

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (2\_2)**
- Recertification Assessment (Choose an item.)**
- Extension of Scope**

<b>Client Company Name / Parent Company: Sime Darby Plantation Berhad</b>
Client Company / Parent Company Address: Level 11, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia
Certification Unit: <b>Strategic Operating Unit (SOU 27)</b> <b>Melalap Palm Oil Mill</b> Location of Certification Unit: 14th KM, Jalan Tenom- Keningau, 89908 Tenom, Sabah, Malaysia
Date of Final Report: 29/11/2023

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## Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	Sime Darby Plantation Berhad		
<b>RSPO Membership Number</b>	1-0008-04-000-00	<b>Membership Approval Date</b>	07/09/2004
<b>Address</b>	Level 11, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Strategic Operating Unit (SOU 27) - Melalap Palm Oil Mill		
<b>Location / Address</b>	14th KM, Jalan Tenom- Keningau, 89908 Tenom, Sabah, Malaysia		
<b>Website</b>	<a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a>		
<b>Management Representative</b>	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, GSD)	<b>E-mail</b>	<a href="mailto:Shylaja.vasudevan@simedarbyplantation.com">Shylaja.vasudevan@simedarbyplantation.com</a>
<b>Telephone</b>	+(603) 78484000 (HQ)	<b>Facsimile</b>	-

2. Certification Information			
<b>Certificate Number</b>	RSPO 547124	<b>Certificate Start Date</b>	02/12/2021
<b>Date of First Certification</b>	21/01/2011	<b>Certificate Expiry Date</b>	01/12/2026
<b>Scope of Certification</b>	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
<b>Visit Objectives</b>	<ul style="list-style-type: none"> <li>• Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> <li>• Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</li> </ul>		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
<b>Supply Chain Module</b>	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	25 MT/ HR
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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<b>Is this a remote audit or on-site audit</b>	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)
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<b>3. Other Certifications</b>			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
MSPO 685285	MSPO 2530-3:2013 General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services Malaysia Sdn Bhd	06/03/2028
MSPO 682053	MSPO 2530-4:2013 General Principles for Palm Oil Mills		06/03/2028
MSPO 718818	MSPO Supply Chain Certification Standard 2018		18/12/2024

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base / Group Manager / Smallholders)</b>	<b>Location</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Melalap Palm Oil Mill	14th KM, Jalan Tenom-Keningau, 205 89908 Tenom, Sabah	5° 13' 58.00" N	115° 59' 15.00" E
Melalap Estate	14th KM, Jalan Tenom-Keningau, 205 89908 Tenom, Sabah	5° 12' 54.00" N	115° 58' 34.70" E
Sapong Estate	14th KM, Jalan Tenom-Keningau, 205 89908 Tenom, Sabah	5° 03' 51.50" N	115° 56' 57.10" E

<b>5. Description of Supply Base</b>					
<b>New Planting Development</b>	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
<b>Estate / Smallholders</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Sapong Estate	2,155.81	45.72	1,215.74	3,417.27	63.09%
Melalap Estate	1,241.48	88.29	890.60	2,220.37	55.91%
<b>Total</b>	<b>3,397.29</b>	<b>134.01</b>	<b>2,106.34</b>	<b>5,637.64</b>	<b>60.26%</b>

<b>6. Plantings &amp; Cycle</b>						
<b>Estate / Smallholders</b>	<b>Age (Years) - ha</b>				<b>Mature</b>	<b>Immature</b>
	<b>0 - 3</b>	<b>4 - 14</b>	<b>15 - 25</b>	<b>&gt;25</b>		
Sapong Estate	308.63	572.61	1,274.57	0.00	1,847.18	308.63
Melalap Estate	121.21	250.67	869.60	0.00	1,120.27	121.21

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<b>Total (ha)</b>	<b>429.84</b>	<b>823.28</b>	<b>2,144.17</b>	<b>N/A</b>	<b>2,967.45</b>	<b>429.84</b>
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**7. Summary of Certified Tonnage of FFB (Own Certified Scope)**

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Dec 2022 – Nov 2023)	Actual (Sept 2022 – Aug 2023)		Estimated last year (Dec 2022 – Nov 2023)
		Previous license period (Sept 2022 – Nov 2022)	Current license period (Dec 2022 – Aug 2023)	
Sapong Estate	33,959.41	5,780.18	19,240.45	29,644.22
Melalap Estate	22,474.75	4,397.69	12,348.66	16,672.35
<b>Total</b>	<b>56,434.16</b>	<b>41,766.98</b>		<b>46,316.57</b>

Note: The forecast yield was verified and confirmed based on Sime Darby 2023 recruitment planning, 2022 rain fall pattern and consideration of prime age of the OP. This certification unit was affected by flood session as that will interrupt the crop recovery process.

**8. Summary of Certified Tonnage of FFB (from other certified unit(s))**

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Dec 2022 – Nov 2023)	Actual (Sept 2022 – Aug 2023)		Forecast (Dec 2023 – Nov 2024)
		Previous license period (Sept 2022 – Nov 2022)	Current license period (Dec 2022 – Aug 2023)	
N/A		N/A	N/A	
<b>Total</b>		N/A		

**9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)**

Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Dec 2022 – Nov 2023)	Actual (Sept 2022 – Aug 2023)		Forecast (Dec 2023 – Nov 2024)
		Previous license period (Sept 2022 – Nov 2022)	Current license period (Dec 2022 – Aug 2023)	
Supplier AA	18,000	1,705.19	4,010.31	12,000
Supplier AB		77.14	162.00	
Supplier AC		203.76	72.56	
Supplier AD		25.49	131.71	
Supplier AE		7,639.86	1,702.62	
Supplier AF		244.84	698.30	
Supplier AG		246.36	279.30	

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Supplier AH		262.32	463.54	
Supplier AI		289.22	1,288.58	
<b>Total</b>	<b>18,000</b>	<b>19,503.10</b>		<b>12,000</b>

Note: High crop pattern from uncertified FFB supplier resulting on high actual FFB compared with forecast.

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	Sept 2022	3,653.96	2,839.74	6,493.7
2	Oct 2022	3,325.77	4,568.73	7,894.50
3	Nov 2022	3,198.14	3,285.71	6,483.85
4	Dec 2022	3,327.89	1,686.34	5,014.23
5	Jan 2023	3,922.27	1,789.52	5,711.79
6	Feb 2023	3,487.42	466.02	3,953.44
7	Mar 2023	3,646.29	671.99	4,318.28
8	Apr 2023	2,551.95	674.92	3,226.87
9	May 2023	3,952.90	965.38	4,918.28
10	June 2023	4,096.54	874.57	4,971.11
11	July 2023	3,288.99	777.53	4,066.52
12	Aug 2023	3,314.86	902.65	4,217.51
<b>TOTAL</b>		<b>41,766.98</b>	<b>19,503.10</b>	<b>61,270.08</b>

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Dec 2022 – Nov 2023)	Actual (Sept 2022 – Aug 2023)		Forecast (Dec 2023 – Nov 2024)
	Previous license period (Sept 2022 – Nov 2022)	Current license period (Dec 2022 – Aug 2023)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
56,434.16 mt	10,177.87 mt	31,589.11 mt	46,316.57 mt
	<b>TOTAL</b>	41,766.98 mt	
<b>CPO (OER: 21.00%)</b>	<b>CPO (OER: 19.79%)</b>		<b>CPO (OER: 20.80%)</b>
11,851.17 mt	19,51.932 mt (19.18%)	63,11.779 mt (19.98%)	9,633.85 mt
	<b>TOTAL</b>	8,263.71 mt	
<b>PK (KER: 4.43%)</b>	<b>PK (KER: 4.61%)</b>		<b>PK (KER: 4.77%)</b>

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2,500.03 mt	487.598 mt (4.79%)	1 435.871 mt (4.55%)	2,209.30 mt
	<b>TOTAL</b>	1,923.47 mt	

Note: The forecast yield was verified and confirmed based on Sime Darby 2023 recruitment planning, 2022 rain fall pattern and consideration of prime age of the OP. This certification unit was affected by flood session as that will interrupt the crop recovery process.

<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Sept 2022	702.000	187.760
2	Oct 2022	632.028	153.675
3	Nov 2022	617.905	146.163
4	Dec 2022	633.551	128.301
5	Jan 2023	768.709	127.142
6	Feb 2023	681.146	152.575
7	Mar 2023	735.316	183.724
8	Apr 2023	518.095	110.830
9	May 2023	824.889	211.630
10	June 2023	796.716	185.560
11	July 2023	668.249	169.423
12	Aug 2023	685.106	166.687
	<b>TOTAL</b>	<b>8,263.71</b>	<b>1,923.47</b>

<b>11. Summary of Actual Volume sold</b>					
<b>Current License period (Dec 2022 – Aug 2023)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	0	0	0	1,811.77	1,811.77
<b>PK (MT)</b>	341.90	0	0	1,093.97	1,435.87
<b>Credits</b>	-	-	-	-	-
<b>Previous License period (Sept 2022 – Nov 2022)</b>					
<b>CPO (MT)</b>	0	0	0	1,951.93	1,951.93
<b>PK (MT)</b>	250.00	0	0	237.59	487.59
<b>Credits</b>	-	-	-	-	-

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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	0.00	-
2	Buyer B	TR-XXXXXXXX-XXXX	-	591.90
<b>TOTAL</b>			<b>0.00</b>	<b>591.90</b>

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

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)
N/A	N/A	N/A	N/A	N/A
<b>TOTAL</b>			<b>N/A</b>	<b>N/A</b>

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	3,763.70	N/A
2.	Buyer BB	N/A	1,331.57
<b>TOTAL</b>		<b>3,763.70</b>	<b>1,331.57</b>

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

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
1	N/A	N/A	N/A
<b>TOTAL</b>			<b>N/A</b>

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	NA		NA	NA
IS-CSPO	NA	NA	NA	NA	NA	NA	NA	NA	NA



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IS-CSPKO	NA	NA	NA	NA	NA	NA	NA	NA	
IS-CSPKE	NA	NA	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
<b>TOTAL</b>		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
<b>Current License period (key in period)</b>							
Credits				NA	NA	NA	NA
Physical	NA	NA	NA				
<b>Previous License period (key in period)</b>							
Credits				NA	NA	NA	NA
Physical	NA	NA	NA				

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

## Section 2: Assessment Process

### Certification Body:

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

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639

Representative: Dr. Chaiyaporn Seekao ([Chaiyaporn.Seekao@bsigroup.com](mailto:Chaiyaporn.Seekao@bsigroup.com))

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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 **04/09/2023-07/09/2023**. 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 remote assessment was conducted on **26/10/2023**. 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**

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification2)</b>	<b>Year 2 (ASA 2_1)</b>	<b>Year 3 (ASA 2_2)</b>	<b>Year 4 (ASA 2_3)</b>	<b>Year 5 (ASA 2_4)</b>
Melalap Palm Oil Mill	√	√	√	√	√
Melalap Estate	√	√	√	√	√
Sapong Estate	√	√	√	√	√

**Tentative Date of Next Visit: September 2, 2024 - September 6, 2024**

**Total Number of Mandays: 9.5**

**2.2 BSI Assessment Team**

<b>Name</b>	<b>Role</b>	<b>Competency</b>
Nor Halis Abu Zar (NHA)	Team Leader	<p><b>Education:</b> Bachelor of Science, Plantation Technology and Management, UTM, 2012</p> <p><b>Work Experience:</b> 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 MS 2530:2013 and has accumulated more than 400 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia.</p> <p><b>Training attended:</b> ISO IMS 9001 and 14001 LA Training (2019), MSPO 2530:2013 LA Training (2019), Endorsed RSPO LA Training (2020), CQI and IRCA Certified ISO 45001 LA Training (2021), ISO 9001:2015 LA Training (2019), MSPO SCCS Auditor (2019)SMETA Requirement Training (2021) and Endorsed RSPO Auditor Refresher Training (P&amp;C).</p> <p><b>Language proficiency:</b> Fluent in in both verbal/written Bahasa Malaysia and English Language.</p> <p><b>Aspect covered in this audit:</b> Occupation Health Safety requirement, HIRARC, Environment responsibility, training, environment impact assessment and management plan</p>
Mohamed Zainal (MHZ)	Team Member	<p><b>Education:</b> Bachelor Degree in Chemical Engineering, National University of Malaysia, 2006</p>

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		<p><b>Work Experience:</b>          He has 7 years working experience in palm oil industry and 5 years specifically on palm oil milling. He is also experiences third party auditing for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO, RSPO P&amp;C, RSPO SCCS, RBA.</p> <p><b>Training attended:</b>          He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed RSPO P&amp;C Refresher Course, MSPO Awareness Training, Endorsed RSPO SCCS Lead Auditor Course, Endorsed RSPO SCCS Refresher Course, Introduction to HCV, HCS &amp; GIS training, SMETA requirement training and Endorsed RSPO Independent Smallholder (ISH) Auditor Training.</p> <p><b>Language proficiency:</b>          Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p><b>Aspect covered in this audit:</b>          Policy and commitment, Social requirements, contract agreement, human rights, workers’ welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land &amp; Legal issue and RSPO supply chain requirements.</p>
<p>Vijay Kanna          Pakirisamy (VKP)</p>	<p>Team Member</p>	<p><b>Education:</b>          Holds a Bachelor Degree in Agribusiness Science Management with Honours, University Utara Malaysia.</p> <p><b>Work Experience:</b>          He has 10 years’ experience in Oil Palm Estate Management in leading Oil Palm Companies such as KL Kepong Bhd, IOI Plantations and United Plantations. The last position held was Senior Assistant Manager. His experience includes the day-to-day estate operations and ensures the implementation of RSPO, ISCC and MSPO certification. He has been a sustainable palm oil auditor since 2019.</p> <p><b>Training attended:</b>          He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, HCV &amp; HCS Introductory Training and SMETA Requirements Training, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&amp;C and SCCS).</p> <p><b>Language proficiency:</b>          Fluent in English, Bahasa Malaysia, Tamil.</p> <p><b>Aspect covered in this audit:</b>          Economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV, and RSPO supply chain requirements</p>

**Accompanying Persons:**

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Name	Role
Not Applicable	

**2.3 Assessment Plan**

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

Date	Time	Subjects	NHA	MHZ	VKP
Sunday 03/09/2023	-	Audit Team Travel from Kuala Lumpur to Kota Kinabalu to Keningau.	√	√	√
Monday, 04/09/2023  Melalap Estate	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan</li> </ul>	√	√	√
	09.00 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	12.30 – 13.30	Lunch/ Break	√	√	√
	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, 05/09/2023  Sapong Estate	09.00 – 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	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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Date	Time	Subjects	NHA	MHZ	VKP
	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 06/09/2023 Melalap POM	09.00 – 12.30	Lab, weighbridge, and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation.  RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	√
	12.30 – 13.30	Lunch/ Break	√	√	√
	13.30 – 16.30	Lab, weighbridge, and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation.	√	√	√
	16.30 – 17.00	Interim Closing briefing.	√	√	√
Thursday 07/09/2023 Melalap POM	09.00 – 12.00	RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	-	-
	12.00 – 12.15	Audit Team Discussion and report preparation	√	-	-
	12.15 – 13.00	Closing Meeting	√	-	-
	-	Audit Team Travel to Kota Kinabalu	√	-	√
Thursday 08/09/2023	-	Audit Team Travel from Kota Kinabalu to Kuala Lumpur	√	-	√

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Major NC Closure (Remote)

Date	Time	Subjects	NHA
Thursday 26/10/2023 SOU 27	08.30 – 09.00	Opening Meeting: Via Microsoft Teams Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan.	√
Sapong Estate	09.00 – 12.00	<ul style="list-style-type: none"> <li>• Verification on previous Major NC: 1. 2388152-202309-M1</li> <li>• Virtual observation by video call, workers interview by call (individual and group session) if necessary.</li> <li>• Document review – implemented evidence</li> </ul>	√
	12.00 – 12.30	Closing Meeting	√

### Section 3: Assessment Findings

#### 3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Sime Darby Plantation Berhad TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.  On 16/01/2020, Sime Darby Plantation Berhad under its subsidiary Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation – Liberia) to Mano Palm Oil Industries Ltd (MPOI): <a href="https://sime-darbyplantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/">https://sime-darbyplantation.com/sime-darby-plantation-completes-the-divestment-of-its-liberia-operations/</a>	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?  If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	Generally, all estates and mills excepted stated below or in the TBP are certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As of Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 01/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently Sime Darby Plantation Berhad have no control in the management. Refer TBP approval dated 13/07/2023.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.  If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	There are no new acquisitions. There is new propose on 2024 for Land legalization still in progress dated approval by RSPO on 13 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 these units are still awaiting to receive land titles.	Complied



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<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 &amp; Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: <a href="http://www.rspo.org/certification/public-announcement">www.rspo.org/certification/public-announcement</a></p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): <a href="http://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations">www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations</a>. ACOP 2020 has been cross-referenced as below: <a href="http://www.rspo.org/members/29">www.rspo.org/members/29</a></p>	<p>Complied</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised</p>	<p>Although there are lapses has been identified at those Indonesia management units, but it has been justified that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>	<p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.</p>	<p>Complied</p>
<p><b>Un-Certified Units or Holdings</b></p>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&amp;C criterion 7.12.</p>	<p>Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/2023.</p>	<p>Complied</p>

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<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification.</p> <ol style="list-style-type: none"> <li>1. NBPOL (Poliamba Limited) 23/05/2020 – no comments  <a href="https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/">https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/</a></li> <li>2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/">https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/</a></li> <li>3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments  <a href="https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/">https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/</a></li> <li>4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-limited/</a></li> <li>5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/</a></li> <li>6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/">https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/</a></li> <li>7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/">https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/</a></li> <li>8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/</a></li> <li>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/</a></li> </ol>	<p>Complied</p>
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	<p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/">https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/</a></p> <p>11. NBPOL (Ramu Agri Industries Ltd) 06/03/2012 - no comments captured in RSPO website:  <a href="https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/">https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/</a></p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/</a></p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/</a></p> <p>14. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/</a></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&amp;C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancies between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of August 2023, 16 out of 19 management units in Indonesia operations completed LUCA review with 1 Concept note (covering all 19 affected manage units) has been endorsed by RSPO.</p> <p>As per Internal Audit conducted in 27 – 28/06/2022, 01 – 06/08/2022 and 23/10/2022, all issues of are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about</p>	<p>Complied</p>

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	land conflict has been lodge by stakeholders as at the day of audit.	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<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>	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	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.	Complied
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.	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.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company	Complied

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

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
<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 is no scheme smallholders and/or outgrowers include in the scope of certification. Hence, this requirement is not applicable.</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	Yong Peng Estate	2,975.41	Certified	Not Applicable	19-May-10	19-20 July 2021				
Chaah	Malaysia	Chaah Oil Mill	8,495.13	Certified	Not Applicable	5-Oct-11	19-20 July 2021				
	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				
Ulu Remis	Malaysia	Ulu Remis Oil Mill	17,115.58	Certified	Not Applicable	11-Apr-11	19-20 July 2021				
	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				
Hadapan	Malaysia	Hadapan Oil Mill	11,371.82	Certified	Not Applicable	29-Mar-11	19-20 July 2021				
	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				

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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	Moroa 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; two (2) Minor nonconformities and zero (0) Opportunity For Improvement raised. The Melalap 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.

<b>Non-conformity</b>			
<b>NCR Ref #</b>	2388152-202309-M1	<b>Issued Date</b>	07/09/2023
<b>Due Date</b>	06/12/2023	<b>Closure Date</b>	26/10/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	7.10.3 (Major)		
<b>Statement of Nonconformity:</b>	The Mitigation Measures for Pollution prevention plan was not effectively implemented.		
<b>Requirement Reference:</b>	Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.		
<b>Objective Evidence:</b>	During site visit at tractor parking bay Sapong Estate, it was observed 3 tractors were parked there. Based on interview with person in charge, 2 unit was write off units, while another 1 unit under repair. Sighted evidence of signage under repair. Sighted leakage of lubricant from tractor under repair and there is no mitigating measures for that. It was not in line with Pollution Prevention Plan FY 2023 Sapong Estate dated 05/02/2023, Issue: Leaking of lubricant, oil from servicing, parking tractor parking area, mitigating measures: To used oil tray to prevent leakage of used oil.		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Oil tray to be placed immediately for every tractor in parking position to ensure any leakages do not contaminate the ground.</li> <li>2. Estate to immediately clean up the leaked lubricant on the ground and dispose it according to Scheduled Waste disposal requirement.</li> <li>3. Trays are placed under all tractors under repair to contain any leakage.</li> </ol>		
<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>1. There was no follow-up plan in place to evaluate the understanding of the worker on the requirements to mitigate leakage from tractors after briefing has been conducted.</li> <li>2. Ineffective supervision/workplace inspection by Management to ensure that awareness and implementation of pollution prevention measures for tractors under repair are in place at workshop area.</li> </ol>		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. All related workers, mandores and staff working at the workshop area will be briefed on their responsibility to ensure that no recurrence of lubricants or any other oils spillage.</li> <li>2. Management will put in place the follow up plan to evaluate and ensure workers understanding in mitigating leakage of lubricant if any, and to conduct</li> </ol>		

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	<p>random spot check monthly at workshop area to ensure all pollution prevention measures are in place.</p> <p>3. Enforcement of e-SIME+ System as platform for any non-conforming practices reporting for further action.</p>
<b>Assessment Conclusion:</b>	<p>Major NC Close Out</p> <ol style="list-style-type: none"> <li>1. Briefing to all related workers, mandores and staff has been conducted on 14/10/2023. Sighted evidence of training material, attendance, and photos. Sighted training evaluation has been documented for all participants. Refer</li> <li>2. Random spot check has been conducted through Workplace Inspection dated 21/09/2023. Sighted evidence of checking on spillage and availability of spill kit in the checklist</li> <li>3. Monitoring on schedule waste issue has been conducted. Sighted e-Sime+ System implementation dated 14/10/2023.</li> <li>4. Verification through interview with Foreman and Tractor driver has been conducted via Microsoft Teams found all of them had good understanding on the issue raised. They have good awareness on managing spillage from tractors.</li> <li>5. Verification through Video Call at Tractor Parking Bay with Assistant Manager found all tractors parked day were equipped with Oil tray to ensure there is no contamination to the soil.</li> <li>6. Interview with estate management confirmed that correction and corrective action has been implemented.</li> </ol> <p>Based on the above evidence, the major non-Conformity is closed effectively on 26/10/2023. Continuous implementation will be further verified in the next assessment.</p>

