plan to reduce pollution and release of GHG d) Development and implementations. <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> <ol style="list-style-type: none"> a) Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, (version 1; year 2008 Issue no. 1; dated 1 April 2009 Register) 	<p>Complied</p>

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		<p>b) Appendix 5.4.1c - Environmental Aspect and Impact Identification form (version 1; year 2008 Issue no. 1; dated 1 April 2009; MR-01/EIA)</p> <p>c) Appendix 5.4.1d – Environmental Impacts Evaluation form (version 1; year 2008 issue no. 1; dated 1 April 2009; MR-02/EIE)</p> <p>The EIA as detailed in the estates register covers all estates activities/operations. The latest register being reviewed dated 25/7/19. There were no changes since the last review for all the three estates. The significant environmental aspects related to the estate operation among others include the following;</p> <ul style="list-style-type: none"> a) FFB transportation to the mill. b) Movement of vehicles/transportation of estates machines and tractors. c) Herbicide/pesticides spraying d) Anti-malaria fogging e) Road resurfacing & grading f) Grass cutting g) construction activities h) harvesting, pest and disease, i) upkeep programme j) nursery / replanting <p>Similarly, the environmental aspects for the mill are tabulated in the EIA master list (EIA/MOM/2013/001—1ME to EIA/2015/MOM/020) updated on respective dates in 2023. Among</p>	
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		<p>others the EIAs are divided into all stations in the mill processing as listed below.</p> <ul style="list-style-type: none"> a) the boiler stack emission, black smoke b) palm oil mill effluent (POME) discharge and water contamination, c) Activities related to managing of scheduled wastes and general wastes. d) Activities of all operations beginning from the mill entrance ending to the effluent, EFB operations. <p>The documents are maintained, sighted and verified.</p> <p>No new planting in all estates within SOU 20. For ongoing operations, the SIA as per latest records of Social Impact Assessment (SIA) Report; SOU 20 Chaah; Operating Units: Chaah POM, Chaah Estate, North Labis Estate, Sungai Simpang Kiri Estate; Assessment date: 6-9/4/2015; Assessment by: Social & Environment Projects Unit, PSQM Department and the actions documented in the Continual Improvement Plan. The Management Plan on Social Impact Assessment the areas of concerns/key includes:</p> <ul style="list-style-type: none"> - Working Condition: Understanding of workers benefits entitlements. - Housing Condition/Living Improvement: <ul style="list-style-type: none"> ▪ Housing complex overall maintenance and cleanliness. ▪ Organize more social activities such as family day. ▪ Organize meeting with stakeholders. 	
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<p>3.4.2</p>	<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>The Action Plans for all OUs within SOU 20 were reviewed at least once a year or whenever issues were raised and revised.</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> <p>Social Management Action Plan established with objectives as following:</p> <ul style="list-style-type: none"> - To review social impacts and to implement plans to mitigate negative impacts and promote the positive impacts - To ensure compliance to SOP and legal requirement regarding social - To contribute to local communities' development - Continuous improvement of workers working and living conditions <p>Based on the Social Impact Assessment (SIA) Report; SOU 20 Chaah; Operating Units: Chaah POM, Chaah Estate, North Labis Estate, Sungai Simpang Kiri Estate; Assessment date: 6-9/4/2015 by Social & Environment Projects Unit, PSQM Department. Recommended action plan maintained as Social Management Action Plan FY2023 as following:</p> <table border="1" data-bbox="1146 1332 1928 1383"> <thead> <tr> <th data-bbox="1146 1332 1429 1383">Issue</th> <th data-bbox="1429 1332 1711 1383">Action plan</th> <th data-bbox="1711 1332 1928 1383">Timeframe/Due</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Issue	Action plan	Timeframe/Due				<p>Complied</p>
Issue	Action plan	Timeframe/Due							

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		Rainwater spill into house	Small awning installation	Dec 2023	
		Broken perimeter's drain	Cementing work	Dec 2023	
		Poor internet connection	To install WIFI	Dec 2023	
		Labour force issue	Grievance channel monitoring, social dialogue, gender committee meeting	Dec 2023	
		Poor housing condition	Monitor and complete OPP (Oil Palm Pal) system	Dec 2023	
		Contributions to flood victims	Food basket and house cleaning	Jan 2023	
		"Kampung" road use by FFB lorry	Instruction letter to transporter to use estate road	Dec 2022	
		Birds making nest at the air hole of house	Install mosquito netting	Q4 2022	
		Stain/graffiti inside room/house	To paint the house wall affected	Q4 2022	
<p>The plan was also reviewed during external stakeholder consultation meeting conducted on 17/1/2023 at Chaah Estate as</p>					

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		<p>host together with Chaah POM and Simpang Kiri Estate while at North Labis Estate on 8/6/2023 with participatory by various stakeholders attended the meeting.</p>																					
<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>The Social/Environmental Action Plan available for each unit 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"> a) Gender Committee, NUPW, b) ESH Meeting, c) Complaint & Request from internal & external stakeholders and muster briefing). d) EIA management - review held respectively for all the estates and mill with date as shown below <table border="1" data-bbox="1137 879 1942 1129"> <thead> <tr> <th></th> <th>OU</th> <th>Review date</th> <th>Updates</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>N Labis Estate</td> <td>10/08/2023</td> <td>No changes</td> </tr> <tr> <td>2</td> <td>Chaah Estate</td> <td>10/08/2023</td> <td>No changes</td> </tr> <tr> <td>3</td> <td>Sg Sp Kiri Estate</td> <td>06/06/2023</td> <td>No changes</td> </tr> <tr> <td>4</td> <td>Chaah POM</td> <td>08/06/2023</td> <td>LORR updated</td> </tr> </tbody> </table> <p>Each operating unit within SOU 20 established their own social management and monitoring plan as following:</p> <ul style="list-style-type: none"> - Chaah POM Social Management Action Plan FY2023 latest revision dated on 1/1/2023 - Chaah Estate Social Management Action Plan FY2023 latest revision dated on 1/2/2023 		OU	Review date	Updates	1	N Labis Estate	10/08/2023	No changes	2	Chaah Estate	10/08/2023	No changes	3	Sg Sp Kiri Estate	06/06/2023	No changes	4	Chaah POM	08/06/2023	LORR updated	<p>Complied</p>
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		<ul style="list-style-type: none"> - Simpang Kiri Estate Social Management Action Plan FY2023 latest revision date: 1/7/2023 - North Labis Estate Social Management Action Plan FY2023 latest revision date: 15/7/2023 <p>The plan established mainly based on inputs from stakeholders' consultation and identified issues by management as well as from the Based on the Social Impact Assessment (SIA) Report; SOU 20 Chaah; Operating Units: Chaah POM, Chaah Estate, North Labis Estate, Sungai Simpang Kiri Estate; Assessment date: 6-9/4/2015 by Social & Environment Projects Unit, PSQM Department. Recommended action plan maintained as Social Management Action Plan FY2023 as following:</p> <table border="1" data-bbox="1151 799 1926 1279"> <thead> <tr> <th data-bbox="1151 799 1429 858">Issue</th> <th data-bbox="1429 799 1711 858">Action plan</th> <th data-bbox="1711 799 1926 858">Timeframe/Due</th> </tr> </thead> <tbody> <tr> <td data-bbox="1151 858 1429 948">Rainwater spill into house</td> <td data-bbox="1429 858 1711 948">Small awning installation</td> <td data-bbox="1711 858 1926 948">Dec 2023</td> </tr> <tr> <td data-bbox="1151 948 1429 1037">Broken perimeters' drain</td> <td data-bbox="1429 948 1711 1037">Cementing work</td> <td data-bbox="1711 948 1926 1037">Dec 2023</td> </tr> <tr> <td data-bbox="1151 1037 1429 1126">Poor internet connection</td> <td data-bbox="1429 1037 1711 1126">To install WIFI</td> <td data-bbox="1711 1037 1926 1126">Dec 2023</td> </tr> <tr> <td data-bbox="1151 1126 1429 1279">Labour force issue</td> <td data-bbox="1429 1126 1711 1279">Grievance channel monitoring, social dialogue, gender committee meeting</td> <td data-bbox="1711 1126 1926 1279">Dec 2023</td> </tr> </tbody> </table>	Issue	Action plan	Timeframe/Due	Rainwater spill into house	Small awning installation	Dec 2023	Broken perimeters' drain	Cementing work	Dec 2023	Poor internet connection	To install WIFI	Dec 2023	Labour force issue	Grievance channel monitoring, social dialogue, gender committee meeting	Dec 2023	
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The plan was also reviewed during external stakeholder consultation meeting conducted on 17/1/2023 at Chaah Estate as host together with Chaah POM and Simpang Kiri Estate while at North Labis Estate on 8/6/2023 with participatory by various stakeholders attended the meeting.					
Criterion 3.5: 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 -	The Workers Management Unit in SDPB HQ has established Standard Operating Procedure Title: Hiring of Local Workers; Doc. # 01-12-19; Effective date: 1/12/2019; Rev. # 1 and Migrant Worker Responsible Recruitment Procedure effective 20 August 2021 to explain the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried			Complied

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		out by the Workforce Management Unit and HR. The document is available to workers upon request.	
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Employment procedures are well implemented with records well maintained as per information reported in indicator 6.1.1 to 6.6.2 below.	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	<p>Sime Darby Plantation Berhad have established Standard Operating Procedure for Risk Assessment and documented in EQMS/SOM sub-section 5.4, Appendix 5.4.1a. Risk were identified and assessed in accordance with the established HIRARC an also in compliance to legal requirements as stated below.</p> <p><u>Chaah Palm Oil Mill</u></p> <ol style="list-style-type: none"> 1. HIRARC was available to address all the risks and hazards associated to the operations in the estate. The HIRARC was reviewed on 05/07/2022. 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/11/ASS/00296-2022/52; CHRA Assessor by XXXXXX Resources with DOSH Reg Number: HQ/11/ASS/00/296; Date of Assessment: 27/12/2022. 3. Medical Surveillance Programme has been performed successfully for the year 2022 for the mill workers exposed to hazardous chemicals and fumes. A total of 33 workers have been examined on 27/12/2022 & 12/01/2023 at Klinik XXXXXX. The results indicated that all workers was declared fit to work. 	Complied

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		<p>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 XXXXXX Engineering Plt on 02-03/10/2020. NRA Report (Report Number: HQ/LPROYKPEB/21/00303) available for verification. Review on NRA has been made on 18/03/2021 with report reference number HQ/LPROYKPEB/21/00406. The recommendation stated by the assessor have been affectively addressed as verified.</p> <p>5. An audiometric testing was done on 29/03/2023 for 14 mill employees deemed to be exposed to excessive noise in the mill. The test was conducted by XXXXXX Sdn Bhd. The report indicated that 2 workers had Standard threshold shift. The workers with STS have been sent for a retest on 21/02/2023. The results were obtained and indicated that STS was confirmed. The mill has reported the cases via JKPP7 to DOSH.</p> <p>6. Chemical Exposure Monitoring has been conducted on 14/02/2023 by XXXXXX Environmental (M) Sdn Bhd. Parameter monitored were n-Hexane. The sampling and laboratory analysis were based on NIOSH Manual Analytical Methods (NMAM) and Occupational Safety and health Administration Methods (OSHA)</p> <p>7. Annual Local Exhaust Ventilation (LEV) System Examination has been conducted on 15/02/2023 by XXXXXX Sdn Bhd. The LEV systems being examined and tested was laboratory fume hood. Result were complied with the parameter by DOE specification.</p> <p><u>Chaah Estates</u></p>	
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		<ol style="list-style-type: none"> 1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Harvesting, Spraying, Manuring and Office Operations. Verification done on the documentations and operations indicated that all the risk controls were adhered to. Last updates sighted on 14/06/2023. 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/00/363-2022-040 conducted by XXXXXX Consultancy (DOSH Registration: JH/04/04/318) on 22/06/2022 was available for verification. 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 2022 has been performed on 18 to 22/07/2022 at Klinik XXXXXX for 18 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work. 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. 	
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		<p>Noise Risk Assessment Report (NRA) was conducted in compliance to Occupational Safety & Health (Noise Exposure) Regulations 2019 in the estates. The assessment was conducted on 26/08/2020 by XXXXXX Consult & Engineering Plt. The assessment report (Ref. No: HQ/LPROYKPEB/21/00322) was available for verification. Additional Noise Risk Assessment Report 2022 has been conducted by XXXXXX Consultancy dated 26 & 28/08/2022.</p> <p>5. Audiometric Testing was done in the estate dated 21/12/2022 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 8 workers deemed to be exposed to excessive noise in the estate. The results indicated that 7 workers had hearing loss, 3 workers with hearing impairment and 4 workers with standard threshold sift. Retest has been conducted for the workers with STS on 16/03/2023. Sighted evidence of JKPP 7 report.</p> <p><u>North Labis Estates</u></p> <p>1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Harvesting, Spraying, Manuring and Office Operations. Verification done on the documentations and operations indicated that all the risk controls were adhered to. Last updates sighted on 14/06/2023.</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/00/363-2022-</p>	
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		<p>039 conducted by XXXXXX Consultancy (DOSH Registration: JH/04/04/318) on 05/03/2022 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 18 to 22/02/2023 at Klinik XXXXXX for 49 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 & Health (Noise Exposure) Regulations 2019 in the estates. The assessment was conducted on 05/10/2020 by XXXXXX Consult & Engineering Plt. The assessment report (Ref. No: HQ/LPROYKPEB/21/00158) was available for verification. Additional Noise Risk Assessment Report 2022 has been conducted by Nisafety Consultancy dated 21/10/2022.</p> <p>5. Audiometric Testing was done in the estate dated 17-23/02/2023 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 34 workers deemed to be exposed to excessive noise in the</p>	
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		<p>estate. The results indicated that 9 workers had hearing loss, 1 workers with hearing impairment and 3 workers with standard threshold sift. Retest has been conducted for the workers with STS on 16/03/2023. Sighted evidence of JKPP 7 report.</p> <p><u>Sg Simpang Kiri Estate</u></p> <ol style="list-style-type: none"> 1. HIRARC was available to address all risk and hazards associated to the operations in the estates. Verified the HIRARC for Replanting and Spraying. Verification done on the documentations and operations indicated that all the risk controls were adhered to. Last updates sighted on 01/04/2023. 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/00/363-2020-152 conducted by XXXXXX Consultancy (DOSHS Registration: JH/04/04/318) on 22/06/2020 was available for verification. 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>The medical surveillance programme for the year 2022 has been performed on 22/12/2022 at Klinik XXXXXX for 18 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work.</p>	
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		<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 & Health (Noise Exposure) Regulations 2019 in the estates. The assessment was conducted on 27/08/2020 by XXXXXX Consult & Engineering Plt. The assessment report (Ref. No: HQ/LPROYKPEB/21/00322) was available for verification. Additional Noise Risk Assessment Report 2022 has been conducted by XXXXXX Consultancy dated 26&27/08/2022.</p> <p>5. Audiometric Testing was done in the estate dated 02/11/2022 and 21/12/2022 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 23 workers deemed to be exposed to excessive noise in the estate. The results indicated that 1 worker had hearing loss, 3 workers with hearing impairment and 3 workers with standard threshold sift. Retest has been conducted for the workers with STS on 17 &19/01/2023. Sighted evidence of JKKP 7 report.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>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"> ▪ Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk. 	Complied