Non-conformity			
<b>NCR Ref #</b>	2388152-202309-N1	<b>Issued Date</b>	07/9/2023
<b>Due Date</b>	Next assessment visit	<b>Closure Date</b>	Open
<b>Indicator &amp; Category (Critical / Minor)</b>	3.3.2 (Minor)		
<b>Statement of Nonconformity:</b>	Procedures for waste management and chemical handling was not consistently implemented.		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures is in place.		
<b>Objective Evidence:</b>	<p>During site visit at SW Store, Sapong Estate, it was found that SW Items Old Batteries which generated 01/06/2023 was wrongly labelled with SW409 instead of SW102 as per procedure Section 2.0 SW102/ 103 for Batteries. It was not in line with Waste Management Procedures for Upstream Malaysia with reference number SD/SDP/GSD/HSE/0522/01 dated May 2022.</p> <p>During the visit to the Spraying Operation at Sapong Estate, it was identified that the tractor used to transport workers had extensive leakage of hydraulic oil at the engine. The worker had brought hydraulic oil, placed in a white container with no label, for the purpose of topping up due to the leakage. It was not in line with Chemical Handling Procedure with document reference number UM/HSE/OCP/04 dated 09/03/2021 section 6.5.1 and OSH (USECHH) Regulations 2000, Part VI</p>		

	<p>Labelling &amp; Relabelling; 21, (1) An employer shall ensure that all chemicals hazardous to health supplied or purchased by him and used in the place of work are labelled and that the labels are not removed, defaced, modified or altered. (2) When the labels mentioned in sub regulation (1) are removed, defaced, modified or altered while the chemical hazardous to health is being used at the place of work, the employer shall re-label the chemical.</p>
<p><b>Corrections:</b></p>	<ol style="list-style-type: none"> <li>1. To immediately replace the old batteries labelling from SW409 to SW102.</li> <li>2. Management to take the immediate actions to train/source for Competent Person for the Estate.</li> <li>3. In the absence of Competent Person, a trained PIC is assigned to undertake the workplace inspection at the Scheduled Waste Store to ensure that the Scheduled Waste Management labelling/handling is in place in accordance to the procedures.</li> <li>4. All containers with no label are immediately identified, and re-labelled with the correct information.</li> <li>5. To immediately conduct briefing to all tractor drivers on Chemical Handling Procedure and to ensure that all secondary containers are equipped with proper labelling.</li> </ol>
<p><b>Root Cause Analysis:</b></p>	<ol style="list-style-type: none"> <li>1. Lapses in ensuring Competent Person availability (after the transfer of the Competent Persons to other estates) including to conduct effective workplace inspection to ensure that the Scheduled Waste Management labelling/handling is in place in accordance to the procedures.</li> <li>2. No follow up evaluation plan to workers after briefing to ensure workers fully understand chemical labelling on secondary storage/container and subsequently stored hydraulic oil in a container without proper labelling.</li> <li>3. Lapses in enforcement and monitoring of any non-compliant practices on scheduled waste and chemical handling.</li> </ol>
<p><b>Corrective Actions:</b></p>	<ol style="list-style-type: none"> <li>1. To conduct refresher briefing to the store attendant on the requirement of scheduled waste storage and handling.</li> <li>2. To put in place a proper human resource plan for Competent persons to ensure that relevant Competent Persons (eg CEPSWAM etc) is always made available for the estate.</li> <li>3. Enforcement of e-SIME+ System as platform for any non-conforming practices reporting for further action</li> <li>4. To conduct scheduled 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 including periodic evaluation plan put in place, to ensure adequate understanding on the subject matter.</li> <li>5. Enforcement of e-SIME+ System as platform for any non-conforming practices reporting for further action.</li> </ol>
<p><b>Assessment Conclusion:</b></p>	<p>The CAP submitted found adequate to address the non-conformity. The effectiveness of CAP implementation will be assessed during next assessment.</p>

Non-conformity			
<b>NCR Ref #</b>	2388152-202309-N2	<b>Issued Date</b>	07/9/2023
<b>Due Date</b>	Next assessment visit	<b>Closure Date</b>	Open
<b>Indicator &amp; Category (Critical / Minor)</b>	6.7.2 (Minor)		
<b>Statement of Nonconformity:</b>	There were lapses in the monitoring of the first aid boxes at Sapong Estate.		
<b>Requirement Reference:</b>	Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites.		
<b>Objective Evidence:</b>	Verified the First Aid Box at the Estate Chemical Store and Schedule Waste Store Sapong Estate to have expired items. The first aid box had triangular bandage that expired on 05/2019 and 03/2021 respectively. Further verification on the First Aid Box monitoring for the Chemical Store was done on 15/08/2023 stating that all items were checked.		
<b>Corrections:</b>	All the expired triangular bandages in the first aid boxes are immediately replaced with new sets.		
<b>Root Cause Analysis:</b>	Lack of monitoring by Estate management in ensuring that expiry of all items in the First Aid Box including items that are not fast consumables/rarely used are tracked of the expiry dates and replaced on time.		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. MA to establish a tracking list for each first aid boxes which include the expiry dates of all items including for triangular bandages and to put in place a monitoring to trigger replacement of the items before expiration dates.</li> <li>2. Monthly first aid box checklist to be improved by including the monitoring of expiry date for all items including triangular bandage.</li> <li>3. Estate management to include an agenda on the monitoring of First Aid Boxes (including expiry dates of items contained in First Aid Boxes) during OSH Meeting.</li> <li>4. Enforcement of e-SIME+ System as platform for any non-conforming practices reporting for further action.</li> </ol>		
<b>Assessment Conclusion:</b>	The CAP submitted found adequate to address the non-conformity. The effectiveness of CAP implementation will be assessed during next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	Good arrangement for audit visit and high commitment by Sustainability Department and units person in charge.

<b>PF 2</b>	Good positive relationship maintained and highlighted by internal and external stakeholders
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### 3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
<b>NCR Ref #</b>	2252028-202209-M1	<b>Issued Date</b>	22/9/2022
<b>Due Date</b>	21/12/2022	<b>Closure Date</b>	30/11/2022
<b>Indicator &amp; Category (Critical / Minor)</b>	2.2.2 (Critical)		
<b>Statement of Nonconformity:</b>	The evidence of legal due diligence of all contracted third parties was not satisfactorily demonstrated. This finding has been escalated to Major/Critical Nonconformity due to recurrence of issue under same Minor indicator.		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
<b>Objective Evidence:</b>	<p>1) At Melalap POM, based on a sampled the payslip (August 2022) of a worker [IC No.: 9008xx-xx-xxxx] of a contractor (United Machinery Parts Supply), it was found that the deduction of EPF was not in accordance with Employees Provident Fund (EPF) Act 1991. The deduction stated in his payslip was RM99.00 which is supposed to be RM121.00, according to Third Schedule of EPF Act 1991, Section 43 &amp; 44A.</p> <p>2) A food service contractor (Santai Café) at Sapong Estate has hired six employees. However, based on site visit and documentation review, only the cook has taken typhoid vaccination as required under Food Act 1983, Food Hygiene Reg. (2009).</p>		
<b>Corrections:</b>	<p>1) Mill have informed the contactor on the issue raised for the EPF monthly deduction and to ensure the previous month starting from July onwards to deduct 11% for EPF from their workers monthly salary/income.</p> <p>2) Management has advised the owner to ensure all employee of Santai Café required to take Typhoid vaccination as required under Food Act 1983, Food Hygiene Reg 2009.</p>		
<b>Root Cause Analysis:</b>	<p>1) The contractor does not aware on the minimum EPF monthly deduction to be at 11% from total monthly salary/income since July 2022.</p> <p>2) Previously Santai Café operate with 2 employees (husband and wife), only the cook taken typhoid vaccination. Santai Café owner didn't aware that all the employee required to take Typhoid vaccination as required under Food Act 1983, Food Hygiene Reg 2009.</p>		
<b>Corrective Actions:</b>	<p>1) Contractor have made the deduction to meet the 11% EPF deduction from July to August 2022</p> <p>2) Santai Café employee has taken the Typhoid vaccination at Klinik Khoo Tenom and register for Sijil Kesihatan at Majlis Daerah Tenom. According to the owner</p>		



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	Santai Café having 4 workers and all the have got the Typhoid vaccination on 23/9/2022. Append herewith Sijil Kesihatan Majlis Daerah Tenom
<b>Assessment Conclusion:</b>	<p>Off-site verification:</p> <p>Evidence of CAP implementation was submitted via email as following:</p> <ul style="list-style-type: none"> <li>- EPF KWSP 5 Form 6 # 6012615700822 for August 2022 Contributions</li> <li>- EPF official receipt # PWF2022098013083; Date: 30/9/2022</li> <li>- EPF KWSP 5 Form 6 # 6012615700922 for September 2022 Contributions</li> <li>- EPF official receipt # PWF2022098013128; Date: 30/9/2022</li> <li>- Payslips of contractors' (United Machinery Parts Supply) workers for the month of July and August 2022</li> <li>- Records of Anti-Typhoid injection by Dr. Lim Kah Hing of Poliklinik TMC Sdn. Bhd. with Majlis Daerah Tenom acknowledgement for 4 employees of Santai Café dated on 23/9/2022</li> </ul> <p>Based on evidences verified, issue confirmed to be addressed accordingly, hence Major NC was closed on 30/11/2022.</p>
<b>Verification statement</b>	<ol style="list-style-type: none"> <li>1. Management has advised the owner to ensure all employee of Santai Café required to take Typhoid vaccination as required under Food Act 1983, Food Hygiene Reg 2009.</li> <li>2. Santai Café employees has taken the Typhoid vaccination at Poliklinik Tenom Sdn Bhd and registered for Sijil Kesihatan at Majlis Daerah Tenom with records available for verification. Santai Café has 4 workers, and all the workers have gotten the Typhoid vaccination on 23/9/2022 with records available for verification.</li> <li>3. Visit to the canteen of the estates and mill confirmed that all workers had Typhoid vaccination. Records were available for verification.</li> </ol> <p>Hence there were no recurrence of the issue. Thus, the critical NC remains closed.</p>

Non-conformity			
<b>NCR Ref #</b>	2252028-202209-M2	<b>Issued Date</b>	22/9/2022
<b>Due Date</b>	21/12/2022	<b>Closure Date</b>	30/11/2022
<b>Indicator &amp; Category (Critical / Minor)</b>	3.6.1 (Critical)		
<b>Statement of Nonconformity:</b>	Some mitigations implemented are insufficient for operations identified with H&S issues based on risk assessments conducted.		
<b>Requirement Reference:</b>	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
<b>Objective Evidence:</b>	<p>1) Sapong Estate: - During site visit at the Spraying Area at Field 2020A, Sapong Estate, it was found that 8 Sprayers were not using goggle and using N95 mask during conduct spraying activities. It was not in line with Safety Operating Procedure – Penyemburan Racun, Document No: SPE/SOP-13 dated 01/01/2021 Section 5 Setiap Pekerja Meracun diwajibkan menggunakan pakaian keselamatan yang telah di berikan/ disediakan oleh pihak pengurusan. Diantaranya seperti berikut: Penutup Hidung Respirator, Sarung Tangan Getah, Kasut Panjang getah, Cermin mata/pelindung mata dan apron. It also not in line with CHRA</p>		

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	<p>recommendation dated 14/08/2020 Section 8.0 Recommendation No. 2 Work Unit: Sprayer (1) To wear respirator 3M3744 or Single Cartridge Respirator. - There is no portable eye wash provided at spraying area at Sapong Estate. It was not in line with Safety Data Sheet (SDS) Monex HC, Sornic HC dated 23/07/2020 Rev.13 Section 8 Exposure Control and Personal Protection, Other equipment: Safety showers and eye wash station should be provided in work areas.</p> <p>2) Melalap POM: - During site visit at Decanter Station, it was observed that Welder with Employee No: 34777 was conduct welding operation for leaking at decanter heavy phase outlet pipe while standing on a steel chair. PPE worn were Face Shield, Leather Gloves and Safety Shoes. However, it was observed that the welder does not wear welding apron. In addition, during interview with foreman at Workshop (Welding Area), there is no evidence that Welding Apron has been provided for welding works. Verification of PPE Issuance record, there is no evidence that welding apron has been issued for him (Employee No: 34777) as per record from 03/01/2022 to 13/09/2022. It was not in line with SOP Station 16: Workshop Issue No:1 Ver. No:1 dated 01/11/2008 Section 16.3.1.2 (e) When performing extensive welding works, use welding apron and HIRARC Workshop dated 30/04/2022 (1) "Operasi Kimpalan; Hazard: Percikan Kimpalan, Kesan: Cedera,Melecur, Kawalan Risiko: SOP, PPE, PWI, Safety Training".</p>
<p><b>Corrections:</b></p>	<p>1) All the sprayer has been advised/brief the important of wearing recommended PPE during spraying to avoid chemical exposure which might affect their health and safety</p> <p>2) Mill have made quotation request and purchase the Welding Apron for the usage during Extensive Welding works.</p>
<p><b>Root Cause Analysis:</b></p>	<p>1) The sprayer did not use the single cartridge mask but using 2M N95 mask and not using google due to feeling uncomfortable if using recommended PPE</p> <p>2) Workshop fitter does not wear welding apron when conducting welding works at mill. Mill also does not provide welding apron for standby. This is due to the management point of view of "Extensive Welding" that were mentioned inside the Standard Operating Procedure (SOP).</p>
<p><b>Corrective Actions:</b></p>	<p>1) Management has equipped the involved spray gang with 3M 3200 single cartridge mask and 3M google as a standard PPE for sprayer as per recommend in CHRA and Monex SDS</p> <p>2) Workshop fitter to ensure all PPE are worn during executing/conducting Extensive welding works at Mill</p>
<p><b>Assessment Conclusion:</b></p>	<p>Off-site verification: Evidence of CAP implementation was submitted via email as following:</p> <ul style="list-style-type: none"> <li>- Records of PPE i.e 3M 3200 single cartridge masks and 3M goggles issuance to all sprayers dated on 8/10/2022</li> <li>- Records of briefing and demonstration of PPE use for all sprayers dated on 8/10/2022</li> <li>- Records of PPE i.e leather welding apron issuance to all workshop welders dated on 19/10/2022</li> <li>- Records of briefing and demonstration of PPE use for all welders dated on 19/10/2022</li> </ul> <p>Based on evidence verified, issue confirmed to be addressed accordingly, hence Major NC was closed on 30/11/2022.</p>

<b>Verification statement</b>	<ol style="list-style-type: none"> <li>1. Field Visit to the estate’s spraying, harvesting and nursery operations confirmed that all workers were equipped with appropriate PPE’s as stated in the HIRARC. Visit to the mill operations also confirmed that all operators were equipped with appropriate PPE’s. Interview with the sampled worked confirmed that they are aware on the requirements to wear appropriate PPE’s while at work.</li> <li>2. The records of PPE issuance were verified at the estate and mills office. All issuances were recorded and acknowledged by the respective workers.</li> <li>3. The management of the mill conduct daily morning briefing on PPE importance to all workers. Records of Morning briefing were available for verification for all operating units.</li> </ol> <p>Thus, there were no recurrence of the issue and the critical NC remains closed.</p>
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<b>Non-conformity</b>			
<b>NCR Ref #</b>	2252028-202209-N1	<b>Issued Date</b>	22/9/2023
<b>Due Date</b>	07/9/2023	<b>Closure Date</b>	07/9/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	2.1.2 (Minor)		
<b>Statement of Nonconformity:</b>	The legal references in environmental aspect and impact identification form were not updated.		
<b>Requirement Reference:</b>	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.		
<b>Objective Evidence:</b>	It was verified in all operating units within SOU 27 that the documented Environmental Aspect Impact Identification Form (Serial No: EAI/2018/XX/XXX has identified the environmental aspects, loads and environmental impacts for all relevant mill and estate activities. However, the Environmental Aspect and Impact Identification Register (EAI/2018/xx/xxx) was found to refer to few outdated versions of legal requirements including EQ (Clean Air) Reg 78 and EQ (Scheduled Waste) Reg 1989 which is presently revised to EQ (Clean Air) Reg 2014 and EQ (Scheduled Waste) Reg 2005 respectively.		
<b>Corrections:</b>	Management has referred to expertise from Regional RSQM to have the updated version of Environmental Aspect Impact Identification Form.		
<b>Root Cause Analysis:</b>	Environmental Aspect Impact Identification Form legal reference was not update with the latest version during the audit.		
<b>Corrective Actions:</b>	The Environmental Aspect Impact Identification Form updated and compiled in EAI file.		
<b>Assessment Conclusion:</b>	Environmental impact & aspect evaluation has been prepared with reference number EAI/2023/04. Several activities was verified which is Compound, Creche/Nest, Dispensary, Field-FFB Transportation, Main Entrance, Pest & Disease control, Petrol/Gasoline, Power Station, Road and Schedule Waste Store. Review has been done on 25/05/2023 for Melalap Estate and Sapong Estate. Environmental Impact Evaluation Form with reference number EIE/2023/01 has been prepared. Latest review was done on 26/05/2023.		

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	<p>For Melalap POM, environmental aspect and impact has been review on 03/06/2023. There is no latest new activity or machine in oil mill. Several activities was verified which is Maintenance of FFB Ramp, Operation at Conveyor and Operation of weighbridge. The environmental management plan has been established base on assessment of aspect and impact for Mill activity.</p> <p>For the legislation, all related activity legal reference was up to date.</p> <p>Sample data as below: Activity Legal reference Operation of weighbridge Electrical supply 1990 Air Emission EQ (Clean Air Regulation) 2014 Spillage EQ (Schedule Waste) Reg. 2005 The Minor NC CAP was conducted efficiently; thus, Minor NC was closed on 07/09/2023.</p>
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Non-conformity			
<b>NCR Ref #</b>	2252028-202209-N2	<b>Issued Date</b>	22/9/2023
<b>Due Date</b>	07/9/2023	<b>Closure Date</b>	07/9/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	Minor (2.1.3)		
<b>Statement of Nonconformity:</b>	Legal or authorised boundaries are not clearly demarcated and not visibly maintained.		
<b>Requirement Reference:</b>	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.		
<b>Objective Evidence:</b>	During site visit at boundary area Sapong Estate, Field P00 P, it was found that there was no clear markers/physical line between the field with Kg. Pantonganas. It was not in line with the requirement stated in the SOP section B7 (Boundaries) dated 01/11/2008 item 7.2 (a) Estate boundaries must be marked with iron pipes, planted along the boundary lines, and painted with red/white alternating rings and (b) If parameters fencing is required, barbed wire fencing with concrete posts with 5 strands must be constructed.		
<b>Corrections:</b>	Management to adhere to SOP section B7 (Boundaries) dated 01/11/2008 item 7.2 (a) Estate boundaries must be marked with iron pipes, planted along the boundary lines, and painted with red/white alternating rings.		
<b>Root Cause Analysis:</b>	No clear markers along boundary perimeter due to both parties (Sapong Estate and Kg. Pantongan) has agreed the boundary stone as boundary markers at Field 00P1.		
<b>Corrective Actions:</b>	Sapong Estate had identified the boundary and mark the perimeter boundary with boundary marker painted with red/white alternating rings.		
<b>Assessment Conclusion:</b>	Legal or authorised boundaries are clearly demarcated and visibly maintained as per verification during site visit. Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of sample estate to indicate the legal boundaries are through construction of trenches and parameter road. This was confirmed through the field visit at Melalap Estate and Sapong Estate found practiced was clearly visible. Markers with red/white was sighted. Boundary and monthly patrolling record was verified.		

	<p>Melalap Estate - Sighted boundary at P02 M neighbouring Government Land and P01 MA boundary with Sungai Pegalan. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p>Sapong Estate - Sighted boundary at P00P1 neighbouring Kg. Sri Tanjung and P02AC neighbouring with Kg Batu Lapan. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p>The Minor NC CAP was conducted efficiently; thus, Minor NC was closed on 07/09/2023</p>
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Opportunity for Improvement	
OFI#	Description
<b>OFI 1</b>	<p><b>OFI Statement:</b>  <u>Indicator 3.6.2</u>                      Monitoring could be further improved on the use of flashback arrestor for Oxygen - Acetylene Gas Cutting set to ensure the effectiveness of the H&amp;S plan to address health and safety risks to people.</p> <p><b>Verification / Follow-up actions:</b>                      Sighted evidence of installation of flashback arrestor for Oxygen - Acetylene Gas Cutting. Monitoring has been made during workplace inspection and sighted evidence of discussion during quarterly OSH meeting.</p>

### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1834696-201906-M1	Critical	6.1.1	11/10/2019	Closed on 09/01/2020
1834696-201906-M2	Critical	6.5.1	11/10/2019	Closed on 09/01/2020
1834696-201906-M3	Critical	2.1.3	11/10/2019	Closed on 09/01/2020
1834696-201906-N1	Minor	4.7.3	11/10/2019	Close on 08/10/2021
1834696-201906-N2	Minor	4.7.5	11/10/2019	Close on 08/10/2021
1834696-201906-N3	Minor	4.7.5	11/10/2019	Close on 08/10/2021
1834696-201906-N4	Minor	5.3.3	11/10/2019	Close on 08/10/2021
2111486-202110-N1	Minor	2.2.2	08/10/2021	Escalated to Major
2252028-202209-M1	Critical	2.2.2	22/09/2022	Close on 30/11/2022
2252028-202209-M2	Critical	3.6.1	22/09/2022	Close on 30/11/2022
2252028-202209-N1	Minor	2.1.2	22/09/2022	Close on 07/09/2023
2252028-202209-N2	Minor	2.1.3	22/09/2022	Close on 07/09/2023
2388152-202309-M1	Critical	7.10.3	07/09/2023	Close on 26/10/2023
2388152-202309-N1	Minor	3.3.2	07/09/2023	"Open"
2388152-202309-N2	Minor	6.7.2	07/09/2023	"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 Melalap Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
School Teachers	- Melalap 3M Humana School - SK Melalap	Face to face interview
Gender Committee Representatives	- Melalap & Sapong Estate Medical Assistant - Sapong Estate Crèche Ayah	Face to face interview
General Vendor/Supplier/Contractor	- SXXX Enterprise (Machine rental supplier) - BXXXXXX Contractor (Mill equipment supplier)	Face to face interview
External FFB Supplier	KXXX KXXXXXXXX (MPOB) Tenom	Face to face interview
Union Representatives	Estate & Mill Sabah Plantation Industry Employees Union (SPIEU) representatives	Face to face interview
Government Department	Pejabat Tenaga Kerja (PTK) Kota Kinabatangan	By phone

Stakeholders comment	
1	<p><b>Feedbacks:</b> School Teachers</p> <p>Company managements always visits and contributes to school programs and activities. 90% of children among estate and mill foreign workers are schooling at Humana while about 10% children from neighbour estate. Building and facilities belonged to company used for Humana School were well maintained by them. SK Melalap school children among estate and mill local employees’ children. Company provides transport</p>

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	<p>to and from school among employees’ children. School attendance among children of SDP’s mill and estate are good.</p> <p><b>Audit Team verification and response:</b> No further issue</p>
2	<p><b>Feedbacks:</b> Gender Committee Representatives Women employees entitled to 3 months paid maternity leave period. Gender committee event conducted periodically involving all women employees including male employees’ spouses. Frequent training conducted on awareness of violence act and sexual harassment in workplace and company’s housing. No issue of violence act and sexual harassment happened since last audit.</p> <p><b>Audit Team verification and response:</b> No further issue</p>
3	<p><b>Feedbacks:</b> General Vendor/Supplier/Contractor For general supplier, purchase made with complete purchasing documents provided by company. For contractor, no issue in purchases contractual matters since company always give priority to locals and/or long-served contractor to provide service/contract work. Contract pricing fair to both parties for direct award contract unless involve tendering that need to be negotiated. Nevertheless, negotiated price for specific contract/tender work if awarded still fair to both parties. Payment always made promptly upon invoices.</p> <p><b>Audit Team verification and response:</b> No further issue</p>
4	<p><b>Feedbacks:</b> External FFB Supplier Proper FFB purchase agreement signed between the mill and FFB supplier with clear terms and conditions on pricing and payments. KXXX KXXXXXXX (MPOB) Tenom been supplying FFB consistently due to its location near the mill. The mill requesting 100% MSPO certified FFB but KXXX KXXXXXXX unable to provide since some of its supplier still not yet MSPO certified. Mill always explain the necessity of getting 100% certified MSPO sources to ensure compliance with MSPO requirements. Mill willing to offer help to ensure 100% compliance with MSPO requirements.</p> <p><b>Audit Team verification and response:</b> Mill and regional sustainability personnel often conducted briefing to FFB suppliers on MSPO requirements. Soon FFB traders and collection centres will be required to get certified with RSPO.</p>
5	<p><b>Feedbacks:</b> Union Representatives No restrictions by management to all mill and estate employees to join union. Almost all local workers associated with SPIEU while more than 50% foreign workers become member. Required fees paid by company with no issue.</p> <p><b>Audit Team verification and response:</b> No further issue</p>
6	<p><b>Feedbacks:</b> Government Department Although Sabah Labour Ordinance not yet revised to be in-line with Employment Act 1955, Sime Darby Plantations showed initiative to comply with the requirement. As example, SDP implemented 7.5 hours daily working hours but not mandatory to be followed by Sabah employer.</p> <p><b>Audit Team verification and response:</b> Verification made with Pejabat Tenaga Kerja (PTK) Officer since it was found among contractors that their worker still working 8 hours daily instead of 7.5 hours.</p>

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

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



**3.5 Impartiality and conflict of interest**

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



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

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Melalap Oil Mill has complied with the Malaysia National Interpretation 2019 of the RSPO P&amp;C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Melalap Oil Mill is remain certified.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<p><b>Name:</b>  <b>NOR HALIS ABU ZAR</b></p>	<p><b>Name:</b>            Shylaja Devi Vasudevan Nair</p>
<p><b>Company Name:</b>  <b>BSI SERVICES MALAYSIA SDN BHD</b></p>	<p><b>Company Name:</b>            Sime Darby Plantation Bhd</p>
<p><b>Title:</b>  <b>CLIENT MANAGER</b></p>	<p><b>Title:</b> Head, Sustainability Compliance Unit,            Group Sustainability Dept.</p>
<p><b>Signature:</b></p> 	<p><b>Signature:</b></p> <p><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></p> 
<p><b>Date:</b> 26/10/2023</p>	<p><b>Date:</b> 28/11/2023</p>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1:</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>SOU27 continued to disseminate public information management documents such as land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans. 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;  <a href="http://www.simedarbyplantation.com/">http://www.simedarbyplantation.com/</a></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 website for Yayasan Sime Darby is <a href="http://www.yayasansimedarby.com/">http://www.yayasansimedarby.com/</a>.</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Information available in appropriate languages and accessible to relevant stakeholders through sample meeting latest conducted at each specific operating unit. For SOU27, stakeholder meeting was carried out on 8/8/2023 at Sapong Estate. Stakeholder bulletin</p>	Complied

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		(complaint and grievance procedure, fire prevention and RSPO requirements) and social dialogue reinforcement were discussed in the meeting with internal stakeholders. Information (in bi-lingual English and Malay) can be seen in the strategic area within estate and mill compound	
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained. - Critical (Major) compliance -	Should there be any request for information that are specified in the RSPO P&C from any stakeholders, record of request can be maintained in few ways such as Communication Logbook, and filing of correspondence documents e.g., email printout, and letter. Engagement process via email/letter to stakeholders were also done together with feedback form if there is any issue to be reported or highlighted to the management. Nonetheless, there was no request for information as verified during audit.	Complied
1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. Related procedures were briefed to external stakeholders during stakeholder consultation meeting on 8/8/2023 and for workers during muster briefing sessions at respective operating units.	Complied
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	Both the estate and the mill continued to maintain the stakeholder's 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 of stakeholders has been established by the mill. The list was updated on for 2023 comprises of various parties, neighbouring communities and Government Agencies. The subjects discussed during the meeting	Complied

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		<p>held on 3/8/2023 with the presence including stakeholders among others discussed on the following subjects;</p> <ul style="list-style-type: none"> <li>a) Company Policies and SOP</li> <li>b) Issues relating to neighborhood and concerns.</li> <li>c) Appointment of social liaison officer for each OU</li> <li>d) Explanation of 11 ILO indicators</li> </ul> <p>There is no major course of concern of issues highlighted during the meeting</p>	
<b>Criterion 1.2:</b> 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>Sime Darby Plantation Berhad has implemented Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The policy was developed in Bahasa Malaysia and English.</p> <p>Sime Darby Plantation Berhad’s Group Sustainability &amp; 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 &amp; Authorities (GPA) and the Code of Business Conduct (COBC). Sime Darby Plantation Berhad has imposed the implementation of the COBC to all its contractors and vendors by signing the Vendors Integrity Pledge document. Copies of the signed pledges were kept by all the operating units and made available for verification. Besides, policies were briefed to stakeholders during the stakeholder meeting. COBC briefing for contractor/vendor was done during contract/VIP signing i.e XYZ Enterprise on 26/4/2023.</p>	Complied

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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>Sime Darby Plantation has established the Vendor Integrity Pledge (VIP) and Vender COBC as a due diligence for external parties/OCP engaged by Operating Units. Sighted sampled as below:</p> <ul style="list-style-type: none"> <li>i. XYZ Enterprise</li> <li>ii. XXXX Berhad</li> <li>iii. XXXX Bersama</li> </ul> <p>At the operating unit level, the system to monitor is mainly by regular checking of the contractors' legal compliance and employees' welfare by the management. Apart from that, annual internal audit is also one of the methods to ensure whether the management is monitoring the compliance and implementation of the policy of the counterparties.</p>	Complied
<p><b>Principle 2: Operate legally and respect rights</b></p>			
<p><b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p><b>(C)</b> The Unit of Certification complies with legal requirements</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad SOU 27 Melalap 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>Melalap Estate:</u></p> <ul style="list-style-type: none"> <li>1. MPOB License #531977002000 valid from 01/09/2022 to 31/08/2023 (Renewal has been request dated 11/07/2023 and waiting for process)</li> <li>2. Air Receiver #SB PMT 597 valid until 04/07/2024</li> </ul>	Complied

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		<p>3. Business Licence #TNM/2023/678 dated 10/01/2023</p> <p>4. Lesen Untuk Menggaji Pekerja Bukan Pemastautin #JTK.H.TNM:600-4/1/92112/577 valid from 12/03/2023 to 11/03/2024</p> <p>5. Wages Deduction Permit #JTKSBH/PMT/113/2022/0068 valid from 12/04/2022 to 11/04/2024</p> <p>6. Diesel Permit #B.PGK.SB(KGU)05/04(PBKB) valid from 11/08/2021 to 09/08/2024</p> <p><u>Sapong Estate:</u></p> <p>1. MPOB License #532297002000 valid from 01/09/2022 to 31/08/2023 (Renewal has been request dated 11/07/2023 and waiting for process)</p> <p>2. Diesel Permit #B.PGK.SB(KGU)27/07 (PBKB) valid from 27/10/2021 to 26/10/2024</p> <p>3. Air Receiver #SB PMT 599 valid until 16/10/2024</p> <p>4. Deduction wages permit for Passport #JTKSBH/PMT/113/2023/0003 valid from 18/01/2023 until 17/01/2025</p> <p>5. Energy Commission permit #000421/2022 valid 24/01/2024</p> <p>6. Weighbridge calibration #DE18009069 inspected by De Metrology Sdn Bhd dated 10/02/2023</p> <p><u>Melalap POM:</u></p> <p>1. MPOB Licence #535146004000 valid from 01/01/2023 to 31/12/2023</p>	
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		<ol style="list-style-type: none"> <li>2. Jadual Pematuhan DOE Licence #003562 with reference file JAS.SHQ.600-3/1/145 valid from 01/07/2023 to 30/06/2024</li> <li>3. Back Pressure Vessel #SB PMT 6247 valid until 13/05/2024.</li> <li>4. Boiler #SB PMD 2092 valid until 11/10/2024.</li> <li>5. Horizontal Air Receiver Tank #SB PMT 14573 valid until 13/05/2024</li> <li>6. Deduction wages permit #JTKSBH/PMT/113/2022/0039 valid from 25/03/2022 to 24/03/2024</li> <li>7. License for Abstraction water #BAKAJ/334/300/05/07/08/15 valid until 31/12/2023</li> <li>8. Weighbridge calibration #DE18009109 inspected by De Metrology Sdn Bhd dated 11/07/2023</li> <li>9. Weighbridge calibration #DE17003147 inspected by De Metrology Sdn Bhd dated 10/02/2023</li> <li>10. Competence person CePSWaM #CePSWaM/03315 to Manager NRIC 8108XX-XX-XXXX.</li> <li>11. Competence person CePPOME #CePPOME/00176 to Manager NRIC 8108X-XX-XXXX.</li> <li>12. Steam Engineer 2<sup>nd</sup> Grade #058/2014 to Manager NRIC8108XX-XX-XXXX dated 15/05/2014</li> <li>13. Competence Person AGT to Manager NRIC 81XXXX-XX-XXXX dated 30/03/2023</li> </ol>	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.	Sime Darby Plantation Berhad SOU 27 Melalap POM Certification Units has ensured legal compliance is in place. Refer Legal Other Requirement Register (LORR) Summary of Compliance updated	Complied

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	<p>- Minor compliance -</p>	<p>April 2023. Refer Appointment letter to person in charge dated April 2023 to Assistant Manager Mill and Estate, that stated on monitor LORR and legal requirements. The system purposely to track changes to the laws and regulations. Among the latest updated laws were:</p> <ul style="list-style-type: none"> <li>• Minimum wages order 2022</li> <li>• Employees’ Social Security (Amendment) Act 2022</li> <li>• Employment Insurance System (EIS) (Amendment) Act 2022</li> <li>• Employment (Amendment) Act 2022</li> <li>• Emergency (Employee’s Minimum Standards of Housing, Accommodations and Amenities) Ordinance 2021</li> </ul>	
<p>2.1.3</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained as per verification during site visit. Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of sample estate to indicate the legal boundaries are through construction of trenches and parameter road. This was confirmed through the field visit at Melalap Estate and Sapong Estate found practiced was clearly visible. Boundary and monthly patrolling record was verified.</p> <p>Melalap Estate</p> <p>Sighted boundary at P02 M neighbouring Government Land and P01 MA boundary with Sungai Pegalan. Verified that there is no planting beyond these legal or authorised boundaries.</p> <p>Sapong Estate</p>	<p>Complied</p>



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		Sighted boundary at P00P1 neighbouring Kg. Sri Tanjung and P02AC neighbouring with Kg Batu Lapan. Verified that there is no planting beyond these legal or authorised boundaries.	
<b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	A list of contracted parties maintained by all operating units within SOU 27 in their respective List of Stakeholders FY 2023 which consists of stakeholders among OCP (Outside Crop Purchase), Transporter, Contractors, Vendors & Suppliers, Local Communities and Other Interested Parties.	Complied
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.  Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available. - Minor compliance -	Contracts contain specific clauses on meeting applicable legal requirements available in the attached Vendor Integrity Pledge records for sampled contractors as per below:  <u>Melalap Palm Oil Mill</u> 1. Contract Agreement dated 01/03/2023 between Melalap Oil Mill (Tenom) and UXXXXX MXXXXXXXXX PXXXX SXXXX. 2. Supply of Labour and Heavy Machinery; Contractor: SXXX EXXXXXXXXX; Dated 08/12/2022.  <u>Melalap Estate</u> 3. Letter of award for Fresh Fruit Bunches Transportation Services for Sime Darby Plantation Berhad's Estates; Transporter: PXXXXXXXXX AXXXX; Dated: 22/02/2022. 4. Supply of Labour and Heavy Machinery; Contractor: SXXX EXXXXXXXXX; Dated 08/12/2022.  <u>Sapong Estate</u>	Complied

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		<p>5. Letter of award for Fresh Fruit Bunches Transportation Services for Sime Darby Plantation Berhad’s Estates; Transporter: PXXXXXXXX AXXXX; Dated: 22/02/2022.</p> <p>6. Supply of Labour and Heavy Machinery; Contractor: SXXX EXXXXXXXXX; Dated 08/12/2022.</p> <p>7. Letter of Award (LOA) Land Preparation and Related Works for Oil Palms Replanting; Contractor: JXXXXXX KXXXX SXX BXX; Dated 30/06/2020; Term: 01/07/2020 – 31/12/2023.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>The contract documents and Vendor Integrity Pledge (VIP) records sighted in the indicator 2.2.2 above also contain clauses disallowing child, forced and trafficked labour. No young workers are employed by contractors and vendors.</p>	Complied
<p><b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Melalap Palm Oil Mill receives certified FFB from its own supply base estate, Melalap Estate and Sapong Estate and non-certified FFB from Outsider Crop Producers (OCP), which includes 2 estates and 7 collection centres. The mill has obtained the required information as per indicator for all FFB suppliers. All records were available and verified during the assessment. Samples as below.</p> <p>1. FFB Collection Centres: CXX EXXXXXXXXXX; MPOB License Number: 522011015000; License Expiry Date: 30/06/2023. The MPOB License has been requested for renewal with records available for verification.</p> <p>2. FFB Collection Centre: KXXXXXXXX MXXXXX KXXXXXXXX; MPOB License Number: 617517015000; License Expiry Date: 31/07/2024.</p>	Complied

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		<p>3. FFB Collection Centres: SXXXXXXX MXXXXX BXXXXXX; MPOB License Number: 619079015000; License Expiry Date: 31/01/2024</p> <p>4. FFB Collection Centre: AXXX SXXXX CXXXXX; MPOB License: 616346015000; License Expiry Date: 31/03/2024.</p> <p>5. OCP Estate: NXX WXX HXX; MPOB License Number: 481418301000; License Expiry Date: 30/11/2026.</p> <p>6. OCP Estate: LXXXXX PXXX; MPOB License; 413195701000; License Expiry Date: 31/11/2027.</p>	
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>As per RSPO Announcement dated 15 February 2022 on Interim Measure for Fulfilment of Indicator 2.3.2 of the 2018 RSPO Principles &amp; Criteria — On Legality of Indirect FFB Supplies, Sime Darby Plantation has submitted the indicator 2.3.2 Case Register to RSPO as per communication email dated 11/11/2022 and acknowledge and registered into the system by RSPO as per communication email dated 24/11/2022. Sime Darby Plantation targeted to fulfil the requirement by November 2023 as per Stepwise Plan for Compliance to Indicator 2.3.2 established.</p>	Complied
<p><b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b></p>			
<p><b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The business plan for the mill is reflected in the form of an annual budget (MPLAN) and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX.</p> <p>The business or management plan for the estates were presented in the form of annual budget (MPLAN) with 5 years projection (2023 – 2027). The annual budget contains the crop projection and the</p>	Complied

		<p>finance allocation for field operation and administration. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p> <p>Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. In the 5 years business plan include items as follows:</p> <ul style="list-style-type: none"> <li>a) Palm oil mill             <ul style="list-style-type: none"> <li>i. Mill intake – FFB input</li> <li>ii. Production of CPO</li> <li>iii. Production of PK</li> <li>iv. Total Palm Oil Extraction</li> <li>v. Total Palm Kernel Extraction</li> <li>vi. Mill cost</li> </ul> </li> <li>b) Oil Palm Estate             <ul style="list-style-type: none"> <li>i. Total crop projection and yield potential</li> <li>ii. Activity direct cost                 <ul style="list-style-type: none"> <li>a. Mature upkeep</li> <li>b. Manuring</li> <li>c. Harvesting and collection</li> <li>d. Transportation</li> <li>e. Nursery</li> </ul> </li> <li>iii. Estate administration</li> </ul> </li> </ul>	
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		<ul style="list-style-type: none"> <li>a. Admin Cost</li> <li>iv. Labour overhead</li> <li>v. Road and bridges</li> <li>vi. Cost of production.</li> </ul> <p>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2027) and well documented upon request.</p>																			
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>Melalap POM Supply Base has established a long-range replanting program until FY 2028. Replanting is planned for the fields older than 25 years, non-performance fields (yield) and Ganoderma infected palms. The total hectare (Ha) for the projected replanting of Melalap Estate are as follows:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Estate</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> <th>2028</th> </tr> </thead> <tbody> <tr> <td>Melalap</td> <td>168.51</td> <td>241.86</td> <td>239.16</td> <td>220.07</td> <td>0.00</td> </tr> <tr> <td>Sapong</td> <td>252.89</td> <td>268.15</td> <td>243.31</td> <td>237.80</td> <td>272.42</td> </tr> </tbody> </table>	Estate	2024	2025	2026	2027	2028	Melalap	168.51	241.86	239.16	220.07	0.00	Sapong	252.89	268.15	243.31	237.80	272.42	Complied
Estate	2024	2025	2026	2027	2028																
Melalap	168.51	241.86	239.16	220.07	0.00																
Sapong	252.89	268.15	243.31	237.80	272.42																
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>Melalap POM Operating Unit held management reviews at their respective sites on a yearly basis. Among the matters discussed during the management review are as follows: -</p> <ol style="list-style-type: none"> <li>1. Results of Internal Audit</li> <li>2. Customer Feedback</li> <li>3. Status of preventive and corrective action plans</li> <li>4. Follow Up actions for management reviews</li> <li>5. Changes that could affect the management system</li> </ol>	Complied																		

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		<p>6. Recommendations for improvement</p> <p>The minutes of the meeting indicated that Internal audit findings were each thoroughly examined, and the corrective action plan were discussed. The management review was conducted at the respective operating units as follows:</p> <p>Melalap Estate: 26/05/2023</p> <p>Sapong Estate: 26/05/2023</p> <p>Melalap POM: 07/08/2023</p>							
<p><b>Criterion 3.2:</b> The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>									
<p>3.2.1</p>	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>In consideration to of environmental and social impact, the operating units has established continuous improvement plan. Reviewed the sampled established FY 2023 as follows:</p> <table border="1" data-bbox="1151 912 1924 1375"> <thead> <tr> <th data-bbox="1151 912 1355 1002">Improvement Issue</th> <th data-bbox="1355 912 1924 1002">Action plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="1151 1002 1355 1206">Mill operation</td> <td data-bbox="1355 1002 1924 1206"> <p>Oil recovery – To avoid any other source of water to flow into sludge pit in order to reduce effluent ratio.</p> <p>Clarification – to minimize using clean water for dilution and ex centrifuge discharge.</p> </td> </tr> <tr> <td data-bbox="1151 1206 1355 1375">Waste reduction</td> <td data-bbox="1355 1206 1924 1375"> <p>Hydraulic and lubricant oil</p> <p>Rectify all the leaking of hydraulic and lubrication oil at all station and proper record and tracking the usage at each tractor.</p> </td> </tr> </tbody> </table>	Improvement Issue	Action plan	Mill operation	<p>Oil recovery – To avoid any other source of water to flow into sludge pit in order to reduce effluent ratio.</p> <p>Clarification – to minimize using clean water for dilution and ex centrifuge discharge.</p>	Waste reduction	<p>Hydraulic and lubricant oil</p> <p>Rectify all the leaking of hydraulic and lubrication oil at all station and proper record and tracking the usage at each tractor.</p>	<p>Complied</p>
Improvement Issue	Action plan								
Mill operation	<p>Oil recovery – To avoid any other source of water to flow into sludge pit in order to reduce effluent ratio.</p> <p>Clarification – to minimize using clean water for dilution and ex centrifuge discharge.</p>								
Waste reduction	<p>Hydraulic and lubricant oil</p> <p>Rectify all the leaking of hydraulic and lubrication oil at all station and proper record and tracking the usage at each tractor.</p>								

		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%; padding: 5px;">Laboratory</td> <td style="padding: 5px;">Locate the proper oil trap to avoid the chemical go into monsoon drain.</td> </tr> </table> <p>Sample of continuous improvement focusing on Social And Environment as below;</p> <p>Melalap POM</p> <ol style="list-style-type: none"> <li>1. Repair Monsoon drain amount RM XX,XXX.XX</li> <li>2. Desludging of Existing Pond RM XXX,XXX.XX</li> </ol> <p>Melalap Estate</p> <ol style="list-style-type: none"> <li>3. Replacement of Asbestos Roofing for workers quarters amount RM XXX,XXX.XX</li> </ol> <p>Sapong Estate</p> <ol style="list-style-type: none"> <li>1. Replacement of Asbestos Roofing for workers quarters amount RM XXX,XXX.XX</li> <li>2. Re-wiring – 1<sup>st</sup> phase 20 units of house amount XXX,XXX.XX</li> </ol> <p>From the interview and document review, the management already improved the housing condition like new painted house for all workers housing this project was complete in Oct 2022. For the bedstead, mattress and wardrobe this verified during site visit at workers housing and record received by workers.</p>	Laboratory	Locate the proper oil trap to avoid the chemical go into monsoon drain.	
Laboratory	Locate the proper oil trap to avoid the chemical go into monsoon drain.				
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p><b>PROCEDURAL NOTE:</b></p>	<p>The Certification Unit has completely its RSPO metrics template version 2.1 and submitted to the CB prior to this assessment. The input data was found to be accurate based on the following records verification:</p> <ul style="list-style-type: none"> <li>• SAP accounting system</li> </ul>	Complied		

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	<p>The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<ul style="list-style-type: none"> <li>• Land titles</li> <li>• Complaints &amp; grievance records</li> <li>• Dept. of Safety &amp; Health’s JKKP8 form</li> </ul>	
<b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Standard Operating Procedures (SOPs) for the estate and mill has been established. Sime Darby SOP issued dated 02/01/2008 and Agricultural Reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU 27 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 Oil Mill holds two SOPs: Sustainable Plantation Management system (SPMS) version 1 dated 1/11/2008 and Mill Quality Management System version 1 dated 1/11/2008 as a guidance document to operate the mill.</p> <p>For Health, Safety and Environment, both mill and estates, Sime Darby has issued Health, Safety and Environment (HSE) Management System and Standard Operating Procedures. Sime Darby continuously updated the SOP established. Among the updated SOP as follows:</p> <ol style="list-style-type: none"> <li>1. UM HSE Management System Manual, UM/HSE/MS/01</li> <li>2. First Aid in Workplace Procedure, UM/HSE/OCP/01</li> </ol>	Complied