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		<ul style="list-style-type: none"> ▪ Awareness and understanding of workplace hazards and how to identify, report, and control them. ▪ Specialized training when their work involves unique hazards. <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"> • Internal Audit conducted by the Group Sustainability Department. • Work Site Inspection (WSI) by site OSH Committee. • Direct involvement of supervisor and rounds by Asst Manager. • Safety incidents reporting via Rapid4. • Health / medical surveillance. • Chemical exposure monitoring, and • Audiometric Monitoring • Daily Monitoring Checklist such as PPE Checklist <p>The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken.</p>	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable</p>	<p>The operating units visited has conducted training need analysis for all employee, management, and contractors. The need analysis</p>	<p>Complied</p>

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	<p>aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>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 20 certification units were to assess understanding of participants include:</p> <ul style="list-style-type: none"> • Participants completing post-training evaluation/feedback form and give suggestions. • Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended. <p>Random interviews with workers showed that they understood what RSPO is, the company's or 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>							
<p>3.7.2</p>	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The operating units maintained the training records conducted. Reviewed the training records as follows:</p> <p><u>Chaah POM</u></p> <table border="1" data-bbox="1151 1177 1926 1351"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Learning from Incident Training</td> <td>07/08/2023</td> </tr> <tr> <td>PPE Training</td> <td>02/08/2023</td> </tr> </tbody> </table>	Training	Date	Learning from Incident Training	07/08/2023	PPE Training	02/08/2023	<p>Complied</p>
Training	Date								
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		Safety at Workplace	16/07/2023	
		Safety Training for Contactor	15/07/2023	
		Hearing Conservation Training	29/06/2023	
		HIRARC Training	18/06/2023	
		Schedule Waste Training	18/05/2023	
		First Aid Training	02/02/2023	
		ERP Training	02/02/2023	
		Chemical Handling Training	12/06/2023	
		Chemical Spillage Handling Training	12/06/2023	
		<u>North Labis Estate</u>		
		Training	Date	
		First Aid Training	12/06/2023	
		Learning From Incident Training	27/07/2023	
		Minimum Wages Briefing	02/08/2023	
		Harvesting Training	28/06/2023	
		Chemical Mixing Training	25/05/2023	
		Riparian Reserve Management	15/04/2023	
		HIRARC Training	22/03/2023	

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		Tractor Driver Training	18/02/2023	
		ERP Training	14/06/2023	
		<u>Sg Simpang Kiri Estate</u>		
		Training	Date	
		First Aider Training	11/08/2023	
		Policy Briefing	07/08/2023	
		Waste Management	17/06/2023	
		PPE Training	15/03/2023	
		Safe Tractor Driving	08/08/2023	
		ILO and Grievance Procedure Training	06/03/2023	
		ERP Training	24/07/2023	
		OSH and HIRARC Training	15/05/2023	
		HCV & RTE Training	16/03/2023	
		Chemical Handling Training	20/04/2023	
		Inter pump and Chemical training	12/05/2023	
		Harvesting Training	14/06/2023	
		<u>Chaah Estate</u>		
		Training	Date	

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		<table border="1"> <tr> <td>Safety Training RSPO</td> <td>11/08/2023</td> </tr> <tr> <td>HIRARC Training</td> <td>05/08/2023</td> </tr> <tr> <td>Ablation Training</td> <td>03/08/2023</td> </tr> <tr> <td>PPE Training</td> <td>02/08/2023</td> </tr> <tr> <td>First Aid Training</td> <td>09/06/2023</td> </tr> <tr> <td>HCV Training</td> <td>22/05/2023</td> </tr> <tr> <td>Contractor Training</td> <td>13/04/2023</td> </tr> <tr> <td>Hearing Conservation Training</td> <td>12/04/2023</td> </tr> <tr> <td>ERP Training</td> <td>12/07/2023</td> </tr> <tr> <td>Policy Briefing</td> <td>31/03/2023</td> </tr> <tr> <td>Chemical handling Training</td> <td>17/02/2023</td> </tr> <tr> <td>Inter pump Training</td> <td>17/02/2023</td> </tr> </table>	Safety Training RSPO	11/08/2023	HIRARC Training	05/08/2023	Ablation Training	03/08/2023	PPE Training	02/08/2023	First Aid Training	09/06/2023	HCV Training	22/05/2023	Contractor Training	13/04/2023	Hearing Conservation Training	12/04/2023	ERP Training	12/07/2023	Policy Briefing	31/03/2023	Chemical handling Training	17/02/2023	Inter pump Training	17/02/2023	
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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 & Quality Management (RSQM) personnel, attended Chaah Mill Manager, Assistant Mill Manager, Lab Supervisor, Lab Despatch Operator, Weighbridge Clerk and Auxiliary Police. Refer Training record dated 21/07/2023.</p>	Complied																								

Criterion 3.8: Supply chain requirement for mills
 (note: All supply chain requirements are considered as **Critical (C)**. However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)

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<p>3.8.1</p>	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Refer Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022 under section Glossary stated the meaning of RSPO Identity preserved as supply chain model assured that the RSPO certified oil palm product delivered to the end user uniquely identifiable to a single RSPO certified supply base. Refer document no. SD/SDP/GSD/SCCS/0522/01. FFB were obtained from all Sime Darby certified estates only. There was no third party's crop nor non-certified FFB received by the mill. This was verified during the stakeholders meeting and site visit at mill.</p>	<p>Complied</p>
<p>3.8.2</p>	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Chaah POM is under Identity Preserved module. Thus, this indicator is not applicable.</p>	<p>Not Applicable</p>
<p>3.8.3</p>	<p>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.</p>	<p>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.</p>	<p>Complied</p>

3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The registration of PalmTrace will be carried out by the Global Trading Department in HQ. Company has registered in PalmTrace system as follows:</p> <table border="1" data-bbox="1153 483 1937 801"> <tr> <td>Member name</td> <td>Chaah Oil Mill</td> </tr> <tr> <td>Palm Trace ID</td> <td>RSPO_PO1000000190</td> </tr> <tr> <td>Membership No</td> <td>1-0008-04-000-00 (Sime Darby Plantation Berhad)</td> </tr> <tr> <td>Type of business</td> <td>Oil mill</td> </tr> <tr> <td>Licence status</td> <td>Active (18/11/2022-17/11/2023)</td> </tr> </table>	Member name	Chaah Oil Mill	Palm Trace ID	RSPO_PO1000000190	Membership No	1-0008-04-000-00 (Sime Darby Plantation Berhad)	Type of business	Oil mill	Licence status	Active (18/11/2022-17/11/2023)	Complied
Member name	Chaah Oil Mill												
Palm Trace ID	RSPO_PO1000000190												
Membership No	1-0008-04-000-00 (Sime Darby Plantation Berhad)												
Type of business	Oil mill												
Licence status	Active (18/11/2022-17/11/2023)												
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"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. 	<p>Documented Procedures were made available for verification and the requirements have been adhered to as follows:</p> <ul style="list-style-type: none"> a) Refer Sustainable Supply chain and Traceability Procedure dated 01/06/2022 with reference number SD/SDP/GSD/SCCS/0522/01. 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. 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. d) Procedures for receiving and processing certified and non-certified FFBs were addressed in the Sustainable Supply chain 	Complied										

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	d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.	and Traceability Procedure dated 01/06/2022 Section 7.0 Receiving FFB at the Mill.	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>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 14/06/2023. 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. Any non-conformity raised, corrective action has been established to rectify the lapse found. The status of the non-conformity shall also be discussed in the management review meeting.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>Chaah POM is an IP mill thus only maintain records of certified FFB received only. Chaah POM maintain the daily records of all certified 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 from Certified Supply Base under Sime Darby Plantation Berhad</p> <p>Sample 1</p>	Complied

		<ul style="list-style-type: none"> • Estate: Sg Simpang Kiri Estate • Certified No: RSPO 548299 • Date: 07/03/2023 • Ticket Number: 175XXX • Vehicle Number: JHXXXXX • Field / Block: P2004A • FFB Weight: 10.88 MT <p>Sample 2</p> <ul style="list-style-type: none"> • Estate: Chaah Estate • Certified No: RSPO 548299 • Date: 11/02/2023 • Ticket Number: 174XXX • Vehicle Number: JLNXXX • Field / Block: P2003A • FFB Weight: 14.25 MT <p>Sample 3</p> <ul style="list-style-type: none"> • Estate: Yong Peng Estate • Certified No: CU-RSPO 863078 • Date: 09/01/2023 • Ticket Number: 174XXX • Vehicle Number: JRXXXXX 	
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		<ul style="list-style-type: none"> • Field / Block: P1996D, 2001C • FFB Weight: 13.59 MT <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 information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>Chaah POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p>CPO - IP</p> <ol style="list-style-type: none"> a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; Chaah POM c) The loading or shipment / delivery date; 19/01/2023 d) The date on which the documents were issued; 19/01/2023 e) RSPO Certificate Number: RSPO 548299 f) A description of the product: CPO IP g) The quantity of the products delivered; 39.59 Mt h) Any related transport documentation; JQF XXXX i) A unique identification number: 011XXX <p>PK - IP</p> <ol style="list-style-type: none"> a) The name and address of the buyer; BUYERXXXXXX b) The name and address of the seller; Chaah POM c) The loading or shipment / delivery date; 13/03/2023 	Complied

		<ul style="list-style-type: none"> d) The date on which the documents were issued; 13/03/2023 e) RSPO Certificate Number: RSPO 548299 f) A description of the product: PK IP g) The quantity of the products delivered; 38.94 Mt h) Any related transport documentation; KFG XXXX i) A unique identification number: 011XXX 	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide 	<p>Chaah 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> <ul style="list-style-type: none"> i. Stated in the SOP, CPO mill cannot outsource processing activities like refining or crushing. Outsourcing activities for Chaah POM was for CPO and PK transportation. ii. Sighted the contract agreement between Sime Darby Plantation Berhad and contractor; <ul style="list-style-type: none"> a) Chaah POM has legal ownership of all input material to be included in the outsourced process. Refer listing of FFB Supplier Certified. The contract agreement and details like MPOB licence were kept in the file. b) Refer Contract Agreement between Sime Darby Plantation Berhad and SXXXXXXX WXXXXX (MXXXX) 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 01/11/2020 and expiring on 31/10/2023. 	Complied

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	relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.	<p>c) The mill trades CSPO and CSPK with its buyers among refineries and/or oleo-chemical plants. Based on agreements, transporter has no ownership of transported products and owned by buyer.</p> <p>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.</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Names and contact details of transporters used for the physical handling of RSPO certified oil palm products were recorded and registered in the mill supplier database system. The independent third parties involve in Mill operation is only transportation services for CPO and PK.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	There is 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."	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory</p>	<p>Addressed in the Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 5.0 Control Of Documents & Records.</p> <p>Chaah POM has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p> <p>As per the RSPO Supply Chain – Module: Identity Preserved (IP) procedure, the records retention for RSPO Supply Chain related</p>	Not Applicable

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	<p>requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>records and reports to be retained for a minimum of 3 years' period. Sampled records of FFB weighbridge tickets and daily production records for last 3 years were still in place for verification.</p> <p>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.</p> <p>ii. The retention period for maintaining the traceability records is 3 years as stated in the Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 5.4.</p> <p>iii. The material and products movement on real-time basis is recorded in "Month End Production Report" for both CPO and PK. The data is summarised in CPO/PK Mass Balance Sheet Calculation Report. Among the information available in the format is date, FFB processed, OER, CPO amount (opening, produced and closing) and transferred CPO (mill weight, refinery weight).</p> <p>iv. Not Applicable since the model use was IP</p>							
<p>3.8.13</p>	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Verified OER and KER as below.</p> <table border="1" data-bbox="1151 1114 1928 1230"> <thead> <tr> <th>Month</th> <th>OER</th> <th>KER</th> </tr> </thead> <tbody> <tr> <td>Aug 2022 – Oct 2023</td> <td>19.05</td> <td>5.24</td> </tr> </tbody> </table>	Month	OER	KER	Aug 2022 – Oct 2023	19.05	5.24	<p>Complied</p>
Month	OER	KER							
Aug 2022 – Oct 2023	19.05	5.24							
<p>3.8.14</p>	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>ChaaH POM derives the extraction rates based on the actual extraction rate produced in the mill. Therefore, the accuracy is continuously maintained.</p>	<p>Complied</p>						

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3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Based on the announcement summary, all the registrations were found to be in order. RSPO certified volume only sold as RSPO certified or as conventional. No RSPO volume sold for other scheme. Refer Sustainable Supply chain and Traceability Procedure dated 01/06/2022. From the record verification no outsider FFB accepted in Chaah POM. The FFB source only from supply base and under parent company which is also certified estates.</p>	Complied
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Registration of transactions</p> <p>i) The registration of PalmTrace is carried out by the Sime Darby's Global Trading Department, HQ. All transaction will be registered in the PalmTrace. Verified the registration of CPO Sale (Contract Number: S/CCE/2206/CPO0016; For the period of Aug 2022 – July 2023, there were 36 announcements for CPO and 24 announcements for PK made. All dispatches announcement was made within 3 months after shipment.</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, 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 & 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

General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	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.	Complied
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.	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 website had not displayed the RSPO website and had not display any RSPO Trademark.	Complied
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	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.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	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, procedures and performances of such implementation. The	Complied

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		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 Chaah POM and verified through document and site review (notice board, business card, shipping documentation, etc.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. Verified the weighbridge tickets to buyer where claim of CSPO (Mass Balance) was stamped on the tickets.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that the product is CPO - IP with RSPO certificate number: RSPO 548299. 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 Chaah 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.		
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Oil palm content is 100% CPO and claim as RSPO IP-certified.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.	Complied
Labelling and trademark (IP)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	Chaah POM is producing crude palm product and does not involve in any labelling of end product.	Complied
Messaging (IP)			

	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>No RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product. No messaging involved since Chaah POM is producing crude palm product and does not involve in any labelling of end product.</p>	<p>Complied</p>
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 20 has implemented the Sime Darby’s Human Rights Charter where they committed to recognizing the role of Human Rights Defenders in accordance with the United Nations declaration on Human Rights Defender.</p> <p>Awareness and training to all workers for them to understand their responsibility in respect of human rights were conducted from time to time during daily morning muster assembly briefing and specific meetings between the workers and management internally. As sample, Chaah Estate conducted briefing on ILO, Social Dialogue,</p>	<p>Complied</p>