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		<ol style="list-style-type: none"> <li>3. Safety Harvesting Procedure, UM/HSE/OCP/02</li> <li>4. Personal Protective Equipment Procedure, UM/HSE/OCP/03</li> <li>5. Chemical Safety Management Procedure, UM/HSE/OCP/04</li> <li>6. Permit to Work (PTW) Procedure, UM/HSE/OCP/05</li> <li>7. OSH Risk Management Procedure, UM/HSE/SE/01</li> </ol>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- 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 Internal Audits by Group Sustainability Department, Workplace Inspection, and usage of checklists by the management of the operation units.</p> <p>Procedures for waste management and chemical handling was not effectively implemented.</p> <p>During site visit at SW Store, Sapong Estate, it was found that SW Items Old Batteries which generated 01/06/2023 was wrongly labelled with SW409 instead of SW102 as per procedure Section 2.0 SW102/ 103 for Batteries. It was not in line with Waste Management Procedures for Upstream Malaysia with reference number SD/SDP/GSD/HSE/0522/01 dated May 2022. During the visit to the Spraying Operation at Sapong Estate, it was identified that the tractor used to transport workers had extensive leakage of hydraulic oil at the engine. The worker had brought hydraulic oil, placed in a white container with no label, for the purpose of topping up due to the leakage. It was not in line with Chemical Handling Procedure with document reference number UM/HSE/OCP/04 dated 09/03/2021 section 6.5.1 and OSH (USECHH) Regulations 2000, Part VI Labelling &amp; Relabeling; 21, (1) An employer shall ensure that all chemicals hazardous to health supplied or purchased by him and used in the place of work are</p>	Non-compliance

		labelled and that the labels are not removed, defaced, modified or altered. (2) When the labels mentioned in sub regulation (1) are removed, defaced, modified or altered while the chemical hazardous to health is being used at the place of work, the employer shall re-label the chemical. Thus, Minor NC was raised.	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	The operating units maintain all the records of monitoring and actions taken for all issues raised during the visit. Reviewed the sampled monitoring records as follows: <u>Internal Audit</u> 1. Melalap POM – 25/05/2023 2. Melalap Estate – 24/05/2023 3. Sapong Estate – 23/05/2023 <u>Workplace Inspection (WPI).</u> 1. Melalap POM: 14/06/2023 2. Melalap Estate: 19/06/2023 3. Sapong Estate: 21/06/2023	Complied
<b>Criterion 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented. - Critical (Major) compliance -	There was no new planting reported in the sampled estates. SIA was conducted on 19 – 21/05/2015 for SOU 27 Melalap POM & supply bases by Social & Environment Projects Unit, PSQM Department. The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, government authorities, local	Complied

		<p>communities, and workers. Issues raised by the stakeholders were incorporated into a management plan. Social profile such as social background of employees, background of local community, education, safety &amp; health, living condition, infrastructure and amenities and stakeholder engagement were taken into consideration in the assessment. For existing operations, the operating unit of SOU 27 has documented the continual improvement plan for social in the Social Management Plan. Identified main social aspects and impacts from SIA considered in the plan including the following categories:</p> <p>Workers’ Housing Condition/Living Improvement</p> <ul style="list-style-type: none"> <li>- Workers’ Working Condition</li> <li>- External stakeholders feedbacks</li> </ul> <p>Improvements conducted by individual operating units within SOU27 including housing improvement programs, minimum wages achievement monitoring and community contribution programs.</p> <p>Environmental impact &amp; aspect evaluation has been prepared with reference number EAI/2023/04. Several activities was verified which is Compound, Creche/Nest, Dispensary, Field-FFB Transportation, Main Entrance, Pest &amp; Disease control, Petrol/Diesel, Power Station, Road and Schedule Waste Store. Review has been done on 25/05/2023 for Melalap Estate and Sapong Estate.</p> <p>Environmental Impact Evaluation Form with reference number EIE/2023/01 has been prepared. Latest review was done on 26/05/2023.</p> <p>For Melalap POM, environmental aspect and impact has been review on 03/06/2023. There is no latest new activity or machine</p>	
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		<p>in oil mill. Several activities was verified which is Maintenance of FFB Ramp, Operation at Conveyor and Operation of weighbridge. The environmental management plan has been established base on assessment of aspect and impact for Mill activity.</p> <p>For the legislation, all related activity legal reference was up to date. Sample data as below:</p> <table border="1" data-bbox="1151 587 1926 1007"> <thead> <tr> <th>Activity</th> <th>Legal reference</th> </tr> </thead> <tbody> <tr> <td>Operation of weighbridge</td> <td>Electrical supply 1990</td> </tr> <tr> <td>Air Emission</td> <td>EQ (Clean Air Regulation) 2014</td> </tr> <tr> <td>Spillage</td> <td>EQ (Schedule Waste) Reg. 2005</td> </tr> <tr> <td>EFB</td> <td>EQA 1974, Garis Panduan Pelan Pengurusan Tandan Kosong Kelapa Sawit.</td> </tr> </tbody> </table>	Activity	Legal reference	Operation of weighbridge	Electrical supply 1990	Air Emission	EQ (Clean Air Regulation) 2014	Spillage	EQ (Schedule Waste) Reg. 2005	EFB	EQA 1974, Garis Panduan Pelan Pengurusan Tandan Kosong Kelapa Sawit.	
Activity	Legal reference												
Operation of weighbridge	Electrical supply 1990												
Air Emission	EQ (Clean Air Regulation) 2014												
Spillage	EQ (Schedule Waste) Reg. 2005												
EFB	EQA 1974, Garis Panduan Pelan Pengurusan Tandan Kosong Kelapa Sawit.												
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>SOU 27 Melalap has a separate Social Impact Assessment (SIA) and Environmental Impact Assessment reports. It mentioned the objectives, category, action, frequency, person in charge and monitoring period.</p> <p>Among others as summarized below:</p> <p>a) To ensure compliance to SOP and legal requirement regarding social (appointment of person in charge/committee to handle social matters, communication on policies/SOP on social to relevant stakeholders, monitoring of pay and agreement of workers and contractor's workers and to maintain housing and</p>	Complied										

		<p>facilities provided to workers). based on inputs received from external stakeholders during stakeholder meetings, union meetings, EWC meetings, and Gender Committee</p> <p>b) To contribute to local communities development based on inputs received from external stakeholders during stakeholder meetings, union meetings, EWC meetings, and Gender Committee meetings.</p> <p>c) Among the issues considered with the stakeholders include: There is no new planting in SOU 27 (Melalap POM Certification Unit). Methodology of assessment is based on interview at workstation for harvesters, sprayers, union representatives, gender committee, contractor, supplier, local community, neighbouring estate, government &amp; School. The secondary data collection – document review/file checking also been made. Main aspects/concerns identified by the assessor:</p> <ul style="list-style-type: none"> <li>- Housing condition/living improvement</li> <li>- Working condition</li> </ul> <p>The management already establish the environmental management plan for Mill base on EIA and EIE and also department of environment requirement (Jadual Pematuhan). The plan for environmental as per below:</p> <table border="1" data-bbox="1153 1173 1921 1375"> <thead> <tr> <th>Programme</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>Air emission management</td> <td>Stack sampling to conduct every 6 monthly.</td> </tr> <tr> <td>Online environmental report</td> <td>To send the report 3 monthly.</td> </tr> </tbody> </table>	Programme	Action plan	Air emission management	Stack sampling to conduct every 6 monthly.	Online environmental report	To send the report 3 monthly.	
Programme	Action plan								
Air emission management	Stack sampling to conduct every 6 monthly.								
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		Domestic waste	To disposed twice weekly. To disposed by contractor hired	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The Social Impact Assessment Management Plan available for each unit were made available and having information i.e issues, management plan, PIC and time frame. Monitoring of plan has been implemented, reviewed and updated by the certification unit. The inputs gathered from the meeting minutes as per the following;</p> <ul style="list-style-type: none"> <li>a) Gender Committee (once every 2 months), NUPW @ Union meeting (at least once a year)</li> <li>b) Safety Meeting (quarterly)</li> <li>c) Complaint &amp; Request from internal &amp; external stakeholders and muster briefing).</li> <li>d) Stakeholders meeting (annual meeting)</li> <li>e) Social dialog (every fortnight), EWC (Employee Welfare Committee – quarterly)</li> </ul> <p>The inputs will be used to monitor the performance of the established plan and to review and update the plan in participatory way.</p> <p>Melalap estate, Sapong Estate and Melalap POM has established Environment Management Plan 2023. The monitoring of the plan has been developed with participation of affected stakeholders. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal workers. Issues raised by the stakeholders were incorporated into</p>		Complied

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		<p>a management plan. Social profile such as social background of employees, background of local community, education, safety, and health, living condition, infrastructure and amenities and stakeholder engagement were assessed accordingly.</p> <p>SOU 27 Melalap has a separate Social Impact Assessment (SIA) and Environmental Impact Assessment reports. It mentioned the objectives, category, action, frequency, person in charge and monitoring period.</p>	
<p><b>Criterion 3.5:</b> A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>The Workers Management Unit based in HQ has established Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019 and Workforce Management Unit Liaison &amp; Recruitment procedure (WMU/LR-SOPP/MARCH2016, Rev. 0 dated 30/03/2016) with the additional foreign workers management process flow (IOM dated 25<sup>th</sup> March 2022, ref: CEOUM/014/03/2022) for 6 processes namely:</p> <ul style="list-style-type: none"> <li>- 01: Arrival of new workers and Deployment to Operating Unit</li> <li>- 02: Permit endorsement for newly arrived workers</li> <li>- 03: Permit renewal</li> <li>- 04: Repatriation</li> <li>- 05: Abscondment</li> <li>- 06: Leave request</li> </ul> <p>The additional documents established to further defined related recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries.</p>	<p>Complied</p>

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3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Application form, employment interview assessment form, medical check-up report and employment contract was sighted for new recruited employees. The latest recruitment of workers (foreign workers) in Melalap POM was on 20/3/2023. All related personal and induction records were kept for reference (identity information (ID), PDPA declaration, briefing. Interviewed with the clerk confirmed that if there is any job vacancy available, they will publish job vacancy advertisement/flyer at the places nearby the villages.</p>	Complied
<b>Criterion 3.6:</b> An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has established the Upstream Malaysia Health, Safety and Environment (HSE) Policy Statement signed by the CEO; Upstream Malaysia dated 01/06/2020.</p> <p><u>Melalap Palm Oil Mill</u></p> <ol style="list-style-type: none"> <li>1. HIRARC was available to address all the risks and hazards associated to the operations in the Mill. The HIRARC was reviewed on 17/01/2023.</li> <li>2. Chemical Health Risk Assessment was conducted in the mill in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000. CHRA Report Reference Number: HQ/10/ASS/00/277-2019/39; DOSH Reg Number: SB/09/01/2004; Date of Assessment: 30/04/2019.</li> <li>3. Medical Surveillance Programme has been performed successfully for the year 2023 for the mill workers exposed to hazardous chemicals and fumes. A total of 33 workers have</li> </ol>	Complied



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		<p>been examined on 20/03/2023 at Klinik MXXXXr Sdn Bhd. All the workers were declared fit to work.</p> <ol style="list-style-type: none"> <li>4. Noise Risk Assessment was conducted in compliance with Occupational Safety and Health Act (Noise Regulations) 2019. Noise Risk Assessment (NRA) has been conducted by Mabello Group of Clinics on 08/07/2023. NRA Report (Report Number: HQ/18/PEB/00/00028-2020/052) available for verification. The recommendation stated by the assessor have been affectively addressed as verified.</li> <li>5. An audiometric testing was done on 19/06/2023 for 75 mill employees deemed to be exposed to excessive noise in the mill. The test was conducted by Klinik MXXXXr Sdn Bhd. The results indicated that no workers were diagnosed with STS, and all were fit to work.</li> </ol> <p><u>SOU 27 Supply Base Estate</u></p> <ol style="list-style-type: none"> <li>1. HIRARC was available at both estates 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.</li> <li>2. Chemical Health Risk Assessment was conducted in compliance to the OSHA Act 1994 and the Use and Standard of Exposure of Chemicals Hazardous to Health (USECHH) Regulations 2000 to assess the risks associated to hazardous chemicals used in the estate.</li> </ol> <p>Melalap Estate: The Chemical Health Risk Assessment Report (Ref. Number: HQ/09/ASS/00/124 – 2019/064) conducted by Global Advance Training &amp; Consultancy (DOSH Registration:</p>	
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		<p>HQ/09/ASS/00/124) on 01/11/2019 was available for verification.</p> <p>Sapong Estate: The Chemical Health Risk Assessment Report (Ref. Number: HQ/09/ASS/00/124-2020/0028) conducted by Gatconst Sdn Bhd (DOSH Registration: HQ/09/ASS/00/124) on 14/08/2020 was available for verification.</p> <p>3. Medical Surveillance were conducted in the estate based on the recommendation of the CHRA for workers exposed to hazardous chemicals. Results of annual medical surveillance were available in the estates for verification as follows.</p> <p>Melalap Estate: The medical surveillance programme for the year 2022 has been performed on 28/12/2022 at Marbello Group of Clinics for 20 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work. The next annual medical surveillance is scheduled to be done on 28/12/2023.</p> <p>Sapong Estate: The medical surveillance programme for the year 2022 has been performed on 28/01/2023 Marbello Group of Clinics for 26 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work.</p> <p>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 and verified as below.</p>	
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		<p>Melalap Estate: The NRA was conducted on 08/07/2020 by Mabello Group of Clinics. The assessment report (Ref. No: HQ/18/PEB/00/00028-2020/054) was available for verification.</p> <p>Sapong Estate: The NRA was conducted on 08/07/2020 by Mabello Group of Clinics. The assessment report (Ref. No: HQ/18/PEB/00/00028-2020/053) was available for verification.</p> <p>5. Audiometric Testing was done in the estates based on the recommendation provided in the Noise Risk Assessment in compliance with OSHA 1994 – OSH (NOISE Exposure) Regulations 2019.</p> <p>Melalap Estate: The audiometric screening was done for 12 workers by Mabello Group of Clinics in December 2022, deemed to be exposed to excessive noise in the estate. The results indicated that all workers had normal hearing and were fit to work.</p> <p>Sapong Estate: The audiometric screening was done for 23 workers by MXXXXXX GXXXX of Clinics in December 2022, deemed to be exposed to excessive noise in the estate. The results indicated that all workers had normal hearing and were fit to work.</p>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Annual Health and Safety Plan available for the estate and mill are mostly implemented through Annual Training Program 2023 and monitored via inspections to address the identified health and safety risks. The emphasis is on safe work by providing,</p> <ul style="list-style-type: none"> <li>▪ Knowledge and skills needed to do their work safely and avoid creating hazards that could place themselves or others at risk.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>▪ Awareness and understanding of workplace hazards and how to identify, report, and control them.</li> <li>▪ Specialized training when their work involves unique hazards.</li> </ul> <p>Besides formal classroom training, other means include on-the-job training and worksite demonstrations to effectively convey safety concepts, ensuring understanding of hazards and their controls, and promoting good work practices.</p> <p>The safety performance of each Operating Unit is monitored via:</p> <ul style="list-style-type: none"> <li>• Internal Audit conducted by the Group Sustainability Department.</li> <li>• Workplace Inspection (WPI) by site OSH Committee.</li> <li>• Direct involvement of supervisor and rounds by Estate and Mill executives.</li> <li>• Safety incidents reporting via Rapid4.</li> <li>• Health / medical surveillance.</li> <li>• Chemical exposure monitoring</li> <li>• Audiometric Monitoring</li> <li>• Daily Monitoring Checklist such as PPE Checklist</li> </ul> <p>The results of monitoring are discussed at meetings and informed to employees, and where applicable, appropriate corrective actions are taken.</p>	
<p><b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers,</p>	<p>The operating units visited has conducted training need analysis for all employee, management, and contractors. The training need</p>	<p>Complied</p>

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	<p>taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>analysis was conducted based on the job designation and training required by the job type.</p> <p>Trainings was identified for management, employee and contractors and programmed throughout FY 2023. The training identified covers the safety and health, environmental and social aspect.</p> <p>Means implemented by SOU 27 certification units were to assess understanding of participants include:</p> <ul style="list-style-type: none"> <li>• Participants completing post-training evaluation/feedback form and give suggestions.</li> <li>• Knowledge acquisition and behavioural application rated by immediate supervisor at workplace post training attended.</li> </ul> <p>Random interviews with workers showed that they understood what RSPO is, the several subsidiaries' 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 among others.</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>Melalap POM</p> <table border="1" data-bbox="1151 1177 1926 1351"> <thead> <tr> <th data-bbox="1151 1177 1711 1235">Training</th> <th data-bbox="1711 1177 1926 1235">Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="1151 1235 1711 1292">Boiler Station Safety Training</td> <td data-bbox="1711 1235 1926 1292">04/07/2023</td> </tr> <tr> <td data-bbox="1151 1292 1711 1351">FFB Grading Training</td> <td data-bbox="1711 1292 1926 1351">12/07/2023</td> </tr> </tbody> </table>	Training	Date	Boiler Station Safety Training	04/07/2023	FFB Grading Training	12/07/2023	<p>Complied</p>
Training	Date								
Boiler Station Safety Training	04/07/2023								
FFB Grading Training	12/07/2023								

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		Auxiliary Police Training	21/07/2023		
		Scheduled Waste Training	01/08/2023		
		Chemical Handling Training	14/08/2023		
		Driver Safety Training	21/08/2023		
		Melalap Estate			
		Training	Date		
		HCV Training	24/08/2023		
		Machinery Training	10/08/2023		
		Harvester SOP Training	21/06/2023		
		RTE Species Training	21/06/2023		
		Spraying Training	13/06/2023		
		Contractors Safety Training	20/05/2023		
		Briefing on HCV Area, RTE Species and Buffer Zone	17/05/2023		
		Sprayers Refresher Training	18/05/2023		
		Briefing on Haze Alert and Guidelines.	12/05/2023		
		Backhoe Safety Training	08/05/2023		

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		<table border="1"> <tr> <td>Fire Prevention and Safety Demonstration</td> <td>20/03/2023</td> </tr> <tr> <td>Emergency Prevention, Preparedness and Response Training</td> <td>12/07/2023</td> </tr> </table>	Fire Prevention and Safety Demonstration	20/03/2023	Emergency Prevention, Preparedness and Response Training	12/07/2023															
Fire Prevention and Safety Demonstration	20/03/2023																				
Emergency Prevention, Preparedness and Response Training	12/07/2023																				
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><u>Sapong Estate</u></p> <table border="1"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Backhoe Contractor Training</td> <td>26/08/2023</td> </tr> <tr> <td>Tractor Driver Training</td> <td>09/08/2023</td> </tr> <tr> <td>Hearing Conservation training</td> <td>26/05/2023</td> </tr> <tr> <td>Harvesting Training – New Contract</td> <td>03/03/2023</td> </tr> <tr> <td>Haze Awareness and Guidelines Briefing</td> <td>12/05/2023</td> </tr> <tr> <td>Nursery Herbicide and P&amp;D Training</td> <td>08/03/2023</td> </tr> <tr> <td>Manuring Training</td> <td>09/08/2023</td> </tr> <tr> <td>Scheduled Waste Training</td> <td>10/08/2022</td> </tr> </tbody> </table> <p>Training conducted from time to time to all personnel critical in SCCS effective implementation. Latest training was conducted by Regional Sustainability &amp; Quality Management (RSQM) personnel, attended Bukit Benut Mill Manager, Assistant Mill Manager, Lab Supervisor, Lab Despatch Operator, Weighbridge Clerk and Auxiliary Police. Refer Training record dated 26/05/2023.</p>	Training	Date	Backhoe Contractor Training	26/08/2023	Tractor Driver Training	09/08/2023	Hearing Conservation training	26/05/2023	Harvesting Training – New Contract	03/03/2023	Haze Awareness and Guidelines Briefing	12/05/2023	Nursery Herbicide and P&D Training	08/03/2023	Manuring Training	09/08/2023	Scheduled Waste Training	10/08/2022	Complied
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<b>Criterion 3.8:</b> Supply chain requirement for mills (note: All supply chain requirements are considered as <b>Critical (C)</b> . However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	Identity Preserved Module  A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.  Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing 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.	Melalap POM is under mass balance module. Thus, this indicator is not applicable.	Not Applicable
3.8.2	Mass Balance Module  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.	Melalap POM received and processed both RSPO certified and uncertified FFB from plantations/estates, outgrowers and FFB Traders and claim only the volume of oil palm products produced from processing of the certified FFB as MB certified.	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. The actual tonnage produced from last audit date is reported in the summary in Table 7 and Table 10.	Complied