		<p>Wages Calculation, Workplace Safety and Accident Sharing dated on 22/7/2023.</p> <p>Communications to external stakeholders including vendors and local communities were made during external stakeholder consultation meeting.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the mill and estates within SOU 20 do not instigate violence or use any form of harassment in their operations.</p> <p>Consultation with sample external stakeholders conducted during on-site assessment also confirmed no violence or use of any form of harassment in the operations of both mill and estates within SOU 20.</p>	Complied
<p>Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistle blowers, complainants and community spokespersons play by lodging complaints in confidence.</p> <p>Based on the records of complaints and grievances, no issue of whistle-blowing that requires anonymity of complainants and/or grievance parties. Interview conducted with internal stakeholders among workers and relevant external stakeholders also confirmed the information.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p>	<p>SDPB has implemented Grievances Response Standard Operating Procedure dated 18/07/2022. The complaints and grievances are</p>	Complied

	<p>- Minor compliance -</p>	<p>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> <p>Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing.</p> <p>Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders.</p> <p>SDPB implemented various channel platform to internal and external stakeholders to communicate grievances to managements as following:</p> <ol style="list-style-type: none"> 1. Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found via website link: https://www.simedarby.com/operating-responsibly/whistleblowing. 2. 'Suara Kami' a platform for the workers to raise any issue. The workers were briefed on the complaint mechanism during morning muster. 3. The latest initiative introduced (Workers Helpline) which effective from August 2021. 4. External stakeholders meeting. <p>Onsite interviewed with the internal and external stakeholders informed they have been briefed on the complaint mechanism includes Suara Kami, Workers Helpline and stakeholders meeting as platform for complaints channel which currently implement by the</p>	
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		company as per sample Grievance Training conducted by Chaah Estate management to workers dated on 17/3/2023.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	Neither any complaints nor land dispute occurred in the SOU 20 Certification Unit since the last audit based on verification from documented information and stakeholder consultation.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	SDPB 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.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	Contributions to community development based on the results of consultation with local communities are demonstrated as per sample sighted as following: - Back to school program contributions through Yayasan Sime Darby; Date: 11/4/2023 - Flood Relief Assistance; Date: 29/1/2023, 2/3/2023 & 3/3/2023 - Employees' new-born child contribution; Date: 19/1/2023 & 18/4/2023	Complied
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			

<p>4.4.1</p>	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 20 able to demonstrate the evidence of legal ownership of its lands through possession of land title documents showing legal ownership available.</p> <p>Chaah POM located within Chaah Estate’s land area. Chaah Estate hold 2 land titles:</p> <ul style="list-style-type: none"> - Title # HSD XXXX; Lot # PT XXXX; District: Batu Pahat; Sub-district: Mukim Chaah Bahru; Area: 1,991.0502 ha - Title # HSD XXXX; Lot # PT XXXX; District: Batu Pahat; Sub-district: Mukim Chaah Bahru; Area: 804.3114 ha <p>North Labis Estate hold a total of 14 land titles as per sample sighted as following:</p> <ul style="list-style-type: none"> - Title # XXXX; Lot # XXXX; Area: 11.17 ha; District: Segamat; Sub-district: Mukim Labis - Title # XXXX; Lot # XXXX; Area: 196.1783 ha; District: Segamat; Sub-district: Mukim Labis <p>Simpang Kiri Estate hold a total of 5 land titles as per sample sighted as following:</p> <ul style="list-style-type: none"> - Title # XXXX; Lot # XXXX; Area: 183.3223 ha; District: Batu Pahat; Sub-district: Mukim Chaah Bahru - Title # XXXX; Lot # XXXX; Area: 203.1519 ha; District: Batu Pahat; Sub-district: Mukim Chaah Bahru 	<p>Complied</p>
<p>4.4.2</p>	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>SDPB developed a Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new development.</p>	<p>Complied</p>

		<p>No land issue related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities.</p> <p>Onsite visit to boundary area, sighted boundary stone and trenches were available to demarcate the boundary of land.</p> <p>Onsite interviewed with the neighbouring villagers confirmed that no encroachment of land by the company.</p> <p>In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>	
4.4.2a	<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>No issues of land dispute issue occur in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p> <p>In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>	Complied
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>No issues of land dispute issue occur in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p> <p>In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>	Complied

4.4.2c	<p>Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	<p>No issues of land dispute issue occur in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p> <p>In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>	Complied
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>No changes to estate perimeters as per boundary maps available for all estates within SOU 20 clearly demarcating estate area with location and coordinate of boundary stone and pegs.</p> <p>There is no land dispute recorded since last audit. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>No issues of land dispute issue occur in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p> <p>In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.</p>	Complied
4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>No issues of land dispute issue occur in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.</p> <p>In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3</p>	Complied

		dated 01/11/2008 documented the process in handling boundaries disputes.	
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	No issues of land dispute issue occur in all estates within SOU 20 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 20. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 20. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence	Complied

	<p>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>of any new planting within SOU 20. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	
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>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 20. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</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>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 20. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	Complied
4.5.6	<p>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.</p> <p>- Minor compliance -</p>	<p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 20. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	Complied
4.5.7	<p>New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent</p>	<p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 20. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any</p>	Complied

	<p>under the right of eminent domain of the federal and state land acquisition legislations.</p> <p>- Minor compliance -</p>	<p>legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 20. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	Complied
<p>Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 20. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. However, in case of any dispute, reference will be made to existing established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008 for establishment with disputed party.</p>	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 20. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available. However, in case of any dispute, reference will be made to existing established Flowchart and Procedures on</p>	Complied

		Handling Land Disputes dated 1/11/2008 for establishment with disputed party.	
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 20. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 20. The estate lands are legally owned by SDPB. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	SDPB has established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the same procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	SDPB has established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the same procedure as well. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	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>SDPB has established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the same procedure as well.</p> <p>There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.</p>	Complied
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>SDPB has established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the same procedure as well.</p> <p>There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.</p>	Complied
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB has established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the same procedure as well.</p> <p>There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.</p>	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	<p>SDPB has established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the same procedure as well.</p> <p>There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.</p>	Complied

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4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	<p>SDPB has established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the same procedure as well.</p> <p>There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.</p>	Complied
<p>Principle 5: Support smallholder inclusion</p>			
<p>Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>Current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary by Region as per latest FFB Price as per MPOB Daily FFB Reference Price Summary by Region (Miill Gate) (RM/1%):</p> <ul style="list-style-type: none"> - August 2023; Date: 11/8/2023: RM 39.54/1% OER - July 2023; Date: 31/7/2023: RM 39.91/1% OER <p>Notwithstanding, the mill received FFB only from sister estates within SOU 20 and FFB diversion from other certified SOU. The FFB supplier were listed in the Chaah POM FFB Supplier list. No external or non-certified FFB received by Chaah POM.</p>	Complied
5.1.2	<p>(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	<p>No external supplier's or smallholder's FFB received by Chaah POM as the mill received FFB only from sister estates within SOU 20 and FFB diversion from other certified SOU. The FFB supplier were listed in the Chaah POM FFB Supplier list.</p>	Not Applicable
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>No external supplier's or smallholder's FFB received by Chaah POM as the mill received FFB only from sister estates within SOU 20 and FFB diversion from other certified SOU. The FFB supplier were listed in the Chaah POM FFB Supplier list.</p>	Not Applicable

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5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>No external supplier's or smallholder's FFB received by Chaah POM as the mill received FFB only from sister estates within SOU 20 and FFB diversion from other certified SOU. The FFB supplier were listed in the Chaah POM FFB Supplier list.</p>	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>No external supplier's or smallholder's FFB received by Chaah POM as the mill received FFB only from sister estates within SOU 20 and FFB diversion from other certified SOU. The FFB supplier were listed in the Chaah POM FFB Supplier list.</p>	Not Applicable
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>No external supplier's or smallholder's FFB received by Chaah POM as the mill received FFB only from sister estates within SOU 20 and FFB diversion from other certified SOU. The FFB supplier were listed in the Chaah POM FFB Supplier list.</p>	Not Applicable
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Weighbridges were calibrated annually with latest as per Certificate of Weighing and Measurement Calibration; Form D 060084; Serial # B844688361; Equipment: Mettler Toledo 60,000 kg Weighbridge; Serial # J4-ATK 01228; Security Sticker # DE18 010313; Calibration by De Metrology Sdn. Bhd.; Date: 6/9/2022</p>	Complied
5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	<p>No external supplier's or smallholder's FFB received by Chaah POM as the mill received FFB only from sister estates within SOU 20 and FFB diversion from other certified SOU. The FFB supplier were listed in the Chaah POM FFB Supplier list.</p>	Not Applicable

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5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB 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
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	<p>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.</p> <p>- Minor compliance -</p>	<p>No external supplier's or smallholder's FFB received by Chaah POM as the mill received FFB only from sister estates within SOU 20 and FFB diversion from other certified SOU. The FFB supplier were listed in the Chaah POM FFB Supplier list.</p>	Not Applicable
5.2.2	<p>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).</p> <p>- Minor compliance -</p>	<p>No external supplier's or smallholder's FFB received by Chaah POM as the mill received FFB only from sister estates within SOU 20 and FFB diversion from other certified SOU. The FFB supplier were listed in the Chaah POM FFB Supplier list.</p>	Not Applicable
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>No external supplier's or smallholder's FFB received by Chaah POM as the mill received FFB only from sister estates within SOU 20 and FFB diversion from other certified SOU. The FFB supplier were listed in the Chaah POM FFB Supplier list.</p>	Not Applicable
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>No external supplier's or smallholder's FFB received by Chaah POM as the mill received FFB only from sister estates within SOU 20 and FFB diversion from other certified SOU. The FFB supplier were listed in the Chaah POM FFB Supplier list.</p>	Not Applicable

5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>No external supplier's or smallholder's FFB received by Chaah POM as the mill received FFB only from sister estates within SOU 20 and FFB diversion from other certified SOU. The FFB supplier were listed in the Chaah POM FFB Supplier list.</p>	Not Applicable
<p>Principle 6: Respect workers' rights and conditions</p>			
<p>Criterion 6.1: Any form of discrimination is prohibited.</p>			
6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 20 has continuously implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2nd December 2019. The policy shall be guided by the commitments spelt out in the Company's in Human Rights Charter (HRC) where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age. Communications made as sample, Chaah Estate conducted briefing on ILO, Social Dialogue and Human Charter dated on 22/7/2023.</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Latest records of employments and interview conducted on-site with sampled internal and external stakeholders confirmed that the workers and groups including local communities, women, and migrant workers have not been discriminated against and no charges of recruitment fees on the foreign workers made.</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>No discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is continuously based on skills, capabilities, medical fitness necessary etc. This was confirmed from job vacancy advertisement and sample recruitment sighted. Workers' promotions are based on skills, capabilities, qualities and medical fitness necessary for the jobs required.</p>	Complied

6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Pregnancy testing was continuously conducted only for women employee involved in chemical handling work to ensure no pregnant women working with the risk of chemical exposure. All women employees involved in chemical handling work within SOU 20 continuously underwent Urine Pregnancy Test (UPT) conducted by respective estate’s Hospital Assistant upon request only. In case of any pregnant women identified among chemical sprayers, she will be transferred to other general light work not involving chemicals. This also applied to breastfeeding mother.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy continuously covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly and through Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. It explained the types of gender-based violence & grievance procedures. Meetings were conducted quarterly according to the handbook. Gender Committee were established by the mill and estates management.</p> <p>The committee was established based on SDPB’s documented Terms of Reference for Gender Representatives (GR) and Gender Committees (GC); March 2021. Latest SOU 20 Gender Committee Meeting Date: 15/7/2023. Latest operating units gender committee meeting conducted as overall SOU 20 Gender Committee Meeting date: 17/7/2023 and in individual operating unit for sample Chaah POM Gender Committee Meeting 03/2023; Date: 8/8/2023.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>No discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed</p>	Complied

		<p>during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting.</p> <p>Sighted the job description of each worker mentions the same regardless of skin colour, religion, race and caste. Evidence of equal pay sighted based on following:</p> <ul style="list-style-type: none"> - Passports & work permit - Work agreement - Payslip & Checkroll - SOCSO & EPF contribution form <p>of sample months of highest, lowest and average (FFB) productions for sample female and male employees as following:</p> <p><u>Chaah Estate:</u></p> <p>A sample of 11 from 193 (5 LW + 6 FW – Bangladeshi, Indian, & Indonesian) workers among female and male Field Workers, General Workers, FFB Cutters, Tractor Drivers, Machine Operators, FFB Carriers, Loose Fruit Collectors, and mandores were checked for the month of Nov 2022, Feb 2023 and Jul 2023.</p> <p><u>North Labis Estate:</u></p> <p>A sample of 14 from 303 (7 LW + 7 FW – Bangladeshi, Indian, & Indonesian) workers among female and male Field Workers, General Workers, FFB Cutters, Tractor Drivers, Machine Operators, FFB Carriers, Loose Fruit Collectors, and mandores were checked for the month of Nov 2022, Apr 2023 and May 2023.</p> <p><u>Simpang Kiri Estate:</u></p> <p>A sample of 10 from 155 (5 LW + 5 FW – Bangladeshi, Indian, & Indonesian) workers among female and male Field Workers,</p>	
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		<p>General Workers, FFB Cutters, Tractor Drivers, Machine Operators, FFB Carriers, Loose Fruit Collectors, and mandores were checked for the month of Nov 2022, Feb 2023 and May 2023.</p> <p><u>Chaah POM:</u></p> <p>A sample of 7 from 78 (4 LW + 3 FW – Indonesian) workers among female and male general workers, shift operators, mechanical and electrical fitters and mandores were checked for the month of Nov 2022, Apr 2023 and May 2023.</p>	
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
<p>6.2.1</p>	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>All the workers are under direct employment and some electrical works are under contractor workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary etc. as per employment contract in compliance with requirements of latest available:</p> <ul style="list-style-type: none"> - MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019 Memorandum of Agreement Between the Malayan Agricultural Producers Association (MAPA) and the National Union of Plantation Workers (NUPW) on Rates of Pay and Other Conditions of Service in Respect of Field and Other General Employees; MAPA/C/3(12) - MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2019 Memorandum of Agreement Between the Malayan Agricultural Producers Association (MAPA) and the National Union of Plantation Workers (NUPW) on Rates of Pay and Other Conditions of Service in Respect of Field and Other General Employees; MAPA/C/3(12) Appendix A, B, C, D, E & Agreed Note # 1, 2, 3 & 4. 	<p>Complied</p>

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		<p>Work agreements also in compliance with Deduction of Wages under Section 24 of the Employment Act 1955; Ref. # JTKNJ.600-44/(BP)-1(5); Date: 31/1/2023 by JTK Johor.</p> <p>Explanations given as per sample latest explanation by management through briefing on piece rate pay for harvester conducted on 2/5/2023 by North Labis Estate management to harvesters.</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Other than mill and estates' own checkroll employment records sighted as per sample in indicator 6.1.6 above, a sample contractor's workers agreement also verified as following:</p> <ul style="list-style-type: none"> - #Xxxx (Chaah Estate Renovation & Construction Contractor); Employee name: Zxxx; Date employed: 1/1/2023; Post: General worker <p>Based on the records of payslip, attendance, Socso and EPF contribution forms copies kept by estate confirmed that the payroll documents give accurate information on compensation for all work performed by contractors' workers.</p>	Complied
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.1.6 above. Records shown all relevant legal compliance requirements were met by SOU 20.</p>	Complied
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of</p>	<p>All estates and mill within SOU 20 provide adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities based on the requirements of Act 446 Employees' Minimum Standards of Housing, Accommodations and Amenities Act 1990 and Workers' Minimum Standards of Housing and Act A1604</p>	OFI