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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 Marketing Department in HQ. Company has registered in PalmTrace system as follows:</p> <table border="1" data-bbox="1151 483 1928 805"> <tr> <td>Member Name</td> <td>Melalap Oil Mill</td> </tr> <tr> <td>Member ID</td> <td>RSPO_PO1000000300</td> </tr> <tr> <td>RSPO Membership Number</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>17/12/2022 to 01/12/2023</td> </tr> </table>	Member Name	Melalap Oil Mill	Member ID	RSPO_PO1000000300	RSPO Membership Number	1-0008-04-000-00 (Sime Darby Plantation Berhad)	Type of Business	Oil mill	Licence Status	17/12/2022 to 01/12/2023	Complied
Member Name	Melalap Oil Mill												
Member ID	RSPO_PO1000000300												
RSPO Membership Number	1-0008-04-000-00 (Sime Darby Plantation Berhad)												
Type of Business	Oil mill												
Licence Status	17/12/2022 to 01/12/2023												
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</li> </ul>	<p>Documented Procedures were made available for verification and the requirements have been adhered to as follows:</p> <ul style="list-style-type: none"> <li>a) Refer Sustainable Supply chain and Traceability Procedure dated 01/06/2022 with reference number SD/SDP/GSD/SCCS/0522/01.</li> <li>b) Complete and up to date records and reports in relation to RSPO SCCS were maintained and available for verification. Among the records available were Mass Balance Sheet, Internal Audit Reports, and SCCS Training records.</li> <li>c) Mill have identified and appointed the Mill Manager as the PIC for RSPO Supply Chain Certification Standard requirements as stated in Sustainable Supply chain and Traceability Procedure dated 01/06/2022 Section 4.0 Responsibilities.</li> <li>d) Procedures for receiving and processing certified and non-certified FFBs were addressed in the Sustainable Supply chain</li> </ul>	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 23-25/07/2023. Based on the internal audit report and checklist, the elements of RSPO supply chain were adequately covered including the RSPO Market Communications and Claims elements. There was no non-conformity raised from the internal audit. Should there be any non-conformity, corrective action shall be established to rectify the lapse found. The status of the non-conformity shall also be discussed in the management review meeting.</p>	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>Melalap POM maintain the daily records of all certified and uncertified FFB received and documented in daily processing records. The records include the FFB suppliers, weight, and vehicle transportation details. The mill has maintained records of FFB received such as Delivery Notes and Weighbridge operator. Sample of FFB delivery records:</p> <p>Incoming FFB</p> <p>Certified Supply Base</p> <p>Company: Sime Darby</p> <ul style="list-style-type: none"> <li>Estate: Melalap Estate</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Certified No: RSPO 547124</li> <li>• Date: 16/01/2023</li> <li>• Ticket Number: 104155</li> <li>• Vehicle Number: SSXXXX PM15</li> <li>• Field / Block: P 01 MA</li> <li>• FFB Weight: 12.40 MT</li> </ul> <p>Non-Certified 3<sup>rd</sup> Party FFB</p> <ul style="list-style-type: none"> <li>• Company: Syarikat Mxxxxxx (Collection Centre)</li> <li>• Estate: Syarikat Mxxxxxx</li> <li>• Date: 07/01/2023</li> <li>• Ticket Number: 103974</li> <li>• Vehicle Number: SACXXXXX</li> <li>• FFB Weight: 30.80 MT</li> </ul> <p>Non-Certified 3<sup>rd</sup> Party FFB</p> <ul style="list-style-type: none"> <li>• Company: Ladang Pxxx Sdn Bhd</li> <li>• Estate: Ladang Pxxx Sdn Bhd</li> <li>• Date: 18/03/2023</li> <li>• Ticket Number: 104928</li> <li>• Vehicle Number: SSXXXXX</li> <li>• FFB Weight: 2.55 MT</li> </ul>	
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		<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>	
<p>3.8.8</p>	<p><b>Sales and Goods Out</b></p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<p>Melalap POM ensured the required information is available in document form. Outgoing records of CPO and PK were verified as below:</p> <p>CPO - MB</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer; BUYERXXXXXX</li> <li>b) The name and address of the seller; Melalap POM</li> <li>c) The loading or shipment / delivery date; 10/01/2023</li> <li>d) The date on which the documents were issued; 10/01/2023</li> <li>e) RSPO Certificate Number: RSPO 547124</li> <li>f) A description of the product: CPO MB</li> <li>g) The quantity of the products delivered; 38.10 Mt</li> <li>h) Any related transport documentation; SMGXXXX</li> <li>i) A unique identification number: 007768</li> </ul> <p>PK - MB</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer; BUYERXXXXXX</li> <li>b) The name and address of the seller; Melalap POM</li> <li>c) The loading or shipment / delivery date; 22/06/2022</li> <li>d) The date on which the documents were issued; 22/06/2022</li> <li>e) RSPO Certificate Number: RSPO 547124</li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>f) A description of the product: PK MB</li> <li>g) The quantity of the products delivered; 36.18 Mt</li> <li>h) Any related transport documentation; RQXXXX</li> <li>i) A unique identification number: 007930</li> </ul>	
3.8.9	<p><b>Outsourcing Activities</b></p> <ul style="list-style-type: none"> <li>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</li> <li>ii) The mill shall ensure the following: <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</li> </ul> </li> </ul>	<p>Melalap 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"> <li>i. Stated in the SOP, CPO mill cannot outsource processing activities like refining or crushing. Outsourcing activities for Melalap POM was for CPO and PK transportation.</li> <li>ii. Sighted the contract agreement between Sime Darby Plantation Berhad and contractor; <ul style="list-style-type: none"> <li>a) Melalap POM has legal ownership of all input material to be included in the outsourced process. Refer listing of FFB Supplier Certified and Non-Certified. The contract agreement and details like MPOB licence were kept in the file.</li> <li>b) Refer Contract Agreement between Sime Darby Plantation Berhad and Pengangkutan DXXXXX TXXX Sdn. Bhd. – Agreement on the Transportation of Crude Palm Oil (CPO) and Palm Kernel (PK) for Sime Darby Plantation Berhad’s Peninsular Malaysia Oil Mills; Initial term: 3 years commencing from 01/01/2021 and expiring on 31/12/2024.</li> <li>c) The mill trades CSPO and CSPK with its buyers among refineries and/or oleo-chemical plants. Based on</li> </ul> </li> </ul>	Complied

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		<p>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 5.0 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>a) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>b) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p>	<p>Record Keeping</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 Section 5.4 in Sustainable Supply Chain and Traceability Procedure (2022); Document ID: SD/SDP/GSD/SCCS/0522/01.</p> <p>iii) NA as the mill is using MB model.</p>	Complied

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	<p>c) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>d) For Mass Balance Module, the mill:</p> <ul style="list-style-type: none"> <li>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</li> <li>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</li> <li>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</li> </ul>	<p>iv) For Mass Balance Module:</p> <ul style="list-style-type: none"> <li>a) All RSPO certified FFB and deliveries of RSPO certified CPO and PK on real time basis. Refer RSPO Mass Balance Sheet Record for Oil Mills FY 2022 and 2023.</li> <li>b) Verified from RSPO Mass Balance Sheet Record for Oil Mills FY 2022 and 2023, confirmed that all volumes of certified CPO and PK that area delivered are deducted from the material accounting system. For the period assessment, only certified PK was sold.</li> <li>c) Based on mass balance sheet latest dated end of August 2023, no negative stock recorded.</li> </ul>							
<p>3.8.13</p>	<p><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. Verified OER and KER as below.</p> <table border="1" data-bbox="1151 986 1930 1102"> <thead> <tr> <th>Month</th> <th>OER</th> <th>KER</th> </tr> </thead> <tbody> <tr> <td>Sept 2022 – Aug 2023</td> <td>19.79</td> <td>4.61</td> </tr> </tbody> </table>	Month	OER	KER	Sept 2022 – Aug 2023	19.79	4.61	<p>Complied</p>
Month	OER	KER							
Sept 2022 – Aug 2023	19.79	4.61							
<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>Melalap 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>						
<p>3.8.15</p>	<p><b>Processing</b></p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil</p>	<p>NA as the mill is using MB module.</p>	<p>Complied</p>						

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	palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.		
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>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/GGM/XXXX/CPOXXXX; For the period of Sept 2022 to August 2023, there were 0 announcements for CPO and 13 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, we have indicated this to the client and they have a system in place to remove the stocks at their respective time interval which was not at this particular audit. Refer correspondence email between Representative HQ with Global Trading Department dated 16/10/2023 titled "Palmtrace CSPO &amp; CSPK Volume Removal for month of October and November 2023".</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>RSPO trademark was not used. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied
<b>General corporate communications</b>			



4.1	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	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>a. Display its RSPO membership status</li> <li>b. Display the RSPO web address (www.rspo.org)</li> <li>c. State that the member supports the work of the RSPO</li> <li>d. State the member's history with regard to the RSPO.</li> <li>e. Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	<p>The Sime Darby Plantation Berhad website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil.</p> <p>The website had not displayed the RSPO website and had not display any RSPO Trademark.</p>	Complied
4.3	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 SDPB towards production of sustainable palm oil. The website has published reports, statements, policies, procedures and performances of such implementation. The website did not specifically publish its product as RSPO certified product.	Complied

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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 Melalap POM and verified through document and site review (notice board, business card, shipping documentation, etc.	Complied
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer. Verified the weighbridge tickets to buyer where claim of CSPO (Mass Balance) was stamped on the tickets.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that the product is CSPO (Mass Balance) with RSPO certificate number: RSPO 547124. Verified the documents found that the supply chain model and certificate number were stated on the ticket.	Complied
5.3	<p>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:</p> <ul style="list-style-type: none"> <li>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.</li> <li>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</li> </ul>	Not applicable since Melalap POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable

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

	<p>trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</p> <ul style="list-style-type: none"> <li>In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications &amp; Claims document.</li> </ul>		
<b>Messaging (MB)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>[Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain.</li> <li>The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</li> </ul> <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> <li>Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</li> </ul>	<p>No RSPO label and storytelling in product-related communications used as CPO and PK is semi-finished product. No messaging involved since Melalap POM is producing crude palm product and does not involve in any labelling of end product.</p>	<p>Complied</p>
<b>Principle 4: Respect community and human rights and deliver benefits</b>			
<b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			

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4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has established Group Sustainability &amp; Quality Policy Statement dated 02/12/2019 approved by Group Managing Director where the company is respecting, upholding &amp; no exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) latest revised in 2020.</p> <p>Besides, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/03/2020. Sime Darby Plantation Berhad respect and safeguard human rights, notion of democracy and its institution. They recognize that Human Rights Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with SDP.</p> <p>The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate. For example training was conducted at Sapong Estate on 30/5/2023 - Induction Course to Newly Joined workers, COBC Briefing, SD Policy Charter, Grievance Channel, Agreement Briefing, Sexual Harassment Briefing, PDPA and etc.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the estates within SOU 27 do not instigate violence or use any form of harassment in their operations</p>	Complied
<p><b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring</p>	<p>Sime Darby Plantation Berhad has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility</p>	Complied

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	<p>anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>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>	
<p>4.2.2</p>	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in <a href="#">Report Your Concerns   Sime Darby Plantation</a>.</p> <p>Besides, external stakeholders were briefed during the stakeholder meeting. Interviewed with the internal and external stakeholders confirmed that they have been briefed and understood on the complaint mechanism implemented by the company.</p>	<p>Complied</p>
<p>4.2.3</p>	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>A Standard Operating Manual (SOM) was established and maintained i.e. Sime Darby Plantation Estate Quality Management System as a system for dealing with complaints and grievance was defined in Sub-section 5.5 Management Responsibility, Appendix 5.5.3.2 Procedure for External Communication, version 2, issue 0, dated 25/5/2015.</p>	<p>Complied</p>

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		<p>The complaints and grievances are open to effected parties including internal and external stakeholders. The time frame to deal with external communications should be within two weeks of the date of receipt for communication requiring direct feedback (Clause 6.3 of the procedure) and within one week of the completion of the investigation, for communication required investigation. The latest training was carried out on 30/5/2023 at Sapong Estate</p> <p>Grievance channels was stated in the employment contract (Item 21) as follows:-</p> <ul style="list-style-type: none"> <li>• Union representative at operating unit..</li> <li>• Suara Kami at 1800818771 or sms 01130116031.</li> <li>• Whistleblowing channel at 1800223388 or +60192797553 (08.30 am – 17.30 pm) or email to <a href="mailto:whistleblowing@simedarbyplantation.com">whistleblowing@simedarbyplantation.com</a></li> </ul> <p>All requests and grievances found to be responded within short time by respective recipients mainly workers as verified during on-site consultation.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow</p>	Complied
<p><b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			

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4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Contributions made by estates were based on consultation with stakeholders among local communities as per sample sighted as following:</p> <ul style="list-style-type: none"> <li>- Sapong Estate: Program Gotong-royong Madani SK Ladang Sapong, Tenom; Date: 19/08/2023</li> <li>- Melalap Estate: Repair and relocate water piping in Ulu Makaniton; Date: 25/08/2023</li> </ul>	Complied
<b>Criterion 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Melalap POM is located on the land of Melalap Estate under Land Title# Country Lease 165314643. A copy of the land title was kept in the mill. Melalap Estate has 6 land titles with a total area of 2,257.25 Ha while Sapong Estate has 8 land titles with a total area of 4,120.14 Ha. All the land titles were made available for verification including shared area with smallholders.</p>	Complied
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>Sime Darby Plantation Berhad has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed. There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been verified against land legality evidence during audit</p>	Complied
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,</p>	<p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.</p>	Complied



	including information on the steps that are taken to involve them in decision making. - Minor compliance -		
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.	Complied
4.4.3	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.	Complied
4.4.5	<b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders	Complied

	- Critical (Major) compliance -	reported. This has also been evident through interview with the local communities.	
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.	Complied
<b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
4.5.2	<b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	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 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.	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied

	- Minor compliance -		
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.  - Minor compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.  - Minor compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.  - Minor compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.  - Minor compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.  - Critical (Major) compliance -	As verified through stakeholders' consultation and boundary verification, there has been no new planting on local people's land since the last assessment.	Complied

<b>Criterion 4.6:</b> Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	<p><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	Complied
4.6.2	<p><b>(C)</b> 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>Addressed in the SOP as mentioned in Indicator 4.6.1.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been verified against land legality evidence during audit</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been verified against land legality evidence during audit</p>	Complied

<b>Criterion 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	Complied
4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Addressed in the SOP as mentioned in Indicator 4.7.1.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>There was no community that had lost access and rights to land as well as no expansion of plantation by the certification unit.</p>	Complied
<b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
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</p>	<p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders</p>	Complied

	is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	reported. This has also been verified against land legality evidence during audit	
4.8.2	<b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been verified against land legality evidence during audit	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been verified against land legality evidence during audit.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been verified against land legality evidence during audit	Complied
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Prices available based on 1% OER MPOB Price provided by Outside Crop Purchase (OCP) personnel of Upstream Malaysia Head Office	Complied

	- Minor compliance -	as per sample previous final price August 2023 = RM 35.16 per 1% OER, July 2023 = RM 35.80 per 1% OER.	
5.1.2	<p><b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).</p> <p>- Critical (Major) compliance -</p>	Those who are interested in selling their FFB to the mill must apply to the Outside Crop Purchasing unit located at HQ, Kuala Lumpur. The unit will then make a due diligence by obtaining legal documents and site visit of the applicant's plantation before granting the approval. Along this process, the unit will have an informal discussion to explain the pricing mechanism and normally during contract signing process. If both parties agree, a contract agreement will then be issued which normally valid for one year.	Complied
5.1.3	<p><b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	The FFB pricing was stated in Section 8 of the contract, Pricing of FFB under Third Schedule. The calculation method of the pricing was basically influenced by MPOB market price. Verification of the contract agreements showed that all the FFB suppliers have agreed with the pricing through signing.	Complied
5.1.4	<p><b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	No binding contract between the mill and out-growers which includes finance, loans/credit, and repayment through FFB price reduction for replanting and/or other support mechanisms. Thus, this indicator is not applicable.	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	Based on sample FFB Purchase Agreement between Melalap POM and OCP, all contracts signed between OCP and Melalap POM were attached with evidence that the mill explains the FFB pricing as per sighted for sample as following:	Complied

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		<p>i) XXX YY ZZZ: Agreement # P/G/1222/FFB03999L; Contract Period: 1/1/2023 – 31/12/2023</p> <p>ii) XXX Enterprise: Agreement #P/G/1222/FFB04009L; Contract Period: 1/1/2023 – 31/12/2023</p> <p>iii) XXX YYY Berhad: Agreement #P/G/1221/FFB04003L; Contract Period: 1/1/2023 – 31/12/2023</p> <p>Verification of the terms and conditions of the sampled contracts showed that the contracts were fair, legal, and made transparent to the contractors. The agreed timeframe of the contract was stated under Section 7 of the contract.</p>	
5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Payments are broken down as defined under the First Schedule/Attachment 1 of the agreed contract. The payments were handled at HQ level and based on verification of the payment vouchers; the payments were made on timely manner.</p>	Complied
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	<p>Weighbridges were calibrated annually, and evidence of calibration certificates were available with the following details:</p> <p>i) Serial no. 212350199, model: ZM305 (60,000 kg), date of calibration: 10/07/2023ii) Serial no. B545689517, model: IND246 (40,000 kg), date of calibration: 10/03/2023</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>Melalap POM supports independent smallholders through purchase of their FFB. No agreements between them on certification as of now. However, the independent smallholders often received information on certification from Melalap POM mainly on MSPO during consultation.</p>	Complied



5.1.9	<p><b>(C)</b> 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>No grievance received from external FFB suppliers since the last audit. Sime Darby Plantation Mill Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 01/04/2008) established to handle if there is any external complaint. Interviewed with the FFB supplier and he is able to show the understanding on the complaint mechanism.</p>	Complied
<p><b>Criterion 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
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>There was an OCP Engagement Program latest conducted together during stakeholder on 8/8/2023 to involve the smallholders and collection centre to explain the sustainability and RSG to the smallholders. The program has involved MPOB officers to explain on the certification as well.</p>	Complied
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>Sime Darby Plantation Berhad as a group has developed Standard Operating Procedure for Responsible Sourcing Guidelines (RSG) with Doc. No.: SD/SDP/GS/001 dated June 2020 in approaching third party FFB &amp; CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers. Internally, OCP Engagement Program conducted on 8/8/2023 to involve the smallholders and collection centre to explain the sustainability and RSG to the smallholders.</p>	Complied
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>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p>	Complied

		Group Sustainability Department, Sustainability Compliance Unit has conducted Desktop Review Assessment for New OCP suppliers on 29/09/2020 to check on the compliance of no planting on peat and forest reserve. There was a OCP Engagement Program conducted together during stakeholder meeting on 8/8/2023 to involve the smallholders and collection centre to explain the sustainability and RSG to the smallholders.	
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Melalap POM supports independent smallholders through purchase of their FFB. No agreements between them on certification as of now. However, the independent smallholders often received information on certification from Melalap POM mainly on MSPO during consultation	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Melalap POM supports independent smallholders through purchase of their FFB. No agreements between them on certification as of now. However, the independent smallholders often received information on certification from Melalap POM mainly on MSPO during consultation	Complied
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	Sime Darby Plantation Berhad has developed Human Rights Charter to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union	Complied

		membership, political affiliation, or age. They will facilitate opportunities for advancement for their employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy can be downloaded from <a href="https://simedarbyplantation.com/sustainability/reports-policies-and-statements/">https://simedarbyplantation.com/sustainability/reports-policies-and-statements/</a>	
6.1.2	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	Based on interview with the workers from different gender and nationalities, it was confirmed that there was no discrimination reported. The management has treated all employees equally for example in term of providing accommodation, medical treatment, job opportunity, wages rate, etc. There was also no charging of recruitment fees incurred for foreign workers.	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>	Sime Darby Plantation Berhad has developed a Promotion for Employees (Doc. No.: SDP/HRUM/2020/SOP01 dated 01/01/2020) and Career Progression for Workers Level (both local and foreign workers), (Doc. No.: SDP/HRUM/2020/SOP01) to provide a guideline on promotion process to ensure all employees are given fair and equal opportunity based on the set requirements such as work performance and suitability of the position	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>	Based on interview with female employees at the sampled operating units, it was confirmed that there is no requirement for pregnancy testing to be conducted prior the employment.	Complied
6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	A combined Gender Committee was established for all the operating units. The committee organizes a meeting every two months. The last meeting was conducted on 11/02/2023 and minutes of meeting were made available for verification. So far, there has been no issue raised by the female workers as verified from the feedback forms	Complied

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		and minutes of meeting. Based on interview with the Gender Committee representatives at all the operating units, it was confirmed that there has been no case of sexual harassment or violence reported.	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Based on the sampled payslips, which consists of both genders, it was noted that workers were paid equally for the same job scope. They were paid according to the Minimum Wage Order 2022 without any form of discrimination. This was also evident through interview with sampled workers.	Complied
<b>Criterion 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	Sime Darby Plantation (Sabah) Sdn Bhd has signed the Collective Agreement (For field/ oil palm harvesters/ oil mill and other general employees) with Sabah Plantation Employees Union (SPIEU), COG no. 089/2021 which effective from 01/01/2020 to 31/12/2022. The new collective agreement is still the process of renewal. Employment contract was available in both English and Bahasa Malaysia/Indonesia. Samples of employment contracts were reviewed and found that the agreements were signed by the employees. The new foreign workers will be inducted for the terms and conditions of employment contract and briefed on the company's policies, upon arrival to the operating units. This was evident through interview.	Complied
6.2.2	<b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on	Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are in compliance with the Sabah Labour Ordinance Cap. 67, Minimum	Complied

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	<p>compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Wages Order 2022, SOCSO Act 1969, EPF Act 1991, EIS Act 2017, and the Collective Agreement (For field/ oil palm harvesters/ oil mill and other general employees) with Sabah Plantation Employees Union (SPIEU), COG no. 089/2021.</p>							
<p>6.2.3</p>	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Based on review of punch cards, workers’ employment contracts and payslips, evidence was available that Melalap POM and estate were able to demonstrate compliance with Sabah Labour Ordinance Cap. 67 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSO, EPF, EIS) and non-statutory deductions (e.g. union/NUPW, water, electricity bills, etc) in accordance with Labour Office permits. Sampled during the audit were the following workers’ employment contracts and payslips for the month of June 2023 (peak), Feb 2023 (low) and April 2023 (average/medium).</p> <p><u>Melalap POM</u></p> <p>6 workers sampled out of 51 workers. Sample of workers as per the following:</p> <table border="1" data-bbox="1137 986 1930 1102"> <tr> <td>ID XXX69</td> <td>ID XXX39</td> <td>ID XXX681</td> </tr> <tr> <td>ID XXX17</td> <td>ID XXX783</td> <td>ID XXX461</td> </tr> </table> <p>For Melalap Estate, a total of 9 out of 123 workers were verified that their work agreement and sample pay slips for the month of December 2022, January 2023 and April 2023 met the conditions stipulated.</p> <p>For Sapong Estate, a total of 13 out of 258 workers were verified that their work agreement and sample pay slips for the month of February 2023, April 2023 and June 2023 met the conditions stipulated.</p>	ID XXX69	ID XXX39	ID XXX681	ID XXX17	ID XXX783	ID XXX461	<p>Complied</p>
ID XXX69	ID XXX39	ID XXX681							
ID XXX17	ID XXX783	ID XXX461							

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		<p>There were no issues of legal non-compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirement verified from the workers sampled.</p>	
<p>6.2.4</p>	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad established Workers Housing Management Procedure 2022, Ver.01, dated 30/06/2022 as guidelines to continuously improve of living standards of their employee in estates and mill operations. Its shown company commitment in managing employee’s housing repair and maintenance through digital platform named Digital Housing Complaint system or ‘OilPalmPal’.</p> <p>To provide guidance to management in providing a safe, livable workers housing condition in accordance with Workers Minimum Standard of Housing &amp; Amenities (Amendment) 2091 (Act A 1604). To integrate all past policies related to workers housing &amp; amenities management in the operating units including.</p> <ul style="list-style-type: none"> <li>- Workers minimum standard of housing amenities guidelines – Jan 2015</li> <li>- IOM – employees housing inspection &amp; welfare – Dec 2020</li> <li>- IOM – rules &amp; regulations at employee house – June 2021</li> <li>- IOM – Safe handling &amp; storage of Petrol – Mar 2021</li> <li>- IOM – Safe Fogging Procedure – June 2021.</li> </ul> <p>All workers are provided with free housing facilities that included basic amenities such as clean water (35 gallons/month), community hall, sport facilities, etc. were provided to the workers.</p> <p>Electricity which is obtained from the national grid. Weekly inspections by estate medical assistant and via VMO visit were done</p>	<p>Complied</p>