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	<p>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>	<p>Amenities (Amendment) Act 2019. These were demonstrated based on SDPB 2021 Workers Housing Management Procedure; Ver. # 0; Effective Date: 26/11/2021 requiring weekly PIOA housing inspection and EWC quarterly or as and when required inspection with sample for latest North Labis Estate Housing Complex/NEST/Community Hall Weekly Inspections (PIOA); Date: 12/8/2023.</p> <p>Notwithstanding, the maintenance and legibility of records related to implementation of Housing Complex/NEST/Community Hall Weekly Inspections (PIOA) could be enhance further.</p> <p>Hence, an OFI has been raised.</p> <p>Sighted too the records of housing repair request system Oil Palm Pal (OPP) maintained by mill and estates. Verified OPP summary indicated no delay in action taken to address issues reported by workers.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>The mill and estates within SOU 20 ensured affordable food for its employee through canteen food price monitoring as part of the efforts to improve workers' access to adequate, sufficient and affordable food via Canteen Tenancy/Rental Agreement. Visit to the canteen/sundry found that prices were clearly displayed for goods been sold. Consultation with workers also indicated they have no issue with food pricing.</p> <p>Trailing made for Chaah Estate grocery shop operator based on the latest signed House Agreement between Chaah Estate and #Bxxx (Grocery shop operator) for tenancy of building for grocery shop provision. Due to unsuitable storage compartment in grocery shop, the application to Fire and Rescue department for subsequent application of cooking gas sales & storage permit from KPDNKK</p>	Complied

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		<p>unable to be made. Currently, cooking gas supplied to workers via external supplier in Chaah town.</p>	
<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>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</i></p>	<p>SDPB provided a 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.</p> <p>In absence of DLW, SOU 20 management conducted Prevailing Wage Assessment with the latest Prevailing Wage Assessment was calculated based on individual local and foreign workers salary including non-monetary benefit given for the month of July 2023 with average mill and estate prevailing wage are as following:</p> <ul style="list-style-type: none"> - Local Workers: RM 2,061.81 - Foreign Workers: RM 2,352.33 <p>Prevailing Wage Assessment conducted by department of Group Group Sustainability Department (GSD). personnel of Sime Darby Plantation with source as following:</p> <ul style="list-style-type: none"> - Checkroll – Worker for period of July 2023 - Checkroll – Operating Unit for period of Jan-Dec 2022 (calculation is RMxx/12) - HR – fixed <p>Denominator of total headcount (workforce 797, worker 709, local worker 209, foreign worker 500)</p>	<p>Complied</p>

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	<p><i>workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage</i> (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
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>Employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.2.2 above. No casual, temporary and day labour employed within all operating units within SOU 20.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> - Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. - Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. <p>Company respects the rights of all personnel to form and join trade unions of their choice to bargain collectively and the workers have their freedom to join the NUPW/MAPA union.</p> <p>Explanation to workers were made by management via meetings which were latest conducted by management to workers from time to time during daily morning muster assembly in estates and mill.</p>	
<p>6.3.2</p>	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Meeting between workers' trade unions (NUPW) representatives and management of certification unit conducted through monthly social dialogue sessions. Sighted the records of latest social dialogues session conducted in all operating units as following:</p> <ul style="list-style-type: none"> - Chaah Palm Oil Mill; Date: 17/6/2023 - Chaah Estate; Date: 3/4/2023 - North Labis Estate; Date: 17/6/2023 - Sungai Simpang Kiri Estate: 17/1/2023 <p>Minutes of meeting kept in file in the office and available for distribution to all workers upon request. Interview with workers representatives confirmed that they are given the copy of minutes</p>	<p>Complied</p>

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		of meeting for scanning and distribute to the workers via smartphone apps.	
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Interview with workers union representatives (NUPW Chairman & NUPW Secretary) confirmed that they were independently elected as the NUPW by all members of NUPW among mill and estate workers via an election without interference by the management.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> - Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. - Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. - Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations. - Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities. - Respecting Community Rights and the Rights of Indigenous 	Complied

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		<p>People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use.</p> <ul style="list-style-type: none"> - Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees. - Protecting the Rights of Children: We seek to promote the wellbeing of children and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography. <p>Verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children.</p>	
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liaison & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the interview and employees master lists data, no young person below 18 years old employed within all operating units within SOU 20.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child</p>	<p>Interview conducted on-site with sampled internal and external stakeholders confirmed that the information on no child labour</p>	Complied

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	<p>protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>policy and the negative effects of child labour were provided in appropriate languages and accessible to them.</p> <p>Records of communication also available as per Vendor Integrity Pledge samples as following:</p> <ul style="list-style-type: none"> - #Xxxx (Chaah Estate Renovation & Construction Contractor); Date: 16/6/2023 - #Pxxx (Simpang Kiri Estate FFB Transporter); Date: 1/1/2022 	
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> - Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims. - Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation. <p>The policy was communicated through the Gender Committee meeting conducted quarterly. Additionally, there's a Checklist of Physical & Sexual Abuse, Intimidation and Isolation for OU management to conduct assessment on periodical basis as per sample latest conducted by Chaah POM on 30/1/2023.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p>	<p>SDPB has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They facilitate opportunities for advancement for their employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy has been communicated to the workers through musters and display on notice boards.</p>	
<p>6.5.3</p>	<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>Assessment for New Mothers was conducted by Gender Committee personnel via assessment checklist with questions as following:</p> <ul style="list-style-type: none"> - Is there any new mothers in the operating unit (workers & staff) - If yes, how many new mothers are in the operating unit? - Is maternity leave (3 months) given to new mothers? - Does a new mother who has returned to work need dedicated space to breastfeed or storing milk? - Does the new mother who return to work need a break outside the break time allotted by the employer (for the purpose of breastfeeding)? If yes, this need to be submitted to the employer for further consideration and approval. <p>Records of latest assessment indicated the following:</p> <ul style="list-style-type: none"> - Chaah Estate; Date: 12/6/2023: 2 New mothers with 3-months old & 8-months old baby respectively; 1 pregnant - North Labis Estate; Date: 15/3/2023: No new mother - Sungai Simpang Kiri Estate; Date: 23/1/2023: 1 new mother with 15-months old baby 	<p>Complied</p>

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		- Chaah POM; Date: 27/2/2023; 1 new mother with 3-months old baby	
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	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. No grievance issues that require the implementation of the mechanism occurs in all operating units within SOU 20 since the last audit.	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All workers have entered into employment voluntarily and the following are prohibited: <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages - Critical (Major) compliance -	All workers have entered into employment voluntarily. Employment of local workers are based on established Standard Operating Procedure Title: Hiring of Local Workers; Doc. # 01-12-19; Effective date: 1/12/2019; Rev. # 1 while employment of foreign workers are implemented as per by SDPB's Responsible Recruitment Policy Migrant Worker Responsible Recruitment Procedure effective 20 August 2021 which specify the following: <ul style="list-style-type: none"> - No Recruitment fees – SDPB core principle of zero-cost means no worker should pay for a job. SDPB shall bear all the costs of recruitment. The Group has reimbursed most of its foreign workers currently within its employ who may have paid recruitment fees to secure employment with the Group. - No retention of documents – SDP do not withhold or detain workers' passports or personal documents. - No contract substitution – Workers' agreements to the terms and conditions of recruitment and employment is voluntary and free from deception or coercion. 	Complied

		<ul style="list-style-type: none"> - SDPB appoint ethical recruitment agents and protect workers from any form of coercion, intimidation or deception in the process of seeking employment in SDPB. - Historic recruitment fees (unreported payments charged by agents, sub-agents or other third parties to SDP's foreign workers in countries of origin, in contravention of SDP's zero recruitment fee policy) reimbursed to current and former workers. <p>Recruitment policies, processes and practices have effective due diligence systems in place to ensure ethical recruitment. All workers are in possession of their own personal documents and have individual, secure lockers within their own accommodation to keep them.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Migrant Worker Responsible Recruitment Procedure dated 20/08/2021. SOU 20 has implemented a Sime Darby's Human Rights Charter on where they committed as below:</p> <ul style="list-style-type: none"> a. Providing equal opportunity b. Respecting freedom of association c. Eradicating any form of exploitation d. Ensuring favourable working conditions e. Enhancing Safety and Health <p>They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights. For e.g.: All the workers have provided with induction training in estate during their arrival to Malaysia.</p>	Complied

Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.

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<p>6.7.1</p>	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>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 were 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, 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 901 1926 1359"> <thead> <tr> <th>OSH Meeting 2023</th> <th>Chaa Estate</th> <th>North Labis Estate</th> </tr> </thead> <tbody> <tr> <td>1st Quarter</td> <td>10/03/2023</td> <td>18/01/2023</td> </tr> <tr> <td>2nd Quarter</td> <td>24/05/2023</td> <td>18/04/2023</td> </tr> <tr> <td>3rd Quarter</td> <td>TBC</td> <td>10/07/2023</td> </tr> <tr> <td colspan="3">OSH Meeting 2022</td> </tr> <tr> <td>2nd Quarter</td> <td>20/06/2022</td> <td>29/04/2023</td> </tr> <tr> <td>3rd Quarter</td> <td>17/09/2022</td> <td>27/07/2022</td> </tr> <tr> <td>4th Quarter</td> <td>12/12/2022</td> <td>21/10/2022</td> </tr> </tbody> </table>	OSH Meeting 2023	Chaa Estate	North Labis Estate	1 st Quarter	10/03/2023	18/01/2023	2 nd Quarter	24/05/2023	18/04/2023	3 rd Quarter	TBC	10/07/2023	OSH Meeting 2022			2 nd Quarter	20/06/2022	29/04/2023	3 rd Quarter	17/09/2022	27/07/2022	4 th Quarter	12/12/2022	21/10/2022	<p>Complied</p>
OSH Meeting 2023	Chaa Estate	North Labis Estate																									
1 st Quarter	10/03/2023	18/01/2023																									
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		<table border="1"> <tr> <td>OSH Meeting 2023</td> <td>Sg Simpang Kiri Estate</td> <td>Chaah POM</td> </tr> <tr> <td>1st Quarter</td> <td>10/03/2023</td> <td>02/03/2023</td> </tr> <tr> <td>2nd Quarter</td> <td>09/06/2023</td> <td>02/06/2023</td> </tr> <tr> <td>3rd Quarter</td> <td>TBC</td> <td>TBC</td> </tr> <tr> <td>OSH Meeting 2022</td> <td></td> <td></td> </tr> <tr> <td>2nd Quarter</td> <td>16/06/2022</td> <td>10/06/2022</td> </tr> <tr> <td>3rd Quarter</td> <td>15/09/2022</td> <td>02/09/2022</td> </tr> <tr> <td>4th Quarter</td> <td>14/12/2022</td> <td>02/12/2022</td> </tr> </table> <p>Workplace inspections are made prior to the ESH meeting. Latest workplace inspection was conducted on the month of February and April 2023.</p>	OSH Meeting 2023	Sg Simpang Kiri Estate	Chaah POM	1 st Quarter	10/03/2023	02/03/2023	2 nd Quarter	09/06/2023	02/06/2023	3 rd Quarter	TBC	TBC	OSH Meeting 2022			2 nd Quarter	16/06/2022	10/06/2022	3 rd Quarter	15/09/2022	02/09/2022	4 th Quarter	14/12/2022	02/12/2022	
OSH Meeting 2023	Sg Simpang Kiri Estate	Chaah POM																									
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4 th Quarter	14/12/2022	02/12/2022																									
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Refer Emergency Preparedness & 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 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</p>	Complied																								

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conducted in the mill and estates to provide awareness to the workers on emergency responses. The trainings were sighted as below.

Estate/ Mill	ERP Training date
Chaah POM	02/02/2023
Chaah Estate	12/07/2023
North Labis Estate	14/06/2023
Sg Simpang Kiri Estate	24/07/2023

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:

Estate/ Mill	First Aid Training date	Latest First Aid Monitoring Record
Chaah POM	02/02/2023	16/08/2023
Chaah Estate	09/06/2023	03/08/2023
North Labis Estate	12/06/2023	01/08/2023

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		<p>Sg Simpang Kiri Estate</p>	<p>11/08/2023</p>	<p>04/08/2023</p>	<p><u>Chaah Estate</u> Accident records were maintained and updated monthly at the estate. The JKPP 8 form have been submitted for the year ending 2022 on 19/01/2023 with reference number JKPP8/129807/2022. Verified availability of amendment report dated 22/06/2023 with reference number JKPP8/147819/2022 There were 12 accidents recorded with 72 days TLA.</p> <p><u>North Labis Estate</u> Accident records were maintained and updated monthly at the estate. The JKPP 8 form have been submitted for the year ending 2022 on 19/01/2023 with reference number JKPP8/132842/2022. There were 10 accidents recorded with 118 days TLA.</p> <p><u>Sg Simpang Kiri Estate</u> Accident records were maintained and updated monthly at the estate. The JKPP 8 form have been submitted for the year ending 2022 on 04/01/2023 with reference number JKPP8/119931/2022. There were 8 accidents recorded with 21 days TLA.</p> <p><u>Chaah 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 18/01/2023 with reference number JKPP8/105951/2022. There were 1 accident recorded with 5 days TLA.</p>
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<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>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 512 1926 932"> <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 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 1150 1926 1289"> <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> </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	<p>Non-compliance</p>
Category	PPE provided																
Tractor Driver	Safety Helmet, Safety Shoes, Ear Plug, Safety Vest.																
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Category	PPE provided																
Mill operator	Safety boots, earmuff, safety vest, helmet, cotton glove																

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		<p>Water treatment Plant Operator</p>	<p>Safety boots, earmuff, safety vest, helmet, cotton glove, dust mask.</p>		
		<p>Workshop</p>	<p>Safety Helmets, Goggles, Leather Gloves, safety Shoes.</p>		
		<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> <p>The complete implementation of personal protective equipment (PPE) usage was not fully executed.</p> <p>During site visit at Sg Simpang Kiri Estate, the evidence found as below:</p> <p>Harvesting Area Field P05C, found 1 harvester was not bringing and wearing their Safety goggles. It was not in line with Safe Work Procedure Oil Palm Plantation Operation Version 01/2021 dated 13/12/2021 "Wear Complete PPE, Safety helmet, Goggles, Gloves and Shoes).</p>			

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		<p>Replanting Area Field P23A, found Tractor Driver was not wearing safety shoes. It was not in line with PPE Matrix: Required PPE Long Sleeve Shirt, Long Trousers, Safety Helmet and Safety Shoes.</p> <p>Replanting area Field P23A, found 4 workers who distributed ERP and Palm Trees for replanting work was not equipped with Mask, and Nitrile gloves when handling Fertilizer RP. It was not in line with Safe Work Procedure Oil Palm Plantation Operation Version 01/2021 dated 13/12/2021 "Wear Complete PPE. It also mentioned in CHRA Recommendation Section 5.1.4: Use of Approved Personal Protective Equipment (USECHH 2000 Regulation 16) Field Manuring Mandor & General "N95 respirator mask, nitrile gloves, safety helmet, wellington boots and apron. Safety glasses will be provide for dustiness fertilizer". Thus, Major NC was raised.</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 1209 1926 1356"> <thead> <tr> <th>Operating Units</th> <th>Month</th> <th>Total Workers</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td>Chaah POM</td> <td>Jan 2023</td> <td>99</td> <td>RM 5,XXX.XX</td> </tr> </tbody> </table>	Operating Units	Month	Total Workers	Amount	Chaah POM	Jan 2023	99	RM 5,XXX.XX	Complied
Operating Units	Month	Total Workers	Amount								
Chaah POM	Jan 2023	99	RM 5,XXX.XX								

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			May 2023	101	RM 5,XXX.XX	
			Jul 2023	104	RM 5,XXX.XX	
		ChaaH Estate	Jan 2023	179	RM 5,XXX.XX	
			May 2023	214	RM 6,XXX.XX	
			Jul 2023	228	RM 6,XXX.XX	
		North Labis Estate	Dec 2022	237	RM 11,XXX.XX	
			Feb 2023	254	RM 8,XXX.XX	
			Jul 2023	299	RM 11,XXX.XX	
		Sg Simpang Kiri Estate	Jan 2023	155	RM 4,XXX.XX	
			May 2023	165	RM 4,XXX.XX	
			Jul 2023	168	RM 5,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		
		ChaaH POM	1	5	25,3768	101.67

		Chaah Estate	12	72	25,3178	114.25	
		North Labis Estate	10	118	45,8169	194.80	
		Sg Simpang Kiri Estate	8	21	32,3760	134.90	

Principle 7: Protect, conserve and enhance ecosystems and the environment

Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>The estates continued to monitor the Implementation of Integrated Pest Management (IPM) plans.</p> <p>a) The estates had in place documented the IPM plan which covered monitoring of pest, control of pest population levels at below threshold levels by using cultural, biological, physical/mechanical and use of pesticides. The plan was guided 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 Turnera subulata, Cassia cobanensis, Antigonon leptopus, 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 where recommended by the PA /Agronomist. Baiting</p>	OFI
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		are continued until bait acceptance threshold level. An OFI being issued for enhancement of beneficial plant in the fields. The planting intensity of beneficial plant in all 3 estates within SOU 20 could be enhance further.	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	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.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	There was no land preparation in SOU 20 Mill and Estates by burning ever since SDPB practiced zero burning as per the policy in: a) EQMS-SOP-SectionB2 - Under felling/clearing & land preparation b) Carbon Policy SDP has a policy of no open burning. 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.	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	The written justification in Standard Operating Procedure (SOP) of all 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	Complied

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		<p>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.</p>																															
<p>7.2.2</p>	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - 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><u>Sg Simpang Kiri Estate</u></p> <table border="1" data-bbox="1137 710 1928 1056"> <thead> <tr> <th>Month</th> <th>Quantity (a.i./Ha)</th> <th>Quantity (a.i/FFB)</th> </tr> </thead> <tbody> <tr> <td>March 2023</td> <td>0.22</td> <td>0.11</td> </tr> <tr> <td>April 2023</td> <td>0.07</td> <td>0.10</td> </tr> <tr> <td>May 2023</td> <td>4.04</td> <td>2.04</td> </tr> <tr> <td>Jun 2023</td> <td>0.84</td> <td>0.41</td> </tr> <tr> <td>Jul 2023</td> <td>0.08</td> <td>0.22</td> </tr> </tbody> </table> <p><u>Chaah Estate</u></p> <table border="1" data-bbox="1137 1115 1928 1345"> <thead> <tr> <th>Month</th> <th>Quantity (a.i./Ha)</th> <th>Quantity (a.i/FFB)</th> </tr> </thead> <tbody> <tr> <td>March 2023</td> <td>1.75</td> <td>0.83</td> </tr> <tr> <td>April 2023</td> <td>1.91</td> <td>0.82</td> </tr> <tr> <td>May 2023</td> <td>6.20</td> <td>3.14</td> </tr> </tbody> </table>	Month	Quantity (a.i./Ha)	Quantity (a.i/FFB)	March 2023	0.22	0.11	April 2023	0.07	0.10	May 2023	4.04	2.04	Jun 2023	0.84	0.41	Jul 2023	0.08	0.22	Month	Quantity (a.i./Ha)	Quantity (a.i/FFB)	March 2023	1.75	0.83	April 2023	1.91	0.82	May 2023	6.20	3.14	<p>Complied</p>
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The 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>There is no prophylactic use of pesticides in all estates visited.</p>	Complied																								

	- Minor compliance -		
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>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 & IV pesticides were used at the mill and estates. Paraquat and Monocrotophos was eliminated. In its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.</p>	Complied
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>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>Chaah POM</u></p>	Complied

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		<table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Chemical Handling Training</td> <td>12/06/2023</td> </tr> <tr> <td>Chemical Spillage Handling Training</td> <td>12/06/2023</td> </tr> </tbody> </table> <p><u>North Labis Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Chemical Mixing Training</td> <td>25/05/2023</td> </tr> </tbody> </table> <p><u>Sg Simpang Kiri Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Chemical Handling Training</td> <td>20/04/2023</td> </tr> <tr> <td>Inter pump and Chemical training</td> <td>12/05/2023</td> </tr> </tbody> </table> <p><u>Chaah Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Chemical handling Training</td> <td>17/02/2023</td> </tr> <tr> <td>Inter pump Training</td> <td>17/02/2023</td> </tr> </tbody> </table>	Training	Date	Chemical Handling Training	12/06/2023	Chemical Spillage Handling Training	12/06/2023	Training	Date	Chemical Mixing Training	25/05/2023	Training	Date	Chemical Handling Training	20/04/2023	Inter pump and Chemical training	12/05/2023	Training	Date	Chemical handling Training	17/02/2023	Inter pump Training	17/02/2023	
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7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and 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,</p>	Complied																						

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		<p>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>																															
<p>7.2.8</p>	<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/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established. Empty containers were tripled rinsed, pierced and delivered to a registered recycler company SX SXXXX Enterprise licensed vendor by DOE and Jabatan Pertanian.</p> <table border="1" data-bbox="1137 715 1888 1018"> <thead> <tr> <th></th> <th>Estate</th> <th>Date</th> <th>20 L</th> <th>Rat Bait Contaner</th> <th>Ally Bottle</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Chaah</td> <td>09/06/23</td> <td>112 pcs</td> <td>-</td> <td>27 pcs</td> </tr> <tr> <td>2</td> <td>Chaah</td> <td>01/02/23</td> <td>180 pcs</td> <td>-</td> <td>178 pcs</td> </tr> <tr> <td>3</td> <td>N Labis</td> <td>06/06/23</td> <td>293 pcs</td> <td>376 kg</td> <td>24 kg</td> </tr> <tr> <td>4</td> <td>Sg Sp Kiri</td> <td>28/04/22</td> <td>74 pcs</td> <td>-</td> <td>-</td> </tr> </tbody> </table>		Estate	Date	20 L	Rat Bait Contaner	Ally Bottle	1	Chaah	09/06/23	112 pcs	-	27 pcs	2	Chaah	01/02/23	180 pcs	-	178 pcs	3	N Labis	06/06/23	293 pcs	376 kg	24 kg	4	Sg Sp Kiri	28/04/22	74 pcs	-	-	<p>Complied</p>
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4	Sg Sp Kiri	28/04/22	74 pcs	-	-																												
<p>7.2.9</p>	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Verified availability of agreement for aerial spraying by Drone at Nursery Simpang Kiri Estate and North Labis Estate. Refer P2P Spraying agreement. The details as below:</p> <p>Contractor: AXXXXXX GXXXXXXXX Sdn Bhd</p> <p>Description of work: Drone Aerial P&D Spraying Estate Nursery.</p> <p>Date/Period; 01/12/2022 to 31/12/2023</p> <p>Refer item 5.8 the contractor shall comply to all relevant Malaysia Laws esp. related to HSE and Drone application (If any).</p>	<p>Complied</p>																														

		<p>Verified through document verification found AXXXXXX GXXXXXXX Sdn Bhd has been receive permit from CAAM.</p> <p>Awareness training and calibration training has been conducted on 20/01/2023. Sighted evidence of attendance, training material and photo evidence.</p>	
7.2.10	<p>(C) 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 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>Chaah Palm Oil Mill - Medical Surveillance Programme has been performed successfully for the year 2022 for the mill workers exposed to hazardous chemicals and fumes. A total of 33 workers have been examined on 27/12/2022 & 12/01/2023 at Klinik XXXXXXX. The results indicated that all workers was declared fit to work.</p> <p>Chaah Estates - The medical surveillance programme for the year 2022 has been performed on 18 to 22/07/2022 at Klinik XXXXXXX for 18 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>North Labis Estates - The medical surveillance programme for the year 2023 has been performed on 18 to 22/02/2023 at Klinik XXXXXXX for 49 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work.</p>	Complied

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		Sg Simpang Kiri Estate - The medical surveillance programme for the year 2022 has been performed on 22/12/2022 at Klinik XXXXXX for 18 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work							
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>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> <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>	Complied						
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>									
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>SOU 20 Chaah 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"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping) - GHG</td> </tr> </tbody> </table>		Receptor	Sources	1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping) - GHG	Complied
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			<p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2023. The waste generated from the mill/estates operations as shown below:</p>																	
			<table border="1"> <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> <tr> <td>2</td> <td>Domestic waste</td> <td>rubbish from the mill/estate complex and employees' quarters</td> </tr> <tr> <td>3</td> <td>Industrial waste</td> <td>Fiber, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td>4</td> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table>				Type of waste	Details	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	2	Domestic waste	rubbish from the mill/estate complex and employees' quarters	3	Industrial waste	Fiber, palm kernel shell, boiler ash, scrap iron	4	Sewage	Sewage from housing/office complex
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3	Leakage of lubricant	Storage & vehicle maintenance				
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 Chaah POM and the estates in SOU 20, procedure SD/SDP/PSQM (ESH)/203-EN1 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <ul style="list-style-type: none"> a) Management and disposal of wastewater 2023 has been established compiled by Assistant Engineer/Assistants/Staff. b) Waste Management Plan 2023 has been established prepared by QA and verified by the Assistant Engineer/Assistants/Staff. c) Waste Management Plan 2023 has been established in Jan 2023. 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. 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. 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 	Complied			

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collected by SDI upon completion of every vehicles/engine servicing. DOE has made approval to authorize SDI via letter dated 06/9/2011. DOE letter of authority was sighted and verified. SW 404 are dispatched to FXXXX SXXXXXXXX SXXXX Sdn Bhd.

Estate	Date	SW410	SW409	SW305	SW404
Chaah	04/08/23	0.42	-	0.091	-
Chaah	01/04/23	0.020	-	0.200	-
Chaah	08/06/23	-	-	-	0.0056
Chaah	08/12/22	-	-	-	0.0074
N Labis	02/05/23	0.021	-	0.680	-
N Labis	02/12/22	0.070	-	0.500	-
N Labis	10/06/23	-	-	-	0.045
N Labis	10/12/22	-	-	-	0.036
Sg Sp Kiri	27/05/23	0.007	-	0.250	-
Sg Sp Kiri	25/11/22	0.005	-	0.250	-
Sg Sp Kiri	08/06/23	-	-	-	0.0130
Sg Sp Kiri	08/12/22	-	-	-	0.0021

	Date	SW410	SW409	SW305	SW322
CPOM	27/05/23	0.211	0.124	0.302	0.137

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CPOM	25/11/22	0.200	0.110	-	0.185
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The CU scheduled waste is disposed to the following vendors registered with DOE.

Estate	Date	SW Buyers/Vendor
N Labis Estate	30/4/24	RXXXXX MXXX Sdn Bhd
Chaah Estate	30/4/24	KXXXXX MXXXXX Sdn Bhd
Sg Sp Kiri Estate	30/4/24	RXXXXX MXXX Sdn Bhd
Chaah POM	30/4/24	KXXXXX AXXX Sdn Bhd

Empty containers were disposed empty container to SXX SXXXX TXXXXXXX Enterprise. Details as shown in 7.2.8 above. Domestic waste for the operating units in SOU 20 was disposed as follows :

Estate	Site	Schedule
N Labis Estate	P 16A	Collection 2/3 x week
Chaah Estate	MDL	Collection 2/3 x week
Sg Sp Kiri Estate	MDL	Collection 2/3 x week
Chaah POM	MDL	Collection with Chaah Estate

Evidence of collection were verified through the payment made to Majlis Daerah Labis e.g., bill no BDE 03/04/2023 9115 - The estates and mill appoint respective contractors (e.g., UXX RXXXXXX Sdn

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		Bhd) and YXXX PXXX EXXXX Construction for the transportation to the municipal landfill.	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	There was no land preparation in SOU 20 Mill and Estates by burning ever since SDB practiced zero burning as per the policy in: a) EQMS SOP Section-B2 uunder felling/clearing & land preparation b) Carbon Policy 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.	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	SOU 20 continued to use and implement SOPs for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOPs were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOPs. a) Sime Darby Plantation Agricultural Reference Manual (ARM) dated June 2021 b) Estate Quality Management System (EQMS) Manual dated 01/11/2008, c) Safety Standard Operating Procedures (SSOP) dated 25/02/2015, d) Sustainable Plantation Management System Manual (SPMS),	Complied

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		<p>e) "Guidelines On River Management" Manual, ESH Management System Manual dated 01/07/2012,</p> <p>f) Occupational Safety and Health Manual dated 03/03/2008,</p> <p>g) Pictorial Safety Standards and Security Guidelines (PSS).</p> <p>h) Plantations/Mill Quality Management System (PQMS/MQMS) std operating manual</p> <p>All the estates and mill operations were guided through the manuals and SOPs. 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 SOPs had been implemented and they understood the requirements of the SOPs, the bottom-line of which is Responsible Agricultural Charter the care for their safety and health and the environment.</p>	
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>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 the indication of soil health and monitors the changes in the organic carbon and total nitrogen. For all 4 estates Agronomic assessment and fertiliser recommendation was conducted by Sime Darby Research Plant Nutrition & Protection Unit PNP Northern Region to formulate the 2023 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement.</p>	Complied