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		<p>to ensure good housing and surrounding condition. Records were well maintained for inspections visits and housing repair request as per sample as following:</p> <ul style="list-style-type: none"> <li>- Melalap Estate: Latest OPP ID 316; House # 82; Date: 03/09/2023; Completion: In-progress (purchase of replacement part) – target 5/9/2023</li> <li>- Latest VMO visit reported in Housing Complex/NEST/Community Hall Weekly Inspection (PIOA) form for Sapong Estate, Date: 27/06/2023 &amp; 26/07/2023 as per report by Dr. Muhammad Faisal (VMO MMC: 63351) of Klinik Mabello Kota Kinabatangan – report with remark: <i>"Rubbish content at illegal dumping site seem to be increasing indicating that residents still throw rubbish there; Recommendation: to put signage – "Dilarang membuang sampah" – total score PIOA: 90%"</i></li> </ul> <p>Latest visit by VMO was conducted in 29/08/2023 no major issue reported in the log book.</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>All workers were also provided with 10kg of rice once every two months as per company's policy. Records of distribution of rice at all the operating units were made available for verification. Interview with the workers confirmed that they have easy access to adequate, sufficient and affordable foods at the nearby town. Sundry shops were also available inside the premise and the price of goods were reasonable</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b> STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p>	<p>SOU 27 has carried out the Prevailing Wage Assessment and calculated individual local and foreign workers current salary including non-monetary benefit given average SOU 27 Melalap for local worker RM: 2,383.35; FW: RM 2,403.73. DLW assessment</p>	Complied

<p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage). The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> </ul>	<p>conducted by Group Sustainability Department (GSD) Sime Darby Plantation Berhad.</p>	
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	<ul style="list-style-type: none"> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> <li>• The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p> <p>- Minor compliance -</p>	<p>All employees hired are permanent employee (for locals and foreign workers) as well under contractor's workers. All permanent and full-time employment or contract workers used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2. 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 27.</p>	Complied
<p><b>Criterion 6.3:</b> The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability &amp; 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"> <li>• Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>• Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> <li>• Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively.</li> </ul> <p>During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join the SPIEU and any other union.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>The Mill Manager was appointed as social representative in Melalap POM and to communicate with stakeholders among both external and internal stakeholders including workers union (SPIEU) representatives.</p> <p>Latest communication made during meeting as per minutes of meeting records of SOU 27 SPIEU Representatives meeting with management dated on 24/08/2023 at Sapong Estate meeting room.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on the worker's interview, the selection of SPIEU representative made from the election among the SPIEU member without management interference. Foreign workers included in the committee formation and appointment letter sighted. The selection also based on the election meeting.</p>	Complied
<p><b>Criterion 6.4:</b> Children are not employed or exploited.</p>			
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 &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p>	Complied

		<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"> <li>- Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</li> <li>- Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> <li>- 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.</li> <li>- 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.</li> <li>- Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use.</li> <li>- Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees.</li> <li>- 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.</li> </ul>	
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		<p>Verification of workers master list (direct employed and contract workers) confirmed that there is no child labour hired.</p> <p>For contractors, the clause 5.8 abolishment of child labour &amp; 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><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liaison &amp; Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</p>	Complied
6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Employee Master Listing and through interviewed with the stakeholders.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders. For example, the latest briefing on COBC and company policy was last carried out on 30/08/2023 at Sapong Estate.</p>	Complied
<p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability &amp; 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>	Complied

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		<ul style="list-style-type: none"> <li>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.</li> <li>Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation.</li> </ul> <p>The policy was communicated during muster briefing on 30/05/2023 at Sapong Estate</p>	
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>SOU27 has implemented Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director dated on 02/12/2019 supported by the SDP Human Rights Charter where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>The assessment of needs for new mothers was conducted by Gender Committee in SOU27. Among issues identified based on assessment outcome:</p> <ul style="list-style-type: none"> <li>- Request for break time/leave to go for post-natal check after delivery.</li> <li>- Request for break time for breast feed (30 minutes per session)</li> </ul> <p>Management has no objection to approve the request by new mothers and confirmed with the interview with them.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p>	<p>Sime Darby Plantation Berhad has revised Terms of Reference for Gender Representatives and Gender Committees dated March 2021. Flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008 was implemented as well. In addition to the said</p>	Complied

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	<p>- Minor compliance -</p>	<p>process, a Grievance Response SOP, version:2 dated 18/7/2023 was development as to clearly outline procedural aspect on handling the intake and logging of grievances received through formal and informal channels, assignment of grievances received for investigation and cancelling, withdrawing, closing or reopening and investigation. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e- Form, email address and toll free number/ hotline can be found in <a href="https://sime-darbyplantation.com/who-we-are/corporate-governance/report-your-concerns/">https://sime-darbyplantation.com/who-we-are/corporate-governance/report-your-concerns/</a></p> <p>Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally. The latest briefing was carried out on 26/7/2023 at Sapong Estate</p>	
<p><b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> </ul>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and available as follows:</p> <p>a) Migrant Worker Responsible Recruitment Procedure effective 20 August 2021 which provides the procedures for recruitment, selection and hiring. It includes steps to be taken to ensure foreign applicants with criminal record are filtered out.</p>	<p>Complied</p>

<ul style="list-style-type: none"> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>b) Hiring and selection of local workers, Doc No. 01-11-19 which details out the procedure of fill up job application forms, screening, interview, and medical check-up.</p> <p>c) Employment contracts (for foreign workers) and letters of job offer (for local workers) document the termination procedures</p> <p>d) Letters of job offer (for local workers) on retirement. Foreign workers is not subjected to retirement process because their employment would be dependent upon issuance of their annual work permits by the Immigration Department.</p> <p>e) Promotion is stipulated under SOP Doc No. SDP/HRUM/2020/SOP01 dated 1 Jan 2020.</p> <p>Passport was kept by workers themselves and locker has been provided at their house for safe keeping.</p> <p>Based on payslips sighted and interview with workers, there was no evidence of any debt bondage and withholding of wages. Number of samples (workers) taken are determined based on the formula of <math>\sqrt{n} \times 0.8</math> (n= total number of workers) as per indicator 6.2.3. Based on the workers interview, the overtime was given voluntarily if any work offered. The termination of service clearly stated that the termination of employment if:</p> <ol style="list-style-type: none"> <li>1. The company is not satisfied with your performance</li> <li>2. You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term.</li> <li>3. You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime.</li> </ol>	
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		<p>You have breached any express or implied terms of your employment. Fail medical examination based on FOMEMA result.</p>	
<p>6.6.2</p>	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.          - Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has implemented a Sime Darby's Human Rights Charter revised 2020 and can be easily access via <a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a> where they committed as below:</p> <ul style="list-style-type: none"> <li>a. Providing equal opportunity</li> <li>b. Respecting freedom of association</li> <li>c. Eradicating any form of exploitation</li> <li>d. Providing decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs</li> <li>e. Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution.</li> </ul> <p>All the foreign workers will be provided with induction training prior to work. Besides, they were provided with decent living condition and free from any discrimination. The workers informed that they were treated equally without any discrimination and allow joining union/SPIEU freely. No contract substitution has occurred through interviewed with the workers</p>	<p>Complied</p>
<p><b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			



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<p>6.7.1</p>	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>All operating units have formed an OSH Committee in the respective mill and estate to address all issues associated to Health and Safety in the operating units.</p> <p>a. <u>Melalap Palm Oil Mill</u></p> <p>The Mill Manager, Pn. Nor Azian Binti Anuar has been appointed as the Chairman of the OSH committee in the mill as stated in the appointment letter dated 05/09/2022 undersigned by the Regional CEO - Sabah Region.</p> <p>b. <u>Melalap Estate &amp; Sapong Estate</u></p> <p>The Estate Manager, Mr. Muslimin Bin Sulta has been appointed as the Chairman of the OSH Committee in the state as stated in the appointment letter dated 15/12/2022 undersigned by the Regional CEO, Sabah Region.</p> <p>OSH Committee of the respective operating units conducts regular OSH Meetings to address all issues related to OSH in the operating units.</p> <p>a. Melalap POM have conducted regular OSH Meetings in the mill. The meeting minutes were available for verification dated 23/06/2023 (02/2023), 22/03/2023 (01/2023), 16/12/2023 (04/2023) and 23/09/2023.</p> <p>b. Melalap Estate conducted regular OSH Meetings in the estate. The meeting minutes were available for verification dated 22/06/2023 (02-2023), 31/03/2023 (01-2023), 23/12/2022 (04-2022) and 15/09/2022 (03-2022).</p> <p>c. Sapong Estate conducted regular OSH Meetings in the estate. The meeting minutes were available for verification dated</p>	<p>Complied</p>
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		23/06/2023 (02-2023), 31/03/2023 (01-2023), 16/12/2023 (04-2022) and 06/09/2023 (03-2022).					
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>Emergency Response Plans and Procedures were available in the estates and mills to address potential emergencies such as Flood, Fire, Chemical Spillage, Poisoning, Earthquake/landslide, Accidents, Storm and Wild/ Poisonous Animal Attacks. The plans have been posted at notice boards in the mills and estates and communicated to the workers. Emergency contact numbers have been posted at the notice boards and provided to the workers as well. Interview with the workers such as mandores and store attendants indicated that the workers are aware on the available emergency response plans. Trainings were conducted in the mill and estates to provide awareness to the workers on emergency responses. The trainings were sighted as below.</p> <ol style="list-style-type: none"> <li>1. <u>Melalap Palm Oil Mill</u> <ul style="list-style-type: none"> <li>- Fire Drill and Spillage Training – 20/03/2023</li> </ul> </li> <li>2. <u>Melalap Estate</u> <table border="1" data-bbox="1182 1002 1912 1150"> <tr> <td>Fire Prevention and Safety Demonstration</td> <td>20/03/2023</td> </tr> <tr> <td>Emergency Prevention, Preparedness and Response Training</td> <td>12/07/2023</td> </tr> </table> </li> <li>3. <u>Sapong Estate</u> <ul style="list-style-type: none"> <li>- Fire Drill and Fire Extinguisher Demonstration conducted on 04/04/2023.</li> </ul> </li> </ol> <p>First aiders were present in the operating units. They have been trained and obtained certificates as the PIC to address first aid in the operating units. Visit to the mill and estates indicated each</p>	Fire Prevention and Safety Demonstration	20/03/2023	Emergency Prevention, Preparedness and Response Training	12/07/2023	Non-compliance
Fire Prevention and Safety Demonstration	20/03/2023						
Emergency Prevention, Preparedness and Response Training	12/07/2023						

		<p>station and gangs were equipped with first aid kits. Interview with the respective first aid holders indicated that they were aware on the methods to use the items in the first aid boxes. The boxes are regularly monitored by the mill and estate Hospital Assistants to replenish the used items and replace expired items. Records of items used were also maintained and available in the boxes.</p> <ul style="list-style-type: none"> <li>- Basic Occupational First Aid Training was conducted on 28 – 29/08/2023 for the whole SOU 27.</li> <li>- First Aid Training was conducted for First Aid Box holders at Sapong Estate on 26/06/2023.</li> </ul> <p>Accident records were maintained in the estate and available for verification.</p> <ol style="list-style-type: none"> <li>1. <u>Melalap POM</u>              For the year 2022 there were 1 accident reported with 13 days LTI. The JKPP 8 form have been submitted to DOSH and available for verification. For the year 2023 there were no accidents reported as of to date.</li> <li>2. <u>Melalap Estate</u>              For the year 2022 there were 2 accidents reported for the year with 9 losses of mandays. The JKPP 8 and respective JKPP 6 forms have been submitted to DOSH and available for verification. For the year 2023 there were 6 accident and incidents reported in the estate. Records of investigation and reporting were available for verification.</li> <li>3. <u>Sapong Estate</u>              For the year 2022 there were 4 reported accident cases with a total of 4 days LTI. The JKPP 8 Form has been submitted to</li> </ol>	
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		<p>DOSH dated 06/01/2023 with records available for verification. AS for 2023 there were 4 accident cases with an LTI of 17 days. The accident investigation records were available for verification.</p> <p>There were lapses in the monitoring of the first aid boxes at Sapong Estate</p> <p>Verified the First Aid Box at the Estate Chemical Store and Schedule Waste Store Sapong Estate to have expired items. The first aid box had triangular bandage that expired on 05/2019 and 03/2021 respectively. Further verification on the First Aid Box monitoring for the Chemical Store was done on 15/08/2023 stating that all items were checked. Thus, Minor NC was raised.</p>	
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>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>	Complied
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p>	<p>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.</p>	Complied

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	<p>- Minor compliance -</p>	<p>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 619 1926 1219"> <thead> <tr> <th>Operating Units</th> <th>Month</th> <th>Total Workers</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Melalap POM</td> <td>June 2023</td> <td>81</td> </tr> <tr> <td>July 2023</td> <td>80</td> </tr> <tr> <td>August 2023</td> <td>82</td> </tr> <tr> <td rowspan="3">Melalap Estate</td> <td>June 2023</td> <td>136</td> </tr> <tr> <td>July 2023</td> <td>142</td> </tr> <tr> <td>August 2023</td> <td>141</td> </tr> <tr> <td rowspan="3">Sapong Estate</td> <td>June 2023</td> <td>263</td> </tr> <tr> <td>July 2023</td> <td>266</td> </tr> <tr> <td>August 2023</td> <td>262</td> </tr> </tbody> </table>	Operating Units	Month	Total Workers	Melalap POM	June 2023	81	July 2023	80	August 2023	82	Melalap Estate	June 2023	136	July 2023	142	August 2023	141	Sapong Estate	June 2023	263	July 2023	266	August 2023	262	
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6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>All accidents incidents are reviewed during the quarterly held safety meetings in the operating units. Records on Lost Time Accident (LTA) are maintained and presented during the meetings. Accident records were updated and available for verification in the rapid4 System. JKPP 8 have been submitted to DOSH accordingly and</p>	Complied																								

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		<p>available for verification. The LTA for each operating unit has been recorded (year to date August 2023) and available as below.</p> <table border="1" data-bbox="1137 443 1921 726"> <thead> <tr> <th rowspan="2">Operating Units</th> <th colspan="2">2022</th> <th colspan="2">2023 (To Date)</th> </tr> <tr> <th>Cases</th> <th>Days</th> <th>Cases</th> <th>Days</th> </tr> </thead> <tbody> <tr> <td>Melalap POM</td> <td>1</td> <td>13</td> <td>0</td> <td>0</td> </tr> <tr> <td>Melalap Estate</td> <td>2</td> <td>9</td> <td>6</td> <td>11</td> </tr> <tr> <td>Sapong Estate</td> <td>4</td> <td>4</td> <td>4</td> <td>17</td> </tr> </tbody> </table>	Operating Units	2022		2023 (To Date)		Cases	Days	Cases	Days	Melalap POM	1	13	0	0	Melalap Estate	2	9	6	11	Sapong Estate	4	4	4	17	
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<b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.																											
7.1.1	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators.</p> <p>There are several IPM available as per IPM plan in Sapong estate as per below:-</p> <table border="1" data-bbox="1137 1184 1921 1359"> <thead> <tr> <th>Issue/ Area</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>Usage of insecticides - Cypermethrin</td> <td>Reduce Spraying round from twice per month to once per month</td> </tr> </tbody> </table>	Issue/ Area	Action Plan	Usage of insecticides - Cypermethrin	Reduce Spraying round from twice per month to once per month	Complied																				
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7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM. This is not practiced in the estates visited.</p>		Complied								

7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>Interview with the estate management and workers indicated that there was no use of fire as pest control in the estates. Visit around the estate also indicated that there was no evidence of fire being used as the methods of pest control is mainly via pesticide applications and biological controls (IPM).</p>	Complied									
<b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.												
7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The written justification in Standard Operating Procedure (SOP) of all agrochemicals are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 01/07/2011. As per section 1.7.2 Table 5, the manual already classified the type of weed, herbicide to used, rate/dosage and dilution rate as a guidance based on the field conditions. Addition or reduction of rounds and dosage will be considered in consultation with the respective head of units or agronomist.</p>	Complied									
7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. Sighted the sampled records of pesticides usage (A.I.) per ha at estates visited FY 2023 (to date) as follows:</p> <p>Melalap Estate</p> <table border="1" data-bbox="1137 1190 1930 1356"> <thead> <tr> <th>Month</th> <th>Quantity (a.i./Ha)</th> <th>Quantity (a.i./FFB)</th> </tr> </thead> <tbody> <tr> <td>Jun 2023</td> <td>2.147</td> <td>1.521</td> </tr> <tr> <td>Jul 2023</td> <td>0.278</td> <td>0.223</td> </tr> </tbody> </table>	Month	Quantity (a.i./Ha)	Quantity (a.i./FFB)	Jun 2023	2.147	1.521	Jul 2023	0.278	0.223	Complied
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7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5. The estates have implemented a Continuous Improvement Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan. Sighted during the site visit at all the estates, the establishment of beneficial plants along the estate roads and immature areas as well as barn owl boxes placed at strategic areas. Paraquat was eliminated. In replace, alternatives such as Glyphosate is used instead.</p>	Complied																		
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There is no prophylactic use of pesticides in all estates visited.</p>	Complied																		

<p>7.2.5</p>	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> <li>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> </ul> <p>- Minor compliance -</p>	<p>The Chemical Registers for the mill and sampled estates were available for verification and reviewed yearly and as and when there are introductions of new chemicals in the operations.</p> <p>The register showed that only class III &amp; IV pesticides were used at the mill and estates. Paraquat and Monocrotophos was eliminated. In its place, less hazardous alternatives such as Glyphosate and Acephate was used instead.</p>	<p>Complied</p>				
<p>7.2.6</p>	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>The pesticides operators have been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly health surveillance done by the Medical Assistant. Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms. Reviewed the training records as per criteria 3.7.2. Sampled the training conducted for pesticide handlers as below: -</p> <p>Melalap Estate</p> <table border="1" data-bbox="1137 1316 1912 1366"> <thead> <tr> <th data-bbox="1137 1316 1675 1366">Training</th> <th data-bbox="1675 1316 1912 1366">Date</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Training	Date			<p>Complied</p>
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7.2.7	<p><b>(C)</b> 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, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety Data Sheet were available.</p>	Complied												
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under recycle waste. The chemical containers are stored in the Empty Chemical Container Store and disposed through waste contractors responsibly. Visit to the Empty Chemical Store indicated that the chemical containers were indeed triple rinsed and punctured prior</p>	Complied												

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		<p>to being stored. Records of empty chemical containers disposal were also maintained and verified for each operating unit.</p> <ol style="list-style-type: none"> <li>1. Melalap Estate have disposed Empty Chemical Containers via LXXXXXX BXXXXXX SXX BXX on 16/06/2023 (Invoice Number: K2306037) with records available for verification.</li> <li>2. Sapong Estate have disposed Empty Chemical Containers via LXXXXXX BXXXXXX SXX BXX on 29/05/2023 (invoice Number: Q2305 – S042) with records available for verification.</li> </ol>	
<p>7.2.9</p>	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Aerial Spraying was conducted at Sapong Estate Nursery for Pest and Disease Control.</p> <ol style="list-style-type: none"> <li>1. The aerial spraying was conducted in line with Sime Darby Plantation Berhad vision of mechanising several tasks across the operations as they expect to eliminate need for manual workers in all non-harvesting activities.</li> <li>2. Sime Darby Plantation Berhad have established an SOP – Spraying Application of Pesticide Combination for Pest and Disease Control in Oil Palm Nursery using Unmanned Aerial Vehicle Blanket Sprayer (All Regions); Ref Number: CP-SOP-M-37.</li> <li>3. Agreement on the Drone Aerial Spraying at Sapong Estate between the estate and JXXX UXXX DXXX dated 01/07/2023 was available for verification.</li> <li>4. Government Authority approval were in progress with application records available for verification. Sighted the Civil Aviation Authority of Malaysia; Application for Commercial Agricultural UAS Aerial Work Certificate dated 01/09/2023. Email correspondence between the authorities were referred to</li> </ol>	<p>Complied</p>

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		<p>stating that operations can commence while the application is in process.</p> <ol style="list-style-type: none"> <li>5. The Drone Operators have obtained Drone Pilot Certification, as verified in the "RDJI Agras T20P &amp; T10 Agriculture Drone Pilot Training dated 21/07/2023.</li> <li>6. Sapong Estate management have briefed the estate workers and staffs that aerial spraying will be conducted at the estate nursery. Records of morning briefing dated 03/08/2023 and 17/08/2023 was available for verification. The briefing was acknowledged to be done 48 hours prior to the application. There is no other stakeholders related such as villagers and local communities involved since the nursery area was located in the middle of estate.</li> <li>7. Permit untuk Bekerja (Permit to Work) was available for verification for Drone Aerial Spraying Operator to conduct the aerial spraying at the estate nursery. The PTW (Bil Number: SPE Nursery 004) dated 19/08/2023 was sampled and verified during the assessment.</li> </ol> <p>Records of aerial spraying done was maintained and available for verification. The records were prepared by the estate supervisor and verified by the estate managers. Sighted the application records for the month of July and August 2023.</p>	
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>The CHRA of each operating units have recommended the necessity of annual medical surveillance for pesticide applicators exposed to pesticides that are classified as organophosphates. Results of annual medical surveillance were available in the estate for verification as follows.</p>	Complied

		<p>Melalap Estate: The medical surveillance programme for the year 2022 has been performed on 28/12/2022 at MXXXXXXo GXXXp of Clinics for 20 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work. The next annual medical surveillance is scheduled to be done on 28/12/2023.</p> <p>Sapong Estate: The medical surveillance programme for the year 2023 has been performed on 28/01/2023 MXXXXXXo GXXXp of Clinics for 26 workers identified to be exposed to hazardous chemicals and fertilisers, in the estate. The results indicated that all workers were fit to work.</p>	
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby 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. 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. Verified through the master listing of workers confirmed that there is no person under age 18 work with pesticide. For other people that have medical restriction based on assessment by CHRA or advice by VMO and HA, workers will be offered alternative equivalent work. It was confirmed based on interview with managements and related workers.</p>	Complied
<p><b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			