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		<p>Annual foliar sampling for Ash, N, P, K, Mg, Ca & B had been carried out in all estates. The latest being :</p> <table border="1" data-bbox="1124 448 1939 667"> <thead> <tr> <th></th> <th>Estate</th> <th>Report Date</th> <th>Report No</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>N Labis Estate</td> <td>31/07/23</td> <td>NLE 23/24</td> </tr> <tr> <td>2</td> <td>Chaah Estate</td> <td>21/03/23</td> <td>S/N/E1051</td> </tr> <tr> <td>3</td> <td>Sg Sp Kiri Estate</td> <td>18/04/23</td> <td>SSKE 04/23</td> </tr> </tbody> </table> <p>Soil analysis for PH, Org C, Total N, Total P, Avail P, Exch K, Exch Ca & Exch Mg was carried out on a 5 year cycle basis and last carried out as follows:</p> <table border="1" data-bbox="1124 807 1939 1026"> <thead> <tr> <th></th> <th>Estate</th> <th>Report Date</th> <th>Report No</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>N Labis Estate</td> <td>23/07/2018</td> <td>S46/2018</td> </tr> <tr> <td>2</td> <td>Chaah Estate</td> <td>05/04/2019</td> <td>S32/2019</td> </tr> <tr> <td>3</td> <td>Sg Sp Kiri Estate</td> <td>13/07/2018</td> <td>S45/2018</td> </tr> </tbody> </table> <p>All foliar and soil sampling & analysis was conducted by Sime Darby Research Plant Nutrition & Protection Unit PNP Northern Region. Soil analysis is made on a 5 year cycle. This year the estates had a resampling soil beginning Mar to Aug 2023, respectively. At the time of audit, the report has yet to be released.</p>		Estate	Report Date	Report No	1	N Labis Estate	31/07/23	NLE 23/24	2	Chaah Estate	21/03/23	S/N/E1051	3	Sg Sp Kiri Estate	18/04/23	SSKE 04/23		Estate	Report Date	Report No	1	N Labis Estate	23/07/2018	S46/2018	2	Chaah Estate	05/04/2019	S32/2019	3	Sg Sp Kiri Estate	13/07/2018	S45/2018	
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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 and application of compost. In addition, during replanting, palms were felled, chipped,</p>	Complied																																

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		<p>windowed and left to decompose. Records showed that the estates had applied EFB at 20-40 tons/ha and records showed that EFB metric ton in 2022/23 was as follows:</p> <table border="1" data-bbox="1124 486 1939 790"> <thead> <tr> <th></th> <th>Estate</th> <th>Field no</th> <th>Ha</th> <th>Mt</th> <th>Month</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>N Labis</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>2</td> <td>Chaah</td> <td>P99D</td> <td>93.45</td> <td>3738</td> <td>June</td> </tr> <tr> <td>3</td> <td>Chaah</td> <td>P01B1</td> <td>43.93</td> <td>1757</td> <td>Oct</td> </tr> <tr> <td>4</td> <td>Chaah</td> <td>P99A</td> <td>66.10</td> <td>2644</td> <td>July</td> </tr> <tr> <td>5</td> <td>Sg Sp Kiri</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>		Estate	Field no	Ha	Mt	Month	1	N Labis	-	-	-	-	2	Chaah	P99D	93.45	3738	June	3	Chaah	P01B1	43.93	1757	Oct	4	Chaah	P99A	66.10	2644	July	5	Sg Sp Kiri	-	-	-	-	
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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 20 estates subject to the recommendation by the Agronomist.</p> <table border="1" data-bbox="1124 1037 1939 1367"> <thead> <tr> <th></th> <th>Fertilizer</th> <th>Kg/palm</th> <th>Application Mth</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</td> <td>April</td> </tr> </tbody> </table>		Fertilizer	Kg/palm	Application Mth	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	April	Complied												
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Criterion 7.5: Practices minimise and control erosion and degradation of soils.																																																		
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>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"> <tr> <td></td> <td>N Labis</td> <td>Sg Sp Kiri</td> <td>Chaah</td> </tr> <tr> <td>1</td> <td>Jerangau</td> <td>Bungor</td> <td>LocalAlluvium</td> </tr> <tr> <td>2</td> <td>Rengam</td> <td>Organic Clay</td> <td>Serdang</td> </tr> <tr> <td>3</td> <td>Local Alluvium</td> <td>Setol</td> <td>Muck</td> </tr> <tr> <td>4</td> <td>Rasau</td> <td>Sg Amin</td> <td>Malacca</td> </tr> <tr> <td>5</td> <td>Bungor</td> <td>Gajah Mati</td> <td>Munching</td> </tr> <tr> <td>6</td> <td>Yong Peng</td> <td>-</td> <td>Tavy</td> </tr> <tr> <td>7</td> <td>Segamat</td> <td>-</td> <td>Bungor</td> </tr> <tr> <td>8</td> <td>Durian</td> <td>-</td> <td>Yong Peng</td> </tr> <tr> <td>9</td> <td>Kulai</td> <td>-</td> <td>Jempol</td> </tr> <tr> <td>10</td> <td>Malacca</td> <td>-</td> <td>Jabil</td> </tr> </table> <p>The Soil Series Map were issued by the R&D - TTAS – Precision Agriculture Unit dated Mac 2022.</p>					N Labis	Sg Sp Kiri	Chaah	1	Jerangau	Bungor	LocalAlluvium	2	Rengam	Organic Clay	Serdang	3	Local Alluvium	Setol	Muck	4	Rasau	Sg Amin	Malacca	5	Bungor	Gajah Mati	Munching	6	Yong Peng	-	Tavy	7	Segamat	-	Bungor	8	Durian	-	Yong Peng	9	Kulai	-	Jempol	10	Malacca	-	Jabil	Complied
	N Labis	Sg Sp Kiri	Chaah																																															
1	Jerangau	Bungor	LocalAlluvium																																															
2	Rengam	Organic Clay	Serdang																																															
3	Local Alluvium	Setol	Muck																																															
4	Rasau	Sg Amin	Malacca																																															
5	Bungor	Gajah Mati	Munching																																															
6	Yong Peng	-	Tavy																																															
7	Segamat	-	Bungor																																															
8	Durian	-	Yong Peng																																															
9	Kulai	-	Jempol																																															
10	Malacca	-	Jabil																																															
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in	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 3.1 Protect and conserve biodiversity and ecosystems stated as follows:				Complied																																												

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	<p>contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>“3.1.2 - Management of erosion by protection of steep slopes and river reserves within our operations and promote restoration programs”. Stated in the Environment Plan FY 2023, Do not fill area more than 25 degree and Marking / signage to be established at slope area >25 degree.</p> <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 some mature areas. The cover crop mucuna bracteata had been planted along some slopes by management. Large areas with neprolepis biserrata in the inter rows were sighted during the visit. The slope maps for the titled ha were provided by the R&D Precision Agriculture Unit Sept 2019 with details as follows:</p> <table border="1" data-bbox="1171 879 1809 1278"> <thead> <tr> <th>No</th> <th>Topography</th> <th>Chaah</th> <th>Sg Spg Kiri</th> <th>N Labis</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0-2</td> <td>13.82</td> <td>67.88</td> <td>35.07</td> </tr> <tr> <td>2</td> <td>2-6</td> <td>40.78</td> <td>25.01</td> <td>40.01</td> </tr> <tr> <td>3</td> <td>6-12</td> <td>28.39</td> <td>6.98</td> <td>19.39</td> </tr> <tr> <td>4</td> <td>12-20</td> <td>13.63</td> <td>0.13</td> <td>5.26</td> </tr> <tr> <td>5</td> <td>20-25</td> <td>2.67</td> <td>0.01</td> <td>0.24</td> </tr> <tr> <td>6</td> <td>>25</td> <td>0.71</td> <td>0.00</td> <td>0.02</td> </tr> <tr> <td></td> <td>Total</td> <td>100%</td> <td>100%</td> <td>100%</td> </tr> </tbody> </table>	No	Topography	Chaah	Sg Spg Kiri	N Labis	1	0-2	13.82	67.88	35.07	2	2-6	40.78	25.01	40.01	3	6-12	28.39	6.98	19.39	4	12-20	13.63	0.13	5.26	5	20-25	2.67	0.01	0.24	6	>25	0.71	0.00	0.02		Total	100%	100%	100%	
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	Total	100%	100%	100%																																							
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>Based on field visit at Bukit Benut Estate, it was verified that there was no new planting of oil palm sighted on steep terrain.</p>	Complied																																								

Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>Soil surveys are made and available in a soil map at the estates. Topographic contour maps 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 March 2019. However, the auditor verified there is no new planting activity in the estates visited. Hence, the criteria are not applicable.</p>	Not Applicable
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>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.</p>	Not Applicable
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>Soil surveys are made and available in a soil map at the estates. Topographic contour maps are also available which are both used to manage the drainage and road works in the estates. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at SOU 20 estates. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable

7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at SOU 20 estates. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at SOU 20 estates. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The water and ground cover management programme is documented in the To change to Sime Darby Plantation Agricultural Reference Manual (Water Management in Coastal and Peat Lands), Issue No:2 dated June 2021. 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"> a) Monitor the quality of main water inlet/outlet for pollutants from estate’s operations. b) Contingency during water shortage. c) Field water management - side pit construction d) Adequate field drains e) Reuse/recycle wastewater. f) Peat soil water management <p>Management strategy for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils) is based on the</p>	Not Applicable

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		<p>established ARM, section 10: Water Management In Coastal and Peat Plantings.</p> <p>There were 2 management strategies;</p> <p>a) optimal water level monitoring</p> <p>b) and flushing of acid rain water.</p> <p>There is no peat soil or soil categorized as marginal or fragile soil at SOU 20 estates. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at SOU 20 estates. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at SOU 20 estates. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable

7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at SOU 20 estates. The auditor verified there is no new planting activity in the estate visited. Hence, the criteria are not applicable.</p>	Not Applicable												
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>															
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>SOU 20 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> <p>a) Implementation of rain water harvest,</p> <p>b) Construction of water gate and scheduled water pumping for effective management of field drains and field water level.</p> <p>c) daily monitoring of bund / scheduled maintenance</p> <p>d) Establishment of mucuna bracteata to prevent erosion,</p> <p>e) Side drain at field road to control water, frond stacking,</p> <p>f) Enhancement of ground vegetation at bare ground area.</p> <p>The water sources are as shown below:</p> <table border="1" data-bbox="1137 1236 1921 1311"> <thead> <tr> <th>Water source</th> <th>Usage</th> <th>Monitoring & measurement</th> <th>Freq</th> <th>PIC</th> <th>Review status</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Water source	Usage	Monitoring & measurement	Freq	PIC	Review status							Complied
Water source	Usage	Monitoring & measurement	Freq	PIC	Review status										

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				To obtain treated water supply from mill's WTP			
		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 Engi neer	As and when required	
<p>The Estates had implemented water managements plans which covered:</p> <ul style="list-style-type: none"> a) Water shortage contingencies b) Water pollution prevention c) Reduce wastage d) Identification & management of waste waters e) Monitoring rainfall f) Regular water quality analysis. <p>Water management plan review date was sighted and verified with records as follows;</p>							
		Estate/Mill	Review date	Issues			

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		1	N Labis Estate	02/01/2023	Nil	
		2	Chaah Estate	15/01/2023	Nil	
		3	Sg Sp Kiri Estate	03/06/2023	Nil	
		4	Chaah POM	11/08/2023	Nil	
		The water reduction plan is shown below;				
			Issues/Areas	Action Steps	PIC	Status
		1	Rain water collection	Large containers are to be placed at strategic locations to collect rain water 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 compartmentalization	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

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		5	education	Avoid excessive usage during cleaning Close pipe to prevent water dripping	AM/Field staff	On-going
		6	Re-streaming	Re stream from sterilizer condensate pit for dilution	Mill engineer	On-going
The Mill Identification & Management of Waste Water						
			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

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		4	Lab	Cleaning water	Process drain	Monsoon drain	
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	5	Wash room	Toilet water, cleaning water	Septic tank	Collection by licensed contractor.	Complied

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:

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. The buffer zones identified at the estates are as follows. Among other parameters are;

	River width	Buffer zone		River width	Buffer zone
1	> 40 m	50 m	4	5 - 10 m	10 m
2	20 - 40 m	40 m	5	< 5 m	5 m
3	10 - 20 m	20 m	-		-

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	parameter	Standard		Parameter	standard
1	pH	6-9	4	SS	50
2	BOD	3	5	AN	0.3
3	COD	25	6	DO	5-7

	parameter	Standard		Parameter	standard
1	Aldrin	0.02 ppb	5	Heptachlor	0.05 ppb
2	Dieldrin	0.02 ppb	6	lindane	2 ppb
3	t-DDT	0.1 ppb	7	endosulfan	10 ppb
4	BHC	2 ppb	8	Chlordane	0.08 ppb

	Estate	Buffer zone area
1	N Labis Estate	Sg Gatom
2	Chaah Estate	Sg Sayong
3	Sg Sp Kiri Est	Sungai Simpang Kiri / water Catchment
5	Chaah POM	Water Catchment

Samples are taken from the mill and estates for detection of any pollution arising from the mill and estates activities. Water samples

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		<p>from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses.</p> <p>Among others management plan taken:</p> <ul style="list-style-type: none"> • Regular inspection at buffer/HCV areas • Monitor water from surrounding areas • Track, measure and report all activities around river • Train and educate workers. <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> <table border="1" data-bbox="1160 767 1919 1045"> <thead> <tr> <th></th> <th>OU</th> <th>Sampling sites</th> <th>Date</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>N Labis</td> <td>Sg Gatom 3 points</td> <td>10/04/23</td> <td>4x/year</td> </tr> <tr> <td>2</td> <td>Chaah</td> <td>Sg Sayong 3 points</td> <td>25/05/23</td> <td>4x/year</td> </tr> <tr> <td>3</td> <td>Sg Sp Kiri</td> <td>Sg Sp Kiri (9 points)</td> <td>01/06/23</td> <td>4x/year</td> </tr> <tr> <td>4</td> <td>Chaah POM</td> <td>Sg Gerchang</td> <td>10/04/23</td> <td>4x/year</td> </tr> </tbody> </table>		OU	Sampling sites	Date	Frequency	1	N Labis	Sg Gatom 3 points	10/04/23	4x/year	2	Chaah	Sg Sayong 3 points	25/05/23	4x/year	3	Sg Sp Kiri	Sg Sp Kiri (9 points)	01/06/23	4x/year	4	Chaah POM	Sg Gerchang	10/04/23	4x/year	
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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 CPOM disposed effluent on water discharge final point exit to Sg Simpang Kiri via Chaah Estate field. Sighted quarterly report has been submitted to DOE (license no Jadual Pematuhan license no 004043 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="1126 1281 1924 1375"> <thead> <tr> <th></th> <th>Jan – Mac 22</th> <th>STD</th> <th>10/04/23</th> <th>18/05/23</th> <th>14/06/23</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>5-9</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>		Jan – Mac 22	STD	10/04/23	18/05/23	14/06/23	1	pH	5-9	-	-	-	Complied													
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		<table border="1"> <tr> <td>2</td> <td>BOD mg/l</td> <td>2,500</td> <td>66.00</td> <td>30.00</td> <td>55.00</td> </tr> <tr> <td>3</td> <td>A Nitrogen</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>4</td> <td>Total N</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>5</td> <td>Oil & Grease</td> <td>-</td> <td>-</td> <td>-</td> <td>-</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>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> </table> <p>All parameters tested complied with regulatory standards except for marginal pH level.</p>	2	BOD mg/l	2,500	66.00	30.00	55.00	3	A Nitrogen	-	-	-	-	4	Total N	-	-	-	-	5	Oil & Grease	-	-	-	-	6	Total Solids	-	-	-	-	7	S Solids	-	-	-	-															
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- 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>8803</td> <td>60966</td> <td>1.44</td> </tr> <tr> <td>2</td> <td>Feb</td> <td>8591</td> <td>5751</td> <td>1.49</td> </tr> <tr> <td>3</td> <td>Mac</td> <td>8930</td> <td>6516</td> <td>1.37</td> </tr> <tr> <td>4</td> <td>Apr</td> <td>8876</td> <td>5809</td> <td>1.53</td> </tr> <tr> <td>5</td> <td>May</td> <td>8181</td> <td>5116</td> <td>1.60</td> </tr> <tr> <td>6</td> <td>Jun</td> <td>9158</td> <td>5903</td> <td>1.55</td> </tr> <tr> <td>7</td> <td>July</td> <td>9268</td> <td>5348</td> <td>1.73</td> </tr> <tr> <td>8</td> <td>Aug</td> <td>9663</td> <td>6153</td> <td>1.57</td> </tr> <tr> <td>9</td> <td>Sep</td> <td>9513</td> <td>5833</td> <td>1.63</td> </tr> </tbody> </table>		Month	Water/mt	FFB /mt	Water /FFB	1	Jan	8803	60966	1.44	2	Feb	8591	5751	1.49	3	Mac	8930	6516	1.37	4	Apr	8876	5809	1.53	5	May	8181	5116	1.60	6	Jun	9158	5903	1.55	7	July	9268	5348	1.73	8	Aug	9663	6153	1.57	9	Sep	9513	5833	1.63	Complied
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		10	Oct	9002	5509	1.63	
		11	Nov	9955	6650	1.50	
		12	Dec	10423	8799	1.18	
			Total	110363	73493	1.50	
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.							
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>					Complied
			Target	Objective	Action plan		
		1	Backhoe tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	<p>To ensure the vehicle engine is turn off during idle time</p> <p>To record vehicle activity which consume fuel</p>		
		2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned	To record vehicle activity in order to eliminate waste activity which consume fuel.		

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		vehicles and fuel using mobile equipment	To turn off vehicle engine during idle time.																																																																		
3	Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources Usage of solar streetlight																																																																		
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		Total	41,961	68,056	52,632	10,640	
<p>The estates and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running.</p> <p>Performance variation in view of several factors i.e.</p> <ul style="list-style-type: none"> 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>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><u>Chaah Mill and SOU 20 Estates</u></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> <ul style="list-style-type: none"> a) Environmental Aspect Identification Summary FY 2023 reviewed accordingly. b) Environmental Impact Evaluation Summary FY 2023 reviewed accordingly. 							

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		<p>Renewable energy usage & diesel consumption 2021 was established and monitored by monthly basis. Among others effort to reduce diesel usage includes the following;</p> <ul style="list-style-type: none"> a) By maintenance of the boiler & 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>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
<p>7.10.1</p>	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 20 Mill and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and Genset operation.</p> <ul style="list-style-type: none"> 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. b) Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report. 	<p>Complied</p>
<p>7.10.2</p>	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>SOU 20 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 20 estates.</p>	<p>Complied</p>

<p>7.10.3</p>	<p>(C) 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 742 1930 1264"> <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 & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>land</td> <td>Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.</td> </tr> </tbody> </table> <p>Chaah Mill conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS was found</p>		Receptors	Source	1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). 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>Complied</p>
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		<p>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> <ul style="list-style-type: none"> a) Scheduled wastes – were disposed through KXXXXX AXXX Sdn Bhd, (SW404), RXXXXX MXXX Sdn Bhd. Domestic waste are disposed at Majlis Daerah Labis landfill 2/3x a week accumulated at designated area located far from housing complexes and waterways for all estates and mill. b) Full compliance to zero burning practices. 	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>There was no land preparation of existence or new planting in SOU 20 and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) Compliance to Responsible Agriculture Charter b) EQMS-SOP-Section B2 - Under felling/clearing & land preparation <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</p>	Complied

		<p>was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>																
<p>7.11.2</p>	<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"> a) Pencegahan dan Langkah Kawalan Kebakaran di SDP b) Larangan melakukan pembakaran terbuka di kawasan SDP c) Pemantauan Kawasan Hotspot d) 5km radius zero burning commitment e) ERP procedure <p>Therein containing</p> <ul style="list-style-type: none"> i. Objective ii. Activity and prevention. iii. Function of Fire and Rescue Team iv. Emergency Evacuation Plan / Drill <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="1122 1117 1942 1372"> <thead> <tr> <th></th> <th>Estate / Mill</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>N Labis Estate</td> <td>14/06/23</td> </tr> <tr> <td>2</td> <td>Chaah Estate</td> <td>12/07/23</td> </tr> <tr> <td>3</td> <td>Sg Sp Kiri Estate</td> <td>24/07/23</td> </tr> <tr> <td>4</td> <td>Chaah POM</td> <td>07/02/23</td> </tr> </tbody> </table>		Estate / Mill	Date	1	N Labis Estate	14/06/23	2	Chaah Estate	12/07/23	3	Sg Sp Kiri Estate	24/07/23	4	Chaah POM	07/02/23	<p>Complied</p>
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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 20 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"> a) Pencegahan dan Langkah Kawalan Kebakaran di SDP b) Larangan melakukan pembakaran terbuka di kawasan SDP c) Pemantauan Kawasan Hotspot d) 5km radius zero burning commitment e) Compliance to Responsible Agriculture Charter f) Program Simulasi Kebakaran Lampiran A Fire Prevention and Control Measure. <ul style="list-style-type: none"> i. Objective ii. Activity and prevention. iii. Function of Fire and Rescue Team iv. Emergency Evacuation Plan / Drill v. Compliance to related legislative requirement <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="1122 1166 1937 1358"> <thead> <tr> <th></th> <th>OU</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>N Labis Estate</td> <td>08/06/2023</td> <td>28/07/2022</td> </tr> <tr> <td>2</td> <td>Chaah Estate</td> <td>17/01/2023</td> <td>17/01/2022</td> </tr> <tr> <td>3</td> <td>Sg Sp Kiri Estate</td> <td>17/01/2023</td> <td>17/01/2022</td> </tr> </tbody> </table>		OU	Date	Date	1	N Labis Estate	08/06/2023	28/07/2022	2	Chaah Estate	17/01/2023	17/01/2022	3	Sg Sp Kiri Estate	17/01/2023	17/01/2022	Complied
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Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.						
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>			<p>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. Hence principle 7 is not applicable.</p>		Not Applicable
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE:</p> <p>Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>			<p>The HCV re-assessment was compiled by GSD (Previously known as PSQM) team on Aug 2016 for Estates of SOU 20. 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"> - Landscape context - biodiversity & conservation values - ecosystem service / social & cultural values <p>c) HCV criteria & application to agriculture</p> <ul style="list-style-type: none"> - Visual observation & supporting information - Wildlife in plantation - decision on HCV status 		Complied

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		<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 20 are given below;</p> <table border="1" data-bbox="1120 614 1944 1109"> <thead> <tr> <th>Estate</th> <th>Description</th> <th>Ha</th> <th>Type</th> </tr> </thead> <tbody> <tr> <td>Sg Spg Kiri</td> <td>Water catchment P06</td> <td>0.32</td> <td>HCV 4</td> </tr> <tr> <td>Sg Spg Kiri</td> <td>River reserve Sg Spg Kiri P04</td> <td>8.94</td> <td>HCV 4</td> </tr> <tr> <td>Sg Spg Kiri</td> <td>Bund P00</td> <td>53.85</td> <td>HCV 4</td> </tr> <tr> <td>Chaah Estate</td> <td>Water catchment P 04A</td> <td>0.47</td> <td>HCV 4</td> </tr> <tr> <td>Chaah Estate</td> <td>Water catchment P 02D</td> <td>1.61</td> <td>HCV 4</td> </tr> <tr> <td>Chaah Estate</td> <td>Bund P03C</td> <td>4.87</td> <td>HCV 4</td> </tr> <tr> <td>N Labis Estate</td> <td>Water Catchment</td> <td>0.85</td> <td>HCV 4</td> </tr> <tr> <td>N Labis Estate</td> <td>River Reserve Sg Gatom</td> <td>0.78</td> <td>HCV 4</td> </tr> <tr> <td colspan="2" style="text-align: right;">Total</td> <td>70.69</td> <td></td> </tr> </tbody> </table> <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>	Estate	Description	Ha	Type	Sg Spg Kiri	Water catchment P06	0.32	HCV 4	Sg Spg Kiri	River reserve Sg Spg Kiri P04	8.94	HCV 4	Sg Spg Kiri	Bund P00	53.85	HCV 4	Chaah Estate	Water catchment P 04A	0.47	HCV 4	Chaah Estate	Water catchment P 02D	1.61	HCV 4	Chaah Estate	Bund P03C	4.87	HCV 4	N Labis Estate	Water Catchment	0.85	HCV 4	N Labis Estate	River Reserve Sg Gatom	0.78	HCV 4	Total		70.69		
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		The audit findings have confirmed that there is no new planting after 15 Nov 2018 in SOU 20 estates. Hence the current HCV assessment of the estates remains valid.	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not Applicable	Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>The HCV re-assessment was compiled by GSD (Previously known as PSQM) on Sept 2016 for Estates of SOU 20. 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"> - Landscape context - biodiversity & conservation values - ecosystem service / social & cultural values <p>c) HCV criteria & application to agriculture</p> <ul style="list-style-type: none"> - Visual observation & supporting information - Wildlife in plantation - decision on HCV status <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.</p> <p>All areas were sighted and verified. Hectare for the re-categorized areas has not affected the others category including the planted</p>	Complied

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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 20 estates. Hence, the requirement under this indicator does not apply.</p>	Not Applicable																				
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working</p>	<p>The HCV re-assessment was compiled by GSD (Previously known as PSQM) on Sept 2016 for Estates of SOU 20. 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>	Complied																				

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	<p>for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>b) Description of assessment area</p> <ul style="list-style-type: none"> - Landscape context - biodiversity & conservation values - ecosystem service / social & cultural values <p>c) HCV criteria & application to agriculture</p> <ul style="list-style-type: none"> - Visual observation & supporting information - Wildlife in plantation - decision on HCV status <p>d) HCV management / Monitoring.</p> <p>All the HCVs were maintained by the management of estates and mill. This exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented.</p> <p>No RTE species identified in the estates visited as per Addendum to High conservation value, Final Report for Strategic Operating Unit 20, ver. 2.0 dated Sept 2016. The monitoring was done monthly by respective estates.</p>	
<p>7.12.7</p>	<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> <ul style="list-style-type: none"> a) Area b) Field no. and GPS coordinate c) Observation - Encroachment /sign of trespassing 	<p>Complied</p>

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		<ul style="list-style-type: none"> - Wildlife issues/conflicts/sighting - Pollution /erosion issues <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 651 1910 1369"> <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 liase with related agency</td> <td>On-going</td> <td>Estate mgmt</td> </tr> <tr> <td>2</td> <td>Protection or conservation & monitoring of biodiversity area.</td> <td>To continuously collaborate with R& D to monitor the status & health of trees</td> <td>On-going</td> <td>Estate mgmt</td> </tr> <tr> <td>3</td> <td>Protection & conservation of mangrove forests area.</td> <td>To erect signs indicating mangrove forest near coastal areas. To erect signs indicating mangrove forest as HCV areas for conservation.</td> <td>On-going</td> <td>Estate mgmt</td> </tr> <tr> <td>5</td> <td>Rehabilitation & habitat</td> <td>To participate in tree planting divers tree</td> <td></td> <td></td> </tr> </tbody> </table>		Action steps	Action Plan	Date	PIC	1	Inspection of HCV	Continuous inspection and recommendation To liase with related agency	On-going	Estate mgmt	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	To participate in tree planting divers tree			
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			enhancement	species to enhance the surrounding biodiversity.	On-going	Estate mgmt	
		6	Interface with animals	<p>Raise awareness of HCV/RTE to employees</p> <p>Employees are taught not to disturbed/hunt wildlife.</p> <p>Liaison with Jabatan Perhilitan on wildlife encounter/discovery</p>	On-going	Estate mgmt	
		7	Education and awareness	<p>Educate employees on importance of biodiversity.</p> <p>Encourage research on specific biodiversity</p> <p>To erect signage</p> <p>No fishing/no hunting/no swimming</p>	On-going	Estate mgmt	
		<p>No RTE species identified in the estate visited as per Addendum to High conservation value, Final Report for Strategic Operating Unit 4, ver. 2.0 dated July 2020. The monitoring was done monthly by respective estates.</p>					
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</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 20 estates. Hence, the requirement under this indicator does not apply.</p>					Not Applicable

	- Critical (Major) compliance -		
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **CHAAH POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2022** for **CHAAH POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.75
PKO	1.75

Extraction	%
OER	18.89
KER	5.21

Production	t/yr
FFB Process	73,350.20
CPO Produced	13,856.38
PKO Produced	0.00

Land Use	Ha
OP Planted Area	18,439.41
OP Planted on peat	106.14
Conservation (forested)	9.72
Conservation (non-forested)	0.00
Total	18,555.27

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	49,610.16	1.07	20,893.83	0.78	0.00	0.00	70,503.98	1.07
CO ₂ Emission from fertilizer	50,46.28	0.11	26.62	0.00	0.00	0.00	5,072.90	0.11
NO ₂ Emission	2,534.67	0.05	15.16	0.00	0.00	0.00	2,549.83	0.05
Fuel Consumption	19.54	0.00	7.67	0.00	0.00	0.00	27.22	0.00
Peat Oxidation	0.00	0.00	19.96	0.00	0.00	0.00	19.96	0.00
Sink								
Crop Sequestration	-46,592.51	-1.00	-18,251.00	-0.68	0.00	0.00	-64,843.51	-1.00
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	10,618.14	0.23	2,712.24	0.10	0.00	0.00	13,330.38	0.23

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	14,377.88	0.20
Fuel Consumption	1.84	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	14,379.72	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

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

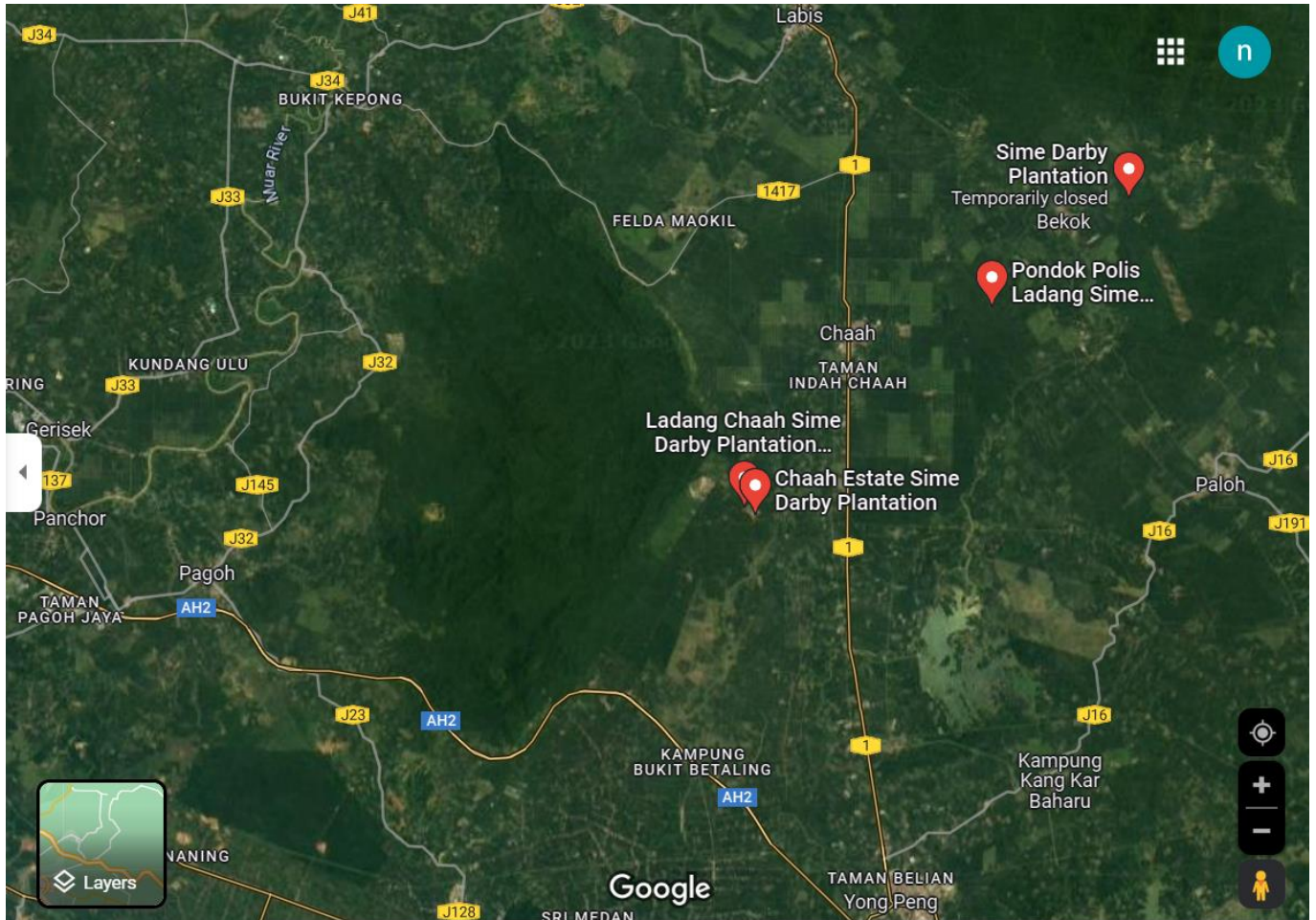
*This mill has no kernel crusher operation.

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

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

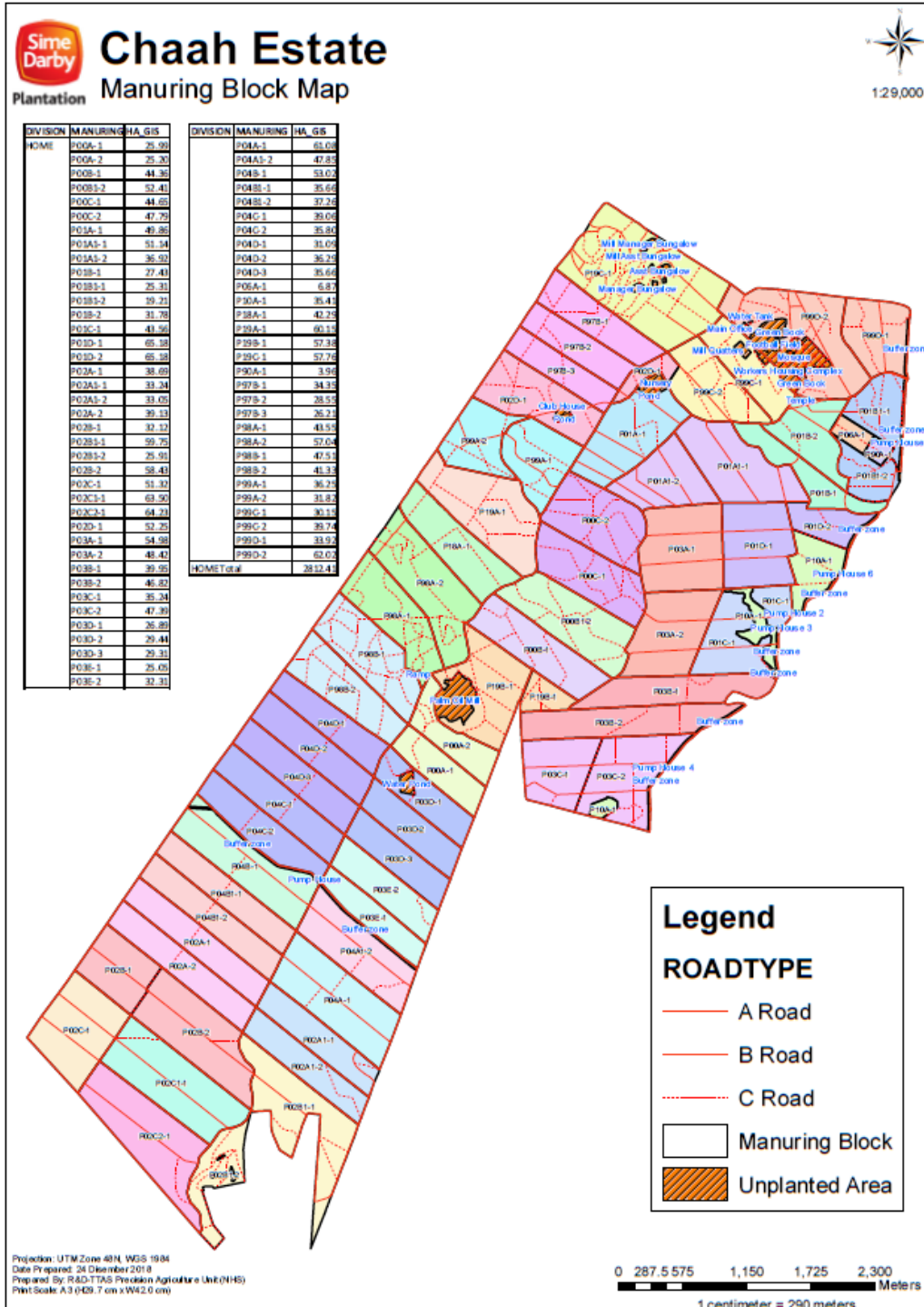
Note: FFB Planted on peat was due to crop diversion from SOU21 Gunung Mas: compliance to indicators relating to peat is indicated in the related SOU Audit Report. This information was cascaded during PalmGHG Training in Jakarta, June 2023

Appendix C: Location Map of Certification Unit and Supply bases

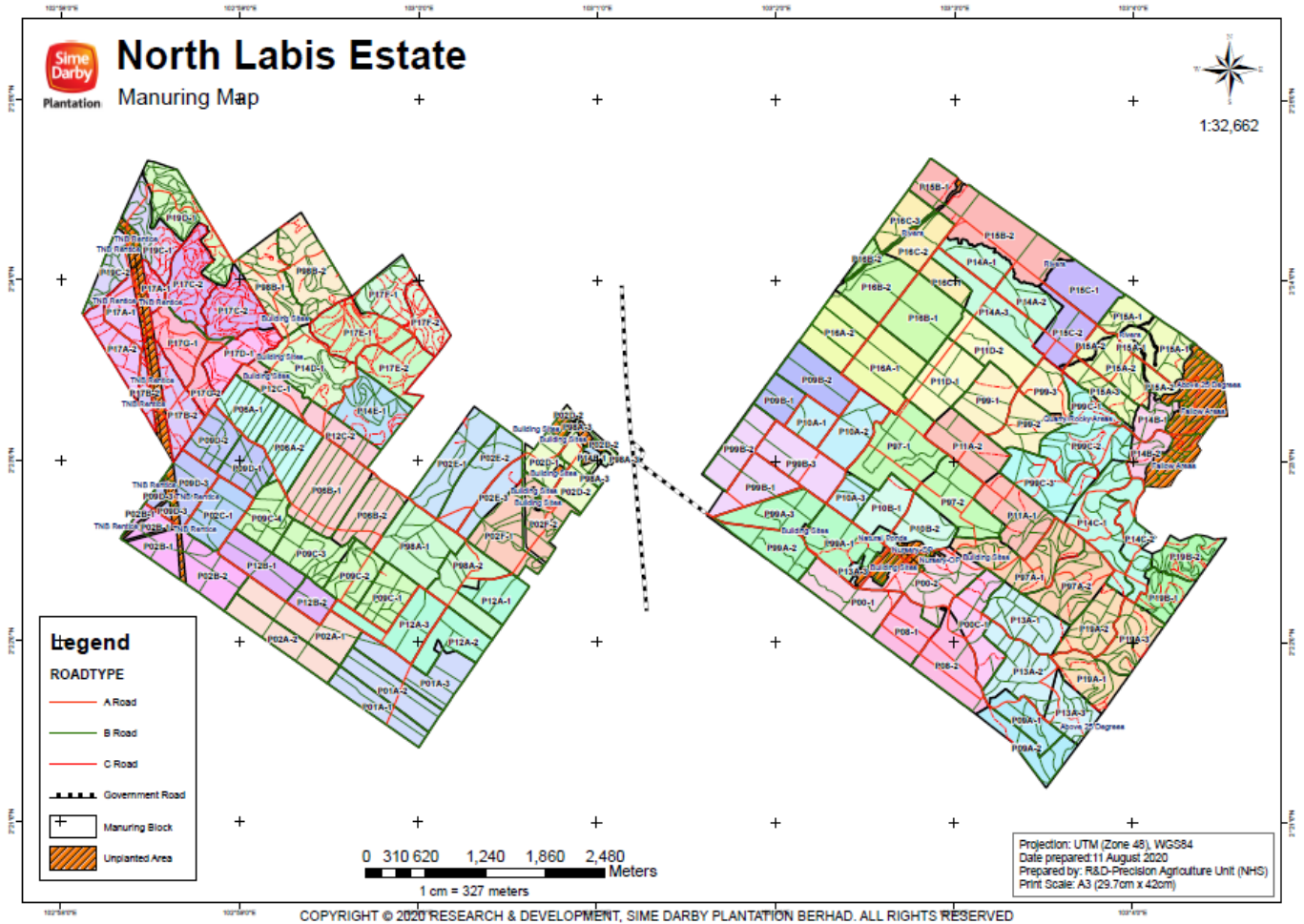


Appendix D: Estate Field Map

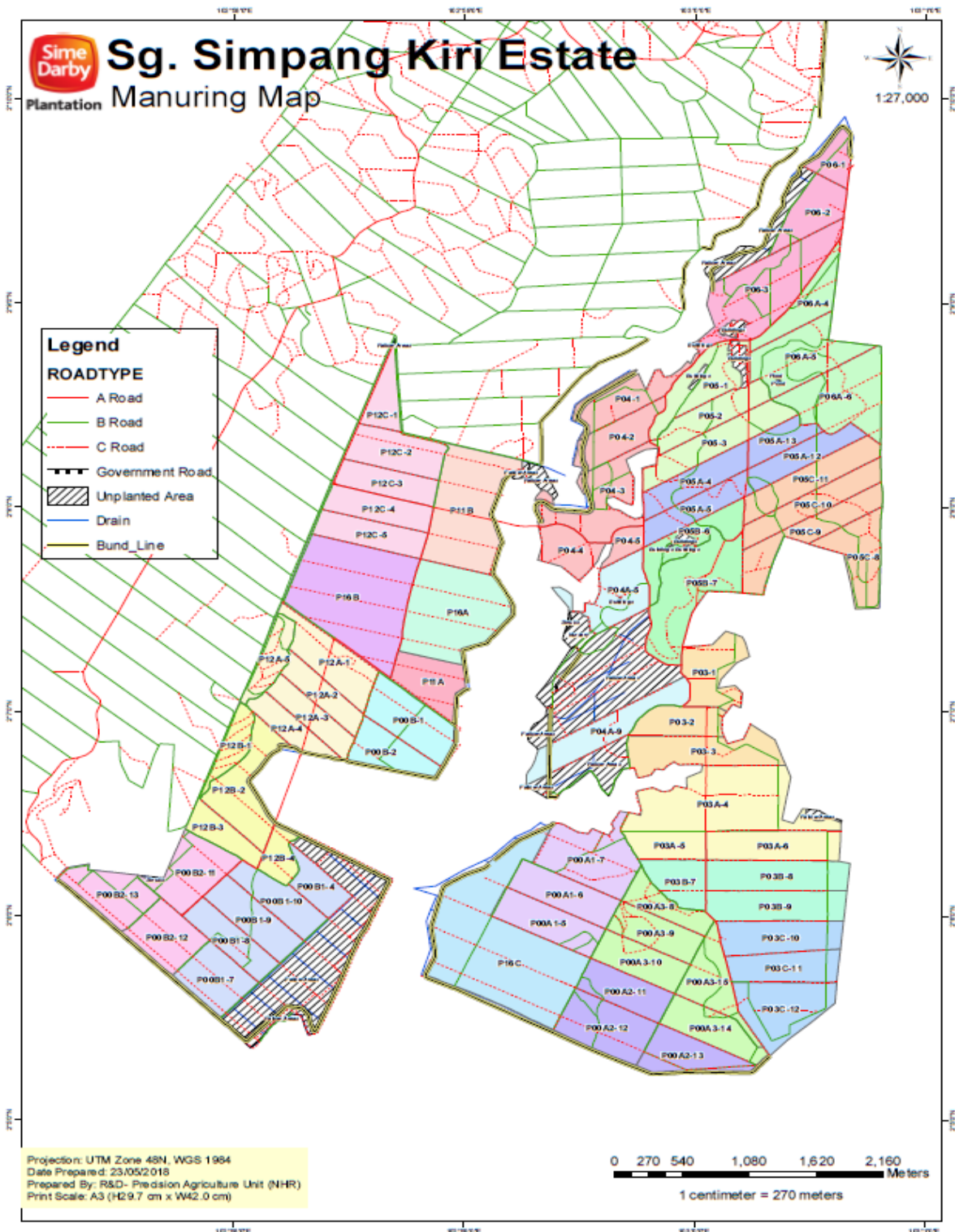
Chaah Estate



North Labis Estate



Sg. Simpang Kiri Estate



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Appendix E: List of Smallholder Registered and/or sampled

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
Not Applicable									
					Total				
Note: * are smallholders sampled in this audit.									

Appendix F: List of Abbreviations

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