<p>7.3.1</p>	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Addressed in the Waste Management Procedure for Estates &amp; Mill dated May 2022 with reference number SD/SDH/GSD/HSE/0522/01. Waste management were based on their categorization which is:</p> <ul style="list-style-type: none"> <li>• Scheduled Waste</li> <li>• Hazardous waste</li> <li>• Non-Hazardous waste</li> <li>• Industrial waste</li> <li>• Construction waste</li> <li>• Agricultural waste</li> <li>• Office waste</li> <li>• General waste</li> </ul> <p>Melalap Estate, Sapong Estate and POM has established Waste Management Plan 2023. Among details in the management plan tabulated in the table below:</p> <table border="1" data-bbox="1137 1018 1935 1331"> <thead> <tr> <th data-bbox="1137 1018 1352 1107">Waste Generation</th> <th data-bbox="1359 1018 1935 1107">Action Plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 1112 1352 1331">Scheduled waste</td> <td data-bbox="1359 1112 1935 1331"> <ol style="list-style-type: none"> <li>1. Comply with Schedule waste regulation</li> <li>2. Update inventory of SW in E-Swiss on monthly basis</li> <li>3. Ensure storage of SW not exceed 180 days</li> <li>4. Ensure each SW have labels</li> </ol> </td> </tr> </tbody> </table>	Waste Generation	Action Plan	Scheduled waste	<ol style="list-style-type: none"> <li>1. Comply with Schedule waste regulation</li> <li>2. Update inventory of SW in E-Swiss on monthly basis</li> <li>3. Ensure storage of SW not exceed 180 days</li> <li>4. Ensure each SW have labels</li> </ol>	<p>Complied</p>
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			<ol style="list-style-type: none"> <li>5. Comply to the Environment Quality (SW) Regulation 2005</li> </ol>		
		<p>Industrial waste</p>	<ol style="list-style-type: none"> <li>1. Liaise with Procurement Department for tendering process to appoint vendor to collect scrap metals</li> <li>2. Ensure the contractor to dispose the debris after work completion</li> <li>3. Monitoring POME application</li> </ol>		
		<p>Domestic waste</p>	<ol style="list-style-type: none"> <li>1. Identify landfill at least 500m distances from nearest waterways, river</li> <li>2. Allocate sufficient amount of dustbin at office and housing compound</li> <li>3. Collect waste at estate compound at least 3 times a week</li> <li>4. Arrange licenced contractors to de sludge septic tank periodically</li> </ol>		
		<p>Operational waste</p>	<ol style="list-style-type: none"> <li>1. Fertilizer bag re used for loose fruit collection or return to supplier</li> <li>2. Old tyres used for landscaping or return to supplier</li> </ol>		
		<p>Wastes management plan is developed based on the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. The Waste Management Plans 2023 were established to mitigate and control the identified waste and source of pollution. Generally, the scheduled waste was disposed through licensed vendors, organic wastes were disposed through</p>			



		<p>government landfill and recyclable wastes were sent to recycle contractors.</p> <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" data-bbox="1137 587 1928 1026"> <thead> <tr> <th>Type of Waste</th> <th>Item description</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Scheduled waste</td> <td>Used lubricants</td> </tr> <tr> <td>Empty pesticide</td> </tr> <tr> <td>Used batteries</td> </tr> <tr> <td>Clinical waste</td> </tr> <tr> <td>Domestic waste</td> <td>Rubbish from the mill/estate complex and employees' quarters</td> </tr> <tr> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table>	Type of Waste	Item description	Scheduled waste	Used lubricants	Empty pesticide	Used batteries	Clinical waste	Domestic waste	Rubbish from the mill/estate complex and employees' quarters	Sewage	Sewage from housing/office complex	
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7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Procedure of Schedule waste management has been established. Refer Waste Management Procedure for Estates &amp; Mill dated May 2022 with reference number SD/SDH/GSD/HSE/0522/01. Other reference made was Guidelines for Packaging, Labelling and Storage of Scheduled Wastes In Malaysia.</p> <p>Awareness training on Schedule waste has been conducted as per date below:</p> <ul style="list-style-type: none"> <li>• Melalap Estate: 20/03/2023</li> <li>• Spong Estate: 10/08/2022</li> </ul>	Complied											

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		<ul style="list-style-type: none"> <li>• Melalap POM: 11/08/2023</li> </ul> <p>Generally, the workers have demonstrated good understanding in proper disposal of wastes.</p> <p>Record of Inventory of Schedule Waste and Disposal Record as per details below:</p> <p><u>Melalap Estate</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> <li>• File reference Number: JAS.SSP.XXX-3/4/XX</li> <li>• Date Reporting: Aug 2023</li> <li>• Waste Generated: SW 102, SW 305 SW 404, SW 408, SW 409.</li> </ul> <p><u>Disposal</u></p> <p>Sample 1</p> <ul style="list-style-type: none"> <li>• Disposal consignment note: CN2306-XXXX</li> <li>• Date Disposal: 16/06/2023</li> <li>• SW 104 – Used welding rod, 0.007 MT disposed by LXXXXXX BXXXXXX Sdn Bhd</li> </ul> <p>Sample 2</p> <ul style="list-style-type: none"> <li>• Disposal consignment note: CN2306-XXXX</li> <li>• Date Disposal: 16/06/2023</li> <li>• SW 410 – Contaminated Cotton Rags, 0.005 MT disposed by LXXXXXX BXXXXXX Sdn Bhd</li> </ul> <p><u>Sapong Estate</u></p>	
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		<p><u>Inventory</u></p> <ul style="list-style-type: none"> <li>• File reference Number: JAS.SSP.XXX-3/4/XX</li> <li>• Date Reporting: Aug 2023</li> <li>• Waste Generated: SW 102, SW 305 SW 404, SW 408, SW 409.</li> </ul> <p><u>Disposal</u></p> <p>Sample 1</p> <ul style="list-style-type: none"> <li>• Disposal consignment note: CN2305-XXXX</li> <li>• Date Disposal: 29/05/2023</li> <li>• SW 408 – Contaminated Soil, 0.080 MT disposed by LXXXXXX BXXXXXX Sdn Bhd</li> </ul> <p>Sample 2</p> <ul style="list-style-type: none"> <li>• Disposal consignment note: CN2305-S115</li> <li>• Date Disposal: 29/05/2023</li> <li>• SW 409 – Used Chemical Container, 0.074 MT disposed by LXXXXXX BXXXXXX Sdn Bhd</li> </ul> <p><u>Melalap POM</u></p> <p><u>Inventory</u></p> <ul style="list-style-type: none"> <li>• File reference Number: JAS.SSP.XXX-3/1/XX</li> <li>• Date Reporting: 05/09/2023</li> <li>• Waste Generated: SW 109, SW 305, SW 306, SW 312, SW 322, SW 323, SW 409, SW 410.</li> </ul> <p><u>Disposal</u></p>	
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		<p>Sample 1</p> <ul style="list-style-type: none"> <li>Disposal consignment note: CN2305-XXXX</li> <li>Date Disposal: 18/04/2023</li> <li>SW 109 – Used Fluorescent, 0.028 MT disposed by LXXXXXX BXXXXXX Sdn Bhd</li> </ul> <p>Sample 2</p> <ul style="list-style-type: none"> <li>Disposal consignment note: CN2305-S115</li> <li>Date Disposal: 29/05/2023</li> <li>SW 410 – Used Oil Filter / PPE, 0.165 MT disposed by LXXXXXX BXXXXXX Sdn Bhd</li> </ul>	
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Not sighted any open burning as per visit to the estates field and housing compound in Melalap POM and supply base confirmed that no open fire were been use for waste disposal. SDP has a policy of no open burning. As advocated, the estate practiced zero burning. In the replants visited during the audit in the Estate, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p> <p>There was no evidence of fire used for waste disposal estate visited. Domestic waste was collected and disposed at Municipal Council bin.</p>	Complied
<p><b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p>	<p>Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained</p>	Complied

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	<p>- Minor compliance -</p>	<p>yield. All sample Estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices are consistently monitored by estate operation management and the regional office. The recommendations for improvements are given to maintain sustainable practices. Leaf analysis and foliar sampling will be monitored on a yearly basis. Variable dosage recommendation was given by the agronomist for fertilizer input for all sample Estates. ARM Section 8 Rev: 02 Issue date: June 2021 covers the procedure for fertilizer application for both immature and mature. The procedure gives the guideline type of fertilizers to be used, timing to apply, dosage and placement.</p> <p>The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents:</p> <ul style="list-style-type: none"> <li>a) EQMS chapter B8 - Leguminous Cover Crops</li> <li>b) EQMS chapter B14 – Manuring</li> <li>c) ARM Section 8 – Manuring</li> </ul>	
<p>7.4.2</p>	<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 foliar sampling analysis was last conducted in 2022 for the sampled estates to monitor the changes in nutrient status. The results of the analysis were used by the agronomist for their recommendation for fertilizers applications programmed. The soil analysis is done once in 5 years. This analysis was followed as per Sustainable Plantation Management System (SPMS) Appendix 11 Ver. 1, under SOP for taking Soil samples dated 01/08/2009. Analysis reports were made available for verification as per below:</p> <p>Agronomist report was available dated 24/05/2023.</p> <p>Melalap Estate</p>	<p>Complied</p>

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		<p>Soil analysis conducted by Chief Chemist II from Sime Darby Research Sdn Bhd dated 20/09/2019 as per Soil Analysis Test report no. S7/2019 in Melalap Estate.</p> <p>Foliar analysis conducted by Chief Chemist II from Sime Darby Research Sdn Bhd dated 30/01/2023 as per Foliar Analysis Test report no. P3/2023 in Melalap Estate.</p> <p>Sapong Estate</p> <p>Soil analysis conducted by Chief Chemist II from Sime Darby Research Sdn Bhd dated 21/09/2019 as per Soil Analysis Test report no. S8/2019 in Sapong estate.</p> <p>Foliar analysis conducted by Chief Chemist II from Sime Darby Research Sdn Bhd dated 30/01/2023 as per Foliar Analysis Test report no. P2/2023 in Sapong Estate.</p>													
<p>7.4.3</p>	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Melalap POM. The best practice of EFB application is described in the ARM. Records were available for verification. Based on the records, it was noted that the EFB application rate per hectare was around 30-40 mt/ha. Refer record below:</p> <p>Melalap Estate</p> <table border="1" data-bbox="1137 1129 1928 1361"> <thead> <tr> <th>Field</th> <th>Hectarage, Ha</th> <th>Total MT Applied</th> </tr> </thead> <tbody> <tr> <td>P00PB</td> <td>52.67</td> <td>710</td> </tr> <tr> <td>P00PC</td> <td>89.79</td> <td>3,261</td> </tr> <tr> <td>P00PD</td> <td>103.63</td> <td>3,574</td> </tr> </tbody> </table>	Field	Hectarage, Ha	Total MT Applied	P00PB	52.67	710	P00PC	89.79	3,261	P00PD	103.63	3,574	<p>Complied</p>
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P02CA	2.33	31.43													
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7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>The fertiliser application was conducted as per recommendation by agronomist base on foliar sampling conducted. The fertiliser application records were available at the estate visited for review. The estate reported the fertilised application to the Plant Nutrition &amp; Protection, Sabah Region. Refer 2023/2024 Fertiliser Programme and Application Record. Sample of fertilizer programme and application record as table below:</p> <table border="1" data-bbox="1137 1203 1928 1382"> <thead> <tr> <th>Field</th> <th>Fertilizer</th> <th>Amount, MT</th> <th>Program</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>Mature</td> <td>NKC</td> <td>642.30</td> <td>July – Dec 2023</td> <td>In Progress</td> </tr> </tbody> </table>	Field	Fertilizer	Amount, MT	Program	Status	Mature	NKC	642.30	July – Dec 2023	In Progress	Complied		
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		Mature	RP	250.20	July – Dec 2023	In Progress																						
<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.																												
7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Maps identifying marginal and fragile soil, including steep terrain were available for verification. They were prepared by R&amp;D-TTAS Precision Agriculture Unit dated 19/01/2022.</p> <p>Melalap Estate</p> <table border="1"> <thead> <tr> <th>Soil Type</th> <th>Percentage, %</th> </tr> </thead> <tbody> <tr> <td>Antulai</td> <td>2.51</td> </tr> <tr> <td>Kelawat</td> <td>36.09</td> </tr> <tr> <td>Koyah</td> <td>17.63</td> </tr> <tr> <td>Luasong</td> <td>1.77</td> </tr> <tr> <td>Tanjong Lipat</td> <td>40.98</td> </tr> <tr> <td>Unclassified</td> <td>1.02</td> </tr> </tbody> </table> <p>Sapong Estate</p> <table border="1"> <thead> <tr> <th>Soil Type</th> <th>Percentage, %</th> </tr> </thead> <tbody> <tr> <td>Sinaron</td> <td>66.42</td> </tr> <tr> <td>Binkor</td> <td>16.15</td> </tr> <tr> <td>Brantian</td> <td>10.01</td> </tr> </tbody> </table>				Soil Type	Percentage, %	Antulai	2.51	Kelawat	36.09	Koyah	17.63	Luasong	1.77	Tanjong Lipat	40.98	Unclassified	1.02	Soil Type	Percentage, %	Sinaron	66.42	Binkor	16.15	Brantian	10.01	Complied
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		Labau	7.41																						
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Based on the verification there is no soils in the table classified as marginal or fragile soil.</p> <p>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: "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 &gt;25 degree.</p> <p>Record verification as per below:</p>		Complied																					
		<table border="1"> <thead> <tr> <th>Estate</th> <th>Degree</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Melalap</td> <td>0°-2°</td> <td>77.30%</td> </tr> <tr> <td>2°-6°</td> <td>4.88%</td> </tr> <tr> <td>6°-12°</td> <td>12.25%</td> </tr> <tr> <td>12°-20°</td> <td>5.16%</td> </tr> <tr> <td>&lt;25°</td> <td>0.41%</td> </tr> <tr> <td rowspan="3">Sapong</td> <td>0°-2°</td> <td>25.50%</td> </tr> <tr> <td>2°-6°</td> <td>24.42%</td> </tr> <tr> <td>6°-12°</td> <td>26.55%</td> </tr> </tbody> </table>			Estate	Degree	Hectarage	Melalap	0°-2°	77.30%	2°-6°	4.88%	6°-12°	12.25%	12°-20°	5.16%	<25°	0.41%	Sapong	0°-2°	25.50%	2°-6°	24.42%	6°-12°	26.55%
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12°-20°	20.22%						
<25°	3.03%						
		<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 the interlines. Cover crops were planted in the replants and in certain mature areas. The cover crop <i>Mucuna Bracteata</i> had been planted along crucial slopes by management. Large areas with <i>Neprolepis Biserrata</i> in the inter rows were sighted during the visit.</p>					
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 Melalap Estate and Sapong Estate, it was verified that there was no new planting of oil palm sighted on steep terrain.</p>	Complied				
<p><b>Criterion 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>							
7.6.1	<p><b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>No new plantings in Melalap Estate. Soil series and topography maps were available for the estate. No marginal or fragile soil categorized in the estate as per soil map issued by R&amp;D Precision Agriculture Unit.</p>	Complied				
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>No new plantings in Estate. Addressed in the Sime Darby Plantation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 02/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest:</p> <p>– “We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:</p>	Complied				

		– vii. No new development of peat areas, regardless of depth or location. We will seek to rehabilitate existing plantings on peats where possible.	
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.  - Minor compliance -	No new plantings in Melalap Estate. As per slope map prepared by R&D-TTAS Precision Agriculture Unit dated November 2018, topography information Melalap Estate and Sapong Estate was available as verified under indicator 7.5.2.	Complied
<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.  - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 27. The entire estates of SOU 27 had no new planting program during the audit period and forthcoming as recorded. This was verified as per soil analysis report and as per indicator 7.5.1.	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.  <b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).  - Minor compliance -	Peat Inventory have been sent by Sime Darby Plantation HQ dated 14/11/2019 to RSPO Secretariat. However, no peat soil in sampling estate as per verification on soil sampling by R&D-TTAS Precision Agriculture Unit dated 19/01/2022.	Complied
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised.  - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 27. The entire estates of SOU 27 had no new planting program during the audit period and forthcoming as recorded.	Complied
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place.	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 27. The entire estates of SOU 27 had no new	Complied

	- Critical (Major) compliance -	planting program during the audit period and forthcoming as recorded.	
7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 27. The entire estates of SOU 27 had no new planting program during the audit period and forthcoming as recorded.	Complied
7.7.6	<p><b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 27. The entire estates of SOU 27 had no new planting program during the audit period and forthcoming as recorded.	Complied
7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p>	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 27. The entire estates of SOU 27 had no new planting program during the audit period and forthcoming as recorded.	Complied

	- Critical (Major) compliance -									
<b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.										
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>Both the Mill and Estate had established its Water Management Plan for year 2023 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as:</p> <ul style="list-style-type: none"> <li>- Evaluation of water consumption and water sources.</li> <li>- Monitoring of negative impact to the environment.</li> <li>- Steps to optimize water consumption through water saving methods.</li> <li>- Control of fertility and soil moisture.</li> <li>- Monitoring of water management.</li> </ul> <p>Among the action plan to reduce freshwater usage tabulated in the table below;</p> <p>Melalap Estate and Sapong Estate</p> <table border="1"> <thead> <tr> <th>Issue</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>Rain harvesting</td> <td>Large containers are to be placed at strategic location to collect wastewater</td> </tr> <tr> <td rowspan="2">Leaking of water pipe</td> <td>Weekly linesite inspection by MA/PIOA</td> </tr> <tr> <td>Reminder to be provided to workers during muster briefing</td> </tr> </tbody> </table>	Issue	Action Plan	Rain harvesting	Large containers are to be placed at strategic location to collect wastewater	Leaking of water pipe	Weekly linesite inspection by MA/PIOA	Reminder to be provided to workers during muster briefing	Complied
Issue	Action Plan									
Rain harvesting	Large containers are to be placed at strategic location to collect wastewater									
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	Reminder to be provided to workers during muster briefing									

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		Stream water (Pegalan Div.)	Large containers are to be placed at strategic location to collect wastewater	
		Melalap POM		
		Issue / Area	Action Plan	
		Wet Cleaning at process area	To ensure wet cleaning using water jet	
		Dilution water at press	To control dilution rate during process	
		Fishpond at AP and Gazebo	To use circulation water only	
		Water shortage	Implement rainwater harvesting	
		Severe water pollution	Decontaminate pond by flushing water and chemical treatment	
7.8.2	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>From the verification was done through site visit, interview and document review, it was confirmed that 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). Monitoring was done by water sampling conducted by the certification units.</p> <p>Water sampling was conducted by quarterly basis base on Sustainable Plantation Management System (SPMS) Appendix 7 Standard Operating Procedure (SOP) for Water Quality Monitoring</p>		Complied

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		<p>dated 01/06/2016. Water sampling conducted by water and wastewater lab, Sime Darby Research Sdn Bhd.</p> <p>Melalap Estate</p> <ul style="list-style-type: none"> <li>• River water analysis was conducted on 05/07/2023. Refer report with refence number IE958/2023. Sample taken for Sungai Melalap and Sungai Pegalan.</li> <li>• Domestic water analysis was conducted on 07/08/2023. Refer report with reference number IE1079/2023. Sample taken for Raw water pond, After treated water and Drinking water.</li> </ul> <p>Sapong Estate</p> <ul style="list-style-type: none"> <li>• River water analysis was conducted on 13/06/2023. Refer report with refence number IE935/2023. Sample taken for Sungai Biah, Sungai Ampat and Sungai Bunut.</li> <li>• Domestic water analysis was conducted on 08/08/2023. Refer report with reference number ML823/2023. Sample taken for Raw water pond, After treated water and Drinking water.</li> </ul> <p>Melalap POM</p> <ul style="list-style-type: none"> <li>• River water analysis was conducted on 12/07/2023. Refer report with refence number IE958/2023. Sample taken for Sungai Melalap and Sungai Pegalan.</li> <li>• Domestic water analysis was conducted on 07/08/2023. Refer report with reference number IE1079/2023. Sample taken for Raw water pond, After treated water and Drinking water.</li> </ul> <p>Awareness signage has been placed at the strategic area for example main gate and buffer zone area. Training has been</p>	
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		<p>communicated with workers during muster call and affected stakeholders during stakeholder meeting.</p>																									
<p>7.8.3</p>	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>Mill effluent is treated through biological anaerobic treatment. Regular monitoring was conducted as per requirement. Monthly and quarterly reports were submitted to DOE accordingly. Reviewed the Quarterly Return Form to DOE as follows:</p> <table border="1" data-bbox="1137 598 1917 1177"> <thead> <tr> <th>Report Date</th> <th>Quarter/Week</th> <th>BOD (Limit=20 mg/L)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">07/07/2023</td> <td>1<sup>st</sup>week/1<sup>st</sup>month</td> <td>17.00</td> </tr> <tr> <td>5<sup>th</sup>week/2<sup>nd</sup>Month</td> <td>16.00</td> </tr> <tr> <td>9<sup>th</sup>week/3<sup>rd</sup>Month</td> <td>9.00</td> </tr> <tr> <td rowspan="3">20/04/2023</td> <td>1<sup>st</sup>week/1<sup>st</sup>month</td> <td>17.00</td> </tr> <tr> <td>5<sup>th</sup>week/2<sup>nd</sup>Month</td> <td>10.00</td> </tr> <tr> <td>9<sup>th</sup>week/3<sup>rd</sup>Month</td> <td>17.00</td> </tr> <tr> <td rowspan="3">19/01/2023</td> <td>1<sup>st</sup>week/1<sup>st</sup>month</td> <td>14.00</td> </tr> <tr> <td>5<sup>th</sup>week/2<sup>nd</sup>Month</td> <td>13.00</td> </tr> <tr> <td>9<sup>th</sup>week/3<sup>rd</sup>Month</td> <td>13.00</td> </tr> </tbody> </table> <p>Melalap POM discharge POME through Land Application after treated as per "Jadual Pematuhan" No:003562. Signage on "Takat Pelepasan" was maintained at Mill has conducted water sampling at final discharge. Refer Report from Sime Darby Plantation Research Sdn Bhd dated 12/07/2023 with reference number IE958/2023.</p>	Report Date	Quarter/Week	BOD (Limit=20 mg/L)	07/07/2023	1 <sup>st</sup> week/1 <sup>st</sup> month	17.00	5 <sup>th</sup> week/2 <sup>nd</sup> Month	16.00	9 <sup>th</sup> week/3 <sup>rd</sup> Month	9.00	20/04/2023	1 <sup>st</sup> week/1 <sup>st</sup> month	17.00	5 <sup>th</sup> week/2 <sup>nd</sup> Month	10.00	9 <sup>th</sup> week/3 <sup>rd</sup> Month	17.00	19/01/2023	1 <sup>st</sup> week/1 <sup>st</sup> month	14.00	5 <sup>th</sup> week/2 <sup>nd</sup> Month	13.00	9 <sup>th</sup> week/3 <sup>rd</sup> Month	13.00	<p>Complied</p>
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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>Mill has maintained monitoring of water usage for processing FFB which are recorded monthly. Water for processing is abstracted from water catchment by using pump. The trend of water usage is tandem with volume of FFB process. Refer Water Usage Record Melalap POM. Average data as below:</p> <table border="1" data-bbox="1137 547 1921 694"> <thead> <tr> <th>Year</th> <th>FFB Processed, MT</th> <th>Water/L</th> <th>Water/FFB</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>60,449.58</td> <td>121,009.30</td> <td>2.00</td> </tr> </tbody> </table>	Year	FFB Processed, MT	Water/L	Water/FFB	2022	60,449.58	121,009.30	2.00	Complied
Year	FFB Processed, MT	Water/L	Water/FFB								
2022	60,449.58	121,009.30	2.00								
<b>Criterion 7.9:</b> 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 Management Plan 2023. The document was reviewed/updated on January 2023. Among the Energy Management Plan were:</p> <ul style="list-style-type: none"> <li>i) Create awareness among staff/ workers regarding importance of saving electricity.</li> <li>ii) Do labelling / awareness sticker to switching off the main switch for facilities / equipment after being used or not being used.</li> <li>iii) Replacing the fluorescent lamp into LED lamp which consume less electricity.</li> <li>iv) Worker’s housing inspection to ensure no illegal wiring</li> <li>v) Preventive maintenance programme for estate vehicles</li> <li>vi) Training / Educate workers on fuel saving practices</li> <li>vii) Regular maintenance of transport @ machine as per recommendation</li> </ul>	Complied								

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		<p>There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p> <table border="1" data-bbox="1137 507 1926 770"> <thead> <tr> <th>Estate / Mill</th> <th>Fiber, MT</th> <th>CPO, MT</th> <th>Usage / CPO (MT)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Melalap POM</td> <td>10,871.77</td> <td rowspan="3">11,961.36</td> <td rowspan="3">1.13</td> </tr> <tr> <td>Shell, MT</td> </tr> <tr> <td>2552.69</td> </tr> </tbody> </table> <p>The mill and estate monitored the diesel usage per ton FFB process/production on monthly basis. Reviewed the data To date 2022 as follows:</p> <table border="1" data-bbox="1137 890 1926 1254"> <thead> <tr> <th>Estate / Mill</th> <th>Diesel, (MT)</th> <th>FFB / CPO, (MT)</th> <th>Diesel / FFB / CPO (MT)</th> </tr> </thead> <tbody> <tr> <td>Melalap Estate</td> <td>22,152.00</td> <td>10,937.13</td> <td>2.02</td> </tr> <tr> <td>Sapong Estate</td> <td>38,120.00</td> <td>17,326.09</td> <td>2.19</td> </tr> <tr> <td>Melalap POM</td> <td>7,353.79</td> <td>11,961.36</td> <td>0.08</td> </tr> </tbody> </table> <p>At the mill, the utilisation of fibre and shell as biofuel for boiler operation is consistently implemented to generate electricity through turbines. This helps to reduce the dependency to fossil fuel.</p>	Estate / Mill	Fiber, MT	CPO, MT	Usage / CPO (MT)	Melalap POM	10,871.77	11,961.36	1.13	Shell, MT	2552.69	Estate / Mill	Diesel, (MT)	FFB / CPO, (MT)	Diesel / FFB / CPO (MT)	Melalap Estate	22,152.00	10,937.13	2.02	Sapong Estate	38,120.00	17,326.09	2.19	Melalap POM	7,353.79	11,961.36	0.08	
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<b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Both the mill and the estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation. The management from both estate 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 adversely impact the environment.</p> <p>Fuel Consumption, POME and reported in the Palm GHG Summary Report. The consumption of fertilisers and diesel were verified through Estates:</p> <ul style="list-style-type: none"> <li>• FFB record book</li> <li>• Stock book</li> <li>• Monthly stock issue</li> <li>• Stock requisition note Mill</li> <li>• Mill Month End Production Report</li> <li>• Monthly production report</li> <li>• Flowmeter &amp; running hours record book</li> <li>• Effluent analysis report Based on the verification of records; all the sampled issuance was traceable</li> </ul>	Complied
7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p>	<p>Not applicable since no new development by the certification unit.</p>	Not Applicable

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	<p>- Critical (Major) compliance -</p>															
<p>7.10.3</p>	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Assessment of all polluting activities was conducted under Environmental Risk Assessment for identifying activities that contributes significant impact to environment including gaseous emission. Among the plan for pollution preventive action Plan FY 2023 were:</p> <table border="1" data-bbox="1137 598 1935 1332"> <thead> <tr> <th data-bbox="1144 603 1532 652">Environmental issue</th> <th data-bbox="1538 603 1928 652">Action Plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="1144 657 1532 804">Leaking of pesticides during chemical mixing and washing into outside land</td> <td data-bbox="1538 657 1928 804">To recollect water used and recycled during next premixing Water pump repaired</td> </tr> <tr> <td data-bbox="1144 809 1532 892">Leaking of lubricant, oil from servicing, parking tractor</td> <td data-bbox="1538 809 1928 892">To used oil tray to prevent leakage of used oil</td> </tr> <tr> <td data-bbox="1144 896 1532 979">Smoke from vehicle exhaust i.e. tractor</td> <td data-bbox="1538 896 1928 979">Regular engine maintenance</td> </tr> <tr> <td data-bbox="1144 984 1532 1327" rowspan="4">Erosion during replanting work</td> <td data-bbox="1538 984 1928 1074">Riparian reserve 20m to established</td> </tr> <tr> <td data-bbox="1538 1078 1928 1161">Do not fill area more than 25 degree</td> </tr> <tr> <td data-bbox="1538 1166 1928 1287">Marking/signage to be established at slope area &gt;25 degree</td> </tr> <tr> <td data-bbox="1538 1292 1928 1327">LCC sowing at terrace area</td> </tr> </tbody> </table>	Environmental issue	Action Plan	Leaking of pesticides during chemical mixing and washing into outside land	To recollect water used and recycled during next premixing Water pump repaired	Leaking of lubricant, oil from servicing, parking tractor	To used oil tray to prevent leakage of used oil	Smoke from vehicle exhaust i.e. tractor	Regular engine maintenance	Erosion during replanting work	Riparian reserve 20m to established	Do not fill area more than 25 degree	Marking/signage to be established at slope area >25 degree	LCC sowing at terrace area	<p>Non-compliance</p>
Environmental issue	Action Plan															
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		<p>Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.</p> <p>As prescribed under DOE's Compliance Schedule, the mill is obliged to conduct stack sampling minimum once a year. Below are the verified reports (Isokinetic Stack &amp; Air Emission Monitoring Report):</p> <p><u>1<sup>st</sup> Half 2023</u></p> <ul style="list-style-type: none"> <li>• Report no.: SAHEN/Melalap-099/23-01(B2C2)</li> <li>• Report date: 03/06/2023</li> <li>• Result: Dust: 130.79 mg/m<sup>3</sup> (B5) vs limit 150, CO: 0.88 mg/m<sup>3</sup> vs limit 1000 @ 12% CO<sub>2</sub></li> </ul> <p>For Air Pollution Control System, management use Electrostatic Precipitator (ESP) for monitoring. Continuous Emissions Monitoring System (CEMS) which link to the DOE on real time base were monitored.</p> <p>Sighted Online Environmental Reporting (OER) has been submitted to DOE on quarterly basis. The result within parameter as per Jadwal Pematuhan AS(B)XX/XXX/000/XXX Licence No: 003562.</p> <p>Environmental audit by 3<sup>rd</sup> party has been conducted 2 times yearly by Assessor with reference number EA0079/CESSWI 3309 dated 30/12/2022 and 30/06/2022.</p> <p>Latest DOE visit was sighted on 12/07/2023. Sighted reports details and no issue has been raised.</p> <p>The Mitigation Measures for Pollution prevention plan was not effectively implemented.</p> <p>During site visit at tractor parking bay Sapong Estate, it was observed 3 tractors were parked there. Based on interview with</p>	
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		person in charge, 2 unit was writing off units, while another 1 unit under repair. Sighted evidence of signage under repair. Sighted leakage of lubricant from tractor under repair and there is no mitigating measures for that. It was not in line with Pollution Prevention Plan FY 2023 Sapong Estate dated 05/02/2023, Issue: Leaking of lubricant, oil from servicing, parking tractor parking area, mitigating measures: To used oil tray to prevent leakage of used oil. Thus, Major NC was raised.	
<b>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</b>			
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Visit to the replanting areas in Melalap Estates and Sapong estate confirmed that the land for replanting is not prepared by burning. Interview with the workers and management indicated that they do not prepare land for replating by burning. Verification through document review, interview and site visit confirmed that there is no replanting prepared by burning. Refer Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law – EQA and Regulations 1974. No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Fire prevention measure has been established. Refer Emergency Preparedness and Response Procedures. Refer document no. UM/HSE/SP/02. Hotspot monitoring managed by HQ (Fire Hotspot Monitoring Team) – if any fire is detected, inform estate. Sime Darby was engaged the Smart Hotspot Alert that monitored by satellite VIIRS for fire prevention. Sime Darby Daily Hotspot Monitoring system has been in place since November 2013 using	Complied

		NASA satellite data. The system monitors any possible occurrence of fire within or nearby the concession areas throughout Sime Darby Plantation Upstream operation globally. At the estates level, there are fire prevention team established. Among the mechanisms to prevent fire are training on firefighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump.	
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.  - Minor compliance -	There is evidence that management has engaged with stakeholders regarding on fire prevention and control measures. Refer Stakeholder meeting dated 03/08/2023. Refer Section 5.0 item 5.1. stated details on Fire Prevention.	Complied
<b>Criterion 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.  A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.  - Critical (Major) compliance -	Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, this indicator is not applicable during this assessment. The immature areas are of replanted area.	Not Applicable
7.12.2	<b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:  a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.  b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the	The reassessment on the HCV area in SOU 27 has been conducted on 7 – 9/7/2015 and documented in HCV Re-Assessment for Strategic Operating Unit (SOU) 27 Melalap final Report Ver. III dated January 2016. 7 HCV were identified for identification (a) of high biodiversity value habits and Conservation status (b) in both estates as follows:  <u>Melalap Estate</u>	Complied

	<p>HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b></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>	<table border="1"> <thead> <tr> <th>No</th> <th>Assessment</th> <th>(Ha)</th> <th>Present HCV</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water catchment (P01KA)</td> <td>3.6700</td> <td>4</td> </tr> <tr> <td>2</td> <td>River reserve</td> <td>84.2500</td> <td>4</td> </tr> <tr> <td>3</td> <td>Aki Tampulan</td> <td>0.0045</td> <td>6</td> </tr> <tr> <td>4</td> <td>Stone Cemetery (P01MA)</td> <td>0.3700</td> <td>6</td> </tr> </tbody> </table> <p><u>Sapong Estate</u></p> <table border="1"> <thead> <tr> <th>No</th> <th>Assessment</th> <th>(Ha)</th> <th>Present HCV</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Stream buffer zone</td> <td>41.8900</td> <td>4</td> </tr> <tr> <td>2</td> <td>Slope area P03AA</td> <td>0.4000</td> <td>4</td> </tr> <tr> <td>3</td> <td>Cemetery (P02A &amp; P02BA)</td> <td>3.4300</td> <td>6</td> </tr> </tbody> </table> <p>As per site verification with land statement and interview with stakeholder no new planting was available in sample estate.</p>	No	Assessment	(Ha)	Present HCV	1	Water catchment (P01KA)	3.6700	4	2	River reserve	84.2500	4	3	Aki Tampulan	0.0045	6	4	Stone Cemetery (P01MA)	0.3700	6	No	Assessment	(Ha)	Present HCV	1	Stream buffer zone	41.8900	4	2	Slope area P03AA	0.4000	4	3	Cemetery (P02A & P02BA)	3.4300	6	
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7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not Applicable	Not Applicable																																				
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly</p>	<p>No new planting after 15 November 2018 within SOU 27. Base on the HCV identified in the report, the estate has established management plan for the year 2023. Review on HCV Management Plan Melalap Estate and Sapong Estate has been done on 03/01/2023. Reviewed the implementation of the management plan as follows:</p> <p><u>Melalap Estate</u></p>	Complied																																				



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<p>managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	Issue / Area	Action Plan	
	Water catchment	To ensure no logging or hunting in conservation area	
		To allow vegetation to grow in all natural area by no chemical spraying	
		To inform and communicate to all employees, contractor and all neighbour	
		To ensure signage area available	
	River (Pegalan) Reserve	To allow vegetation to grow in all natural area by no chemical spraying only manual weeding or slashing is allowed	
		To maintain the buffer zone (width)	
		To update the hydrology map	
	Aki Tumpulan Stone & Cemetery (P01MA)	Maintaining and monitoring cemetery area and grass cutting as per scheduled	
		Put the signages	
	Training	6 monthly training for all workers and staff on	

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			biodiversity conservation and management	
			Educating and enhancing stakeholders' development through environment and biodiversity training and awareness	
			Awareness on HCV and RTE species to all workers	
		<u>Sapong Estate</u>		
		<b>Issue / Area</b>	<b>Action Plan</b>	
		Maintain all remnant forest patches, area more than 25 degree slope	To ensure no logging or hunting in conservation area  To inform and communicate to all employee, contractor, supplier that encroachment and hunting are not allowed, permitted in the conservation area.	
Identification of riparian (Sungai Ampat, Bunut & Biah)	To maintain the buffer zone width as per company policy  No chemical interventions be carried out in the riparian reserved. Only manual weeding or slashing is allowed			

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		<table border="1"> <tr> <td data-bbox="1133 362 1525 544">Training</td> <td data-bbox="1525 362 1928 544">To inform and retrain all the sprayers to maintain soft grasses at interrow</td> </tr> <tr> <td data-bbox="1133 544 1525 544"></td> <td data-bbox="1525 544 1928 544">To document all the training</td> </tr> <tr> <td data-bbox="1133 544 1525 699">Maintaining fruits trees &amp; plant</td> <td data-bbox="1525 544 1928 699">To maintain the fruit trees planting area e.g. monitoring grass cutting and trees well being</td> </tr> <tr> <td data-bbox="1133 699 1525 820">Maintain HCV area - Cemetery</td> <td data-bbox="1525 699 1928 820">Maintaining and monitoring cemetery area e.g. grass cutting activity, signage.</td> </tr> </table>	Training	To inform and retrain all the sprayers to maintain soft grasses at interrow		To document all the training	Maintaining fruits trees & plant	To maintain the fruit trees planting area e.g. monitoring grass cutting and trees well being	Maintain HCV area - Cemetery	Maintaining and monitoring cemetery area e.g. grass cutting activity, signage.	<p>Monitoring for wildlife (Animal sighting) was done. Refer records dated August 2023.</p> <p>Awareness training on HCV and buffer zone was conduct on:</p> <p>Melalap Estate: 24/08/2023</p> <p>Sapong Estate: 14/06/2023</p>	
Training	To inform and retrain all the sprayers to maintain soft grasses at interrow											
	To document all the training											
Maintaining fruits trees & plant	To maintain the fruit trees planting area e.g. monitoring grass cutting and trees well being											
Maintain HCV area - Cemetery	Maintaining and monitoring cemetery area e.g. grass cutting activity, signage.											
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 was no changes as per previous year record. There were no rights of local communities been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas. The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations.</p>	Complied									
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in</p>	<p>Based on the biodiversity report, there was no RTE species found in all the estates. Nonetheless, the monitoring plan of wildlife was established and implemented. Education about the status of RTE</p>	Complied									

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	<p>place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>has been given to workforce through a muster briefing from time to time. Signage to restrict hunting and intrusion have been put up at many places at the estates especially at the points of entry to create awareness among the workers and surrounding communities.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>Educational activities on RTE species were done through a few means such as briefings/training and no hunting signage. Interview with workers showed that they have a good understanding in the restriction of hunting or endangering the RTE species. Sighted the management also conducted the RTE monitoring, sample in Melalap Estate and Sapong Estate. Refer HCV monitoring latest record for the month of August 2023.</p>	Complied
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 27 estates. There is no land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018. Hence, the requirement under this indicator does not apply.</p>	Not Applicable

**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in 2022 for Melalap Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2022 for Melalap Palm Oil Mill and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.52
PKO	1.52

Extraction	%
OER	19.64
KER	4.53

Production	t/yr
FFB Process	60,679.82
CPO Produced	11,914.58
PKO Produced	2,747.30

Land Use	Ha
OP Planted Area	3,397.29
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	130.21
<b>Total</b>	<b>3,527.50</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	33,553.77	0.81	0.00	0.00	0.00	0.00	33,553.77	0.81
CO <sub>2</sub> Emission from fertilizer	3,270.10	0.08	0.00	0.00	0.00	0.00	3,270.10	0.08
NO <sub>2</sub> Emission	1,858.00	0.05	0.00	0.00	0.00	0.00	1,858.00	0.05
Fuel Consumption	21.38	0.01	0.00	0.00	0.00	0.00	21.38	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	-31,804.54	-0.77	0.00	0.00	0.00	0.00	-31,804.54	-0.77
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>6,898.71</b>	<b>2.03</b>	0.00	0.00	0.00	0.00	<b>6,898.71</b>	<b>2.03</b>

*\*Note: Includes both estates and smallholders*

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**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	11,894.27	0.20
Fuel Consumption	1.27	0.00
Grid Electricity Utilization	255.51	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>12,151.06</b>	<b>0.20</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	100

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

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



**Appendix D: Estate Field Map**

Melalap Estate



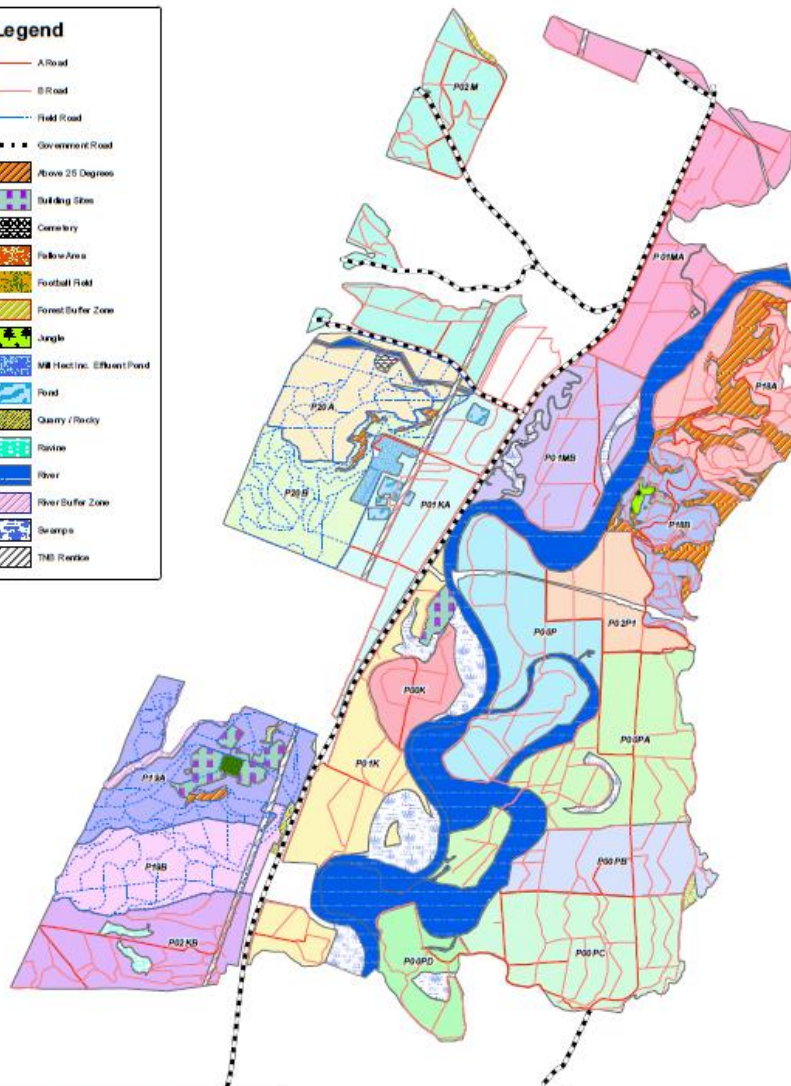
**Melalap Estate**

GPS Surveyed Map (Draft Map)

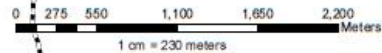


**Legend**

- A Road
- B Road
- Field Road
- Government Road
- Above 25 Degrees
- Building Sites
- Cemetery
- Fallow Area
- Football Field
- Forest Buffer Zone
- Jungle
- Mill Head Inc. Effluent Pond
- Pond
- Quarry / Rocky
- Ravine
- River
- River Buffer Zone
- Swamps
- TMS Redline



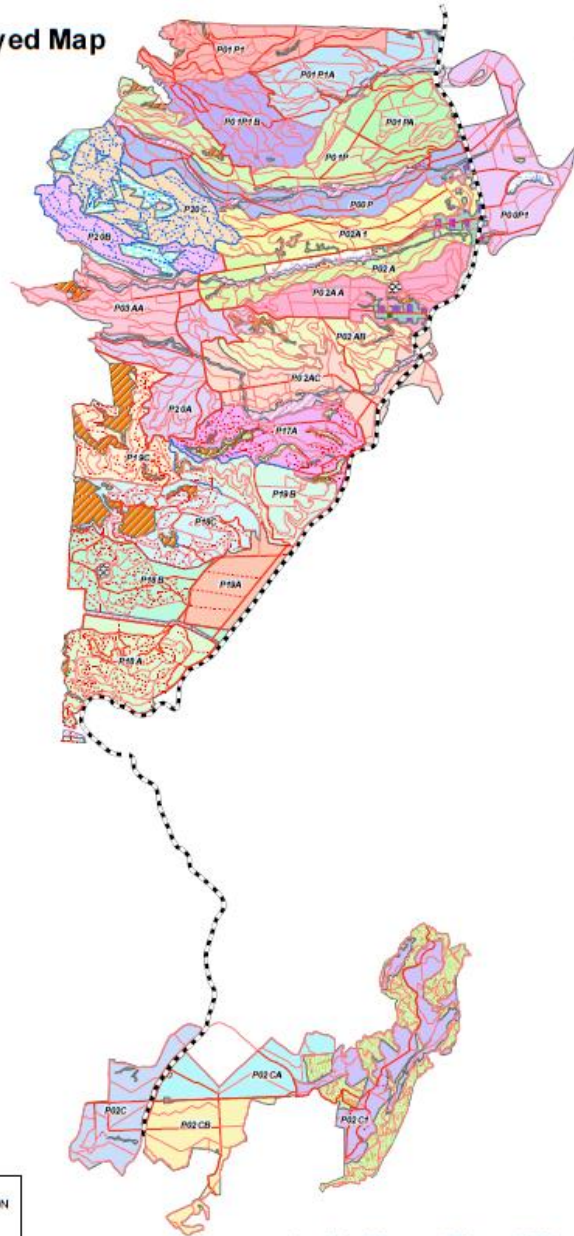
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 Projection : Universal Transverse Mercator 50N  
 Datum : WGS 84  
 Date Prepared : 09 December 2021  
 Prepared by : Precision Agriculture Unit (UCP)  
 Print Scale : A3 (29.7 cm x 42cm)





Sapong Estate

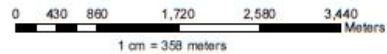
**Sime Darby** **Sapong Estate**  
 Plantation **GPS Surveyed Map**



**Legend**

- A Road
- B Road
- C Road
- Field Road
- Government Road
- Above 25 Degrees
- Building Site
- Cemetery
- Fallow Area
- Football Field
- Jati Area
- QP Nursery
- Ravine
- River
- River Buffer Zone
- Security Trenches
- Swamps

Data Source : GPS Surveyed  
 Projection : Universal Transverse Mercator 50N  
 Datum : WGS 84  
 Date Prepared : 15 December 2021  
 Prepared by : Precision Agriculture Unit (UCP)  
 Print Scale : A3 (29.7 cm x 42cm)



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**Appendix E: List of Smallholder Registered and/or sampled**

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

**Appendix F: List of Abbreviations**

a.i	Active Ingredient
ARM	Agriculture Reference Manual
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
SDPB	Sime Darby Plantation Berhad
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure