

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

**Client Company Name / Parent Company:
TDM Plantation Sdn Bhd**

Client Company / Parent Company Address:
Level 1, Wisma TDM, 443D, Jalan Kamaruddin, 20400 Kuala Terengganu, Terengganu, Malaysia

Certification Unit:
Kemaman Palm Oil Mill

Location of Certification Unit:
KM 121, Jerangau – Jabor Highway, 24101 Kemaman, Terengganu, Malaysia

Date of Final Report:
01/02/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	TDM Plantation Sdn Bhd		
RSPO Membership Number	1-0095-11-000-00	Membership Approval Date	28/11/2011
Address:	Level 1, Wisma TDM, 443D, Jalan Kamaruddin, 20400 Kuala Terengganu, Terengganu, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Kemaman Palm Oil Mill		
Location / Address	Kemaman Palm Oil Mill, KM 121, Jerangau - Jabur Highway, Kemaman, 24101, Terengganu, Malaysia		
Website	www.tdmberhad.com.my		
Management Representative	Tn Hj Shahbudin bin Usop	E-mail	kpom.tdmp@tdmberhad.com.my
Telephone	+60 9-822 6566	Facsimile	+60 9-822 6704

2. Certification Information			
Certificate Number	RSPO 587626	Certificate Start Date	01/11/2023
Date of First Certification	01/11/2013	Certificate Expiry Date	31/10/2028
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<p>Determination of the conformity of the client's management system, or parts of it with audit criteria.</p> <p>Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</p>		
Assessment Cycle	<input type="checkbox"/> Pre-Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 2) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	<input checked="" type="checkbox"/> RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> RSPO P&C 2018 for Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	60 MT/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site Audit (Option AI)	<input type="checkbox"/> On-site Audit (Option AII)	<input type="checkbox"/> Remote Audit
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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 678572	MSPO Part 4 (MS 2530-4:2013) General Principles for Palm Oil Mills	BSI Services (M) Sdn Bhd	14/12/2027
MSPO 686877	MSPO Part 3 (MS 2530-3:2013) General Principles for Oil Palm Plantations and Organized Smallholders	BSI Services (M) Sdn Bhd	14/12/2027
MSPO 778497	MSPO Supply Chain Certification (MSPO-SCCS-01, 01-Sept-2018)	BSI Services (M) Sdn Bhd	08/01/2028

4. Location(s) of Mill & Supply Bases			
Name (Mill & Supply Bases)	Location	GPS Coordinates	
		Latitude	Longitude
Kemaman Palm Oil Mill	KM 121, Jerangau – Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4°24'10.80" N	103°14'52.80" E
Pelantoh Estate	KM 121, Jerangau – Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4°24'19.23" N	103°14'59.64" E
Tebak Estate	KM 121, Jerangau – Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4°25'48.61" N	103°13'35.40" E
Jernih Estate	KM 121, Jerangau – Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	4°26'24.00" N	103°12'39.59" E
Air Putih Estate	PT 2143-2147, Mukim Tebak & 1209-1213, Mukim Bandi, 24007 Kemaman, Terengganu, Malaysia	4°15'18.59" N	103°12'38.77" E
Gajah Mati Estate	Ladang Gajah Mati, 23200 Bukit Besi, Dungun, Terengganu, Malaysia	4°41'45.05" N	103°12'23.30" E
MAIDAM Estate	Jalan Kuala Jengal – Jongok Batu, Kampung Jongok Batu, 23000 Kuala Dungun, Terengganu, Malaysia	4°39'42.90" N	103°08'38.00" E
Notes:			

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)			<input type="checkbox"/> Yes (please refer to Principle 7 for details)	
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Pelantoh Estate	2,604.52	3.02	438.46	3,046.00	85.51
Tebak Estate	2,510.03	5.14	399.86	2,915.03	86.11
Jernih Estate	2,282.10	73.61	395.26	2,750.97	82.96
Air Putih Estate	3,839.73	52.93	991.61	4,884.27	78.61
Gajah Mati Estate	2,933.64	62.17	888.24	3,884.05	75.53
MAIDAM Estate	356.76	7.52	542.36	906.64	39.35
Total	14,526.78	277.47	3,582.71	18,386.96	79.01

Notes:

- (1) Total Planted Area for TDM Kemaman POM & Supply Bases decreased 2,690.42 Ha. (from 17,217.20 Ha. to 14,526.78 Ha.) compared to previous reporting period due to:
 - a) Pelantoh Estate decreased 548.75 Ha due to newly survey of estate area done by GIS AAD Department of TDM Plantation Sdn Bhd (concluded in March 2023). The survey specifically covers planted areas and excludes infrastructure elements like buffer zones, swamps, rivers, ponds, steep terrain, high conservation value (HCV) areas, roads, and TNB rentice.
 - b) Tebak Estate decreased 412.30 Ha due to newly survey of estate area done by GIS AAD Department of TDM Plantation Sdn Bhd (concluded in March 2023)
 - c) Jernih Estate decreased 539.97 Ha. due to newly survey of estate area done by GIS AAD Department of TDM Plantation Sdn Bhd (concluded in March 2023)
 - d) Air Putih Estate decreased 202.97 Ha. due to elephant encroachment areas and newly survey for drains and field roads areas.
 - e) Gajah Mati Estate decreased 587.23 Ha. due to newly survey of estate area done by GIS AAD Department of TDM Plantation Sdn Bhd (concluded in March 2023)
 - f) MAIDAM Estate decreased 399.20 Ha. due to due to newly survey of estate area done by GIS AAD Department of TDM Plantation Sdn Bhd (concluded in March 2023)
- (2) HCV Area for TDM Kemaman POM & Supply Bases decreased 166.27 Ha. (from 443.74 Ha. to 277.47 Ha.) compared to previous reporting period. The justification is included at Indicator 7.12.2.
- (3) Infrastructure & Other Area for TDM Kemaman POM & Supply Bases increased 2,373.98 Ha. (from 1,208.73 Ha. to 3,582.71 Ha.) compared to previous reporting period due to newly survey of estate area done by GIS AAD Department of TDM Plantation Sdn Bhd (concluded in March 2023).

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 – 3	4 – 14	15 – 25	>25		
Pelantoh Estate	979.00	520.46	10.32	1,094.74	1,625.52	979.00
Tebak Estate	190.63	661.71	193.04	1,464.65	2,319.40	190.63
Jernih Estate	418.74	918.37	944.99	-	1,694.85	587.25
Air Putih Estate	-	2,470.83	-	1368.9	3,753.83	85.9
Gajah Mati Estate	690.13	1,741.48	120.65	381.38	2,243.51	690.13
MAIDAM Estate	105.26	63.43	188.07	-	251.50	105.26
Total (ha)	2,383.76	6,376.28	1,457.07	4,309.67	11,888.61	2,638.17

Note: Only Mature area is considered as production area

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / Year			Forecast (Nov 23 – Oct 24)
	Estimated Last Year (Nov 22 – Oct 23)	Actual (Oct 22 – Sept 23)		
		Previous License Period (Oct 22)	Current License Period (Nov 22 – Sept 23)	
Pelantoh Estate	12,179.04	1,241.23	12,509.18	14,850.00
Tebak Estate	30,980.78	2,049.44	18,229.08	25,500.00
Jernih Estate	39,848.46	3,075.25	20,828.83	28,450.00
Air Putih Estate	67,228.29	6,921.36	41,160.55	58,730.00
Gajah Mati Estate	4,018.52	3,499.05	23,836.07	32,850.00
MAIDAM Estate	2,200.08	159.81	1,486.81	2,121.00
Total	156,455.17	16,946.14	118,050.52	162,501.00
		134,996.66 MT		

Notes:

- On the 26-Oct-2023, the RSPO Secretariat granted approval for the Extension of Volume request submitted by the Certificate Holder. The approved extension encompasses an additional volume allocation of 17,073.17 MT for FFB, 3,000 MT for CSPO, and 768 MT for CSPK. As a result of this approval, significant adjustments have been made to the Certified Volume figures. The new Certified Volumes, in comparison to the initial figures referenced in the previous Public Summary Report, are as follows:
 - Certified Volume for FFB_estates: 156,455.17 MT (an increase of 17,073.17 MT)
 - Certified Volume for CSPO: 33,821.19 MT (an increase of 3,000 MT)
 - Certified Volume for CSPK: 8,130.04 MT (an increase of 768 MT)
- The forecasted volume for the period of Nov-2023 to Oct-2024 shows no significant deviation when compared to the estimated figures for the preceding year, spanning Nov-2022 to Oct-2023.

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / Year			
	Estimated Last Year (Nov 22 – Oct 23)	Actual (Oct 22 – Sept 23)		Forecast (Nov 23 – Oct 24)
		Previous License Period (Oct 22)	Current License Period (Nov 22 – Sept 23)	
Pinang Emas Estate		0.00	9,814.15	
Jerangau Estate		0.00	7,765.71	
Tayor Estate		0.00	697.70	
Jaya Estate		0.00	1,652.08	
Fikri Estate		0.00	1,212.28	
Total		0.00	21,141.92	
		21,141.92 MT		

Note:
 (1) These five estates fall under the Unit of Certification (UoC) of the Sungai Tong Palm Oil Mill, holding the RSPO certificate number RSPO 595564 (validity of the certificate is until the 26-Dec-2023).

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / Smallholders	Tonnage (MT) / Year			
	Estimated Last Year (Nov 22 – Oct 23)	Actual (Oct 22 – Sept 23)		Forecast (Nov 23 – Oct 24)
		Previous License Period (Oct 22)	Current License Period (Nov 22 – Sept 23)	
–	–	–	–	–
Total	–	–	–	–
		0.00 MT		

Note:
 (1) Following a comprehensive review of records, site visits, and documented procedures, it has been confirmed that there are no outgrowers or smallholders supplying their Fresh Fruit Bunches (FFB) to this Palm Oil Mill (POM). Therefore, the established and applicable supply chain module for this UoC is Identity Preserved (IP).

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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.	October 2022	16,946.14	–	16,946.14
2.	November 2022	14,117.82	–	14,117.82
3.	December 2022	12,463.71	–	12,463.71
4.	January 2023	9,622.86	–	9,622.86
5.	February 2023	4,213.69	–	4,213.69
6.	March 2023	9,114.86	–	9,114.86
7.	April 2023	10,115.54	–	10,115.54
8.	May 2023	12,517.58	–	12,517.58
9.	June 2023	12,408.68	–	12,408.68
10.	July 2023	15,694.29	–	15,694.29
11.	August 2023	18,834.13	–	18,834.13
12.	September 2023	20,089.29	–	20,089.29
TOTAL		156,138.58	–	156,884.45

10. Summary of Certified Tonnage			
Estimated Last Year (Nov 22 – Oct 23)	Actual (Oct 22 – Sept 23)		Forecast (Nov 23 – Oct 24)
	Previous License Period (Oct 22)	Current License Period (Nov 22 – Sept 23)	
FFB	FFB	FFB	FFB
156,455.17 MT	16,946.14 MT	139,192.44 MT	162,501.34 MT
	Total	156,138.58 MT	
CPO (OER: 21.62%)	CPO (OER: 20.38%)	CPO (OER: 20.15%)	CPO (OER: 21.00%)
33,821.19 MT	3,453.70 MT	28,195.59 MT	34,136.35 MT
	Total	31,649.29 MT (OER: 20.27%)	
PK (KER: 5.20%)	PK (KER: 4.61%)	PK (KER: 4.37%)	PK (KER: 4.67%)
8,130.04 MT	780.50 MT	6,114.62 MT	7,590.48 MT
	Total	6,895.12 MT (KER: 4.42%)	
Notes:			
<p>(1) On the 26-Oct-2023, the RSPO Secretariat granted approval for the Extension of Volume request submitted by the Certificate Holder. The approved extension encompasses an additional volume allocation of 17,073.17 MT for FFB, 3,000 MT for CSPO, and 768 MT for CSPK. As a result of this approval, significant adjustments have been made to the Certified Volume figures. The new Certified Volumes, in comparison to the initial figures referenced in the previous Public Summary Report, are as follows:</p> <ul style="list-style-type: none"> • Certified Volume for FFB_estates: 156,455.17 MT (an increase of 17,073.17 MT) • Certified Volume for CSPO: 33,821.19 MT (an increase of 3,000 MT) • Certified Volume for CSPK: 8,130.04 MT (an increase of 768 MT) <p>(2) The forecasted volume for the period of Nov-2023 to Oct-2024 shows no significant deviation when compared to the estimated figures for the preceding year, spanning Nov-2022 to Oct-2023.</p>			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1.	October 2022	3,453.70	780.50
2.	November 2022	2,842.32	638.34
3.	December 2022	2,266.92	512.68
4.	January 2023	1,784.35	411.21
5.	February 2023	900.55	209.17
6.	March 2023	1,789.06	435.75
7.	April 2023	2,159.06	545.67
8.	May 2023	2,577.42	600.68
9.	June 2023	2,396.54	493.84

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10.	July 2023	3,290.26	673.72
11.	August 2023	3,807.29	748.72
12.	September 2023	4,381.82	844.84
TOTAL		31,649.29	6,895.12

11. Summary of Actual Volume Sold

Current License Period (Nov 22 – Sept 23)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	25,456.53	–	–	–	25,456.53
PK (MT)	5,934.18	–	–	–	5,934.18
Credits	–	–	–	–	–

Previous License Period (Oct 22)

CPO (MT)	4,122.05	–	–	–	4,122.05
PK (MT)	650.16	–	–	–	650.16
Credits	–	–	–	–	–

Notes:

- (1) It has been verified that, for both the current license period and the previous license period, the volume of RSPO-certified palm oil sold does not exceed the RSPO-certified palm oil production volume.
- (2) Conventional is RSPO certified material but sold as non-RSPO.

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 ABC	TR-4e03a012-9306	250.00	-
		TR-2de4dcb0-0393	250.00	-
		TR-06c7fab2-4de4	186.05	-
		TR-ef9fc523-fd69	236.24	-
		TR-97152b12-56ea	268.53	-
		TR-b5a25256-006a	63.95	-
		TR-fa9d5cff-e30d	248.57	-
		TR-96b099a2-9413	500.00	-
		TR-b3e7efce-0942	9.73	-
		TR-3f9824b3-f9d8	6.57	-
2.	Buyer ABC	TR-f90219c5-7d94	513.61	-

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		TR-ace0b97e-ca9a	500.00	-
		TR-83563011-5248	195.99	-
		TR-dd45c9a2-0c95	204.00	-
		TR-95be1539-228e	510.00	-
		TR-edda040e-a5b3	200.00	-
		TR-12ef7104-aabb	500.00	-
		TR-bf57d847-ab8a	200.00	-
		TR-f1187af4-b170	499.31	-
		TR-85735627-e5f7	450.54	-
		TR-cd69d17d-6d61	200.00	-
		TR-c762ad00-4578	663.26	-
		TR-e8e40659-e605	500.00	-
		TR-800ff827-711c	200.00	-
		TR-dbfa433a-dc74	498.03	-
		TR-c9f2d9cb-7f51	49.46	-
		TR-61907b22-0db5	122.54	-
		TR-97439655-27d7	500.00	-
		TR-f3df74fb-8a4f	500.00	-
		TR-b266f2a5-d1f7	250.70	-
		TR-aeb0de0b-af04	30.72	-
		TR-c9cc5342-596a	500.00	-
		TR-e717c549-bfe6	500.00	-
		TR-e94fe189-405f	126.76	-
		TR-c08771f7-e824	500.00	-
		TR-e201a52f-a910	220.61	-
		TR-d4e71982-744c	123.75	-
		TR-270e623b-e11a	234.33	-
		TR-ca2f1871-cd1b	165.30	-
		TR-4baa2f09-303b	82.82	-
		TR-9677a560-147b	500.00	-
		TR-08ae079d-a99c	502.40	-
		TR-f14148db-d30d	200.00	-

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		TR-8b0bcddf-b6d6	500.00	-
		TR-52680c3d-3967	79.39	-
		TR-ee216de3-c0d5	276.25	-
		TR-90e4f2b8-8214	265.67	-
		TR-f787dd30-c174	499.33	-
		TR-95c768fc-a482	499.14	-
		TR-1b34e534-0a08	500.00	-
		TR-e73c8af2-643f	500.00	-
		TR-310a85c4-90a8	50.56	-
		TR-5a9fbf8b-6ab8	497.70	-
		TR-c39c5f82-ea2b	495.55	-
		TR-4c7665bb-7cae	500.00	-
		TR-5b8efac5-b3e1	100.00	-
		TR-25bdee63-e97f	700.00	-
		TR-16f30651-29cf	500.00	-
		TR-64748a9b-1172	297.19	-
		TR-b00ba6fa-7f9f	499.18	-
		TR-3ea48f02-a664	200.00	-
		TR-7e819182-94dc	700.00	-
		TR-2225a673-fc65	500.00	-
		TR-ed7e8f72-c794	499.45	-
		TR-53299b7d-0349	500.00	-
3.	Buyer ABC	TR-fad11103-6c77	216.72	-
		TR-dd7ddaaf-29ad	200.00	-
		TR-5263f707-119e	204.10	-
		TR-67f5ad79-876a	200.00	-
		TR-5ec08131-82f9	160.76	-
		TR-473adcc5-a4e3	37.92	-
		TR-088d95f6-2f03	83.28	-
4.	Buyer ABC	TR-3d894a6b-affc	203.70	-
		TR-372a7b96-b78b	81.70	-
		TR-1e00da6d-50bb	178.43	-

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		TR-f021f846-f745	119.85	-
		TR-af7f662b-e53d	2.00	-
		TR-aa367619-d326	190.05	-
		TR-766211d8-0561	18.30	-
		TR-b5943f60-262a	125.29	-
		TR-4efefb30-060b	199.96	-
		TR-487df16e-41ba	7.95	-
		TR-fa4d1e53-0edd	18.52	-
		TR-88b1da66-0dad	21.57	-
		TR-bbf504bd-5316	200.00	-
		TR-64aabd75-eb9e	74.71	-
5.	Buyer ABC	TR-7ded7295-2192	118.26	-
		TR-0129eac3-92de	203.30	-
		TR-c05f1745-3fd7	201.22	-
		TR-d5cc8ee4-ebf8	82.28	-
		TR-6e3dc17e-dad1	59.80	-
		TR-f40830ed-99db	100.00	-
		TR-ac5c6fc2-9d23	203.90	-
		TR-a33e6e11-7002	201.29	-
		TR-5f161c7e-3570	37.63	-
6.	Buyer ABC	TR-e4f8ed5b-6de0	256.05	-
		TR-1dfeb2fd-807b	250.00	-
		TR-562439e6-0f6e	83.64	-
		TR-42b0f788-f7b9	11.58	-
		TR-4e90b23f-97ab	116.36	-
		TR-a461d99a-af63	6.27	-
		TR-44f8e718-1077	194.74	-
		TR-62a7cce2-d892	5.26	-
		TR-76ec9f16-575a	200.00	-
		TR-a3527ef1-a461	3.83	-
		TR-ff18bc44-54bc	200.00	-
		TR-f860d597-8834	198.35	-

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7.	Buyer ABC	TR-4af0fa2d-10bf	254.12	-
		TR-ab1dacbd-ba02	476.20	-
		TR-3e1f62db-990f	236.52	-
		TR-670303a7-ee50	183.06	-
		TR-96d29ad1-b1fe	23.80	-
		TR-d93ecfb-ce59	251.10	-
		TR-416f9175-4bf1	159.06	-
		TR-e4da48d7-76b4	22.20	-
		TR-3db552eb-64f4	65.84	-
		TR-7163188a-998f	21.83	-
		TR-890ea3c3-fe45	18.74	-
		TR-4a2c6ba2-2cf5	166.23	-
		TR-11d483d4-090f	199.48	-
		TR-4ee38d5c-1aec	84.89	-
8.	Buyer ABC	TR-0c947043-815c	-	483.58
		TR-cf1dbfb8-9f21	-	48.52
		TR-fed4f84c-7249	-	592.03
		TR-1d9f6d85-7a3a	-	161.42
		TR-a32b1c38-0a3b	-	377.25
		TR-86b58f0b-71ed	-	52.97
		TR-e30b943f-52aa	-	182.75
		TR-c1689844-3b05	-	160.75
		TR-e2a12b81-1491	-	85.14
		TR-4d435127-064b	-	85.14
		TR-062d8703-91e2	-	115.17
		TR-4bab0048-13e3	-	132.08
		TR-dee40ee4-fcc8	-	126.74
		TR-4ce17035-f92c	-	238.86
		TR-5724f295-fa6b	-	159.88
		TR-1bf99a65-7e4e	-	31.59
		TR-c9c95cf5-4c88	-	292.41
TR-ba87c1fb-36a7	-	37.38		

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		TR-9e948ee3-cb79	-	36.19
		TR-58aa8afc-1782	-	324.00
		TR-1cee782c-a0d4	-	66.25
		TR-5f806c7b-96b2	-	287.81
		TR-c4241810-9714	-	197.10
		TR-07617a3d-0609	-	257.75
		TR-08c53c33-f2bb	-	126.90
		TR-986cf730-9bd8	-	120.03
		TR-d9389266-932d	-	430.00
9.	Buyer ABC	TR-9f486638-c367	-	27.72
		TR-4e85eec3-eba2	-	100.00
		TR-e3983978-1694	-	118.06
		TR-d9ff0bbe-cc80	-	16.27
		TR-3b4d1ac9-652c	-	72.28
		TR-f119d247-5a7d	-	83.25
		TR-b041f7e2-658a	-	43.33
		TR-09f6538a-5e7c	-	43.87
10.	Buyer ABC	TR-39a6cc98-8eb2	-	28.76
		TR-ad8e9863-d8a6	-	1.11
		TR-a33e784f-67a7	-	98.89
		TR-b6e11fcc-0330	-	18.86
		TR-0ef0fbe3-479b	-	121.46
		TR-059f1483-2e54	-	40.72
		TR-36d2aaa9-ed34	-	15.79
		TR-edb7ab60-db0c	-	49.78
		TR-14efb027-23b8	-	102.06
		TR-e976e64a-b256	-	69.87
		TR-6d875a2e-f8f9	-	97.94
		TR-88aa3cba-b898	-	143.49
		TR-75046f84-5243	-	81.14
		TOTAL	29,564.82	6,584.34

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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)
-	-	-	-	-
TOTAL			-	-

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
-	-	-	-
TOTAL		-	-

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
-	-	-	-
TOTAL			-

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated Last Year (Nov 22 – Oct 23)			Actual (Oct 22 – Sept 23)			Forecast (Nov 22 – Oct 23)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			-			-			-
IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	
CSPK	-	-		-	-		-	-	

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)
-	-	-	-	-	-	-
TOTAL		N/A	N/A	N/A	N/A	N/A

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13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other Schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License Period (Nov 22 – Oct 23)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License Period (Oct 22)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A	N/A	N/A	N/A	N/A

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)
-	-	-	-	-	-	-	-
TOTAL			N/A	N/A	N/A	N/A	N/A

Section 2: Assessment Process

Certification Body:

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

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)

Website: www.bsigroup.com

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted from 22-Oct-2023 until 26-Oct-2023. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on 22-Sept-2023.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities' engagement and workers welfare and safety.

The Critical NC close out on-site assessment was conducted on 02-Jan-2024. 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 was 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.

Following the agreement reached during the RSPO Assurance Standing Committee (ASC) Meeting on 22-Sept-2022, it was determined that in the event the result of the calculation is less than four (4) estates, the minimum number of estates to be audited is four (4). Therefore, in compliance with this agreement, the audit covered four out of six estates of the Unit of Certification, namely Pelantoh Estate, Air Putih Estate, MAIDAM Estate, and Tebak Estate, as well as the Kemaman Palm Oil Mill.

Meetings were held with stakeholders to seek their views on the performance of the certification unit 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.

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA2-1)	Year 3 (ASA2-2)	Year 4 (ASA2-3)	Year 5 (ASA2-4)
Kemaman POM	√	√	√	√	√
Pelantoh Estate	√		√	√	
Tebak Estate	√	√		√	√
Jernih Estate		√	√		√
Air Putih Estate	√	√		√	√
Gajah Mati Estate		√	√		√
MAIDAM Estate	√		√	√	

Tentative Date of Next Visit: 08-Jul-2024 – 12-Jul-2024

Total Number of Mandays: 15 mandays

2.2 BSI Assessment Team

Name	Role	Competency
Mohamad Amirul Saifullah bin Mohamad Senan	Team Leader	<p>Education: Holds a Bachelor of Agricultural Science from Universiti Putra Malaysia.</p> <p>Work Experience: With over 6 years of experience in oil palm plantation operations, agriculture, safety, and health-related fields, he has been an integral part of a large publicly listed plantation organization since 2012. His job responsibilities include supervising and monitoring estate operations to ensure compliance with RSPO, ISCC, and MSPO requirements and regulations, Good Agricultural Practice, and other standard operating</p>

		<p>procedures. He has also actively participated in internal audits of plantation operations to ensure adherence to RSPO, ISCC, and MSPO requirements. Subsequently, he spent 6 years working with an international Certification Body (CB), conducting certification audits of plantation operations for compliance with RSPO, MSPO, and ISCC requirements. He is a qualified Lead Auditor for RSPO P&C, RSPO Supply Chain, ISCC, MSPO OPMC, and MSPO Supply Chain certification audits, as well as a qualified Auditor for ISO 9001:2015 certification audits. Since January 2019, he has conducted audits in various countries, including Malaysia, Indonesia, Cambodia, Thailand, Singapore, Japan, India, Germany, and Spain. His expertise extends to the Palm Oil sector, encompassing industry fundamentals such as good agricultural practices (GAP), best management practices (BMP), sustainability, social issues (e.g., worker welfare and employment terms, gender issues), occupational health and safety (OHS) matters, and environmental considerations (e.g., pollution control and resource conservation).</p> <p>Training attended: Attended, completed and passed ISO 9001:2015 Lead Auditor Course (CQI-IRCA certified), ISO 45001:2018 Lead Auditor Course (CQI-IRCA certified), RSPO P&C Lead Auditor Course (endorsed by RSPO Secretariat), RSPO Supply Chain Certification Training Course (endorsed by RSPO Secretariat), RSPO P&C 2018 Version Introduction Course (endorsed by RSPO Secretariat), RSPO Supply Chain Certification Update Course (endorsed by RSPO Secretariat), MSPO Lead Auditor Course (endorsed by MPOCC), MSPO Supply Chain Certification Training Course (endorsed by MPOCC), ISCC EU and PLUS Basic Training, ISCC Greenhouse Gas Training, ISCC Waste and Residues Training, SA8000 Introduction & Basic Auditor Course, and HCV-HCSA Assessor Training Course.</p> <p>Language proficiency: Fluent in Bahasa Malaysia and English languages.</p> <p>Aspect covered in this audit: <input type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements <input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Valence Shem	Team Member	<p>Education: Holds a Bachelor of Technology BTech (Hons.) Industrial Technology, University of Science Malaysia.</p> <p>Work Experience: He has more than 20 years of working experience with 9 years in oil palm plantation industry and 13 years in management system auditing since 2009 for various standards such as ISO 14001, RSPO P&C, RSPO SCCS, MSPO and SMETA.</p> <p>Training attended: He has completed ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS</p>

		<p>Lead Assessor Course, MSPO Awareness Training, ISO 45001 Lead Auditor Course, SMETA Auditor training, HCV-HCS training and RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements <input checked="" type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
<p>Yusof Khairan Nizar bin Ahmad Tarmizi</p>	<p>Team Member</p>	<p>Education: Holds a Diploma in Public Administration-ITM (1991), Certificate of Safety and Health Officer-MII (2003), Bachelor of Corporate Administration (Hons), MARA University of Technology and a Master of Science in Occupational Safety and Health Management-Northern University of Malaysia.</p> <p>Work Experience: Has more than 30 years of working experience in varies industries including as safety officer in manufacturing company; consultant and trainer for management systems including ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, OHSAS 18001:2007, MS1722:2011, Environmental Legislation; contract auditor with varies accredited certification bodies for scheme including Malaysia Sustainable Palm Oil (MSPO), RSPO Principles & Criteria; MPOCC Registered Peer Reviewer and was a Certificate of Safety and Health Officer-Malaysian Insurance Institute.</p> <p>Training attended: He has completed ISO 9001:2000 IRCA/IATC A Lead Auditor Training; ISO 14001:2004 IEMA Approved EMS Advanced Lead Auditor Training Course; OH&SMS IRCA Certified Lead Auditor Training Course; MS 1722 Lead Auditor Training; MSPO Auditing; Endorsed RSPO P&C 2018 Lead Auditor Course; SMETA Requirements Training; HCV & HCS Introductory Training, RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&C).</p> <p>Also attended the Quality & Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment – For Bodied Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality Malaysia, ISO/IEC 17021. MSPO Peer Reviewer Training (MPOCC).</p> <p>Language Proficiency: Fluent in in both verbal/written Bahasa Malaysia and English.</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>

<p>Dr. Suhaili Sahari</p>	<p>Peer Reviewer</p>	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato’ Mohd Muda.</p> <p>Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joins Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Lead Auditor and Internal Auditor 2. ASI reviewer training 3. Safety and Health 4. ISO 14001:2015 Standard 5. RSPO Standards: RSPO P&C 2018 MY-NI 2019 6. MSPO Standards: MS 2530: 2013 part 1, 2, 3 and 4 7. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS 8. HACCP MS 1480:2019 9. GAP Standard: GLOBALGAP, Euro GAP 10. MSPO Peer Reviewer Training 2 - 2017 by MPOCC. <p>Expertise: General Management, Auditing, Environment and Plantation Management.</p>
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Accompanying Persons:

Name	Role
Mohamed Hidhir Zainal Abidin (MHZ)	Observer

2.3 Assessment Plan

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

Date	Time	Subjects	MAS	VS	YKN
Sunday, 22-Oct-2023 Pelantoh Estate	9:00 AM – 9:30 AM	Opening Meeting: <ul style="list-style-type: none">Opening Presentation by Audit team leader.Confirmation of assessment scope and finalize Audit Plan	√	√	√
	9:30 AM – 1:00 PM	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc. Consultation with relevant stakeholders which consists of various categories such as government agencies/ enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighbouring estates, smallholders, villages, workers representative, etc.), etc.	√	√	√
	1:00 PM – 2:00 PM	Lunch Break	√	√	√
	2:00 PM – 5:30 PM	Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP, and implementation etc.)	√	√	√
	5:30 PM – 6:00 PM	Interim Closing Briefing	√	√	√
Monday, 23-Oct-2023 Kemaman Palm Oil Mill	9:00 AM – 1:00 PM	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, et. Stakeholder consultations: (11:00 am – 1:00 pm) Consultation with relevant stakeholders which consists of various categories such as government agencies/ enforcers, NGO, contractors, suppliers, surrounding communities (e.g., neighboring estates, smallholders, villages, workers representative, etc.), etc.	√	√	√
	1:00 PM – 2:00 PM	Lunch Break	√	√	√

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Date	Time	Subjects	MAS	VS	YKN
	2:00 PM – 5:30 PM	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.	√	√	√
	5:30 PM – 6:00 PM	Interim Closing Briefing	√	√	√
Tuesday, 24-Oct-2023 Air Putih Estate	9:00 AM – 1:00 PM	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	1:00 PM – 2:00 PM	Lunch Break	√	√	√
	2:00 PM – 5:30 PM	Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	5:30 PM – 6:00 PM	Interim Closing Briefing	√	√	√
Wednesday, 25-Oct-2023 MAIDAM Estate	9:00 AM – 1:00 PM	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
	1:00 PM – 2:00 PM	Lunch Break	√	√	√
	2:00 PM – 5:30 PM	Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	5:30 PM	Interim Closing Briefing	√	√	√

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Date	Time	Subjects	MAS	VS	YKN
	– 6:00 PM				
Thursday, 26-Oct-2023	9:00 AM – 1:00 PM	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√	√
Tebak Estate	1:00 PM – 2:00 PM	Lunch Break	√	√	√
	2:00 PM – 5:00 PM	Document review P1 – P7: (General Documentation e.g., Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	√	√	√
	5:00 PM – 5:15 PM	Audit Team Meeting and Report Preparation	√	√	√
	5:15 PM – 6:00 PM	Closing Meeting	√	√	√

NC Closure Audit Plan

Date	Time	Subjects	MAS
Tuesday, 02-Jan-2024	9:00 AM – 9:15 AM	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan 	√
	9:15 AM – 12:30 PM	Verification on Major NC closure evidence. Document review, site observation, workers/stakeholder interview (individual and group session) for: <ul style="list-style-type: none"> 2412049-202310-M1 2412049-202310-M2 2412049-202310-M3 2412049-202310-M4 Site Observation: (1) MAIDAM Estate (2) Tebak Estate (3) Pelantoh Estate	√
	12:30 PM– 1:00 PM	Closing Meeting: Conclusion and recommendation	√

Section 3: Assessment Findings

3.1. Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. Please refer to Approved Time Bound Plan for details on the mills and estates of TDM Plantation Sdn. Bhd. Group.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	As per the latest Time Bound Plan, approved by the RSPO Secretariat on 29/03/2023, all estates and mills in Malaysia are anticipated to achieve certification within five years. Notably, an exception is made for TDM-YT Bukit Bidong Estate, where the new proposed year for certification is 2026. This adjustment is made from the initially planned year for certification, which was August 2023. Furthermore, it has been determined that certification for sites in Indonesia is deemed unnecessary. This decision is based on the fact that the operation and management control have already been transferred to Ikhasas Sawit Sdn. Bhd., as communicated in the latest correspondence with RSPO via email dated 19/12/2022.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	TDM-YT Bukit Bidong Estate was acquired from Tabung Haji Plantation on 01/08/2020. According to the latest Time Bound Plan, approved by the RSPO Secretariat on 29/03/2023, there has been a revision in the proposed year for certification for TDM-YT Bukit Bidong Estate. The new proposed year for certification is now 2026, marking a modification from the initial plan, which had set August 2023 as the year for certification.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	As of now there are no deviations on the period required for approval by the RSPO Secretariat.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, the approved year of certification for TDM-YT Bukit Bidong Estate was deviated from 2023 to 2026. The justification for this was due to the estate was still recovering from financial and production losses. ACOP Reporting has been verified and found to be consistent.	Complied

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Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No, there has not been any isolated lapses in the implementation of the plan.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No, there is no fundamental failure in implementation of the plan.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	No replacement of forest or any HCV area after dates defined in this Criterion 7.12 involving primary forest. TDM-YT Bukit Bidong Estate has already conducted it's HCV assessment by Sabarinah & Associates Sdn. Bhd.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	No new plantings since 1st January 2010 that requires compliance with the RSPO New Plantings Procedure.	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	Based on RSPO RACP tracker, there are 2 cases of Management Units with potential liability, Concept Note and Remediation Plan required. These 2 cases involving Indonesia operations which already been sold and TDM-YT Bukit Bidong Estate which already conducted it's HCV assessment and the report will be used to finish up LUCA and RaCP.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	TDM Plantation Sdn Bhd 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. No labour dispute reported in the uncertified units. 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 including interviews conducted.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	The desktop study conducted before the assessment has confirmed that there are no reported instances of legal non-compliance in the uncertified unit, specifically in TDM-YT Bukit Bidong Estate.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified	Yes, internal audit was done and the uncertified unit which is TDM-YT Bukit Bidong Estate need	Complied

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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.	to conduct HCV & SIA assessment which the report will be used to finalize LUCA report. HCV assessment was conducted by Sabarinah & Associates Sdn. Bhd. on 27/10/2022 and SIA was conducted by Green Sustainability Sdn. Bhd. on 18/10/ 2022.	
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?	Yes, TDM-YT Bukit Bidong Estate is lacking it's HCV and SIA reports which already in progress of completion and pending reports. Communication with RSPO also already been made and they are waiting for the LUCA report to be finalized.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Yes. Stakeholders including NGO were consulted in the uncertified unit and documented.	Complied

3.2. Progress of scheme smallholders and/or outgrowers

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

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Approved Time Bound Plan

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		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)				
				Latitude	Longitude						Any revision from the last approved TBP?	New Proposed Year for Certification	Justification of changes for each UoC	Date of approval from RSPO	
KEMAMAN	MALAYSIA	KEMAMAN PALM OIL MILL	KM 121, Jerangau-labor Highway, 24101 Kemaman, Terengganu, Malaysia	4.4030	103.2480	21.94	Certified	-	2013	1st July 2022	No				
	MALAYSIA	JERNIH ESTATE	KM 121, Jerangau-labor Highway, 24101 Kemaman, Terengganu, Malaysia	4.4400	103.2110	3,135.60	Certified	-	2013	1st July 2022	No				
	MALAYSIA	PELANTOH ESTATE	KM 121, Jerangau-labor Highway, 24101 Kemaman, Terengganu, Malaysia	4.4053	103.2499	3,291.60	Certified	-	2013	1st July 2022	No				
	MALAYSIA	TEBAK ESTATE	KM 121, Jerangau-labor Highway, 24101 Kemaman, Terengganu, Malaysia	4.4301	103.2266	3,293.63	Certified	-	2013	1st July 2022	No				
	MALAYSIA	AIR PUTHI ESTATE	KM 121, Jerangau-labor Highway, 24101 Kemaman, Terengganu, Malaysia	4.1400	103.1300	4,351.98	Certified	-	2013	1st July 2022	No				
	MALAYSIA	MAIDAM ESTATE	AM9, Bandar Ams, 23400 Dungun Terengganu, Malaysia	4.6277	103.2068	914.08	Certified	-	2013	1st July 2022	No				
	MALAYSIA	GAJAH MATI ESTATE	Lot 140-141, Mukim Bukit Besi, 23200 Dungun Terengganu, Malaysia	4.6958	103.2065	3,882.78	Certified	-	2013	1st July 2022	No				
SUNGAI TONG	MALAYSIA	SUNGAI TONG PALM OIL MILL	Lot 7563, Batu 23, Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu, Terengganu, Malaysia	5.3083	102.9105	20.79	Certified	-	2013	1st July 2022	No				
	MALAYSIA	FIKRI ESTATE	Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu	5.3226	102.8961	3,711.05	Certified	-	2013	1st July 2022	No				
	MALAYSIA	PELONG ESTATE	Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu	5.2821	102.8332	3,012.20	Certified	-	2013	1st July 2022	No				
	MALAYSIA	TAYOR ESTATE	Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu	5.2661	102.8843	2,219.92	Certified	-	2013	1st July 2022	No				
	MALAYSIA	JAYA ESTATE	Jalan Kuala Terengganu-Kota Bharu, 21500 Setiu Terengganu	5.3954	102.8843	3,455.79	Certified	-	2013	1st July 2022	No				
	MALAYSIA	PINANG EMAS ESTATE	Bukit Besi 23000 Dungun, Terengganu, Malaysia	4.7611	103.2238	3,870.18	Certified	-	2013	1st July 2022	No				
	MALAYSIA	JERANGAU ESTATE	Jalan Jerangau, 21810 Aji, Hulu Terengganu, Terengganu, Malaysia	4.9615	103.1631	1,480.93	Certified	-	2013	1st July 2022	No				
	MALAYSIA	TDM-YT BUKIT BIDONG ESTATE	Lot 2092, Jalan Merang-Terengganu, Kampung Gong Tengah, 22100 Permaisuri, Terengganu	5.4890	102.9251	2,594.50	Not Certified	Aug-23	Uncertified	N/A		Yes	2026	The estate is currently facing losses of up to RM12M for 2022 and rehabilitation works are already planned and executed.	29/3/2023

On 27/02/2023, the Head of Sustainability & Risk Unit for TDM Plantation Sdn. Bhd. formally requested approval from the RSPO Secretariat to revise the Time Bound Plan of TDM Plantation Sdn. Bhd. This revision pertained to the postponement of the RSPO certification process for TDM Plantation Sdn. Bhd., particularly TDM-YT Bukit Bidong Estate, which initially scheduled for completion by August 2023. The request was made due to experiencing losses and is still recuperating, rendering it unable to meet the initially set deadline.

Subsequently, on 29/03/2023, the Head of Certification for the RSPO Secretariat responded to this request via email to the Head of Sustainability & Risk Unit for TDM Plantation Sdn. Bhd. The response conveyed the RSPO Secretariat's agreement with the proposed new timeline for certification under TDM Plantation Berhad, extending the deadline to 2026. However, it was emphasized that this approval is subject to the fulfilment of related Time Bound Plan requirements stated in the RSPO Certification System documents by the RSPO Members.

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 four (4) Critical; five (5) Minor nonconformities and 2 (two) Opportunity For Improvement raised. The Kemaman Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2412049-202310-M1	Issued Date	26/10/2023
Due Date	24/01/2024	Closure Date	02/01/2024
Indicator & Category (Critical / Minor)	3.8.16 (Major)		
Statement of Nonconformity:	The shipping announcement in the RSPO PalmTrace was not correctly made.		
Requirement Reference:	Registration of Transactions 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. 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.		
Objective Evidence:	<u>Location: Kemaman Palm Oil Mill</u> Based on samples of PalmTrace transaction, it was found that the SC Model announced for Transaction ID no. TR-07617a3d-0609, dated 08/09/2023 i.e., IP for the sale of 257.75 mt certified palm kernel, was not consistent with the related commercial invoice (#IN000015291, dated 25/08/2023) issued i.e., SG.		
Corrections:	TDM Trading's representative will communicate with and apprise the buyer of an issue related to the inaccurate shipping announcement in RSPO PalmTrace.		
Root Cause Analysis:	The oversight of Transaction ID TR-07617a3d-0609, pertaining to the Shipping Announcement in RSPO PalmTrace, occurred due to a lack of regular scrutiny and monitoring by the designated PIC.		
Corrective Actions:	Regular checks, including a monthly review, will be conducted to monitor data input in RSPO PalmTrace. This process involves collaboration between the Trading Department and the designated person in charge at the mill side.		
Assessment Conclusion:	The on-site verification was conducted on 02/01/2024. The following supporting evidence was thoroughly reviewed during the on-site verification process:		

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	<p>(1) Sighted the communication record between General Manager of TDM Trading Department and the buyer on 24/10/2023 regarding the issue related to the inaccurate shipping announcement in RSPO PalmTrace.</p> <p>(2) sighted the appointment letter (TDMP/RSPO/001/2023) dated 14/12/2023 issued to Compliance Executive by Senior Mill Manger as designated person in charge at the mill side to monitor data input in RSPO PalmTrace.</p> <p>(3) Sighted the Monthly Inspection and monitoring for Information of RSPO PalmTrace System & Invocie Details for the month of Nov 2023 and Dec 2023, which was maintained by Compliance Executive and verified by the Senior Mill Manager.</p> <p>During the on-site verification process, it was confirmed that the management had taken the necessary actions to address the identified Major NC. To ensure the effectiveness of the corrective actions, further verification was conducted through interviews with the Senior Mill Manager, General Manager of TDM Trading Department, and Compliance Executive.</p> <p>Based on the findings from the on-site verification, the review of evidence and documents, as well as the interviews conducted with selected personnel, it can be concluded that the corrective action has been implemented effectively. As a result, the identified Major NC has been successfully addressed and closed.</p>
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Non-conformity			
NCR Ref #	2412049-202310-M2	Issued Date	26/10/2023
Due Date	24/01/2024	Closure Date	02/01/2024
Indicator & Category (Critical / Minor)	5.1.6		
Statement of Nonconformity:	No evidence that the payment to the appointed contractor is made in timely manner.		
Requirement Reference:	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.		
Objective Evidence:	<p><u>Location: Kemaman POM</u></p> <p>While examining the evidence of payment for one of the contractor companies appointed by the mill management to provide manpower, materials, equipment, and execute the replacement of the deteriorated C channel with a new one for the hot water tank platform measuring 20 ft x 6 ft (as specified in Surat Perintah Kerja No. P/C05/150/2023 dated 01/08/2023), it was noted that Invoice No. F 00411, dated 30/08/2023, which the mill management received on 05/09/2023, remains unpaid.</p> <p>Furthermore, the contract signed by both parties does not specify the agreed-upon payment terms. This absence of clear payment terms creates challenges for the contractor in demonstrating that any potential delay in payment is not due to their own actions.</p>		
Corrections:	(1) To specify and reinstate the agreed-upon payment terms in all contract / Surat Perjanjian Kerja.		

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	(2) To conduct briefing to the contractor or any outsources to ensure their understanding of a term in Surat Perjanjian Kerja.
Root Cause Analysis:	(1) The lack of standardization in contracts, particularly the <i>Surat Perjanjian Kerja</i> , by the Headquarters' Account Department (2) Inadequate monitoring by the Person-in-Charge (PIC)
Corrective Actions:	To perform regular checking and monitoring by PIC regarding this matter.
Assessment Conclusion:	<p>The on-site verification was conducted on 02/01/2024. The following supporting evidence was thoroughly reviewed during the on-site verification process:</p> <ol style="list-style-type: none"> (1) Sighted the Memorandum (TDM/CT/1123) dated 30/11/2023 by PIC of Finance (TDM Berhad) to Head of Procurement related to revision of credit term for all contractors and suppliers (from 30 days to 90 days) (2) Sighted e-Payment Voucher (JV 22721) dated 27/11/2023 as evidence that payment has been made to the appointed contractor. (3) Sighted monitoring record of progress payment for each contractor, which was maintained by the Office Clerk and verified by the Senior Mill Manager – latest record is for the month of Dec-2023. (4) Sighted standard template of Letter of Award established by the management, which contain term “Payment to the contractor or supplier must be disbursed within ninety working days after TDMP receives the required documents, including but not limited to the invoice, purchase order, delivery order, service or work receipt note, and any other relevant supporting documents”. (5) Sighted record briefing conducted to all contractors and suppliers engaged by the mill management dated 13/12/2023 – briefed on terms and conditions of payment for work order agreements. The briefing was conducted by the Senior Mill Manager and Compliance Executive. <p>During the on-site verification process, it was confirmed that the management had taken the necessary actions to address the identified Major NC. To ensure the effectiveness of the corrective actions, further verification was conducted through interviews with the Senior Mill Manager, one of the contractor companies appointed by the mill management, and Compliance Executive.</p> <p>Based on the findings from the on-site verification, the review of evidence and documents, as well as the interviews conducted with selected personnel, it can be concluded that the corrective action has been implemented effectively. As a result, the identified Major NC has been successfully addressed and closed.</p>

Non-conformity			
NCR Ref #	2412049-202310-M3	Issued Date	26/10/2023
Due Date	24/1/2024	Closure Date	02/01/2024
Indicator & Category (Critical / Minor)	6.2.3 (Critical)		
Statement of Nonconformity:	Payment of overtime was not correctly calculated.		

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Requirement Reference:	(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.
Objective Evidence:	<u>Location: Air Putih Estate</u> Based on verification of sampled pay slips at Air Putih Estate, it was found that the price bonus was not taken into account in paying the overtime for a worker (Emp. No. AP2201564) for the month of January 2023.
Corrections:	(1) Recalculation of the Price Bonus rate that is not included in the total overtime hours for the employees involved according to the MAPA Circular Agreement that has been distributed. (2) Immediate repayment scheme to repay all miscalculation of Price Bonus for all affected workers.
Root Cause Analysis:	Overtime working hours is not efficiently recorded in the employees check roll book, but the total overtime hours are added up manually at the end of the month causing errors in the summation of OT rates with PB.
Corrective Actions:	(1) Reimbursement of the price bonus rate according to the number of unpaid overtime hours to the employees involved in October 2023 salary. (2) Training for all account clerks and field officer involved in filling out the check roll book on how to record the amount of overtime work and related payments more efficiently.
Assessment Conclusion:	The on-site verification was conducted on 02/01/2024. The following supporting evidence was thoroughly reviewed during the on-site verification process: (1) Sighted the Detailed Employee Payslip for the month of Oct 2023 for Employee No. AP2201564, which included the repayment all miscalculation of Price Bonus. (2) Sighted training record "Completion of the Checkroll Book and Related Allowances" dated 30/10/2023. Training was conducted by Chief Clerk and attended by all staffs and clerks. During the on-site verification process, it was confirmed that the management had taken the necessary actions to address the identified Major NC. To ensure the effectiveness of the corrective actions, further verification was conducted through interviews with the Estate Manager, Chief Clerk, Office Clerk, Field Staff, affected worker, and Compliance Coordinator. Based on the findings from the on-site verification, the review of evidence and documents, as well as the interviews conducted with selected personnel, it can be concluded that the corrective action has been implemented effectively. As a result, the identified Major NC has been successfully addressed and closed.

Non-conformity			
NCR Ref #	2412049-202310-M4	Issued Date	26/10/2023
Due Date	24/1/2024	Closure Date	02/01/2024
Indicator & Category (Critical / Minor)	7.8.2 (Critical)		
Statement of Nonconformity:	The implementation of management plan for maintaining riparian zones was not satisfactorily demonstrated.		
Requirement Reference:	(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).		
Objective Evidence:	<p><u>Location: of Pelantoh Estate, MAIDAM Estate, and Tebak Estate</u></p> <p>Based on site verification at the buffer zones of Pelantoh Estate (Field no. 21A, along Sungai Tebak), MAIDAM Estate (Field no. 18A1, along Sungai Angka) and Tebak Estate (Field no. 19/A2, along Sungai Mas and 19/A1, along Sungai Tebak), the following lapses were found:</p> <ol style="list-style-type: none"> (1) The buffer zones have been replanted with oil palm in 2021 (Pelantoh Estate), 2018 (MAIDAM Estate), and 2019 (Tebak Estate). This is not inline with TDM's Slope and River Buffer Zone Policy. (2) The number of marking poles (blue/white stripes pegs) was not as many as required in the TDM's Agriculture Policy No. 01.02 Survey and Boundary Demarcation. (3) Some trace of herbicides application at Pelantoh Estate and trace of fertilizer application at Tebak Estate within the buffer zones were seen. 		
Corrections:	<p><u>Pelantoh Estate:</u></p> <p>Installing additional marker poles within the buffer zone to ensure compliance with TDM's Agriculture Policy No. 01.02 Survey and Boundary Demarcation SOP, and to align with workers' awareness of restricted areas for activities such as pesticide application, fertilization, tree planting, and other measures aimed at preserving the river's sustainability.</p> <p><u>MAIDAM Estate:</u></p> <ol style="list-style-type: none"> (1) Remarketing the buffer zone will be conducted to ensure the compliance of the TDM's Slope and River Buffer Zone Policy. The marking poles (blue/white stripes pegs) will be place at every 100 m interval alongside the riparian zone (Sungai Angka) according TDM's Agriculture Policy No. 01.02. (2) Management plan will be focused on how to substitute the buffer zone that have been replanted with oil palm to the natural or non-harvested vegetation plant based on the minimum requirement that have been designed to benefit and protect the water system. The estate management will give a proper briefing about the slope and River Buffer Zone Policy to those that involved in the next replanting programme as to ensure this policy strictly followed. <p><u>Tebak Estate:</u></p>		

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	<p>Estate management need to install additional marker poles within the buffer zone to ensure compliance with TDM's Agriculture Policy No. 01.02 Survey and Boundary Demarcation SOP, and to align with workers' awareness of restricted areas for activities such as pesticide application, fertilization, palms planting, and other measures aimed at preserving the river's sustainability.</p>
<p>Root Cause Analysis:</p>	<p><u>Pelantoh Estate:</u> Despite the installation of marker poles in the estate's buffer zone in response to concerns raised during the RSPO internal audit in July 2023, their quantity remains insufficient, failing to meet the requirements specified in TDM's Agriculture Policy No. 01.02 Survey and Boundary Demarcation. Additionally, workers still lack the essential knowledge and understanding concerning river sustainability and buffer zones.</p> <p><u>MAIDAM Estate:</u> Lack of knowledge on determining the appropriate width of the riparian area resulting in the action taken for replanting the new oil palm on the buffer zone.</p> <p><u>Tebak Estate:</u> Lack of knowledge on determining the appropriate width of the riparian area resulting in the action taken for replanting the new oil palm on the buffer zone.</p>
<p>Corrective Actions:</p>	<p><u>Pelantoh Estate:</u> Regular refresher training sessions will be conducted to reinforce the significance of the buffer zone to employees, with a particular focus on promoting river sustainability and the buffer zone's importance. The training conducted this time includes not only training materials and training evaluation forms, but also incorporates a quiz to ensure that each employee comprehends the topics discussed and can apply the knowledge provided while performing their tasks.</p> <p><u>Tebak Estate:</u> Regular refresher training sessions will be conducted to reinforce the significance of the buffer zone to employees, with a particular focus on promoting river sustainability and the buffer zone's importance. The training conducted this time includes not only training materials and training evaluation forms, but also incorporates a quiz to ensure that each employee comprehends the topics discussed and can apply the knowledge provided while performing their tasks.</p>
<p>Assessment Conclusion:</p>	<p>The on-site verification was conducted on 02/01/2024. The following supporting evidence was thoroughly reviewed during the on-site verification process:</p> <ol style="list-style-type: none"> (1) Sighted the additional marker poles erected along the buffer zones (one in 100 m interval) at MAIDAM Estate, Pelantoh Estate, and Tebak Estate. (2) Sighted training record "Buffer Zone" conducted in Nov 2023 by each estate. Training was conducted by Estate Manager and attended by relevant staffs and workers. <p>During the on-site verification process, it was confirmed that the management had taken the necessary actions to address the identified Major NC. To ensure the effectiveness of the corrective actions, further verification was conducted through</p>

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	<p>interviews with the Estate Manager, Field Staff, sampled workers, and Compliance Executive.</p> <p>Based on the findings from the on-site verification, the review of evidence and documents, as well as the interviews conducted with selected personnel, it can be concluded that the corrective action has been implemented effectively. As a result, the identified Major NC has been successfully addressed and closed.</p>
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Non-conformity			
NCR Ref #	2412049-202310-N1	Issued Date	26/10/2023
Due Date	Next Audit	Closure Date	-
Indicator & Category (Critical / Minor)	1.1.5 (Minor)		
Statement of Nonconformity:	The current list of contact and details of stakeholders and their nominated representatives is not updated.		
Requirement Reference:	There is a current list of contact and details of stakeholders and their nominated representatives.		
Objective Evidence:	<p><u>Location: Tebak Estate</u></p> <p>During the documentation review, it was evident that each operating unit has diligently maintained a comprehensive list of contacts and details for stakeholders and their nominated representatives. This list encompasses various entities, including government agencies, schools, hospitals, vendors/suppliers, contractors, estates, and local community leaders. It was observed that all operating units had updated their respective lists in September 2023. However, a discrepancy was noted at Tebak Estate, specifically in the 'Contractor' column. The estate had listed 17 contractors, but it was revealed that only three of these contractors remain actively engaged by the estate management for plantation activities. The remaining 14 contractors are no longer involved with the estate.</p>		
Corrections:	<p>The list of active stakeholders has been updated to the latest stakeholders until October 2023.</p> <p>Estate had updated new stakeholders list which includes only active parties engaged with the estate. Specifically, in the Contractor columns, the remaining active contractors were only 3 contractors that are still engaged with the estate.</p>		
Root Cause Analysis:	Overlooked by the PIC to monitor the details at the current active stakeholders listing.		
Corrective Actions:	<p>(1) To perform regular checking and monitoring by the PIC to make sure all stakeholder lists are updated.</p> <p>(2) To perform regular refreshment briefing to the PIC regarding to this matter.</p>		
Assessment Conclusion:	The Corrective Action Plans (CAPs) were accepted. The effective implementation of these corrective actions will be assessed and verified during the next audit. The status of the corrective actions is currently marked as "Open" until their successful implementation is confirmed.		

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Non-conformity			
NCR Ref #	2412049-202310-N2	Issued Date	26/10/2023
Due Date	Next Audit	Closure Date	-
Indicator & Category (Critical / Minor)	2.1.3 (Minor)		
Statement of Nonconformity:	The demarcation of legal and authorised boundary was not visibly maintained.		
Requirement Reference:	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.		
Objective Evidence:	<p><u>Location: MAIDAM Estate</u></p> <p>At MAIDAM Estate, the demarcation of boundary between the estate and Jengal Forest Reserved was not visibly maintained in accordance with TDM's Agriculture Policy No. 01.02 Survey and Boundary Demarcation. There was one boundary stone identified. However, the stone is located within MAIDAM Estate's planted area (GPS ref.: 4.61527 103.15634). This is also verifiable using the estate's map.</p>		
Corrections:	The estate management will cooperate with the Agronomist GPS team to re-identify/resurvey demarcation of boundary between the estate and Jengal Forest Reserved		
Root Cause Analysis:	Due to over the time and weathering, the boundary stone become vulnerable to damage or collapse.		
Corrective Actions:	<p>(1) Boundary stone should be monitored regularly for sign of damage and repair or replace if possible, according to Agriculture Policy No. 01.02.</p> <p>(2) Always trim the plant that grow and climbing around the boundary stone because it can cause a damage if left unchecked.</p>		
Assessment Conclusion:	The Corrective Action Plans (CAPs) were accepted. The effective implementation of these corrective actions will be assessed and verified during the next audit. The status of the corrective actions is currently marked as "Open" until their successful implementation is confirmed.		

Non-conformity			
NCR Ref #	2412049-202310-N3	Issued Date	26/10/2023
Due Date	Next Audit	Closure Date	-
Indicator & Category (Critical / Minor)	2.2.3 (Minor)		
Statement of Nonconformity:	No clauses disallowing child, forced and trafficked labour contain in the contract signed with one of contractor.		
Requirement Reference:	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.		
Objective Evidence:	<u>Location: Air Putih Estate</u>		

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	It is standard practice for each estate management of Kemaman POM & Supply Bases to document the basic requirements of the RSPO P&C within a document known as a Surat Perintah Kerja or Syarat-syarat dan Spesifikasi Kerja Kontrak. However, upon reviewing the documents for one of the contractors, specifically the Surat Perintah Kerja No. AP 38/23 dated 01/07/2023, it was observed that there are no clauses disallowing child, forced and trafficked labour contain in this document.
Corrections:	(1) Employment agreements with all contractors will be updated to comply with the standards. (2) All employment agreements with all contractors will be updated and notified to the contractors involved in order to comply with the clauses disallowing child, forced and trafficked labour contain in the contract before being signed by both parties.
Root Cause Analysis:	As in estate implementation before, employment agreements with contractors which are not supplying human labour, whether harvesters or machine drivers, are exempt from the clause that does not allow children, forced labour and trafficking as they are not directly involved with the supply of human labour.
Corrective Actions:	(1) Establish the Surat Perintah Kerja with all related requirement by RSPO P&C. (2) To perform regular refreshment briefing to the PIC regarding to this matter.
Assessment Conclusion:	The Corrective Action Plans (CAPs) were accepted. The effective implementation of these corrective actions will be assessed and verified during the next audit. The status of the corrective actions is currently marked as "Open" until their successful implementation is confirmed.

Non-conformity			
NCR Ref #	2412049-202310-N4	Issued Date	26/10/2023
Due Date	Next Audit	Closure Date	-
Indicator & Category (Critical / Minor)	6.4.1 (Minor)		
Statement of Nonconformity:	The remediation of child labour is not in place.		
Requirement Reference:	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.		
Objective Evidence:	<u>Location: Kemaman POM and audited estates</u> Each audited operating unit within the Kemaman POM & Supply Bases adheres to the Social Policy and the Protection of Children Policy, both of which were developed by the management of TDMP Sdn. Bhd. These policies have received approval from the Chief Executive Officer of TDMP Sdn. Bhd. on 23-Feb-2023. Through site visits and extensive documentation review, it has been confirmed that each operating unit does not engage in the exploitation of children, including the use of child labor. However, the management has not established any remediation measures in the event of child exploitation cases, even in situations		

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	where such exploitation is not explicitly covered in contracts signed with contractors or service providers.
Corrections:	To update the remediation of child labour in the Social Policy and the Protection of Children Policy accordingly.
Root Cause Analysis:	The updated Social Policy incorporates the previous RSPO standard, with no specific emphasis on the remediation of child labour. This decision was made under the assumption that there is no significant change between the latest and previous standards concerning child labour.
Corrective Actions:	(1) The HQ TDMP will issue a memo and establish SOP regarding to the any remediation measures in the event of child labour issue. (2) To brief and explain to contractors or service providers regarding to the remediation of child labour as to give awareness and understanding for this matter.
Assessment Conclusion:	The Corrective Action Plans (CAPs) were accepted. The effective implementation of these corrective actions will be assessed and verified during the next audit. The status of the corrective actions is currently marked as "Open" until their successful implementation is confirmed.

Non-conformity			
NCR Ref #	2412049-202310-N5	Issued Date	26/10/2023
Due Date	Next Audit	Closure Date	-
Indicator & Category (Critical / Minor)	7.3.1 (Minor)		
Statement of Nonconformity:	The implementation of wastes management plan was not satisfactorily demonstrated.		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
Objective Evidence:	<p><u>Location: Pelantoh Estate, MAIDAM Estate, and Tebak Estate</u></p> <p>Based on verification through Google Earth, the wastes landfill at Pelantoh Estate (GPS: 4°24'01"N 103°14'10"E), MAIDAM Estate (GPS: 4°38'55"N 103°09'10"E) and Tebak Estate (GPS: 4°26'09"N 103°15'22"E) have residential areas and/or river or waterways within their 3 km radius distance. This is not in-line with the TDM's Domestic Wastes procedure, ver. May 2017, Clause 5.2.2 (b) reads:</p> <ul style="list-style-type: none"> • The landfill shall be located not less than 3 km away from nearest residential, office, or other premises • The landfill shall be located not less than 3 km away from the nearest river or waterway 		
Corrections:	<p><u>Pelantoh Estate:</u> TDM's Domestic Wastes ver. May 2017 procedure will be revised requires revision to align with the current conditions within the estate.</p>		

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	<p><u>MAIDAM Estate:</u> TDM's Domestic Wastes procedure will be revised needs to be revised to align with the current situation at the estates.</p>
Root Cause Analysis:	<p><u>Pelantoh Estate:</u> There is no suitable location for a waste disposal site within the estate, as most of the proposed sites are less than 3 km away from the nearest water source, river source, river, residential areas, and facilities.</p> <p><u>MAIDAM Estate:</u> Current landfill at the estate is the most suitable and strategic due to the topographic factors at the estate which makes it easy for is easily tractors to access and also the location is far away from nearest river or another waterway.</p>
Corrective Actions:	<p><u>Pelantoh Estate:</u> The selection of the waste disposal site will always conform to the new SOP if the old SOP is revised and adjusted to the estate's current circumstances.</p> <p><u>MAIDAM Estate:</u> To ensure if another landfill may be prepared, it must follow the revise SOP criteria in future.</p>
Assessment Conclusion:	<p>The Corrective Action Plans (CAPs) were accepted. The effective implementation of these corrective actions will be assessed and verified during the next audit. The status of the corrective actions is currently marked as "Open" until their successful implementation is confirmed.</p>

Opportunity for Improvements	
OFI #	Description
Observation	<p>2412049-202310-01 <u>Indicator 3.6.1</u> The risk assessment for the work activity involving the transportation of workers to and from the work area could be further enhanced.</p>
OFI 1	<p>2412049-202310-I1 <u>Indicator 3.4.1</u> The assessment of the impact arising from the generation and disposal of domestic waste in landfills could be further enhanced.</p>
OFI 2	<p>2412049-202310-I2 <u>Indicator 7.2.1</u> The demonstration of the justification for all pesticides used can be further enhanced.</p>

Positive Findings	
PF #	Description
PF 1	The audit visit is well-organized, with a high level of commitment demonstrated by both the Sustainability Department and the designated personnel in various units.
PF 2	A positive and strong relationship has been consistently maintained and emphasized by both internal and external stakeholders.

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2266495-202210-M1	Issued Date	27/10/2022
Due Date	26/01/2022	Closure Date	26/12/2022
Indicator & Category (Critical / Minor)	3.6.2 (Critical)		
Statement of Nonconformity:	The Implementation of H&S Plan for the risks to people not fully monitored.		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	During site inspection at workshop Kemaman POM, workshop area, it was found that Petrol were store in the container without any labelled. It was not in line with CHRA Recommendation Section 5.2 and 7.0 USECHH Labelling and Relabelling (USECHH 2000, Regulation 20 & 21), (3) If the chemicals are transferred to a smaller container, relabelling is required with the chemical name or trade name as written on the original label and SOP Chemical Management dated 01/09/2022 Section 4.0 Procedures For handling (c) Ensure that the container is properly label, not damaged and no spillage during handling.		
Corrections:	To replace the container with proper labelling accordingly and make sure the container in good condition which not damaged and no spillage during handling the chemical.		
Root Cause Analysis:	Lack of awareness related to chemical management among the workers.		
Corrective Actions:	To regularly conduct inspection to monitor practising for chemical handling and management. To continue arranging a proper refreshment training session for the workers. The signage PENGENDALIAN YANG BETUL BAHAN KIMIA/TERJADUAL will be place to give understanding among the workers.		
Assessment Conclusion:	Major NC Close Out 1. Replacement of the containers has been carried out and proper labelling has been done immediately. 2. Regular inspection on chemical handling has been conducted. Refer Checklist Jadual Pembersihan Mingguan Kemaman POM dated October 2022 and November 2022. Refer Section Workshop No. 3 "Memastikan Bahan Kimia dan		

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	<p>Bahan buangan terjadual di letakkan di Kawasan yang betul dan dikendalikan dengan baik”.</p> <p>3. Refreshment training on chemical handling has been given to workers. Refer Training “Taklimat Pengurusan bahan Kimia Dan Bahan Buangan Terjadual dated 27/10/2022 at Kemaman Palm Oil Mill Office. Refer training material item no 2,3 and 4. Sighted training material, attendance and photos.</p> <p>4. Signage has been placed at workshop. Verified through site inspection, signage “Sila Pastikan Bahan Kimia Dan Bahan Buangan Terjadual Di Kendalikan Dengan Cara Yang Betul” has been placed. Additional signage has been placed which is “Bahan Kimia @ Bahan Buangan Terjadual Yang Di Pindahkan Perlu Di Label Semula” and “Di Larang Menggunakan Bekas Makanan Untuk Mengisi Bahan Kimia @ Barang Buangan Terjadual”.</p> <p>Based on the above evidence, the major Non-Conformity is closed effectively on 26/12/2022 after the onsite NC closure date on 18/12/2022 due to pending information required. Continuous implementation will be further verified in the next assessment.</p>
Effectiveness Closure (for previous audit closed Critical NC):	The corrective action taken found to be sufficient and effective. It is implemented accordingly. No similar non-compliance found during the audit. Thus, the Major NC raised during Surveillance Audit (ASA 1_4) was remain closed.

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2266495-202210-M2	Issued Date	27/10/2022
Due Date	26/01/2023	Closure Date	26/12/2022
Indicator & Category (Critical / Minor)	6.1.2 (Critical)		
Statement of Nonconformity:	Recruitment fees (permit renewal fees) was charged to foreign workers.		
Requirement Reference:	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.		
Objective Evidence:	<p><u>Jernih Estate</u></p> <p>Evidence of salary deduction under description (potongan permit kerja) was sighted in the pay slip for November 2021 and July 2022 for the following workers:</p> <ol style="list-style-type: none"> 1. JN1800824 (Nov 21: RM 42.60) 2. JN1400633 (July 22: RM 42.50) 3. JN1900900 (Nov 21: RM 42.50) 4. JN1000396 (July 22: RM 42.50) 5. JN1100486 (Nov 21: RM 42.50) 6. JN1600750 (July 22: RM 42.50) 		

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	Based on company circular ref: TDMP/SMP/3/01.06 dated 15/4/2009, PLKS has to be paid by employee.
Corrections:	Management will make a refund on deduction to the workers for PLKS renewal started May 2021 until September 2022.
Root Cause Analysis:	The Estate Management did not receive any letter or memo from HQ TDMP regarding of deduction to the workers for PLKS renewal as per RSPO regulation as at May 2021 (clause 6.1.2) because lack of understanding about regulation demands. The management understand that PLKS is free of charge and deduction (RM85.00) is understood to be an external cost from PLKS. However the deduction (RM85.00) is included in the cost of PLKS.
Corrective Actions:	The HQ TDMP has issue a new circular letter (TDMP/OD/FW/32/22 dated 27/11/2022) stated that salary deductions for PLKS renew are not allowed, this means that the management will cover all the expenses of PLKS renewal as per RSPO Regulation as at May 2021 (clause 6.1.2)
Assessment Conclusion:	<p>Major NC Close Out</p> <ol style="list-style-type: none"> 1. Refund on deduction to the workers for Permits and passport cost has been prepared and will be paid on 20/12/2022. Refer evidence document Cash Requisition Form for Advance December 2022 dated 14/12/2022 prepared by Chief Clerk, verified by Assistant Manager and approved by Manager. 2. New circular has been issue and kept by the operating units. Refer "Memorandum Bayaran Pas Lawatan Kerja Sementara (PLKS) Dan Pembaharuan Passport" dated 27/11/2022 with reference document TDMP/OD/FW/32/22. 3. Enforcement on the new circular has been circulate to all management units via email dated 27/11/2022 from Mr Muhamad Shawal Endut on behalf Manager "Pengurus Tenaga Kerja Dan Pengurusan Keselamatan". <p>Based on the above evidence, the major Non-Conformity is closed effectively on 26/12/2022 after the onsite NC closure date on 18/12/2022 due to pending information required. Continuous implementation will be further verified in the next assessment.</p>
Effectiveness Closure (for previous audit closed Critical NC):	The corrective action taken found to be sufficient and effective. It is implemented accordingly. No similar non-compliance found during the audit. Thus, the Major NC raised during Surveillance Audit (ASA 1_4) was remain closed.

Previous Audit Minor Non-conformity			
NCR Ref #	2266495-202210-N1	Issued Date	27/10/2022
Due Date	26/10/2023	Closure Date	26/10/2023
Indicator & Category (Critical / Minor)	2.2.2 (Minor)		
Statement of Nonconformity:	Evidence of legal due diligence of all contracted third parties were not effectively demonstrated		

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Requirement Reference:	Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/accredited) for migrant workers, service providers and labour contractors, is available.
Objective Evidence:	<p><u>Gajah Mati Estate</u></p> <p>Employment letter dated 1/1/22 between Nantha Agency and employee with ID:6?##3*-11-\$27 has not included pertinent terms and conditions as per Employment Act 1959. No details of employee's entitlement (i.e rest day, annual leave, sick leave) in the employment contract. Further check on the salary voucher dated 6/9/2022 (August 2022 wage month), no EIS contribution in the pay slip. Contribution for EPF and SOCSO were not in accordance with monthly contribution rate (third schedule for EPF) and rate of contribution (Act 4).</p> <p>JA Warisan Mekar Sdn Bhd employee's ID: &*#@17-11-\$99 pay slip checked:</p> <ul style="list-style-type: none"> i. EIS and SOCSO contribution was not in accordance with monthly contribution rate (third schedule for EPF) and rate of contribution (Act 4). EPF contribution based on RM1500 (minimum wage) with total contribution of RM360 and not proportionate with August 2022 salary (RM4334.32). For SOCSO contribution, total of RM 32.60 (for RM 1400-1500 salary scale) was made and verified via Jadual Caruman 8A for August 2022. ii. Interview was made with JA Warisan Mekar Sdn Bhd representative during onsite stakeholder consultation on 26/10/2022. Based on his explanation, the basis of contribution is RM1500 regardless of total salary received per month. <p><u>Jernih Estate</u></p> <p>No evidence of employment contract between H2R Oil and Gas Services (contract harvesting) and workers available for verification.</p>
Corrections:	<ol style="list-style-type: none"> 1. The company asks contractor to re-evaluate the method of payment of wages and allowances according to the proper conditions. 2. Contractor informed to employee and they will make refund of the insufficient contribution. 3. Amendment of the old version to a more detailed employment letter will be done for their employee. – Nantha Agency <p>The main contractor (H2R Oil & Gas Services) has instructed the sub-contractor (Siber Callysta Sales And Services) to issue a work agreement for the harvesting contract workers at Jernih Estate and the contractor must make sure each new worker have a work agreement. Then management is not allowed who workers didn't have work agreement to work at estate.</p>
Root Cause Analysis:	<p><u>Gajah Mati Estate</u></p> <p>Previously, the contractor had a different misinterpreted understanding of the payment method of EPF and SOCSO contributions. However, the estate management will take measures to ensure that the contractor compiles with the contribution payment method accurately. This occurs due to lack on training and understanding on required regulation related EPF and SOCSO Contribution.</p> <p><u>Jernih Estate</u></p>

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	Misunderstanding between main contractor (H2R Oil & Gas Services) and sub-contractor (Siber Callysta Sales And Services) on work agreement preparation. This occurs due to lack on training and understanding on required regulation related agreement preparation.
Corrective Actions:	To conduct special briefing among contractor and supplier regarding to the contribution EPF and SOCSO to give awareness and understanding for this matter. Regular meeting with all contractors as to ensure compliance of all payment method and contribution. The sub-contractor (Siber Callysta Sales And Services) to issue a work agreement for each contract employee and must keep a copy of it in the estate office for record and audit purpose.
Assessment Conclusion:	Based on the evidence, documents, and interview with relevant personnel, it can be concluded that the corrective action was effectively implemented during the Re-certification Assessment, which was conducted from 22 to 26 Oct-2023. Consequently, the identified Minor NC was closed.

Previous Audit Minor Non-conformity			
NCR Ref #	2266495-202210-N2	Issued Date	27/10/2022
Due Date	26/10/2023	Closure Date	26/10/2023
Indicator & Category (Critical / Minor)	3.1.3 (Minor)		
Statement of Nonconformity:	Management review minutes of meeting was not available.		
Requirement Reference:	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.		
Objective Evidence:	Based on interview and email verification, Management review meeting was conducted on 15/09/2022 however, until the date of audit, there is no evidence of minutes of meeting were available. It was not in line with SOP Management Review Standard Operating Procedure dated 01/10/2022 Edition TDMP/01 Rev. TDMP-03/2022 Section Flow Chart: Propose Minutes of Meeting And Submit to PAM for approval and Signature. Distribute minutes to Management Review Committee members and other relevant personnel.		
Corrections:	The management review minute will be provided and available at estate / mill.		
Root Cause Analysis:	The document related to management review was recorded and updated. However, for management review minute of meeting did not provided by PIC due to delayed of updated issue of matter arising in the meeting.		
Corrective Actions:	To monitor the implementation of the SOP Management Review Standard Operating Procedure dated 01/10/2022 Edition TDMP/01 Rev. TDMP-03/2022 Section Flow Chart: through sustainability department. Management minute meeting need to be submitted to sustainability department within 14 days after the meetings. Sustainability department will provide reminder if the date line exceeded.		

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	To conduct training to PIC on the SOP Management Review Standard Operating Procedure dated 01/10/2022 Edition TDMP/01 Rev. TDMP-03/2022 and to reassess the effectiveness of the training.
Assessment Conclusion:	Based on the evidence, documents, and interview with relevant personnel, it can be concluded that the corrective action was effectively implemented during the Re-certification Assessment, which was conducted from 22 to 26 Oct-2023. Consequently, the identified Minor NC was closed.

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

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2266495-202210-N1	Minor	2.2.2	27/10/2022	Closed out on 26/10/2023
2266495-202210-N2	Minor	3.1.3	27/10/2022	Closed out on 26/10/2023
2412049-202310-M1	Critical	3.8.16	26/10/2023	Closed out on 02/10/2024
2412049-202310-M2	Critical	5.1.6	26/10/2023	Closed out on 02/10/2024
2412049-202310-M3	Critical	6.2.3	26/10/2023	Closed out on 02/10/2024
2412049-202310-M4	Critical	7.8.2	26/10/2023	Closed out on 02/10/2024
2412049-202310-N1	Minor	1.1.5	26/10/2023	"Open"
2412049-202310-N2	Minor	2.1.3	26/10/2023	"Open"
2412049-202310-N3	Minor	2.2.3	26/10/2023	"Open"
2412049-202310-N4	Minor	6.4.1	26/10/2023	"Open"
2412049-202310-N5	Minor	7.3.1	26/10/2023	"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 Kemaman Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder Name / Organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal	Gender Committee	Face to face
Internal	Workers' representative	Face to face
Contractor	Maliaray Holidays Sdn Bhd	Phone interview
Contractor	Sutera Adela Sdn Bhd	Phone Interview
Contractor	Chong Trading	Face to face
Governmental Department	Jabatan Tenaga Kerja – Pejabat Tenaga Kerja Kemaman	Phone Interview
Governmental Department	TABIKA KEMAS Padang Kubu	Face to face
NGO	NUPW	Face to face
Communities	JPKK Sungai Mas/Tebak	Face to face
Communities	JPKK Padang Kubu	Face to face
Communities	JPKK Jenang Baru	Face to face

Stakeholders comment	
1.	Workers' representatives (mill and respective estates)
	<p>Feedbacks: The workers' representatives stated that most workers were expressed their satisfaction with the good relationship established between the management and them over the years. They noted that the management always ensures that their living conditions, especially facilities, are always in good condition. They also stated that every complaint and grievance, especially related to housing conditions, will be dealt with as best and as quickly as possible by the management.</p> <p>Audit Team verification and response: No further issue</p>
2.	Contractors/Service Providers
	Feedbacks:

	<p>Contractors confirmed good business relationship with the POM and estate. Tender process was transparent, and terms of contracts are fair. They also mentioned that payment was made in timely manner according to agreed contract agreement. Complaint and grievance procedure were known, and their workers were provided with valid contract agreement, payslip and wages meets minimum wage, SOCSO and EPF contribution where necessary.</p> <p>Audit Team verification and response: No further issue</p>
3.	<p>Jabatan Tenaga Kerja – Pejabat Tenaga Kerja Kemaman</p> <p>Feedbacks: The company consistently engages in collaborative endeavors with the department, ensuring seamless cooperation across all areas.</p> <p>Audit Team verification and response: No further issue.</p>
4.	<p>TABIKA KEMAS Padang Kubu</p> <p>Feedbacks: Representatives from TABIKA KEMAS mentioned good relationship with Ladang Pelantoh since they are located near to workers quarters. The management will provide assistance when needed. Estates workers sent their kids to this TABIKA</p> <p>Audit Team verification and response: No further issue</p>

5.	<p>Communities (NUPW, JPKK Sungai Mas/Tebak, JPKK Padang Kubu & JPKK Jenang Baru)</p> <p>Feedbacks: The community representative has stated that the management has not taken any action to exclude local workers and hire foreign workers for existing estate work, specifically FFB harvesting. The also mentioned that the individual who reported this issue to the media is not an estate worker but a worker to one of contractors hired by the estate for FFB harvesting work.</p> <p>The representative highlights that, within the local community, the management maintains close ties and continues to provide ample opportunities for local workers to engage in farm-related activities. This suggests that the management is actively involving the local community in its operations, fostering relationships, and offering work opportunities to individuals within the community.</p> <p>Audit Team verification and response: Response: The management has clarified that the reported situation was a misunderstanding originating from the contractor's own employees. According to the management, the reality is that due to the restrictions on the entry of foreign workers into Malaysia during the COVID-19 pandemic, the company opened up opportunities for FFB harvesting contracts to the local communities.</p> <p>The management emphasizes that, before entering into these contracts, they communicated clearly to the contractors that this arrangement is temporary. It was explicitly stated that the contract would be re-evaluated once the government allows the entry of foreign workers for plantation work. The intention was never to terminate contracts with local contractors but to address a temporary situation caused by the pandemic.</p>
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	<p>Upon further evaluation and when foreign workers are permitted to enter Malaysia, the management plans to reduce their dependence on contractors and utilize their own workers for plantation work. The misunderstanding arose when the contractor's employees perceived their contracts as terminated, mistakenly believing that the management prioritized foreign workers.</p> <p>To address this confusion, the management, represented by the CEO, held a meeting with the contractors to provide clarity and explain the actual situation. It was emphasized that the management did not exclude local contractors and expressed the intention to continue cooperation on other projects or works.</p> <p>Audit Team verification:</p> <p>The meeting with community representatives was convened with the objective of seeking clarification on issues that had been disseminated through mass media and social media. Specifically, there were claims suggesting that the management prioritizes foreign workers and discriminates against local workers. Following the meeting and subsequent interactions with the management and its representatives, it was established that these allegations were rooted in a misunderstanding among the contractor's employees.</p> <p>The clarification provided by the management during the meeting served to dispel any misconceptions and shed light on the actual situation. It became apparent that the reported preference for foreign workers was not a deliberate act of discrimination against local workers but rather a result of a temporary measure necessitated by the COVID-19 pandemic.</p> <p>The meeting facilitated a constructive dialogue, enabling the management to address concerns, provide context, and rectify any misinformation that may have circulated. This proactive engagement with the community representatives reflects the company's commitment to transparency and open communication, fostering a relationship of trust and understanding between the management and the local community.</p>
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List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Kumpulan Ladang-Ladang Terengganu Berhad (Terengganu State Government Incorporated Company)	Current	18,869.67	N/A	N/A	All estates within SOU Kemaman belongs to the Terengganu State Government Incorporated Company that owns 100% stake in TDM.

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

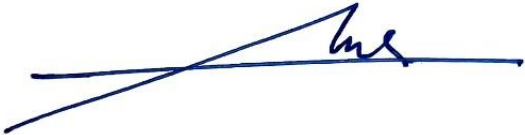
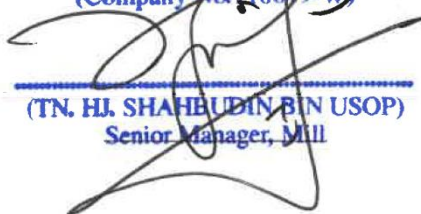
3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

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

Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamad Amirul Saifullah	Name: Tn Hj. Shahbudin bin Usop
Company Name: BSI Services (M) Sdn Bhd	Company Name: TDM Plantation Sdn Bhd
Title: Client Manager	Title: Senior Manager – Mill
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i>  TDM PLANTATION SDN. BHD (A Member of TDM Berhad Group) Kemaman Palm Oil Mill (Company No. 110679-W) <hr/> (TN. HJ. SHAHBUDIN BIN USOP) Senior Manager, Mill
Date: 26/01/2024	Date: 29/01/2024

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <p>- Critical (Major) compliance -</p>	<p>All required documents are accessible at both the operating sites and the head office, with no reported restrictions by stakeholders on obtaining information or documents. The company ensures that relevant documentation is readily available upon request. Additionally, a communication procedure, including information requests, is outlined on notice boards at the estates and mill.</p> <p>Company policies, including a statement highlighting the availability of documents to the public, are prominently displayed on notice boards in the vicinity of the estates and mill. The accessible documents include but are not limited to:</p> <ul style="list-style-type: none"> • Land ownership title • OSH Plan (Occupational Safety and Health) • SIA Report (Social Impact Assessment) • EIA Report (Environmental Impact Assessment) • HCV report and related documentation (High Conservation Value) • Continuous Improvement Plan • Pollution Prevention Plan • Environmental Management/Monitoring Plan • Communication and Complaint/Grievance Procedure • Consultation Procedure 	Complied

		<ul style="list-style-type: none"> • Human Rights Policy • Contributions to community development 	
<p>1.1.2</p>	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>A Communication Flowchart with Mill/Estate Management has been developed, providing a clear depiction of the information/report request process. The timeline for response and resolution is set at 28 working days. To facilitate this process, the company has implemented a Request and Response Form designed for stakeholders. Furthermore, information is available in both Bahasa Malaysia and English, ensuring accessibility and understanding for a diverse audience.</p> <p>Relevant stakeholders receive comprehensive information during external stakeholder meetings. These meetings serve as platforms for engaging stakeholders and fostering effective communication. The briefings during these meetings are conducted in Bahasa Malaysia, ensuring that all stakeholders can understand and participate in the discussions.</p> <p>The most recent external stakeholder meeting took place on 24-Aug-2023. During this meeting, stakeholders were not only given the opportunity to provide feedback and discuss the progress of previous feedback, but they were also provided with valuable information on various company policies, including the grievance mechanism, SOPs related to stakeholder requests, Anti Bribery and Corruption Policy, "No Gift" Policy, Work Ethical Policy, RSPO P&C certification, and other relevant topics.</p> <p>For internal stakeholders, mostly briefings were given during morning muster call, which were conducted separately at each operating unit. The briefing was conducted by the management representative. These briefings aimed to disseminate crucial information to internal</p>	<p>Complied</p>

		<p>stakeholders. The information shared included details about TDM policies, employment contracts, grievance procedures, human rights, the roles of gender committees, the roles of trade unions or workers' representatives, various policies and guidelines such as the Sustainable Palm Oil Policy, guidelines for handling workplace harassment, minimum wages, and information regarding RSPO and MSPO certifications.</p>	
<p>1.1.3</p>	<p>(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p>The company has established a comprehensive system for recording communication with stakeholders, utilizing a designated form. These records, encompassing information requests and responses, are diligently maintained at the respective operating units visited. The logbook serves as a primary tool for recording various requests from both internal and external stakeholders, with a notable focus on monetary contributions and donation requests from neighboring villages and schools.</p> <p>For instance, at Pelantoh Estate, the Records of Communication with Stakeholders for 2023 are systematically documented. The Compliance Clerk, most recently in September 2023, updates this record. Examples from the logbook include:</p> <ul style="list-style-type: none"> • On 08/05/2023, Sekolah Kebangsaan Padang Kubu submitted an application requesting the use of the farm road for a cross-country competition at the school level. The approval was granted, and the Estate Manager, as the Person in Charge (PIC), took action to permit the request. The approval was completed on 22/04/2023. • Sekolah Menengah Kebangsaan Seri Bandi applied on 26-Sept-2023 to use transport facilities (van) for students answering SPM geography questions in 2023. The request was approved, and 	<p>Complied</p>

		<p>the Estate Manager served as the PIC, overseeing the approval process. The completion date for this approval was 26/09/2023.</p> <ul style="list-style-type: none"> • A request was documented in the logbook at MAIDAM Estate, seeking donations for the local community, specifically targeting paralyzed individuals, disabled individuals, dialysis patients, and families with disabled children. • On 29-Mar-2023, the PIBG of Sekolah Menengah Kebangsaan Durian Mas submitted an application for donations to support the Form 6 motivation and leadership camp program. An agreement to contribute was reached, and the completion date for this agreement was documented as 04/04/2023. 	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>A standardized procedure titled "Communication with Mill/Estate" has been established at all audited estates and the Kemaman POM. This procedure is meticulously documented and presented in a flowchart format, outlining the systematic flow of the consultation and communication process. The information reported is categorized based on the type of communication, ensuring a tailored and efficient approach. According to the procedure, any required action is mandated to be completed within 28 days.</p> <p>In instances where further action requires approval from the Head Office, the estate or POM management is responsible for submitting the request. The Head Office is committed to resolving such requests within 30 working days.</p> <p>To promote awareness and understanding, comprehensive briefings on this communication procedure have been conducted for all internal and external stakeholders. These briefings occurred during stakeholder meetings and were also integrated into muster/rollcall</p>	Complied

		meetings, ensuring widespread knowledge and adherence to the established communication guidelines.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	<p>The stakeholder list for the year 2023 at each operating unit has been recently updated, with the latest revision completed in September 2023. This updated list includes contact information and details for various stakeholders and their nominated representatives. Notably, the stakeholder list has been verified to encompass a diverse range, incorporating vendors/suppliers, relevant authorities such as DOSH/DOE, local schools, community leaders, and other interested parties.</p> <p>However, a discrepancy was noted at Tebak Estate, specifically in the 'Contractor' column. The estate had listed 17 contractors, but it was revealed that only three of these contractors remain actively engaged by the estate management for plantation activities. The remaining 14 contractors are no longer involved with the estate. Therefore, a Minor NC has been raised against this indicator.</p>	<p>Non-compliance</p> <p>NCR Ref #: 20231026-N1 Minor</p>
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	<p>The management has instituted key policies to govern ethical conduct, ensuring uniform adoption and implementation across all operating units. These policies are as follows:</p> <p>(1) Anti Bribery and Corruption Policy (TDMB/CISD/1220/ABC(2.0), Version 2.0, dated 07/12/2020): to articulate the TDMB Group's comprehensive stance against bribery and corruption in all manifestations.</p>	Complied

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		<p>(2) "No Gift" Policy (TDMB/CISD/1220/"NO GIFT"(2.0), Version 2.0, dated 07/12/2020): to prevent actual or perceived conflicts of interest in business dealings and decision-making, demonstrating the company's unwavering commitment to the highest standards of ethics and integrity.</p> <p>(3) Work Ethical Policy (approved by CEO of TDM Plantation Sdn Bhd on 23-Feb-2023): to establish guidelines for ethical conduct within the organization.</p> <p>These policies have been effectively communicated to all employees at each operating unit, with the latest briefing conducted in May 2023. Furthermore, external stakeholders were apprised of these policies during the External Stakeholders Meeting, which took place most recently on 24-Aug-2023. This ensures that both internal and external parties are well-informed about and aligned with the ethical standards set forth by the organization.</p>	
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>Regular briefings on the established policies are consistently conducted for workers during morning muster, roll call, and gatherings, ensuring that internal stakeholders are well-informed and aligned with the organizational standards mentioned earlier. This proactive approach serves to reinforce the importance of adherence to ethical conduct in daily operations.</p> <p>To further ensure compliance and the effective implementation of policies, an internal audit program has been instituted, covering aspects related to Environment, Safety, and Health (ESH), Roundtable on Sustainable Palm Oil (RSPO), and Environmental, Social, and Governance (ESG). Additionally, the due diligence declaration of suppliers and contractors is integrated into this</p>	Complied

		<p>program. This robust mechanism is employed to monitor and assess the organization's adherence to policies and its overall commitment to ethical business practices. The internal audit program serves as a comprehensive tool to verify and sustain compliance across various domains, fostering a culture of ethical conduct within the organization.</p>	
<p>Principle 2: Operate legally and respect rights</p>			
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
<p>2.1.1</p>	<p>(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -</p>	<p>Based on the records reviewed, observations during site visits, and interviews with relevant personnel, it has been verified that all operating units within TDM Kemaman POM & Supply Bases are in compliance with applicable legal requirements. There were no reported violations of the law involving any of the operating units, and no warning notices were issued by Malaysian government authorities to any of the units.</p> <p>Furthermore, each operating unit of the UoC has obtained and renewed the necessary licenses and permits as required by the law. Some of the sampled licenses and permits viewed in the mill and estates are as follows:</p> <p>Kemaman POM:</p> <ul style="list-style-type: none"> • DOE License: 004055, exp on 06/30/2023 • License to Abstract Surface Water under Subsection 43 (1) of the Water Resources (Terengganu) Enactment 2020, No. License PA (P) – A0012 exp on 31/12/2023 • Permit to purchase, store and use sodium hydroxide, Permit No. 006585, exp on 31/12/2023 	<p>Complied</p>

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		<ul style="list-style-type: none"> • Scheduled controlled goods permit under Regulation 9(2) of the Supply Control Regulations 1974 – No. Series P: T001757 exp on 10/05/2024 for 42,000 liter diesel (industries) • MPOB license under the Malaysian Palm Oil Board (licensing) regulations 2005 in the Malaysian Palm Oil Board Act 1998 – no. lessen 500041904000 exp on 31/03/2024 • License for private installation under Regulation 9 of the electricity supply act 1990 – license no. 2022/03534 exp on 20/11/2023 – installation capacity must not exceed 2,400 kilowatts • Wage deductions under section 24 of the 1955 work act for the purpose of housing loan payments for the Terengganu State Economic Development Corporation (PMINT) - authorization letter reference number JTK/(T)600.2.2.3 JLD.2(8) dated 05/09/2019 • Permit deductions from employee wages for the purpose of bill and electricity payments (based on employee use), MIDDLE home rental purchase deductions (amount of deductions based on house price/period for 6 to 20 years) under section 24 of the labor act 1955, effective from 15/06/ 2010 and may be withdrawn by the Director General of Manpower at any time at his discretion. • Competent Person: <ul style="list-style-type: none"> ○ Authorized Entrant and Standby Person for Confined Space (AESP): No. Sir NW-ECRO-AE-R-8075-U, exp on 22/11/2024 ○ Cepswam: CePSWaM/2318929, expired on 16/01/2024 ○ CePPOME/00228, awarded on 16/12/2020 	
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		<ul style="list-style-type: none"> ○ Grade 1 engine driver for steam engines and steam boilers certificate no TG/12/EIA/01/6 dated 02/05/2012 ○ Grade 2 Engine Driver for combustion engines in certificate no TG/16/EIP/02/8 dated 24/02/2016 ○ Jrutera (Steam) Grade 2 certificate no 174/2013 dated 24/12/2013 ○ Certificate of competence as a machinery custodian under the electricity supply act 1990 – certificate no PJ-T-1-B-1521-2001 – category A0 dated 31/12/2001 ○ Certificate of competence as a machinery keeper under the electricity supply act 1990 – certificate no PJ-T-4-H-0068-1999 – category A4 dated 27/01/1999 ○ FFB Grader: No. Certificate MPOB-KKMBS-TU-151-2010 dated 05-Aug-2010 ○ Estate Hospital Assistants according to the terms of Registration of Estate Hospital Assistants, Act of Parliament No. 12 of 1965 – No. Registration Q 2226 grade 3 level dated 13/09/2019 ○ Sodium hydroxide permit holder: registration no TC0026/2023 exp on 31/12/2023 ○ Typhoid vaccination record for canteen operator: no series 54B22011A exp on 18/10/2026 ● CF – 26 machineries that have CF from JKPP. Sampled as below: <ul style="list-style-type: none"> ○ Machinery: Empire Boiler (Water Tube) – registration number PMD 12383 – No. CF PMD-TG/22 31115 – Inspection deadline 22/05/2022 – Expiration date 21/08/2023 	
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		<ul style="list-style-type: none"> ○ Water tube steam boiler (Mackenzie) – TG PMD 232 –PMD-TG/23 34613 – 16/02/2023 – 15/05/2024 ○ Softener Pressure Filter 3 – TG PMT 1374 – PMT-TG/23 34615 – 16/02/2023 – 15/05/2024 ○ Air Receiver – TG PMT 81764 – PMT-TG/23 34619 – 16/02/2023 – 15/05/2024 ○ Clarification Plant – TGP0272/5 – 16/02/2023 – 15/05/2024 • Calibration: <ul style="list-style-type: none"> ○ Certificate of calibration No. 12983 for Open Channel Flowmeter, exp on 04-Jan-2024 ○ Certificate of calibration No. SST/SA/R/2022K/1958 for Analytical Balance, exp on 04-Jan-2024 <p><u>Air Putih Estate:</u></p> <ul style="list-style-type: none"> • MPOB License under the Malaysian Palm Oil Board (Licensing) Regulations 2005 Malaysian Palm Oil Board Act 1998: No. License 503322802000 (Ladang Air Putih) exp on 31/07/2024 (Selling and moving oil palm fruit) • MPOB License under the Malaysian Palm Oil Board (Licensing) Regulations 2005 Malaysian Palm Oil Board Act 1998: No. License 503558102000 (Ladang Tabung Warisan) exp on 31/07/2024 (Selling and moving oil palm fruit) • MPOB License under the Malaysian Palm Oil Board (Licensing) Regulations 2005 Malaysian Palm Oil Board Act 1998: No. License 560687011000 exp on 30/04/2024 (Producing, selling and moving, and storing oil palm seedlings from oil palm seeds) 	
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		<ul style="list-style-type: none"> • Water Abstracting License under Subsection 43 (1) of the Water Resources (Terengganu) Enactment 2020, No. PA License (P) – A0075 exp on 31/12/2023 – for the purpose of use in oil palm tree nurseries • Salary Advance Permit under Section 22 of the Work Act 1955 for the purpose of purchasing essential goods, between RM100.00 to RM500.00 per month: No. Series PMT.2010/043 – effective from 01/01/2011 and may be withdrawn by the Director General of Manpower at any time at his discretion. • Deduction Permit From Employee's Salary under Section 24 of the Work Act 1955 for the purpose of paying for store spare parts (RM 7.62 - RM 86.93) as well as electricity bills and water bills (depending on employee usage): No. Series PMT.2010/044 – effective from 01/01/2011 and may be withdrawn by the Director General of Manpower at any time at his discretion. • Permit Deduction From Employee's Salary under Section 24 of the Act <p>Sighted evidence of compliance to legal and other requirements such as:</p> <ul style="list-style-type: none"> • MPOB Licence No 620807002000 for Pelantoh Estate with size of 3,439.83 Ha. Valid from 01/02/2023-31/01/2024. • Diesel Permit No Ref (KPDNKK/KMN/25-14/07 SK D) for quantity of 12,000 litres (north Estate) and 12000 (south estate). Valid from 23/01/2022-22/01/2025. • Air Receiver at Workshop TG PMT 4818 valid from 03/01/2023-26/03/2024. 	
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		<p><u>Maidam Estate</u> Sighted evidence of compliance for applicable legal and other requirements for estate operation:</p> <ul style="list-style-type: none"> • MPOB License No. 503576002000 for Lot No. 1083, PT934, Lot 970, Lot 971 Mukim Jengai, Dungun. Size estate 792.4 Ha. Valid from 01/09/2023-31/08/2024. • Diesel Permit TR/DGN/15/09 SKD for 8,500 Litres valid from 06/10/2021-05/10/2024. • CF for workers housing under Regulation 38(1)(a) Standard of Minimum of Workers Housing and Ammenities Regulations 1990 for Rumah Kong 1 storey dated 17/08/2017. <p><u>Tebak Estate</u> Also sighted evidence of compliance such as:</p> <ul style="list-style-type: none"> • MPOB License No. 620743002000 Lot 29, Lot 30 Mukim Tebak, Kemaman. Area Size 2,927.68 Ha. Valid from 10/10/2023-31/12/2023 (2 Months) and 01/10/2024-31/12/2024 (1 year). • CF for Air Receiver TG PMT 1292 valid from 16/03/2023-15/06/2024. • Diesel storage Permit from KPDNKK ref No. KPDNKK/KMN/25-12/06 SK D valid from 15/06/2021-15/06/2024 for 22,000 litres of Diesel. 	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>Legal and Other Requirements (LOR) (TDM/Estate/01) Revision 00/2021 dated 01/01/2021. The purpose is to ensure the estate is</p>	<p>Complied</p>

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		<p>aware with current legal and other requirements that relevant to their operation.</p> <p>Established and documented Estate Legal Requirements Register 2023, last reviewed & updated 10/10/2023 (Version 3). Consist of legal requirements under:</p> <ul style="list-style-type: none"> • Occupational Safety and Health Act 1994 and its subsidiaries Regulations. • Factories and Machinery Act 1967 and its subsidiary Regulations. • Uniformed Building By-law 1984 • Pesticides Act 1974 • Electrical Supply Act 1990 • Fire Service Act 1988 • Environmental Quality Act 1974 and its subsidiary Regulations. • National Land Code (Amendment) 2016 and updated • Fire Services (Fire Certificate) Regulations (Amendment) 2020 • Fire Services (Designated Premise) Orders 2022. <p>The mill has appointed the Compliance Executive as person responsible for compliance legal and other requirement as per appointment letter (Refer letter no. TDMP/LRR/001/2021) dated 23/02/2021 signed by the Mill Manager.</p> <p>The estates have appointed the Asst. Manager as person responsible for compliance legal and other requirement as per appointment letter dated 01/08/2022. Refer appointment letter with ref no. LJM.RSPO/MSPO/2022.</p>	
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<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>It is reassuring to note that the legal boundaries of Air Putih Estate, Pelantoh Estate, and Tebak Estate, and MAIDAM Estate are clearly demarcated and visibly maintained. In addition to the existing markers, such as roads, drains, and rivers, additional wooden or metal pegs have been installed to enhance the visibility of the boundaries. This practice ensures that the boundaries are easily identifiable and distinguishable.</p> <p>The availability of a boundary map depicting the locations of boundary markers further supports the clarity of the demarcation. During the verification process, several boundary stones and markers were revisited and confirmed to be within the designated perimeters of the estate land as indicated by the land title boundaries. This on-site verification ensures that the physical boundaries align with the legal demarcations.</p> <p>Verified during site visit that no planting activities have taken place beyond the legal demarcated boundary areas of the mill and estates. This demonstrates compliance with the designated land titles and the specified use for the cultivation of agricultural crops of economic value.</p> <p>However, at MAIDAM Estate, the demarcation of boundary between the estate and Jengal Forest Reserved was not visibly maintained in accordance with TDM’s Agriculture Policy No. 01.02 Survey and Boundary Demarcation. There was one boundary stone identified. However, the stone is located within MAIDAM Estate’s planted area (GPS ref.: 4.61527 103.15634). This is also verifiable using the estate’s</p>	<p>Non-compliance</p> <p>NCR Ref #: 20231026-N2 (Minor)</p>
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		map. Therefore, a Minor NC has been raised against this indicator.	
Criterion 2.2: 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 -	The list of contracted parties has been provided for verification at the audited Operating Unit (OU) and has been integrated into the Stakeholder List for the year 2023. The information in the stakeholder lists includes name and addresses of contractors, their contact person and contact numbers.	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 -	Kemaman POM and all audited estates are able to demonstrate that all contracts contain specific clauses on meeting legal requirements. Specific clauses on meeting applicable legal requirement are available in the <i>Surat Perintah Kerja</i> (SPK) or <i>Syarat-syarat dan Spesifikasi Kerja Kontrak</i> with all contracted third parties. In the agreement too, among other the contract specifically mentioned contractors are required to comply with all TDM policies and procedures as well as applicable laws. This was sighted in document signed with the following contractors: <ul style="list-style-type: none"> • Maliaray Holidays Sdn Bhd (school bus service provider) with Pelantoh Estate • Kejuruteraan Prisma (mill activities works) with Kemaman POM • Fa Sama Trading (mill activities works) with Kemaman POM • Sutura Adela Sdn Bhd (CPO Transporter) with Kemaman POM • Sidhu Brothers Transport Sdn Bhd (CPO Transporter) with Kemaman POM • JPG Jentera Sdn Bhd (Badang rental for FFB in-filed collection) with Air Putih Estate 	Complied

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		<ul style="list-style-type: none"> • WJ Paya Enterprrie (machineries rental for FFB transport) with Air Putih Estate • Tebak Estate • Wan OS Enterprise (road grading works) with Tebak Estate • Koperasi Ladang Kelapa Sawit Kemaman Terengganu Berhad (excavator rental for drainage works) with Tebak Estate • Sesak Maju Enterprise (backhoe rental) with Tebak Estate <p>The legal due diligence of all contracted third parties at Kemaman POM and all audited estates are evident and adequately demonstrated.</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>It is standard practice for each estate management of Kemaman POM & Supply Bases to document the basic requirements of the RSPO P&C within a document known as a <i>Surat Perintah Kerja</i> or <i>Syarat-syarat dan Spesifikasi Kerja Kontrak</i>. Paragraph 4 of the signed contract explicitly outlines the commitment not to employ children or young persons, engage in forced labor, or utilize trafficked labor. This commitment is consistently and explicitly included in all contracts that were sampled, as reported under section 2.2.2.</p> <p>However, upon reviewing the documents for one of the contractors engaged by Air Putih Estate, specifically the <i>Surat Perintah Kerja</i> No. AP 38/23 dated 01/07/2023, it was observed that there are no clauses disallowing child, forced and trafficked labour contain in this document. Therefore, a Minor NC has been raised against this indicator.</p>	<p>Non-compliance</p> <p>NCR Ref #: 20231026-N3 (Minor)</p>

Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> Information on geo-location of FFB origins Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>The mill receives FFB only from the TDMP Estates and its own supply bases within the certification scope, or diversion from its sister mills (Sungai Tong Palm Oil Mill) due to breakdown or annual maintenance. All the estates are from the same certification scope possess. The information required by this indicator was made available for verification.</p>	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>Not Applicable as the mill does not receive any indirectly sourced FFB.</p>	Not Applicable
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The business or management plan of the operating units is addressed in the annual budget with 5-year projection plan (2023 to 2028). The palm oil mill budget includes the projected FFB processed, CPO and PK production, OER and KER, production cost, training, insurance, environment conservation, while the estates consist of Crop Projection, upkeep & cultivation, harvesting & collection, General Charges, and Capital Expenditure to name a few.</p> <p>Business Plan established and documented and mill keeping forecast plan between 2004-2027 that include:</p> <ul style="list-style-type: none"> FFB Processed 	Complied

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		<ul style="list-style-type: none"> • Production of CPO and Kernel • General charges • Maintenance • Process shift labors • General services <p>From above data, Total Processing Cost will be decided and determined. Available too in details 5 years FFB, CPO & PK Projection (2024-2028) and above-mentioned charges, expenditure and services (2034-2028).</p> <p><u>Air Putih Estate</u> Sighted established and available a long-term business plan titled Strategic Business Plan 2024-2027 & Budget 2023. That includes:</p> <ul style="list-style-type: none"> • FFB Projection including FFB (MT) • Mature, immature, replanting. • FFB (Yield/Ha) • Estate Production Cost (RM MT/FFB) • Capex (RM) <p>Among details forecasted are the FFB production as below:</p> <table border="1"> <thead> <tr> <th rowspan="2">Total Area (Ha)</th> <th colspan="2">2023</th> <th colspan="2">2024</th> <th colspan="2">2025</th> </tr> <tr> <th>FFB (MT)</th> <th>Yield (MT/Ha)</th> <th>FFB (MT)</th> <th>Yield (MT/Ha)</th> <th>FFB (MT)</th> <th>Yield (MT/Ha)</th> </tr> </thead> <tbody> <tr> <td>3,839.73</td> <td>68,500</td> <td>18.25</td> <td>63,000</td> <td>19.23</td> <td>55,000</td> <td>20.53</td> </tr> </tbody> </table>	Total Area (Ha)	2023		2024		2025		FFB (MT)	Yield (MT/Ha)	FFB (MT)	Yield (MT/Ha)	FFB (MT)	Yield (MT/Ha)	3,839.73	68,500	18.25	63,000	19.23	55,000	20.53	
Total Area (Ha)	2023			2024		2025																	
	FFB (MT)	Yield (MT/Ha)	FFB (MT)	Yield (MT/Ha)	FFB (MT)	Yield (MT/Ha)																	
3,839.73	68,500	18.25	63,000	19.23	55,000	20.53																	

<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -</p>	<p>Annual replanting programmes, which are reviewed annually, were available at each sampled estates and the details are summarised as follows:</p> <table border="1" data-bbox="1122 488 1930 786"> <thead> <tr> <th rowspan="2">Estates</th> <th colspan="6">Area (Ha)</th> </tr> <tr> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> <th>2028</th> </tr> </thead> <tbody> <tr> <td>Pelantoh</td> <td>298.73</td> <td>0</td> <td>266.34</td> <td>253.35</td> <td>286.64</td> <td>0</td> </tr> <tr> <td>Air Putih</td> <td>183.70</td> <td>0</td> <td>0</td> <td>167.46</td> <td>300.43</td> <td>597.64</td> </tr> <tr> <td>MAIDAM</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Tebak</td> <td>370.26</td> <td>0</td> <td>252.62</td> <td>238.45</td> <td>338.50</td> <td>264.82</td> </tr> </tbody> </table> <p>However, the actual replanting activities are still contingent upon approval from the top management of TDM.</p>	Estates	Area (Ha)						2023	2024	2025	2026	2027	2028	Pelantoh	298.73	0	266.34	253.35	286.64	0	Air Putih	183.70	0	0	167.46	300.43	597.64	MAIDAM	0	0	0	0	0	0	Tebak	370.26	0	252.62	238.45	338.50	264.82	<p>Complied</p>
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<p>3.1.3</p>	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -</p>	<p>The certification unit held its last management review meeting on 09/08/2023 in accordance with the SOP Management Review Standard Operating Procedure dated 01/10/2022 Edition TDMP/01 Rev. TDMP-03/2022. It was attended by 50 key personnel from all operating units and chaired by the CEO. The minutes of meeting were made available at each sampled operating unit for verification. Among the agenda recorded in the minutes were:</p> <ol style="list-style-type: none"> 1) Performance progress report 2) Estates monthly expenses – adequacy of resources 3) Review of overspending 4) SBP 2024-2027 	<p>Complied</p>																																									

		<p>5) Sustainability & SCCS</p> <p>II – status of actions from the previous management review and changes that could affect the management</p> <p>III – the needs and expectation of interested parties (stakeholders), including complains</p> <p>IV – the extent to which MSPO/RSPO/ISCC management plans have been achieved, information on the organisation’s performance (which includes NC & CA, MM results, Status of compliance, audit results)</p> <p>AOB – continual improvement with regards to crop quality, field upkeep, etc.</p> <p><u>Kemaman POM</u></p> <p>Management Review was conducted on 14/09/2023 at Akademi TDM attended by CEO, Head of Plantation, Plantation Controllers (North & South), Mill Sr, Managers, Sr Asst. Mill Managers, Staff, Estate Managers Sustainability Head and others (55 names in attendance list)</p>	
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The action plans for continuous improvement were documented in various formats such as:</p> <ul style="list-style-type: none"> • Optimising the yield of the supply base. • Reduction in use of pesticides (Criterion 7.2) 	<p>Complied</p>

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		<ul style="list-style-type: none"> • Environmental impacts (Criteria 3.4, 7.6 and 7.7) • Waste reduction (Criterion 7.3) • Pollution and greenhouse gas (GHG) emissions (Criterion 7.10) • Impacts on communities, workers, and smallholders (Principle 6) • Integrated management of HCV-HCS, peatland and other conservation areas (Criteria 7.7 and 7.12) <p>The sampled operating units are implementing the action plans accordingly. Progress of the plans were also discussed in the management review meetings.</p>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required. - Minor Compliance -</p>	<p>The CU has filled its RSPO metrics template version 2.1 and submitted to the CB prior to this assessment. Based on verification through various documents such as land titles, JKPP report, employees register, computer software recording system, to name a few, the data reported in the metrics template were found to be accurate.</p>	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -</p>	<p>The estate operations are guided by TDM’s Agriculture Policy. Among the operations covers in the manual are: AP1 – Land preparation</p>	Complied

		<p>AP2 – Oil Palm Nursery AP3 – Planting and replanting AP4 – Agronomic practices AP5 – Manuring AP6 – Weed management AP7 – Harvesting and crop evacuation AP8 – Pest and disease AP9 – Water and soil conservation</p> <p>The APs are updated from time to time to suit the current needs.</p> <p><u>Kemaman POM</u> While the mill has documented its operation procedure in a multi-level document covering from reception of FFB until dispatch of CPO & PK. Sighted list of SOPs established and documented for Mill operation. A total of 30 SOPs with latest revision date indicated. Among sampled included:</p> <ul style="list-style-type: none"> • SOP Safety and Health Committee Rev. date Nov 2016 • SOP EFB Press Station Rev. date Jan 2015 • SOP Permit to Work Rev. Nov 2020 • SOP Scheduled Waste Handling Rev. date Nov 2021 • SOP MSPO/RSPO/ISCC Internal Audit Rev. date Jan 2022 	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	Apart from daily routine supervision, has established mechanism to monitor the implementation of their procedure by visits from Plantation Controller, Agronomist, Mill Advisor, Sustainability	Complied

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	<p>- Minor Compliance -</p>	<p>Department, internal audits, and workplace inspection by Safety Officer.</p> <p><u>Kemaman POM</u></p> <p>A mechanism to ensure consistent implementation of the procedure sighted through:</p> <ul style="list-style-type: none"> • Internal audit conducted once a year on implementation of RSPO and relevant SOPs. • Safety and Health Inspection conducted once in every 3 months on OSH SOPs and practices. • Plantation Operation Meeting (POM) as minutes sampled on 09/08/2023 at Akademi TDM where status of Pruning, SOP Palm Thinning, Manpower Problems, Performance, Quality claims, Sustainability, Internal audit results and other operation issues. • Environmental Monitoring and Compliance meeting conducted to monitor legal compliance, environmental issues. 	
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Records of monitoring and actions taken had been maintained for more than 12 months at the mill and estates.</p> <p>Daily Muster chits and briefing records were available at POM and estates.</p> <p>Actual operational and field activities were verified during on-site field inspection at the POM and estates audited.</p> <p>Verified that estates monitoring records on spraying, manuring, and harvesting operations, and mill monitoring records on daily production report (FFB processed/Ramp balance, throughput/starting & stopping time, and boiler monitoring sheet), Daily</p>	<p>Complied</p>

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		<p>notification report (machinery status), Daily supervision and walkabouts by Supervisor and Assistant Managers were maintained and available during the assessment at the estates and mill.</p> <p>Reports of top management and government agencies visits also maintained by estates and mill management accordingly.</p> <p>Evident from the Management Review Meeting minutes which is properly maintained that the input from the internal audit findings were discussed as to identify the effectiveness of the implementation of the RSPO P&C requirement.</p> <p>The on-site audit confirmed that the records were satisfactorily maintained.</p>	
<p>Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>No additional methods have been implemented or introduced in the operations of the mill and estates, which could potentially result in altered impacts on the social and environmental aspects. The social and environmental impacts arising from the mill and estates operations have remained consistent. Furthermore, there have been no new planting activities conducted at all estates of the UoC.</p> <p>Nevertheless, the management unit has carried out a reassessment Social Impact Assessment for TDMP Sdn Bhd for Bukit Besi Complex in June 2022. The assessment was done by external consultant under Green Orbis Environment Sdn Bhd from 12/06/2022 to 15/06/2022. The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal</p>	<p>OFI</p> <p>Ref. No. 2412049- 202310-I1</p>

		<p>workers. Issues raised by the stakeholders were incorporated into a management plan. The report includes both positive and negative impact and its recommendation.</p> <p><u>Kemaman POM</u></p> <p>Mill has conducted Environmental Aspect and Impact Identification and Assessment conducted by the Sustainability Compliance Team and approved by the Senior Mill Manager in May 2023.</p> <p>Activities included for mill assessment of environmental impact such as:</p> <ul style="list-style-type: none"> • Reception Station • Sterilization Clarification • Nuts & Kernel Station • Raw and Treated Effluent Plant • Laboratories • Cafeteria • Bio Compost Plant and 9 others. <p>According to SOP Environmental Aspect/Impacts Evaluation (TDM/03) Edition TDMP/03 sated 01/2021. List of Environmental impact to be included Shortage of Landfill in relation to impact from generation of waste, other than Ozone layer depletion. Global Warning, Air Pollution, Water pollution, land contamination, depletion of natural resources.</p>	
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		<p><u>Estates</u></p> <p>Environmental aspect and impact assessment was conducted and reviewed in April 2023 as list of Environmental Aspect Identification (EAI) with 28 particulars (activities, products, and services) related to plantation or estate operation. Another document used to assess the impact called Environmental Impact Evaluation (EIE) dated reviewed on 11/04/2023. Sighted Code of Environmental Impact:</p> <table border="1" data-bbox="1137 619 1926 981"> <thead> <tr> <th>Code</th> <th>Impact</th> <th>Code</th> <th>Impact</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Ozone Layer Depletion</td> <td>2</td> <td>Global warming</td> </tr> <tr> <td>3</td> <td>Air Pollution</td> <td>4</td> <td>Water pollution</td> </tr> <tr> <td>5</td> <td>Land contamination</td> <td>6</td> <td>Unpleasant working Environment</td> </tr> <tr> <td>7</td> <td>Depletion of Nat. resources</td> <td>8</td> <td>Community Impact</td> </tr> <tr> <td>9</td> <td>Business Impact</td> <td></td> <td></td> </tr> </tbody> </table> <p>An OFI has been raised against this indicator due to the assessment of the impact arising from the generation and disposal of domestic waste in landfills could be further enhanced.</p>	Code	Impact	Code	Impact	1	Ozone Layer Depletion	2	Global warming	3	Air Pollution	4	Water pollution	5	Land contamination	6	Unpleasant working Environment	7	Depletion of Nat. resources	8	Community Impact	9	Business Impact			
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3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>Based on the above-mentioned methodology, the SIA was developed with participation of the affected stakeholders. Verification of the evidence of implementations of the sampled management and monitoring plans showed that the plans were implemented accordingly. Social management plan has been</p>	Complied																								

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		<p>reviewed for all operating units on annual basis. SIA management plan sighted as the following:</p> <table border="1" data-bbox="1137 448 1926 746"> <thead> <tr> <th>Estate/Mill</th> <th>Date of review</th> </tr> </thead> <tbody> <tr> <td>Kemaman POM</td> <td>03/10/2023</td> </tr> <tr> <td>Pelantoh Estate</td> <td>12/10/2023</td> </tr> <tr> <td>Air Putih Estate</td> <td>18/10/2023</td> </tr> <tr> <td>MAIDAM Estate</td> <td>09/10/2023</td> </tr> <tr> <td>Air Putih Estate</td> <td>16/10/2023</td> </tr> </tbody> </table> <p>The management plan has been formulated through the consolidation of feedback and issues gathered from various meetings, including stakeholder meetings, union meetings, and gender committee meetings.</p> <p>Additionally, operating units have implemented an Environmental Management Plan derived from the outcomes of the Environmental Risk Assessment. To ensure its relevance and effectiveness, the management plan undergoes an annual review as part of the Environmental Risk Assessment Review process. This iterative approach ensures that the management plan stays current and aligned with the environmental considerations identified through regular assessments.</p>	Estate/Mill	Date of review	Kemaman POM	03/10/2023	Pelantoh Estate	12/10/2023	Air Putih Estate	18/10/2023	MAIDAM Estate	09/10/2023	Air Putih Estate	16/10/2023	
Estate/Mill	Date of review														
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3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -</p>	<p>The Social Management Plan is actively implemented, reviewed, and updated annually in a participatory manner, incorporating feedback gathered during meetings with stakeholders, Union/NUPW meetings, and gender committee meetings. The Social Management</p>	Complied												

		<p>Plan for 2023, available in both mill and estate, reflects issues identified during these interactions. The plan is subject to regular reviews and updates, with reporting carried out in accordance with Indicator 3.4.2.</p> <p>In terms of environmental management, operating units have established an Environmental Management Plan based on the Environmental Risk Assessment. Notable environmental issues, along with corresponding mitigation measures, responsible personnel, time frames, and status updates, have been identified. Some of the issues include leakage of used engine oil and lubricants from the workshop, chemical leakage in the storage area, spillage of engine oil and lubricants during vehicle washing, high noise levels from the boiler's exhaust blowpipe, improper drainage systems at workers' housing, dangerous gases and fumes in the laboratory, noise from the engine room, and others (totalling 20).</p> <p>Several proactive measures have been implemented to address these issues, such as placing oil trays under bunkers to prevent kernel oil leakage, rainwater harvesting for plant watering and equipment washing, recycling of collected wastewater from the premixing area, installation of barn owl boxes for rat control, establishment of nurseries for beneficial plants along the main road, and careful management of bio compost application to prevent leachate flow into natural rivers, including avoiding application during the rainy season and selecting areas away from natural rivers. These initiatives demonstrate a commitment to environmental stewardship and sustainability within the operating units.</p>	
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Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>TDM Plantation Sdn Bhd has established Standard Operating Procedures (SOP) for the recruitment of both local and foreign workers in the mill and estates.</p> <p>For the recruitment of foreign workers, the SOP titled "Recruitment Procedure (Foreign Workers)" (SOP/OD/REV00) dated 01/03/2019 outlines the process. This involves interviews, selection based on factors such as age, qualifications, and agricultural experience. Retirement and termination procedures align with the provisions of the Employment Act 1955 and individual employment contracts.</p> <p>On the other hand, for the recruitment of local workers in both mill and estates, the SOP is documented under "Prosedur Perlantikan Pekerja Ladang and Kilang" (TDMP/SMP/3/01.01) dated 2nd November 2016. This SOP specifies that the recruitment, selection, and hiring process include vetting and interviews, ensuring that candidates are medically fit. Promotions are solely at the discretion of the Company. The retirement age for local workers is fixed at 60, and termination of employment can be mutually agreed upon, subject to the terms of the employment contract and the Employment Act 1955.</p> <p>The latest briefings regarding the recruitment procedure were conducted at various locations, such as Kemaman POM on 16/06/2023, Pelantoh Estate on 04/04/2023, Air Putih Estate on 12/09/2023, MAIDAM Estate on 11/07/2023, and Tebak Estate on 15/03/2023. These briefings ensure that relevant personnel are informed about the recruitment procedures and adhere to the established protocols.</p>	Complied

3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>In Kemaman POM and all sampled estates (Pelantoh, Air Putih, MAIDAM, and Tebak), comprehensive records of employment are diligently maintained. These records, which include essential documents such as contracts of work, job application forms, medical records, and payslips, are stored in the personal files of employees. This meticulous record-keeping demonstrates adherence to established employment procedures and contributes to transparent and accountable human resources management within the UoC.</p>	Complied
<p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p><u>Hazard Identification, Risk Assessment and Risk Control (HIRARC):</u></p> <p>The UoC is adopting the established SOP namely, Hazard Identification, Risk Assessment and Risk Control SOP Edition TDMP/02, Rev. TDMP-01/2022, dated 01/12/2022. The SOP used as guidance used in the mill and estate to conduct HIRARC and review them annually or if accident occurred. Hazards and risks include all work activities, use of machinery/non-machinery, all staff and employees, contract workers, visitors, people dealing with the project, and people on the TDM premises.</p> <p>Risk assessment (HIRARC) carried out on all operations, where health and safety are an issue, in order to determine the significant hazards and implement control measures. Significant hazards determined and documented include noise exposure, pesticides/chemicals, accident, fire, fuel spillage, working at heights, working in enclosed space, hot work, lightning, electrocution, machinery, etc. Control measures include the use of PPE, fire drill training, first aid training, etc. and "permit to work system" for the mill.</p>	OFI

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		<p>Verified that additional HIRARC reviews also made by the Safety & Health team upon occurrence of incidences or accidents. The latest review was done on 03-Jan-2023 for each operating unit. Sample for list register for HIRARC had been verified for activity at loading ramp, sterilizer, oil room, boiler, workshop, store area, land irrigation, P&D, pruning, spraying, tractor driving, buffer zone, harvesting, Transporting of Worker using motorcycle and transporting workers.</p> <p>Evident from the HIRARC established that the POM and estate management adequately assessed the HIRARC.</p> <p><u>Chemical Health Risk Assessment (CHRA):</u></p> <ul style="list-style-type: none"> • CHRA for Kemaman POM was conducted by HQ/08/ASS/00/259 (Report Ref: HQ/08/ASS/00/259-2020/009), dated 12/07/2020, which involved work units of Wet Analysis Lab Personnel; Water Treatment Operator; Boiler Treatment Operator; Mechanical Maintenance Operator. The Action Plan was developed based on recommendation from the assessor, which was revised on 01/02/2023 by Assistant Mill Manager and approved by Mill Manager. <ul style="list-style-type: none"> ○ Chemical Exposure Monitoring was conducted by by HQ/17/JHI/00/00013 on 21/11/2021 on work unit of boiler, wet analysis laboratory, mechanical maintenance workshop. From the report stated that the exposure of respirable dust, silica quartz, manganese, chromium, nickle and n-Hexane monitoring result had shown below the Permissible Exposure Level (PEL) for TWA 8 hours and MEL as stipulated under Occupational Safety and Health (Use and Standards 	
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		<p>of Exposure of Chemicals Hazardous to Health) Regulations 2000.</p> <ul style="list-style-type: none"> ○ Annual Inspection, Testing and Examination FY2023 on Local Exhaust Ventilation System was conducted by HQ/20/JHII/00/00029 on 08/05/2023. As conclusion, the LEV systems (FH-01 & FH-02) achieve acceptable working condition and safe to use by workers based on recommended guidelines. ● CHRA was assessed by JKKP HQ/10 ASS/00/8 for Pelantoh Estate on 11/05/2021, for Air Putih on 14/04/2021, for MAIDAM Estate on 16/03/2021. Additional CHRA was conducted on 12/08/2022 at MAIDAM Estate for additional pesticides operator (Butik G2). CHRA Action Plan was established based on recommendation from the assessor and reviewed accordingly by each estate management. <p><u>Noise Risk Assessment (NRA):</u></p> <ul style="list-style-type: none"> ● For Kemaman POM, the NRA report, assessed by HQ/09/PEB/00/97 and dated 15 March 2020, addresses specific work units, including sterilizer, engine room & boiler, workshop, oil room, press, kernel plant, and bio-organic plant. <ul style="list-style-type: none"> ○ The report emphasizes the necessity for approved and suitable Personal Protective Equipment (PPE) to be provided for the engine room & boiler, workshop, oil room, press, and kernel plant. This ensures the safety and protection of personnel working in these areas. ○ Additionally, the report recommends the implementation of Audiometric Tests on an annual basis for employees in the 	
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		<p>engine room & boiler, workshop, oil room, press, and kernel plant. This periodic testing aims to monitor and assess the hearing capabilities of individuals working in these specific work units, contributing to overall occupational health and safety measures.</p> <ul style="list-style-type: none"> ○ Mill management have taken steps to reduce the noise levels by construction of a room to isolate the gen sets, reducing the exposure time to high noise and mandatory use of both ear plugs and ear mufflers. ● NRA for Air Putih Estate was assessed by HQ/06/PEB/00/69 on 23/08/2020 and on 10/10/2020 for MAIDAM Estate. Supplement NRA for Air Putih Estate was assessed by HQ/06/PEB/00/69 on 27/08/2023). The management established action plan based on the assessment reports and documented as Action Plan (Noise Risk Assessment Report), with latest revision was in Jan-2023. Noted that the management has taken necessary actions based on the recommendations from the assessor i.e., audiometric test, PHP usage etc. <p>HIRARC for transporting workers to work area to be further enhanced on design and condition of trailer used by tractors to include falling dawn prevention and protection particularly in slippery and hilly area. Thus, an OFI raised against this indicator.</p>	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	An Occupational Safety and Health (OSH) plan, compliant with the Occupational Safety and Health Act and the Factory & Machinery Act 1967, has been documented and implemented.	Complied

	<p>- Critical (Major) compliance -</p>	<p>The OSH Policy was observed to be clearly displayed at prominent locations within the mill and estate. Adequate posters, regulations, and newsletters were prominently exhibited on notice boards. During interviews, workers demonstrated a commendable level of awareness regarding occupational safety and health.</p> <p>Programmes aimed at protecting the health and safety of workers were satisfactorily implemented.</p>	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>OSH Plan, Training Matrix & Training Schedule was sighted for year 2023 in Kemaman POM, Air Putih Estate, Pelantoh Estate, MAIDAM Estate and Tebak Estate. The content of the OSH plan included found need analysis was conducted based on the job designation and training required by the job type. Trainings was identified for Estate Manager, Sr. Assistant/ Supervisor, Mandores, Chief Clerk, Compliance Clerk, Storekeeper, Drivers, Manurers, Sprayers, Harvester and contractors and programmed throughout FY 2023. The training identified covers the safety and health, environmental and social aspect.</p> <p>Specific training for SOP in matrix sighted identified for respective workers and to be conducted during Morning Muster as below:</p> <ul style="list-style-type: none"> • SOP PPE • SOP Manuring • SOP Harvesting • SOP Transporting of FFB • SOP for Chemicals Mixing • SOP for Driving 	<p>Complied</p>

<p>3.7.2</p>	<p>Records of training are maintained. - Minor Compliance -</p>	<p>Sighted Training Log record maintained for year 2023. Information of training and briefing conducted for year 2023 recorded as stated total of 29 type of training conducted so far under category of OSH, Environment and others. Among others:</p> <ul style="list-style-type: none"> • January & February: 4 briefings (a. Foreign worker’s policy & Freedom to join Union, b. Gender Policy & Reproductive Rights Policy, c. Harvesting Safety, d. 2023 SH Program) • March & April: 1 Training & 4 Briefing (a. Harvesting safety, b. Environmental Protection, c. OSH Policy, d. Manuring, BOFA Refresher, e. MSPO Policy) • May: 4 Briefings (a. First Aid, b. Harvesting, Loading and Pruning, c. Spraying, d. Sustainability) • July: 5 Briefings (a. First Aid Box. B. Spraying, c. Pesticides handling, d. Recycling bins, e. RSPO and MSPO). <p>Among Training records available (Internal Training Report):</p> <ul style="list-style-type: none"> • Use of Fire Extinguisher conducted on 04/10/2023 and attended by all workers • Briefing on OSH and Sustainability Requirements to Contractors and Stakeholders on 24/08/2023 and attended by 26 representatives and surrounding community. • Fertilizer Sampling training conducted on 26/07/2023 & 10/08/2023 attended by 4 staff including storekeeper. • Vehicle inspection training was conducted on 02/08/2023 and attended by 10 drivers, foreman, fitter and compliance clerk. 	<p>Complied</p>
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		<ul style="list-style-type: none"> • Training Use of Fire Extinguishers was conducted on 17/05/2023 during Morning Muster and attended by 84 workers as in attendance list. • Training on Noise Induced Hearing Loss and PPE was conducted on 19/02/2023 and attended by 10 workers included tractor drivers, mist blower operators and mandores and compliance clerk. • Basic CPR and First Aid (BOFA) was conducted on 10/10/2023 and attended by first aiders and 1st aid boxes keeper, tractors driver, foreman 	
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>Kemaman POM</u> Sighted RSPO/Supply Chain/Traceability Training Report conducted on 19/06/2023 at Kemaman POM Meeting Room. Attended by 13 staff (Attendance List available) involved in supply chain process in the mill. In the module sighted SOP Supply Chain-Identity Preserved & Mass Balance Module. (TDM/TRCBLT/04) Revision SCCS-02/2022, dated 01/01/2022.</p>	Complied
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However, it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing</p>	<p>The management at Kemaman POM has established and documented the RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022 dated 01/01/2022. According to the Glossary section of this SOP, RSPO Identity Preserved is defined as a supply chain model that ensures RSPO certified oil palm products delivered to the end user are uniquely identifiable to a single RSPO certified supply base.</p>	Complied

	<p>controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>For the period from October 2022 to September 2023, Kemaman POM exclusively received and processed Fresh Fruit Bunches (FFB) from the UoC estates, including Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. Additionally, the mill processed FFB from estates owned by TDM but under different UoC, specifically Sungai Tong POM & Supply Bases (Certificate No. RSPO 595564), which consist of Pinang Emas Estate, Jerangau Estate, Tayor Estate, Jaya Estate, and Fikri Estate.</p> <p>During the audit, which involved site visits and documentation reviews, it was observed that the mill did not receive and process FFB supplied by outgrowers or smallholders. As a result, Kemaman POM is categorized as an Identity Preserved (IP) palm oil mill, in accordance with the RSPO Supply Chain SOP.</p>	
<p>3.8.2</p>	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>The management at Kemaman POM has established and documented the RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022 dated 01/01/2022. According to the Glossary section of this SOP, RSPO Identity Preserved is defined as a supply chain model that ensures RSPO certified oil palm products delivered to the end user are uniquely identifiable to a single RSPO certified supply base.</p> <p>For the period from October 2022 to September 2023, Kemaman POM exclusively received and processed Fresh Fruit Bunches (FFB) from the UoC estates, including Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. Additionally, the mill processed FFB from estates owned by TDM but under different UoC, specifically Sungai Tong POM & Supply Bases (Certificate No. RSPO 595564), which consist of</p>	<p>Not Applicable</p>

		<p>Pinang Emas Estate, Jerangau Estate, Tayor Estate, Jaya Estate, and Fikri Estate.</p> <p>During the audit, which involved site visits and documentation reviews, it was observed that the mill did not receive and process FFB supplied by outgrowers or smallholders. As a result, this indicator is Not Applicable to this POM.</p>	
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The POM provides and submits the recorded estimated tonnage of Crude Palm Oil (CPO) and Palm Kernel (PK) products that could potentially be produced. This data undergoes thorough verification during this Recertification Audit.</p> <p>The aforementioned figure signifies the overall volume of certified palm oil products (CPO and PK) permitted for delivery by the certified mill within a year.</p> <p>The actual tonnage produced is documented and included in each audit report.</p> <p><i>See also Table 10: Summary of Certified Tonnage</i></p>	Complied
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 POM meets all registration and reporting requirements for the appropriate supply chain through the RSPO Supply Chain managing organization (RSPO IT platform or book and claim).</p> <p>Marketing Department will make the necessary transaction of RSPO certified CPO and PK in the RSPO IT Platform. During the audit, verified that all the transactions from the mill (CSPO/CSPK) were announce accordingly.</p> <p>Kemaman POM has registered in RSPO PalmTrace as follows:</p> <ul style="list-style-type: none"> • License ID: CB142953 (Active) • Member Name: Kemaman Palm Oil Mill 	Complied

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		<ul style="list-style-type: none"> • Member ID: RSPO_PO1000001053 • RSPO Membership Number: 1-0095-11-000-00 (TDM Plantation Sdn Bhd) • Type of Business: Oil mill 	
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>The management at TDM Plantation Sdn Bhd has established and documented a comprehensive Standard Operating Procedure (SOP) titled "RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module," Edition TDM/TRCBL/04, Rev. SCCS-02/2022, dated 01/01/2022. The SOP covers various key subjects to ensure effective implementation of RSPO supply chain requirements. The covered subjects include:</p> <ol style="list-style-type: none"> 1. Introduction 2. Objectives 3. Responsibilities 4. Control Of Documents and Records 5. Delivery Of Fresh Fruit Bunches (FFB) From the Estate 6. Receiving FFB at the Mill 7. Process Monitoring 8. Crude Palm Oil (CPO) and Palm Kernel (PK) Dispatch 9. Handling Non-Conforming Products and/or Documents 10. Product Claims 11. Management of Outsourced Contractors 12. Training 13. Reclassification of Mill's Supply Chain Models 14. Production Line 	Complied

		<p>15. Conversion Factors 16. Internal Audit 17. Handling Complaints 18. Management Review</p> <p>This SOP outlines procedures and guidelines to ensure compliance with RSPO supply chain standards, particularly in the areas of identity preserved and mass balance, covering the entire process from FFB delivery to the mill to the dispatch of CPO and PK. The inclusion of responsibilities, control measures, and training elements emphasizes a systematic and well-documented approach to RSPO supply chain management within TDM Plantation Sdn Bhd.</p>	
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> <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. <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 Standard Operating Procedure (SOP) titled "RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module," Edition TDM/TRCBL/04, Rev. SCCS-02/2022, dated 01/01/2022, includes a written procedure for conducting an annual internal audit. This procedure is specified in Section 16.0 – Internal Audit. The internal audit aims to assess whether the mill conforms to the requirements outlined in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Additionally, it evaluates the effective implementation and maintenance of the standard requirements within the organization.</p> <p>For the South Zone mill, a Supply Chain Internal Audit was carried out as per the sampled checklist. A memorandum was issued with the Audit Program (RSPO/MSPO/SCCS) for the fiscal year 2023, dated 03/05/2023. The audit was scheduled between 22-26 October 2023. During the audit, 7 Non-Conformity Reports (NCR) were</p>	Complied

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		<p>raised for Kemaman POM. Root cause investigations were subsequently conducted, as outlined in the Sustainability Audit Corrective Action Report. The report provides details on the corrective actions, identifies the Person in Charge (PIC), and specifies the due dates for the completion of corrective actions.</p> <p>The results of the internal audit were discussed in the Management Review Meeting. The mill has maintained records of the internal audit, including the audit report. The Corrective Action Plan, which includes root cause identification and correction details, has been sent to the internal auditor. This demonstrates a systematic approach to internal audit processes, corrective actions, and continuous improvement within the UoC.</p>	
3.8.7	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>Kemaman POM receives RSPO certified FFB exclusively from TDM Plantations estates. It has been verified that there are no sources of non-certified FFB from outgrowers or independent suppliers/smallholders. The mill employs a systematic verification system at the weighbridge. When FFB is delivered from the estates, the transporters present a Delivery Note (DN) to the mill weighbridge clerk for the FFB to be officially received by the mill.</p> <p>The Daily Production Report reflects traceable figures of certified products from certified raw material sources. All incoming certified raw material is diligently recorded on a daily, monthly, and annual basis. The information related to RSPO certified FFB is documented in FFB Consignment notes and weighbridge tickets. Records verified during the audit for the period of October 2022 to September 2023 include details such as the name and address of the product origin, name and address of the receiver, ticket number, delivery order number, contract number, date, quantity, transporter, type of</p>	Complied

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		<p>product, and RSPO certificate number (including the validity of the certificate).</p> <p>Verified that there is no overproduction of certified tonnage. However, the management has liaised with the CB to request for the volume extension. Then, on 26/10/2023, the RSPO Secretariat approved an extension of volume requested by the Certificate Holder. The approved extension includes an additional volume allocation of 17,073.17 MT for FFB, 3,000 MT for Crude Sustainable Palm Oil (CSPO), and 768 MT for Crude Sustainable Palm Kernel (CSPK). This approval led to adjustments in the Certified Volume figures, resulting in the following updated figures compared to the initial ones mentioned in the previous Public Summary Report:</p> <ul style="list-style-type: none"> • Certified Volume for FFB_estates: 156,455.17 MT (an increase of 17,073.17 MT) • Certified Volume for CSPO: 33,821.19 MT (an increase of 3,000 MT) • Certified Volume for CSPK: 8,130.04 MT (an increase of 768 MT) <p>The mechanism for handling non-conforming FFB and/or documents is addressed in the Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022, dated 01/01/2022, specifically under Section 5 - Delivery FFB from estate and Section 6.0 - Receiving FFB at the mill. This SOP ensures a systematic approach to dealing with any non-conforming elements in the supply chain.</p>	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The</p>	<p>During the audit, the observed samples indicated that all the minimum information (a - i) required for RSPO certified products is available in document form. The information includes Kemaman</p>	Complied

	<p>information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>POM and address of the POM Office, name and address of the buyer, date of delivery, date of the document, RSPO certificate number owned by Kemaman POM (along with the validity date of the certificate), description of the product (CSPO/IP or CSPK/IP), and quantity delivered.</p> <p>This information is consistently documented on various forms, such as weighbridge tickets, sales contracts, delivery orders, MPOB L3 (only for CPO sales), and other relevant documents. The meticulous inclusion of these details in the documentation ensures transparency and compliance with RSPO certification requirements for the certified products processed at Kemaman POM.</p>	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 	<p>There was no outsourced activity at Syarimo POM. However, the mill has engaged with external transporter for transporting the CPO and PK. The agreement between TDM Plantation Sdn. Bhd and Sutera Adela Sdn Bhd (Contract No. TDMP/OD/09/01.32 dated 22/12/2022) outlines the terms of the contract, stating its validity until 31/12/2023.</p> <p>This agreement confirms that Kemaman POM retains legal ownership of all transported CPO and PK. The details of ownership are included in the weighbridge ticket, which is stamped with RSPO certification.</p>	<p>Complied</p>

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	<p>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.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>The RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022, dated 01/01/2022, specifically addresses the dispatch of CPO and PK in Section 8. The mill has established a documented control system with explicit procedures for the outsourced process, and this procedure was communicated by the POM management during a briefing session when the appointed contractor signed the contract with the POM management.</p> <p>The contract agreements with transporters specify that they are required to fulfill and comply with all applicable legal requirements, as well as TDM's own requirements, including RSPO and MSPO standards. The engagement with certification bodies is highlighted in the agreement, indicating that the certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. This underscores the commitment to maintaining compliance with certification standards throughout the entire supply chain, even in outsourced processes.</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.	The list of contracted parties is maintained by the POM in its established stakeholders list. The list contains name of contractors, designated contact persons, contact details (address, phone number, etc.), and type of contracted works done.	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.	No new contractor used for the physical handling of RSPO certified oil palm products by the audited POM since last audit.	Complied
3.8.12	Record keeping	Kemaman POM adheres to the Standard Operating Procedure (SOP) established by TDM to maintain comprehensive records of evidence	Complied

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<ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) 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. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock. 	<p>related to the implementation of RSPO Supply Chain Certification Standard (SCCS). The specific SOP, documented in "RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module," Edition: TDM/TRCBLT/04, Revision: SCCS – 02/2022, dated 01/01/2022, guides the management of traceability records.</p> <p>As outlined in Section 4.0: Control of Documents and Records of the SOP, all traceability records, including FFB Delivery Notes, Weighbridge Tickets, FFB & Truck Daily Summary, Production Reports, CPO & PK Storage Reports, and CPO & PK Delivery Orders, are to be maintained for a minimum period of 5 years. In compliance with relevant legal and regulatory requirements, the mill has retained accounting-related records, including contracts and invoices, for a minimum of seven years, as per the Annual Accounting report and Stock Inventory.</p> <p>The mill processes only FFB from its supply base, with no sources from out-growers or independent suppliers/smallholders. The estimated volume provided by the Unit of Certification (UoC) is included in the Public Summary Report.</p> <p>Traceability has been verified for Production Reports over the past 12 months, demonstrating meticulous record-keeping. Daily and monthly bookkeeping of CPO and PK transactions, including FFB receipt, FFB processed, CPO production, PK production, and balance stocks, is submitted to the Regional Office and Head Office.</p> <p>The two weighbridges at the mill are duly calibrated, and calibration certificates have been verified. As per the SOP, records are archived</p>	
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		<p>and retained for a minimum of 7 years. Monthly summaries of all FFB receipts, production tonnage, and dispatch of CPO and PK are maintained.</p> <p>The mill has established an SCCS Mass Balance sheet document to record and balance all RSPO certified FFB receipts and CPO and PK deliveries in real-time. The mass balance sheet report for the period of October 2022 till September 2023 has been reviewed, and all volumes of certified CPO and PK delivered are accurately deducted from the material accounting system according to the conversion ratios of Oil Extraction Rate (OER) and Kernel Extraction Rate (KER). This comprehensive record-keeping and adherence to SOPs demonstrate the commitment to maintaining the integrity and traceability of RSPO certified products at Kemaman POM.</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Kemaman POM adheres to the Standard Operating Procedure (SOP) established by TDM to maintain records of evidence pertaining to the implementation of the RSPO Supply Chain Certification Standard (SCCS). This SOP is documented in "RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module," Edition: TDM/TRCBLT/04, Revision: SCCS – 02/2022, dated 01/01/2022, specifically under section 15: Conversion factors.</p> <p>The conversion factors for Crude Palm Oil (CPO) and Palm Kernel (PK) production are contingent on the actual Oil Extraction Rate (OER) and Kernel Extraction Rate (KER). These conversion factors are reported daily in the Daily Production Report. The estimated tonnage of CPO and PK for the period from October 2022 to September 2023 was verified, and the figures are reported in the public summary report. This estimate is based on the Fresh Fruit</p>	Complied

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		<p>Bunches (FFB) received and processed by the mill within a 12-month period. The percentage reflects the mill's performance and the quality of the FFB processed during the last 12 months.</p> <p>Deductions and conversion ratios for the volumes of CPO and PK delivered from the Palm Oil Mill have been executed appropriately and recorded. This meticulous approach ensures accurate representation and adherence to RSPO standards, reinforcing TDM's commitment to transparency and compliance in the implementation of the RSPO SCCS.</p>	
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	<p>As per interviewed with Mill Manager, the mill will announce the percentage of OER and KER every day (morning) if there is a process carried out every day. Conversion factor of CPO and PK production is depending on the actual OER and KER. The conversion factors were reported daily in the Daily Production Report.</p> <p>Each month the mill will announce the average rate for OER and KER to the relevant parties. Sighted the summary report prepared by Mill Manager.</p>	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>The management at Kemaman POM has established and documented the RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022 dated 01/01/2022. According to the Glossary section of this SOP, RSPO Identity Preserved is defined as a supply chain model that ensures RSPO certified oil palm products delivered to the end user are uniquely identifiable to a single RSPO certified supply base.</p> <p>For the period from October 2022 to September 2023, Kemaman POM exclusively received and processed Fresh Fruit Bunches (FFB) from the UoC estates, including Pelantoh Estate, Tebak Estate,</p>	Complied

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		<p>Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. Additionally, the mill processed FFB from estates owned by TDM but under different UoC, specifically Sungai Tong POM & Supply Bases (Certificate No. RSPO 595564), which consist of Pinang Emas Estate, Jerangau Estate, Tayor Estate, Jaya Estate, and Fikri Estate.</p> <p>During the audit, which involved site visits and documentation reviews, it was observed that the mill did not receive and process FFB supplied by outgrowers or smallholders. As a result, Kemaman POM is categorized as an Identity Preserved (IP) palm oil mill, in accordance with the RSPO Supply Chain SOP.</p>	
<p>3.8.16</p>	<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>Kemaman POM take legal ownership and physically handle RSPO Certified Sustainable oil palm products (CPO and PK) and registered all transaction in the RSPO IT platform. Declaration time to do shipping announcement is within three-month period after shipment or within the duration agreed by mill’s respective customers/buyers as defined in the SOP under Section 8.4. Kemaman POM has registered in RSPO PalmTrace as follows:</p> <ul style="list-style-type: none"> • License ID: CB142953 (Active) • Member Name: Kemaman Palm Oil Mill • Member ID: RSPO_PO1000001053 • RSPO Membership Number: 1-0095-11-000-00 (TDM Plantation Sdn Bhd) • Type of Business: Oil mill <p>The Marketing Department is responsible for recording all RSPO certified Crude Palm Oil (CPO) and Palm Kernel (PK) transactions in</p>	<p>Non-compliance</p> <p>NCR Ref. No. 2412049-202310-M1</p>

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		<p>the RSPO IT Platform. During the audit, it was verified that all transactions from the mill (CSPO/CSPK) were announced accurately. The volume of RSPO certified products is monitored through the Continuous Accounting System and PalmTrace transactions. Records for transactions made from the Palm Oil Mill (POM) as sold to the next owner are diligently maintained. The audit confirmed that all transactions from the mill (CSPO/CSPK) were announced correctly.</p> <p>Additionally, the company employs the Continuous Accounting System and RSPO PalmTrace Transaction ID to monitor the volume of RSPO certified products. Records for transactions made from the POM as sold to the next owner are systematically managed.</p> <p>Through the downloaded transactions register from the certification unit's PalmTrace, the company demonstrated that it has been accurately registering its transactions in PalmTrace. Details of transactions were summarized in table 11A.</p> <p>Upon reviewing the announcement (transaction) summary, it was found that all registrations were in order, indicating the company's commitment to accurate and transparent reporting of RSPO certified product transactions.</p> <p>For the period under review, there was no sales of CPO or PK under different scheme or as conventional.</p> <p>However, based on samples of PalmTrace transaction, it was found that the SC Model announced for Transaction ID no. TR-07617a3d-0609, dated 08/09/2023 i.e., IP for the sale of 257.75 mt certified palm kernel, was not consistent with the related commercial invoice (#IN000015291, dated</p>	
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		25/08/2023) issued i.e., SG. Thus, a non-conformity report was assigned.	
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>As at to-date, there has been no evidence of any no incorrect or inappropriate claims made at this unit.</p> <p>Relevant information on product claims (including applicable Supply Chain model and certificate number) being correctly indicated in the relevant outgoing paperwork. Verified that the RSPO corporate logo, as well as the trademark logo, are not being used by the mill.</p>	Complied
General corporate communications			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a “non-product related” claim.</p>	<p>TDM Plantation Sdn. Bhd. (TDMP) has highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO via their official website i.e., https://www.tdemberhad.com.my/who-we-are/plantation-division/</p>	Complied
4.2	<p>In corporate communications, a member is allowed to:</p> <ul style="list-style-type: none"> A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member’s history with regard to RSPO E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership 	<p>From the TDM Plantation Sdn. Bhd. (TDMP) official website verified that the statement all is done accordingly the requirement.</p>	Complied
4.3	<p>Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.</p>	<p>Based on desktop review, site visit and documentation review it is verified that the RSPO corporate logo is not use by the UoC.</p>	Complied
4.4	<p>In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.</p>	<p>Based on desktop review, site visit and documentation review it is verified that the no such communication has been made by the UoC.</p>	Complied

<p>4.5</p>	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> • “We have been sourcing RSPO certified palm oil since (YEAR).” • “We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year.” • “We have been RSPO certified since (YEAR).” • “We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil.” • “In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified.” • “Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits.” • “We are RSPO certified. Ask us for our RSPO certified products.” 	<p>Based on desktop review, site visit and documentation review it is verified that the company insert the statement of “In 2013, TDMP became the first plantation in Terengganu and among the few elite companies in Malaysia to achieve 100% RSPO certification”.</p>	<p>Complied</p>
<p>4.6</p>	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <p>i. “The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR).”</p>	<p>Kemaman POM & Supply Bases is under TDM Plantation Sdn Bhd, which holds RSPO Membership Number 1-0095-11-000-00. Therefore, this indicator is Not Applicable.</p>	<p>Complied</p>

	<p>ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.</p> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: "This reported figure is not audited through RSPO Certification".</p>		
Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	TDM Plantation Sdn. Bhd. (TDMP) has highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO via their official website i.e., https://www.tdmberhad.com.my/who-we-are/plantation-division/	Complied
5.1.2	Product-specific communications are voluntary.	Based on desktop review, site visit and documentation review it is verified that no Product-specific communication has been made by the UoC.	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	Based on desktop review, site visit and documentation review it is verified that no Product-specific communication has been made by the UoC.	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	Based on desktop review, site visit and documentation review it is verified that the no use of any other trademark or label to highlight	Complied

		the presence of RSPO certified sustainable palm oil products has been made by the UoC.	
5.1.5	<p>If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below:</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 	Based on the registration at RSPO PalmTrace, the Type of Business of the UoC is Oil Mill. Therefore, this indicator is Not Applicable.	Not Applicable
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain.	Based on the registration at RSPO PalmTrace, the Type of Business of the UoC is Oil Mill. Therefore, this indicator is Not Applicable.	Not Applicable
5.2 Off pack claims			

5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	TDM Plantation Sdn. Bhd. (TDMP) has highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO via their official website i.e., https://www.tdmberhad.com.my/who-we-are/plantation-division/ However, no RSPO Label used at documentation e.g., letterhead, business card, shipping documents, invoices, etc.	Complied
5.2.2	When confirming the sale of certified palm oil 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.	The RSPO Shipping Announcement was done accordingly.	Complied
5.2.3	Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options: <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil 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 products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 	Based on the registration at RSPO PalmTrace, the Type of Business of the UoC is Oil Mill. Therefore, this indicator is Not Applicable.	Complied

5.3 On pack claims

5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	Based on desktop review, site visit and documentation review it is verified that no "On pack claims" has been made by the UoC.	Complied
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <i>*Add RSPO TM Licence Number below or next to the claim.</i> 	Based on desktop review, site visit and documentation review it is verified that no "On pack claims" has been made by the UoC.	Complied
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <i>*Add RSPO TM Licence Number below or next to the claim.</i> 	Based on desktop review, site visit and documentation review it is verified that no "On pack claims" has been made by the UoC.	Complied
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* 	Based on desktop review, site visit and documentation review it is verified that no "On pack claims" has been made by the UoC.	Complied

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	<i>*Add RSPO TM Licence Number below or next to the claim.</i>		
	D) For Products covered with Book and Claim (B&C): <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* <i>*Add RSPO TM Licence Number below or next to the claim.</i>	Based on desktop review, site visit and documentation review it is verified that no "On pack claims" has been made by the UoC.	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	Based on desktop review, site visit and documentation review it is verified that no "On pack claims" has been made by the UoC.	Complied
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	Based on desktop review, site visit and documentation review it is verified that no "On pack claims" has been made by the UoC.	Complied
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	Based on desktop review, site visit and documentation review it is verified that no "On pack claims" has been made by the UoC.	Complied
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	Based on desktop review, site visit and documentation review it is verified that no "On pack claims" has been made by the UoC.	Complied
MODULE A – IDENTITY PRESERVED			
	95% of the palm oil content must be RSPO IP certified.	The management at Kemaman POM has established and documented the RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022 dated 01/01/2022. According to the Glossary section of this SOP, RSPO Identity Preserved is defined as a supply chain model that ensures RSPO certified oil palm products delivered to the end user are uniquely identifiable to a single RSPO certified supply base.	Complied

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		<p>For the period from October 2022 to September 2023, Kemaman POM exclusively received and processed Fresh Fruit Bunches (FFB) from the UoC estates, including Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. Additionally, the mill processed FFB from estates owned by TDM but under different UoC, specifically Sungai Tong POM & Supply Bases (Certificate No. RSPO 595564), which consist of Pinang Emas Estate, Jerangau Estate, Tayor Estate, Jaya Estate, and Fikri Estate.</p> <p>During the audit, which involved site visits and documentation reviews, it was observed that the mill did not receive and process FFB supplied by outgrowers or smallholders. As a result, Kemaman POM is categorized as an Identity Preserved (IP) palm oil mill, in accordance with the RSPO Supply Chain SOP.</p> <p>Therefore, the palm oil content is 100% RSPO IP certified.</p>	
	<p>If 100% of RSPO IP certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>The management at Kemaman POM has established and documented the RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, Edition TDM/TRCBL/04, Rev. SCCS-02/2022 dated 01/01/2022. According to the Glossary section of this SOP, RSPO Identity Preserved is defined as a supply chain model that ensures RSPO certified oil palm products delivered to the end user are uniquely identifiable to a single RSPO certified supply base.</p> <p>For the period from October 2022 to September 2023, Kemaman POM exclusively received and processed Fresh Fruit Bunches (FFB) from the UoC estates, including Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. Additionally, the mill processed FFB from estates owned by TDM but under different UoC, specifically Sungai Tong POM &</p>	<p>Complied</p>

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		<p>Supply Bases (Certificate No. RSPO 595564), which consist of Pinang Emas Estate, Jerangau Estate, Tayor Estate, Jaya Estate, and Fikri Estate.</p> <p>During the audit, which involved site visits and documentation reviews, it was observed that the mill did not receive and process FFB supplied by outgrowers or smallholders. As a result, Kemaman POM is categorized as an Identity Preserved (IP) palm oil mill, in accordance with the RSPO Supply Chain SOP.</p> <p>Therefore, the palm oil content is 100% RSPO IP certified.</p>	
Messaging			
	<p>Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:</p> <ul style="list-style-type: none"> • The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org • RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain. www.rspo.org • Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org 	<p>Based on desktop review, site visit and documentation review it is verified that no Product-specific communication has been made by the UoC.</p>	<p>Complied</p>
Product-Specific Communications Labelling			

	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO Trademark that includes the tag "CERTIFIED"; or • RSPO Trademark that includes the tag "This product contains certified sustainable palm oil". 	<p>Based on desktop review, site visit and documentation review it is verified that no Product-specific communication has been made by the UoC.</p>	<p>Complied</p>
<p>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>TDMP has their Polisi Hak-Hak Asasi Manusia (Human Rights Policy) dated 23/02/2023 approved by the CEO which states their commitment to uphold the Universal Declaration of Human Rights and ILO Core Convention on Labour Standards.</p> <p>The policy was communicated to the stakeholders mainly through stakeholder meetings and workers' routine musters. The last stakeholders meeting was conducted on 24/08/2023</p>	<p>Complied</p>
<p>4.1.2</p>	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>TDMP prohibits any form of violence or harassment in their operation as per the above-mentioned policies. Based on interview with sampled workers and gender committee representatives, there has been no case reported with regards to violence and harassment.</p>	<p>Complied</p>
<p>Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
<p>4.2.1</p>	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>TDMP has developed a Communication Procedure – Carta Aliran Pendendalian Isu Sosial (Stakeholder) (Aduan/Rungutan/Permohonan) / Social issues Flowchart (stakeholders) (Complaint/Application), rev. 2/2017. Based on the procedure, the information/issue reported shall be rectified according to the type of communication, e.g., Prosedur Komunikasi Dengan Pihak Kilang / Ladang, within 28 days & Prosedur Aduan / Rungutan, within 28</p>	<p>Complied</p>

		working days which include the discussion with relevant parties, manager and top management. If further action needs the involvement of the Head Office, then the management will submit the request to Head Office for further approval and shall be rectified within 30 working day.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	To ensure the understanding of all affected and/or illiterate parties, the information is provided in local or language they understand and briefed to the workers during muster and stakeholder meeting. This was confirmed through interview with both internal and external stakeholders.	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	There was no evidence found of any grievances filed by stakeholders since last audit. However, it was noted that the grievance procedure, as reviewed, specifies that complainants should be informed of the status of their complaints at various stages of the dispute resolution process. For instance, within 14 days of receiving a complaint at the estate management level, stakeholders are to be updated on the progress, and the resolution process is expected to be completed within 30 days. The outcome of the resolution process is documented and communicated to the relevant stakeholders.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	Conflict resolution mechanism is addressed in the Communication Procedure – <i>Carta Aliran Pengendalian Isu Sosial (Stakeholder) (Aduan/Rungutan/Permohonan)</i> /Social issues Flowchart (stakeholders) (Complaint/Application), rev. 2/2017. Based in the procedure, mediation is included in the consultation process for resolution which to allow a party to be represented personnel appointed/chosen by the complainant e.g., workers union (NUPW). As for external party, they can choose any person to act as observers, as well as the option of a third-party mediator.	Complied

Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>The mill and estates' management has actively contributed to the well-being of local communities and workers. Notably, the management has facilitated the establishment of recreational facilities, including a football field, community hall, and mosque, for the benefit of local communities. Additionally, the management has made donations to schools, responding to requests for events. The engagement with stakeholders, including local communities and schools, has been evident through consultation processes such as stakeholder meetings and engagements, which involved visits and informal sessions like "teh-tarik" gatherings. Further, interviews with representatives from schools have confirmed that the management has provided assistance, both in terms of donations and workforce, for various repairs and upkeep initiatives. These contributions and engagement activities demonstrate the management's commitment to fostering positive relationships and enhancing the quality of life in the local communities and among workers.</p>	Complied
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The original copies are maintained by the Head office in Kuala Terengganu, Malaysia. The legal use of the land is confirmed to be for the cultivation of oil palms and agricultural use.</p> <p>There were no recorded or known disputes over the ownership of the land. No changes to the land ownership or new land acquisition since the last assessment. The sampled land titles provide evidence of land leases for various estates. Below are details for the Pelantoh, Air Putih, MAIDAM, and Ladang Tebak estates:</p>	Complied

		<p><u>Pelantoh Estate:</u></p> <ol style="list-style-type: none"> 1. Title No. QT(R) Kemaman 11; Area: 3,439.831 Ha.; Years of Ownership/Used: 05/10/1967. mill in this area = 54 acres @ 21.94 hectares 2. Title No. 12509; Area: 35.450 Ha.; Years of Ownership/Used: 27/07/1975. 3. Title No. 12618; Area: 68.712 Ha.; Years of Ownership/Used: 06/01/1975. 4. Title No. 12497; Area: 88.580 Ha.; Years of Ownership/Used: 07/12/1975. 5. Title No. 12512; Area: 73.488 Ha.; Years of Ownership/Used: 27/07/1975. 6. Title No. 12510; Area: 82.277 Ha.; Years of Ownership/Used: 07/12/1975. 7. Title No. 12499; Area: 0.232 Ha.; Years of Ownership/Used: 07/12/1975. 8. Title No. 3380; Area: 11.440 Ha.; Years of Ownership/Used: 24/06/1976. <p><u>Air Putih Estate:</u></p> <p>Total 14 land titles, sampled:</p> <ol style="list-style-type: none"> 1. Title No. 9194; Area: 129.4995 Ha.; Years of Ownership/Used: 24 March 1966. 2. Title No. 9196; Area: 414.3984 Ha.; Years of Ownership/Used: 24 March 1966. 3. Title No. 9195; Area: 984.1963 Ha.; Years of Ownership/Used: 24 March 1966. 4. Title No. 9197; Area: 1,916.5928 Ha.; Years of Ownership: 24 March 1966. 	
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		<p><i>*Several other titles with specific areas and lease agreements for Air Putih Estate were also listed.*</i></p> <p><u>MAIDAM Estate:</u> Memorandum of Agreement between TDM Berhad and MAIDAM Terengganu dated 10 March 1997. Total 17 land titles (sampled, including PT 934, PT 935, PT 970, PT 1083, and PT 1097, each with specific areas and lease agreements).</p> <p><u>Ladang Tebak:</u> (1) Title No. 18274; Area: 218.2 Ha. (2) Title No. 1779; Area: 3,681.10Ha. (3) Title No. 2872; Area:198.191 Ha.</p> <p><i>Note: The provided information is a summary.</i></p>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There has been no dispute on the land rights in this UoC. As such, the process of fair compensation and FPIC is currently not required to be applied.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	There has been no dispute on the land rights in this UoC. As such, the process of fair compensation and FPIC is currently not required to be applied.	Complied

4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	There has been no dispute on the land rights in this UoC. As such, the process of fair compensation and FPIC is currently not required to be applied.	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 dispute on the land rights in this UoC. As such, the process of fair compensation and FPIC is currently not required to be applied.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There has been no dispute on the land rights in this UoC. As such, the process of fair compensation and FPIC is currently not required to be applied.	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 dispute on the land rights in this UoC. As such, the process of fair compensation and FPIC is currently not required to be applied.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	Based on documentation review, observations made and interview with management, there is no evidence of any land conflicts, or claims for legal or customary rights against the Kemaman POM & Supply Bases. Therefore, this Indicator about communities being represented by parties of their own choosing is not applicable.	Complied

4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>Based on documentation review, observations made and interview with management, there is no evidence of any land conflicts, or claims for legal or customary rights against Kemaman POM & Supply Bases.</p> <p>Therefore, this Indicator about agreements negotiated through FPIC is not applicable.</p>	Complied
<p>Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Kemaman POM & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights. It was evident that the land was legally purchased/leased. Therefore, community representation through institutions of their own choosing cannot be assessed.</p>	Complied
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Kemaman POM & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights. Therefore, FPIC is not necessary to be assessed.</p>	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and</p>	<p>Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within</p>	Complied

	<p>associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>the Kemaman POM & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights. Therefore, FPIC is not necessary to be assessed.</p>	
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Kemaman POM & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights. Therefore, FPIC is not necessary to be assessed.</p>	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Kemaman POM & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights. Therefore, FPIC is not necessary to be assessed.</p>	Complied
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>Based on observations, documentation review and interview with management, local communities, and neighbouring stakeholders, it was verified that there is no occurrence of any new planting within the Kemaman POM & Supply Bases. The existing estates are not encumbered by any legal, customary and user rights. Therefore, FPIC is not necessary to be assessed.</p>	Complied
4.5.7	<p>New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.</p>	<p>There is no evidence of any land acquired for plantations or mill after 15 November 2018 within Kemaman POM & Supply Bases.</p>	Complied

	- Minor compliance -		
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	There is no evidence of any new lands acquired in areas inhabited by communities in voluntary isolation.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Addressed in the "Flowchart and Procedures On Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOPESTATE/01, Rev. SOP ESTATES/REV 00, effective date: 01.01.2017; that states the process of resolving land dispute issues. The objective of the procedure is to ensure the land dispute is resolved in participatory way and timely manner. Among the examples of disputes are disputes over land boundaries, conflicts with land-owners and land ownerships. Verification process of conflict will be carried out and affected stakeholders need to be informed. Compensation and negotiation process will be carried out as per the mutual agreement of both parties. This process disseminated to the external stakeholders through stakeholder meeting.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	Addressed in the "Flowchart and Procedures on Handling Land Disputes", Version 1, year 2013, Issue 1, date:02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOPESTATE/01, Rev. SOP ESTATES/REV 00, effective date: 01.01.2017.	Complied

4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	There is a guidance procedure for "Flowchart and Procedures on Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOPESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	The process is explained under "Flowchart and Procedures on Handling Land Disputes", Version 1, year 2013, Issue 1, date: 02.01.2013, Appendix 3 & procedure Doc. No.: TDMP/SOPESTATE/01, Rev. SOP ESTATES/REV 00, Eff date: 01.01.2017	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	The UoC is adopting the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation, and complaints from stakeholders as well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well.	Complied

Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	The UoC is adopting the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation, and complaints from stakeholders as well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Based on desktop studies prior to the audit, documentation review, observations made, and interviews held with external stakeholders, local communities, and management team, it was verified that the Kemaman POM & Supply Bases are not subjected to any legal, customary and user rights. There is no land conflict exist at the time of 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 -	Based on desktop studies prior to the audit, documentation review, observations made, and interviews held with external stakeholders, local communities, and management team, it was verified that the Kemaman POM & Supply Bases are not subjected to any legal, customary and user rights. There is no evidence of any acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations.	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 -	Based on desktop studies prior to the audit, documentation review, observations made, and interviews held with external stakeholders, local communities, and management team, it was verified that the Kemaman POM & Supply Bases are not subjected to any legal, customary and user rights. There is no evidence of any acquisition	Complied

		through dispossession or forced abandonment of customary and user rights prior to the current operations.	
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Kemaman POM is an Identity Preserved (IP) Mill as confirmed by Certificate No. RSPO 587626 (valid from 01/11/2018 – 31/10/2023). The POM only processed RSPO-certified FFB from six (6) estates of the Kemaman POM & Supply Bases i.e., Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. It was verified that there were no sources of uncertified FFB from any outgrowers or independent suppliers/smallholders. Therefore, this indicator is not applicable.	Not Applicable
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	Kemaman POM is an Identity Preserved (IP) Mill as confirmed by Certificate No. RSPO 587626 (valid from 01/11/2018 – 31/10/2023). The POM only processed RSPO-certified FFB from six (6) estates of the Kemaman POM & Supply Bases i.e., Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. It was verified that there were no sources of uncertified FFB from any outgrowers or independent suppliers/smallholders. Therefore, this indicator is not applicable.	Not Applicable
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Kemaman POM is an Identity Preserved (IP) Mill as confirmed by Certificate No. RSPO 587626 (valid from 01/11/2018 – 31/10/2023). The POM only processed RSPO-certified FFB from six (6) estates of the Kemaman POM & Supply Bases i.e., Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. It was verified that there were no sources of	Not Applicable

		uncertified FFB from any outgrowers or independent suppliers/smallholders. Therefore, this indicator is not applicable.	
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>Kemaman POM is an Identity Preserved (IP) Mill as confirmed by Certificate No. RSPO 587626 (valid from 01/11/2018 – 31/10/2023). The POM only processed RSPO-certified FFB from six (6) estates of the Kemaman POM & Supply Bases i.e., Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. It was verified that there were no sources of uncertified FFB from any outgrowers or independent suppliers/smallholders. Therefore, this indicator is not applicable.</p>	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>There are no smallholders supplying FFB to Kemaman POM.</p> <p>However, evidence is available that Syarimo POM & Estates Grouping deal fairly and transparently with its contractors. Based on contracts sampled and reviewed during this audit, evidence was available that all contracts are fair, legal, and transparent and have an agreed timeframe. Among others, the contracts detail out clearly the purpose of the contract, rights and obligations of both parties, contract amount and payment terms, specific timeframe, and mutual termination clause. Among the sampled contracts were:</p> <ul style="list-style-type: none"> • Maliaray Holidays Sdn Bhd (school bus service provider) with Pelantoh Estate • Kejuruteraan Prisma (mill activities works) with Kemaman POM • Fa Sama Trading (mill activities works) with Kemaman POM • Sutera Adela Sdn Bhd (CPO Transporter) with Kemaman POM • Sidhu Brothers Transport Sdn Bhd (CPO Transporter) with Kemaman POM 	Complied

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		<ul style="list-style-type: none"> • JPG Jentera Sdn Bhd (Badang rental for FFB in-filed collection) with Air Putih Estate • WJ Paya Enterpri (machineries rental for FFB transport) with Air Putih Estate • Tebak Estate • Wan OS Enterprise (road grading works) with Tebak Estate • Koperasi Ladang Kelapa Sawit Kemaman Terengganu Berhad (excavator rental for drainage works) with Tebak Estate • Sesak Maju Enterprise (backhoe rental) with Tebak Estate 	
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>There are no smallholders supplying FFB to Syarimo POM. However, evidence is available that IOI Syarimo Grouping made agreed payments in timely manner. Contracts signed with contractors mentioned that payments would be made within 30 days upon receiving original invoice. The demonstration that agreed payment were made in timely manner was confirmed during interview the stakeholder’s consultation, e.g., Sutera Adela Sdn Bhd. In addition, evidence was available that agreed payments were made in a timely manner accompanied by purchase orders, invoices, and payment vouchers.</p> <p>While examining the evidence of payment for one of the contractor companies appointed by the Kemaman POM management to provide manpower, materials, equipment, and execute the replacement of the deteriorated C channel with a new one for the hot water tank platform measuring 20 ft x 6 ft (as specified in <i>Surat Perintah Kerja</i> No. P/C05/150/2023 dated 01/08/2023), it was noted that Invoice No. F 00411, dated 30/08/2023, which the mill</p>	Non-compliance

		<p>management received on 05/09/2023, remains unpaid. Furthermore, the contract signed by both parties does not specify the agreed-upon payment terms. This absence of clear payment terms creates challenges for the contractor in demonstrating that any potential delay in payment is not due to their own actions. Thus, a Major NC has been raised against this indicator.</p>	
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -</p>	<p>Verified that there are two (2) weighbridges available at the Kemaman POM, and none (0) weighbridge available at all estate in this UoC. Each of the weighbridges has been calibrated on annual basis by weighing and measuring equipment verification service provider which was appointed by the Federal Government of Malaysia through Ministry of Domestic Trade and Consumer Affairs (KPDNHEP) under Akta Timbang dan Sukat 1972. Evident the Borang D and Calibration Report for each of the weighbridges during the audit:</p> <p>(1) Calibration Report No.: CA 036544 Calibration Date: 22/06/2023 Calibration Certificate No.: B1955697 Acceptance Limit: 60,000 KG</p> <p>(2) Calibration Report No.: CA 036545 Calibration Date: 13/03/2023 Calibration Certificate No.: B1955531 Acceptance Limit: 80,000 KG</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</p>	<p>Kemaman POM is an Identity Preserved (IP) Mill as confirmed by Certificate No. RSPO 587626 (valid from 01/11/2018 – 31/10/2023). The POM only processed RSPO-certified FFB from six (6) estates of the Kemaman POM & Supply Bases i.e., Pelantoh Estate, Tebak</p>	Not Applicable

	control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. It was verified that there were no sources of uncertified FFB from any outgrowers or independent suppliers/smallholders. Therefore, this indicator is not applicable.	
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Kemaman POM is an Identity Preserved (IP) Mill as confirmed by Certificate No. RSPO 587626 (valid from 01/11/2018 – 31/10/2023). The POM only processed RSPO-certified FFB from six (6) estates of the Kemaman POM & Supply Bases i.e., Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. It was verified that there were no sources of uncertified FFB from any outgrowers or independent suppliers/smallholders. Therefore, this indicator is not applicable.	Not Applicable
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Kemaman POM is an Identity Preserved (IP) Mill as confirmed by Certificate No. RSPO 587626 (valid from 01/11/2018 – 31/10/2023). The POM only processed RSPO-certified FFB from six (6) estates of the Kemaman POM & Supply Bases i.e., Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. It was verified that there were no sources of uncertified FFB from any outgrowers or independent suppliers/smallholders. Therefore, this indicator is not applicable.	Not Applicable
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	Kemaman POM is an Identity Preserved (IP) Mill as confirmed by Certificate No. RSPO 587626 (valid from 01/11/2018 – 31/10/2023). The POM only processed RSPO-certified FFB from six (6) estates of the Kemaman POM & Supply Bases i.e., Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. It was verified that there were no sources of	Not Applicable

		uncertified FFB from any outgrowers or independent suppliers/smallholders. Therefore, this indicator is not applicable.	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Kemaman POM is an Identity Preserved (IP) Mill as confirmed by Certificate No. RSPO 587626 (valid from 01/11/2018 – 31/10/2023). The POM only processed RSPO-certified FFB from six (6) estates of the Kemaman POM & Supply Bases i.e., Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. It was verified that there were no sources of uncertified FFB from any outgrowers or independent suppliers/smallholders. Therefore, this indicator is not applicable.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Kemaman POM is an Identity Preserved (IP) Mill as confirmed by Certificate No. RSPO 587626 (valid from 01/11/2018 – 31/10/2023). The POM only processed RSPO-certified FFB from six (6) estates of the Kemaman POM & Supply Bases i.e., Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. It was verified that there were no sources of uncertified FFB from any outgrowers or independent suppliers/smallholders. Therefore, this indicator is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Kemaman POM is an Identity Preserved (IP) Mill as confirmed by Certificate No. RSPO 587626 (valid from 01/11/2018 – 31/10/2023). The POM only processed RSPO-certified FFB from six (6) estates of the Kemaman POM & Supply Bases i.e., Pelantoh Estate, Tebak Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, and MAIDAM Estate. It was verified that there were no sources of uncertified FFB from any outgrowers or independent suppliers/smallholders. Therefore, this indicator is not applicable.	Not Applicable
Principle 6: Respect workers' rights and conditions			

Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>TDMP has revised the new Human Rights Policy/Polisi Hak Hak Asasi Manusia and Social Policy/Polisi Sosial dated 23/02/2023 since the company decided to use their new logo. Nonetheless, the content and the undersigned remain unchanged. These policies stated the management commitment to treat everyone equally without any discrimination and provide equal opportunities regardless of race, nationality, gender, etc. Interview with workers confirmed that there has been no discrimination practiced by the management.</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Based on review of employment contracts, interviews with workers and stakeholders, the certification unit is able to demonstrate that there is no form of discrimination involving workers and local communities. Its guest workers too are not discriminated against and receive the same remuneration rate and access to amenities as local workers.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>TDMP has their Foreign Workers Policy dated 23/02/2023 assures that recruitment, promotion and remuneration individual qualifications and performance are based on interview with workers as spelt out in the MAPA/NUPW agreement. Based on interview of sampled workers and documentation review which included job application forms, interview notes, and medical fitness confirmation, the certification unit has demonstrated that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities, and medical fitness.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>Based on interviews with workers, Estate Health Assistant and review of documentations, no female workers are employed in manuring nor spraying activities. Pregnancy testing will be carried out once in 3 months (only with their consent) for female workers. As confirmed</p>	Complied

	- Minor compliance -	by the Estate Health Assistant, should a field female worker become pregnant, she would immediately be offered an alternative lighter work and chemical related works are prohibited. A medical removal protection (MRP) as per NADOOPOD Regulation 2004 will be initiated.	
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Gender committee is in place and available at each operating unit. Dates of latest meeting are as follows:</p> <ul style="list-style-type: none"> • Kemaman POM: 10/09/2023 • Pelantoh Estate: 03/09/2023 • Air Putih Estate: 13/09/2023 • MAIDAM Estate: 14/09/2023 • Tebak Estate: 12/09/2023 <p>There were issues reported related sexual harassment, domestic violence as well as reproductive rights. No reported case of harassment and violence so far.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>There is no evidence of discrimination based on religion, gender, nationality, etc. during recruitment of workers. The recruitment process is based on skills, capabilities, medical fitness necessary, etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting. Based on verification of salary as per indicator 6.2.2 for both male and female workers (same work scope – mandore, field/general workers), equal pay was evident in term of wage and allowance as per MAPA/NUPW collective agreement version 2019.</p>	Complied
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			

<p>6.2.1</p>	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>The details pertaining to applicable labor laws, specifically the relevant provisions of the Employment Act 1955 and the MAPA/NUPW agreement, encompassing aspects such as wages, rest days, workdays, working hours, overtime, annual leave, and medical leave, are delineated in employment contracts executed between the company and each individual worker.</p> <p>Documentation of remuneration is encapsulated within payslips issued to workers on a monthly basis. Each payslip meticulously includes particulars such as the worker's name, the month of payment, total monthly wages, overtime pay, compensation for public holidays, remuneration for medical leave (if applicable), performance bonuses, SGP, overtime compensation, paid annual leave, statutory deductions such as SOCSO (applicable to all workers), EIS, and EPF (relevant to Malaysian workers exclusively), as well as any other deductions deemed necessary.</p> <p>Both employment contracts and payslips are formulated in languages familiar to the workers, predominantly in Bahasa Malaysia. The contents are elucidated to the workers by estate management, with the assistance of a translator/NUPW representative if required.</p> <p>During the audit, a scrutiny of the following employment contracts and payslips for the specified months (November 2022 [peak], June 2023 [normal], July 2023 [low]) was conducted and validated:</p> <ul style="list-style-type: none"> • PT1501040; Joined date: 07/01/2016 • PT2303607; Joined date: 09/03/2023 • PT1400917; Joined date: 26/08/2014 • PT1100695; Joined date: 14/12/2011 • PT1701155; Joined date: 29/01/2018 • PT1400875; Joined date: 09/05/2014 	<p>Complied</p>
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		<ul style="list-style-type: none"> • PT2303566; Joined date: 30/01/2023 • PT2303579; Joined date: 06/02/2023 • PT2303613; Joined date: 06/03/2023 • PT00034; Joined date: 01/01/1998 • PT00174; Joined date: 20/01/1993 • PT0800339; Joined date: 15/11/2008 • PT1701115; Joined date: 01/03/2017 • PT1701284; Joined date: 01/12/2017 • MA000006; joined date: 11/08/2007 • MA1600380; joined date: 01/05/2016 <p>Based on the reviewed of the aforementioned sample workers, it is evident that the average daily wage at the ordinary rate of pay surpasses the stipulated Minimum Wages Order 2022 of RM 57.69 per day. Furthermore, the correct deductions in accordance with the law (SOCSO, EPF, EIS) are diligently executed and reflected in the respective payslips. Additionally, the examination of the sample data indicates that the total overtime hours have not exceeded the permissible limit of 104 hours.</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>The details pertaining to applicable labor laws, specifically the relevant provisions of the Employment Act 1955 and the MAPA/NUPW agreement, encompassing aspects such as wages, rest days, workdays, working hours, overtime, annual leave, and medical leave, are delineated in employment contracts executed between the company and each individual worker.</p> <p>Documentation of remuneration is encapsulated within payslips issued to workers on a monthly basis. Each payslip meticulously</p>	Complied

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		<p>includes particulars such as the worker's name, the month of payment, total monthly wages, overtime pay, compensation for public holidays, remuneration for medical leave (if applicable), performance bonuses, SGP, overtime compensation, paid annual leave, statutory deductions such as SOCSO (applicable to all workers), EIS, and EPF (relevant to Malaysian workers exclusively), as well as any other deductions deemed necessary.</p> <p>Both employment contracts and payslips are formulated in languages familiar to the workers, predominantly in Bahasa Malaysia. The contents are elucidated to the workers by estate management, with the assistance of a translator/NUPW representative if required.</p> <p>During the audit, a scrutiny of the following employment contracts and payslips for the specified months (November 2022 [peak], June 2023 [normal], July 2023 [low]) was conducted and validated:</p> <ul style="list-style-type: none"> • PT1501040; Joined date: 07/01/2016 • PT2303607; Joined date: 09/03/2023 • PT1400917; Joined date: 26/08/2014 • PT1100695; Joined date: 14/12/2011 • PT1701155; Joined date: 29/01/2018 • PT1400875; Joined date: 09/05/2014 • PT2303566; Joined date: 30/01/2023 • PT2303579; Joined date: 06/02/2023 • PT2303613; Joined date: 06/03/2023 • PT00034; Joined date: 01/01/1998 • PT00174; Joined date: 20/01/1993 • PT0800339; Joined date: 15/11/2008 • PT1701115; Joined date: 01/03/2017 	
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		<ul style="list-style-type: none"> • PT1701284; Joined date: 01/12/2017 • MA000006; joined date: 11/08/2007 • MA1600380; joined date: 01/05/2016 <p>Based on the reviewed of the aforementioned sample workers, it is evident that the average daily wage at the ordinary rate of pay surpasses the stipulated Minimum Wages Order 2022 of RM 57.69 per day. Furthermore, the correct deductions in accordance with the law (SOCSSO, EPF, EIS) are diligently executed and reflected in the respective payslips. Additionally, the examination of the sample data indicates that the total overtime hours have not exceeded the permissible limit of 104 hours.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Kemaman Palm Oil Mill (POM) and its associated estates have effectively demonstrated adherence to legal requirements in various key areas:</p> <p>Regular Working Hours: Employees interviewed affirmed that they adhere to a six-day workweek, with Friday designated as the rest day. The standard working hours are established at 8 hours per day, a condition explicitly outlined in the employment contracts.</p> <p>Deductions: Compliance with the Labor Department's regulations on salary deductions is evident, as reflected in document JTK(T) 600.2.2.3 JLD.2(8) dated 5/9/19. It is noteworthy that salary deductions are contingent upon the explicit consent of the workers, as stipulated by the permit.</p> <p>Overtime, Sickness, and Holiday Entitlement: The availability of evidence, including overtime records, payslips, and worker interviews, attests to the meticulous observance of overtime payment</p>	Non-compliance

		<p>standards in accordance with both the Employment Act 1955 and the MAPA/NUPW 2019 Agreement. For Kemaman POM specifically, the approved maximum limit for overtime hours stands at 130, as substantiated by the authorization dated 22/12/21, reference: BHG.PU/9/134 JLD 44 (20).</p> <p>Maternity Leave: Female workers are entitled to a paid maternity leave period of two months, a fact that was corroborated during interviews with the Secretary of the Gender Committee. This highlights the commitment to providing adequate support for female employees during maternity.</p> <p>Based on verification of sampled pay slips at Air Putih Estate, it was found that the price bonus was not taken into account in paying the overtime for a worker (Emp. No. AP2201564) for the month of January 2023. Thus, a non-conformity report was assigned due to this lapse.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Kemaman POM and audited estates exhibit commendable standards in providing housing facilities, sanitation, medical services, and welfare amenities for their workforce. On-site visits were conducted to assess the condition of workers' housing, revealing an overall well-maintained environment characterized by cleanliness, properly managed drains, absence of overgrown vegetation, and effective household waste disposal practices.</p> <p>The housing units, each comprising two rooms, are maintained in a habitable condition, contributing to the overall well-being of the residents. Notably, the provision of free water up to 35 gallons per day and subsidized electricity at RM 5 per house per month further</p>	Complied

		<p>underscores the commitment to enhancing the living conditions of the workforce.</p> <p>The estates boast various amenities for the benefit of residents, including a crèche, surau, football field, sundry shop, canteen, and a clinic. The clinic, managed by an Estate Health Assistant and equipped with an ambulance, plays a pivotal role in ensuring the health and welfare of the residents. A visiting medical officer conducts regular fortnightly visits, as documented in the records.</p> <p>Weekly line site inspections are diligently carried out by the Estate Hospital Assistant, maintaining a consistent schedule across the different locations. The following is a summary of the weekly inspections for each estate:</p> <ul style="list-style-type: none"> • Kemaman POM: 07/09/2023; 14/09/2023; 21/09/2023; 28/09/2023 • Pelantoh Estate: 04/09/2023; 11/09/2023; 18/09/2023; 23/09/2023 • Air Putih Estate: 06/09/2023; 13/09/2023; 20/09/2023; 27/09/2023 • MAIDAM Estate: 05/09/2023; 12/09/2023; 19/09/2023; 24/09/2023 • Tebak Estate: 03/09/2023; 10/09/2023; 17/09/2023; 22/09/2023 	
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>Kemaman POM and audited estates effectively showcased the provision of workers' access to ample, satisfactory, and reasonably priced food resources. Notably, the vicinity is equipped with a sundry shop and a food canteen located in proximity to the linesite.</p>	Complied

		<p>The sundry shop plays a pivotal role in offering a diverse range of daily necessities, including vegetables, rice, flour, eggs, sugar, milk, cooking oil, frozen food, beverages, toiletries, and other essential items. This comprehensive inventory ensures that the workers have convenient access to a variety of food products and household essentials, contributing to the overall adequacy and affordability of their sustenance.</p>	
<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of</p>	<p>Prevailing wages and in-kind benefits assessment conducted by Unit of Certification (UoC). As for 2020, a baseline/pilot project for the assessment was carried out at one sample estate (Air Putih Estate).</p> <p>In-kind benefit: RM 957 Take home salary: RM 1,200 Total: RM2,157</p> <p>Progressively, prevailing wages calculation will be extended to each operating units to set a benchmark value for reference.</p>	<p>Complied</p>

	<p>each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage). The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
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>Based on documents sighted and interviews conducted with workers and management, Kemaman POM and estates only employ full-time employees. All core work (e.g harvesting, FFB evacuation and mill processing) performed by full-time and permanent (directly employed by TDMP) and contractor's workers. No casual, temporary and day labour workers employed for all core work in the estate and mill.</p>	Complied

<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>A publicly available statement in the local language acknowledges the implementation of a Freedom of Association policy, as documented in the 'Freedom of Association Policy/<i>Polisi Kebebasan Berpersatuan</i>' dated 01/01/2022. Workers, upon being interviewed, have affirmed that they encounter no restrictions in their rights to join or form trade unions.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>In the case of the selected estates, it has been observed that there is an absence of on-site union representatives. Instead, all matters related to union affairs are managed and addressed by the NUPW Terengganu Branch Secretary.</p> <p>Workers have confirmed, through interviews, that the NUPW Terengganu Branch Secretary has actively engaged with them on multiple occasions to gather feedback and insights. This demonstrates a concerted effort to ensure that the concerns and opinions of the workers are heard and considered.</p> <p>Additionally, meetings between the union representatives and the management have taken place at the respective estates on the following dates:</p> <ul style="list-style-type: none"> • Kemaman POM: 14/08/2023 • Pelantoh Estate: 11/02/2023 • Air Putih Estate: 21/06/2023 	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely</p>	<p>As verified through interviews with the workers, it has been established that all worker representatives were democratically</p>	Complied

	<p>elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>elected by their peers. The selection process involved the workers themselves, ensuring a free and unbiased election. The representatives, reflective of the diverse workforce, comprise individuals of various nationalities.</p> <p>The selection criteria for these representatives were based on multiple factors, including experience, communication skills, and the number of years worked. This approach ensures that the elected representatives possess the necessary qualifications and capabilities to effectively represent the interests and concerns of the workforce.</p>	
<p>Criterion 6.4: Children are not employed or exploited.</p>			
<p>6.4.1</p>	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>The Unit of Certification (UoC) has implemented and adopted two key policies, namely the Social Policy/Polisi Sosial and Protection of Children Policy/Polisi Perlindungan Kanak-Kanak, both effective from 23-Feb-2023. These policies have been developed by TDM Plantation Sdn Bhd. The stated commitment within these policies underscores the company's stance against the exploitation, utilization, and recruitment of child labor, particularly individuals under the age of 16.</p> <p>A comprehensive review of documents, interviews with workers, and consultations with stakeholders have collectively affirmed that there is no historical evidence of child labor being employed within the company. The diligent implementation of the policies has effectively safeguarded against any instances of child labor.</p> <p>Furthermore, it has been substantiated that the youngest workers engaged by the company are at least 18 years old.</p> <p>However, the management has not established any</p>	<p>Non-compliance</p>

		remediation measures in the event of child exploitation cases, even in situations where such exploitation is not explicitly covered in contracts signed with contractors or service providers. Thus, a Minor NC has been raised against this indicator.	
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The assurance that Kemaman Palm Oil Mill (POM) and its associated estates do not employ individuals below the age of 18 years is supported by rigorous verification processes and documentation. The examination of master lists for each operating unit serves as a comprehensive means of verifying the age of all employees.</p> <p>A well-documented age screening verification procedure is in place, wherein details from workers' passports and identity cards, including dates of birth, undergo thorough review and verification before the issuance of employment contracts. This procedure adds an additional layer of scrutiny to ensure compliance with legal age requirements.</p> <p>During the audit, a sampling and verification process was conducted on copies of identity cards and passports. This provided tangible evidence that the age screening verification procedure is effectively implemented. Interviews with both workers and staff, along with field observations, further confirmed that only individuals above the age of 18 are employed within Kemaman POM and estates.</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>The comprehensive assessment conducted, based on documents reviewed, interviews, and field observations, has yielded no evidence indicating the employment of any young persons at Kemaman Palm Oil Mill (POM) and its associated estates. This finding is substantiated by a thorough examination of the master lists for each operating unit, where crucial details such as workers' identity card (IC) numbers and dates of birth are meticulously recorded.</p>	Complied

		In addition to the documentary evidence, interviews with both workers and staff, coupled with firsthand observations during field visits, consistently affirm that the company adheres strictly to a policy of employing only individuals who are above 18 years old. This comprehensive approach, spanning documentation, interviews, and on-site observations, underscores the commitment of Kemaman POM and estates to comply with legal age requirements and ethical employment practices.	
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	<p>The Unit of Certification (UoC) has implemented and adopted two key policies, namely the Social Policy/Polisi Sosial and Protection of Children Policy/Polisi Perlindungan Kanak-Kanak, both effective from 23-Feb-2023. These policies have been developed by TDM Plantation Sdn Bhd. The stated commitment within these policies underscores the company's stance against the exploitation, utilization, and recruitment of child labor, particularly individuals under the age of 16.</p> <p>A comprehensive review of documents, interviews with workers, and consultations with stakeholders have collectively affirmed that there is no historical evidence of child labor being employed within the company. The diligent implementation of the policies has effectively safeguarded against any instances of child labor.</p> <p>Furthermore, it has been substantiated that the youngest workers engaged by the company are at least 18 years old.</p>	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	TDM Plantation Sdn Bhd has undertaken the development and implementation of a Gender Policy to underscore its commitment to safeguarding the rights of workers, with a particular focus on the	Complied

	<p>- Critical (Major) compliance -</p>	<p>protection of female employees. The latest iteration of this policy, dated 23-Feb-2023, has been formally endorsed by the company's new CEO. This policy explicitly outlines the company's dedication to upholding the rights of female workers and asserts that immediate action will be taken in the event of any reported cases of sexual harassment.</p> <p>Furthermore, the commitment to gender-related initiatives is underscored by the company's proactive approach to training. Attendance records from muster ground roll calls have been documented for the following units:</p> <ul style="list-style-type: none"> • Kemaman POM: 15/03/2023 • Pelantoh Estate: 17/05/2023 • Air Putih Estate: 23/08/2023 • MAIDAM Estate: 19/06/2023 • Tebak Estate: 27/07/2023 <p>The emphasis on training aligns with the broader commitment to fostering a workplace culture that actively promotes gender equality and safeguards the well-being of all employees.</p>	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The establishment of a Reproductive Rights Policy, along with the existing Social Policy, has been enacted within TDM Plantation Sdn Bhd. This policy, signed by the CEO and dated February 23, 2023, reflects the company's unwavering commitment to respecting and upholding the reproductive rights of its workers. The policy explicitly outlines the company's stance against interference in the reproductive planning of its workforce. It emphasizes the rights of workers to make decisions in this regard and underscores the</p>	Complied

		<p>company's commitment to avoiding discrimination and harsh treatment of workers based on their reproductive choices.</p> <p>To reinforce awareness and understanding of this policy, the company has conducted training sessions as evidenced by attendance records from muster ground roll calls at various units:</p> <ul style="list-style-type: none"> • Kemaman POM: 15/03/2023 • Pelantoh Estate: 17/05/2023 • Air Putih Estate: 23/08/2023 • MAIDAM Estate: 19/06/2023 • Tebak Estate: 27/07/2023 <p>This approach aligns with broader principles of promoting a workplace culture that respects individual rights and fosters a supportive and inclusive environment for all employees.</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>In August 2023, an assessment for the needs of new mothers was conducted through a Google Form named "<i>Kaji Selidik Ibu Mengandung & Menyusu</i>" targeting female workers in both the estate and mill. This proactive measure allows the company to gather valuable insights into the specific requirements and concerns of pregnant and lactating employees. Recommendations and any necessary follow-up actions resulting from the assessment will be incorporated into the Social Impact Assessment (SIA) management plan.</p> <p>As of the last audit, there were no new mothers identified at each of the visited operating units.</p>	Complied

6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The establishment of the "<i>Tatacara Aduan Gangguan Seksual</i>" or the Complaint Process for Sexual Harassment is a vital component of TDM Plantation Sdn Bhd's commitment to maintaining a safe and respectful workplace environment. The process outlines a clear procedure for reporting any cases or suspicious incidents of sexual harassment promptly.</p> <p>As per the outlined process, individuals are encouraged to report cases or suspicions of sexual harassment within 24 hours. Subsequently, investigations are to be conducted within 2 days, and the findings are to be reported for necessary action within 5 days. This swift and systematic approach demonstrates the company's dedication to addressing and resolving such issues in a timely manner.</p> <p>In stakeholder consultations, gender and workers committee interviews, as well as individual gender committee chairperson interviews, it has been consistently affirmed that no cases of sexual harassment have been reported.</p>	Complied
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime 	<p>The documentation review and interviews conducted with workers at Kemaman POM and audited estates have affirmed the voluntary nature of employment for individuals of various nationalities. Workers have willingly entered into employment agreements, and this commitment is substantiated by the presence of consent letters from the workers.</p> <p>The company demonstrates a commitment to fair employment practices, as evidenced by the absence of recruitment fees charged</p>	Complied

	<ul style="list-style-type: none"> • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>to foreign workers. The contractual agreement between TDM Plantation Sdn Bhd and PT Primadaya Pratama Pandukarya, dated 02/02/2020, explicitly outlines that any recruitment fees are to be borne by the company.</p> <p>Furthermore, workers are adequately informed about the nature of their job responsibilities at the estate or mill before leaving their home countries. The voluntary nature of overtime work is emphasized, and workers have the autonomy to decline offers for overtime work. The company adheres to the Employment Act 1955 by paying overtime rates for voluntary additional work.</p> <p>Workers maintain the freedom to resign at any time without incurring penalties. There is no evidence of wage withholding, highlighting the company's commitment to fair and ethical employment practices. This comprehensive approach underscores the company's dedication to creating a work environment that respects workers' rights, fosters transparency, and upholds fair labor standards.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The presence of the Foreign Worker Policy (<i>Polisi Pekerja Asing</i>), signed by the Chief Executive Officer and dated 23-Feb-2023, underscores TDM Plantation Sdn Bhd's commitment to ensuring that the recruitment of migrant workers adheres to relevant labor laws and regulations. The policy explicitly mentions compliance with the Employment Act 1955, Immigration Act 1959/63, and Compensation Workmen Act 1952. It further emphasizes the commitment to remunerating migrant workers with a reasonable wage in accordance with legal requirements.</p>	Complied

		<p>An evaluation based on selected records affirms that all migrant workers have been hired in accordance with the stipulations of the legal framework. This includes compliance with mandated benefits and the provision of a minimum wage, reinforcing the company's commitment to fair and lawful employment practices.</p>	
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded. - Critical (Major) compliance -</p>	<p>Minutes of Meeting of Safety and Health Committee was conducted regularly as recorded on 18/09/2023, 07/06/2023, 21/03/2023, 21/12/2022. Attended by Chairman/Estate Manager (Adnam b. A. Razik), Secretary/Asst Manager (Mohamad Nursabrie b. Aziz), Employees representatives and Employers Representatives. Meeting discussed on OSH issues, accident statistics, investigation, legal compliance and OSH training. Available Organization Chart Pelantoh Estate 2023. Chairman is Estate Manager and Secretary is Asst Estate Manager, and other members of SHC.</p> <p>Appointment Letter dated 01/07/2022 from Hamdan Ibrahim (CEO) to Manager of Pelantoh as Chairman of SHC. Sighted other members appointment letter dated 01/07/29023 respectively.</p> <p><u>Tebak Estate</u></p> <p>Sighted Organization Chart of SHC year 2023 where Chairman is Estate Manager (Tun Mohd Azmi), Secretary is (Nurul Syafiqah), 11 employers representatives and 11 employees representatives. Discussion and meeting was regularly conducted as required on 13/09/2023, 11/06/2023, 13/03/2023 Meeting discussed on OSH issues, accident statistics, investigation, legal compliance and OSH training. Available Organization Chart Pelantoh Estate 2023.</p>	<p>Complied</p>

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<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Sighted record of Bofa-C & AED E-Training 2023. Participant from all estates in TDMP attended the training conducted on 12/04/2023 between 9.00am-5.00pm. Venue: Online Link: http://www.udemy.com/course/basic-home-first-aid-e-learning/?couponCode=BHFAFREE1Mode</p> <p>Pelantoh represented by: Siti Nur Maisarah, Hashidah Ishak.</p> <p>Sighted First Aid Box Inspection Form dated 10/10/2023, 10/09/2023, 15/08/2023 for Box No. 01-18 by Hashidah bt Ishak (HA),</p> <p>JKKP 8 sent to DOSH dated 31/01/2023. One accident involving Tun Mohamad Firdaus MC 4 days.</p> <p>In 2023 a JKKP 6 involving Rahban occurred on 09/04/2023 at Block 93B1,FFB fall on the face of the harvester and bleeding. Pelantoh Utara. 7 days MC. Record of accident kept such as MC slips No 429634 (09/04/2023-15/04/2023). Accident Report prepared by Siti Nur Maisarah Bt. Aswadi (Compliance Clerk). Hirarc was revised dated 13/04/2023 for harvesting accordingly and approved by Estate Manager.</p> <p><u>Maidam Estate</u></p> <p>Sighted at Block 18A1, mandore (Mohd Fairuz Asmadi) frond stacking having 1st Aid Box No. 11, mandore (Khairul Azuan) harvester having 1st Aid Box No. 9. Available List of 23 items in the box. Inspection was conducted on 16/10/2023 by Medical Assistant (MA) from Klinik Gajah Mati. Total 11 boxes</p> <p><u>Tebak Estate</u></p> <p>Available list of keeper of First Aid Boxes (No. 01-19), updated and inspected by Siti Aminah bt. Mohd Nor (Medical Assistant) on monthly</p>	<p>Complied</p>
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		<p>basis. For October inspected on 02/10/2023, For August inspected on 19/08/2023, For July 2003 inspected on 17/07/2023.</p>																					
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. - Critical (Major) compliance -</p>	<p>SOP For PPE, Edition TDMP/03, Rev.TDMP-01/20023, dated 01/01/2023. Purpose Safety and healthy environment for employees, contractors and public. Set the PPE requirements and usage. Sighted PPE distribution records for year 2021-2023. Data started on 13/01/2022. Among PPE provided included Mask, Apron, Gloves, Helmet, Sickle, Safety glass/goggles, earmuff. Latest distribution or issue as below:</p> <table border="1" data-bbox="1124 699 1899 1190"> <thead> <tr> <th>Date</th> <th>Name</th> <th>Task</th> <th>Geng</th> <th>PPE</th> </tr> </thead> <tbody> <tr> <td>18/10</td> <td>Tg. Nazila</td> <td>Office</td> <td>20C</td> <td>Nitrile & Cotton gloves</td> </tr> <tr> <td>18/10</td> <td>Litom Ali & Kantap, Samsul, Marzuki, Ramlie, Hairumen, Azlan</td> <td>Harvester</td> <td>93C</td> <td>Cotton Gloves, Safety Boots, Safety Helmets, Sickles</td> </tr> <tr> <td>22/10</td> <td>Norhati</td> <td>Mandore</td> <td>20C</td> <td>5 Nitrile Gloves, 5 Cotton Gloves, 4 Safety Goggles</td> </tr> </tbody> </table> <p><u>Maidam Estate</u> Sighted workers at Block 18A1, Frond stacking ladies workers wearing safety boots, Topi mengkuang, cotton gloves, nitrile gloves</p>	Date	Name	Task	Geng	PPE	18/10	Tg. Nazila	Office	20C	Nitrile & Cotton gloves	18/10	Litom Ali & Kantap, Samsul, Marzuki, Ramlie, Hairumen, Azlan	Harvester	93C	Cotton Gloves, Safety Boots, Safety Helmets, Sickles	22/10	Norhati	Mandore	20C	5 Nitrile Gloves, 5 Cotton Gloves, 4 Safety Goggles	<p>Complied</p>
Date	Name	Task	Geng	PPE																			
18/10	Tg. Nazila	Office	20C	Nitrile & Cotton gloves																			
18/10	Litom Ali & Kantap, Samsul, Marzuki, Ramlie, Hairumen, Azlan	Harvester	93C	Cotton Gloves, Safety Boots, Safety Helmets, Sickles																			
22/10	Norhati	Mandore	20C	5 Nitrile Gloves, 5 Cotton Gloves, 4 Safety Goggles																			

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		<p>and group of harvesters wearing safety boots, safety helmet, cotton gloves a safety vest.</p> <p><u>Tebak Estate</u></p> <p>Sighted PPE Issuance record (Ear plugs) to 17 workers (tractor driver, lorry drivers, mist blower operators on 22/10/1013. Sighted other issuance records of PPE for year 2023 such as nitrile gloves, apron, safety helmets and safety boots since January- September.</p>	
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.</p> <p>- Minor compliance -</p>	<p><u>Pelantoh Estate</u></p> <p>Sighted records of monthly contribution made by employee and employer to SOCSO as social protection, injury sickness or medical coverage for workers as below:</p> <ul style="list-style-type: none"> • September 2023: 251 workers and amount RM 9,158.80. • May 2023: 248 workers and amount RM 9,722.50 • January 2023: 205 workers and amount RM 7,686.40 <p><u>Maidam Estate</u></p> <p>Sighted a record of contribution for SOCSO payment (As in SOCSO Deducting Listing) made by employer and employees for month of February, June and October:</p> <ul style="list-style-type: none"> • February 2023: Total employees 44, RM 1,735.70 • June 2023: Total employees 52, RM 2,306.00 • October 2023: Total employees 48, RM 1,796.20 	Complied
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>JKKP 8 was sent to DOSH as sighted the form dated 31/01/2023. For statistics of accident and disease in 2022 found no cases reported and occurred in the estate. In 2023 found JKKP7 (Occupational</p>	Complied

		<p>Disease Notification) made to ZDOSH as a result of audiometric test on hearing impairment to 4 workers (Ahmad b. Taman, Ali b. Saidin, Badrul Hisyam b. Abdullah and Sahdi). Cases reported by Poliklinik Ibnu Sina (Dr. Suzanna Sulaiman) investigated by DOSH on 24/05/.2023.</p>	
<p>Principle 7: Protect, conserve and enhance ecosystems and the environment</p>			
<p>Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
<p>7.1.1</p>	<p>(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -</p>	<p><u>Pelantoh Estate</u> As sampled found IPM Plan 2023 approved by Estate Manager dated 13/09/2023 as below:</p> <ul style="list-style-type: none"> • Use of Barn Owl to reduce the application of rodenticides (mature area) • Prevention of Rhinoceros Beatle from breeding in chopped palm waste (replanting area) • Use of natural enemies to kill bagworm in order to avoid class 1 pesticides use. (Nursery area) <p><u>Maidam Estate</u> Sighted in the estate, IPM Management Plan 2023 approved by Estate Manager dated 07/06/2023. In the plan action included: Use of barn owl to reduce the application of rodenticides-On going Prevention for rhinoceros beetle from breeding in chopped palm waste-On going Beneficial plant helps to attract natural enemies as biological control agents against pest in palm plantation-Done Uses of rodenticides to prevent rat from breeding-On going</p>	<p>Complied</p>

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7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	Currently no species with referenced to Global Invasive Species Database and CABI.org are used in the management of IPM.	Complied										
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	All estate has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.	Complied										
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.													
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	Standard Operating Procedure (SOP) of all agrochemicals are available. Selective products and application methods that are specific to the target pest, weed or disease are prioritised as in: <ul style="list-style-type: none">• A11 – Immature Weeding dated March 2020• A12 – Mature Weeding dated May 2017• A13 – Control of Pest & Insects dated March 2020• A14 – Rat Baiting dated March 2020 The demonstration of the justification for all pesticides used can be further enhanced.	OFI										
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - Critical (Major) compliance -	Sampled Pesticides Usage per Ha/Ton for year 2023. (Jan-Sep) <table border="1" data-bbox="1122 1241 1930 1329"> <thead> <tr> <th>Chemicals</th> <th>ai</th> <th>Unit</th> <th>a.i %</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Aly 20 DF</td> <td>Metsulfuron methyls</td> <td>Kg</td> <td>20</td> <td>28.20</td> </tr> </tbody> </table>	Chemicals	ai	Unit	a.i %	Total	Aly 20 DF	Metsulfuron methyls	Kg	20	28.20	Complied
Chemicals	ai	Unit	a.i %	Total									
Aly 20 DF	Metsulfuron methyls	Kg	20	28.20									

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		Foxil	Triclopyr butotyl	Litres	32.10	255.52		
		Glyphosate	Glyphosate isopropylamine	Litres	41	155.80		
		Asir 5GR	Carbosulfan	Kg	5.00	20.75		
		Roundup/Shield	Glyphosate isopropylamine	Litres	41.00	205.00		
		Garlon Mix 4L	Triclopyr butotyl	Litre	29.48	94.34		
		Butik G2	Chlorophacinone	Kg	0.01	24.30		
		Kenbast/G-Fos	Glufosinate-ammonium	Litre	13.50	24.30		
		Fosinate	Gluufosinate-ammonium	Litre	13.50	513.70		
		Bayfolan	Fosforus	Litre	8.00	2.88		
		Monex HL	MSMA+diuron	Litre	47.30	9.46		
		Miracle S240	Polyether modified trisiloxane	Litre	75	21.00		
		Cypermethrin	Cyclopropanecarboxylic acid	Kg	100	20.00		
		Total Pesticides					1,350.95	
		Total FFB Production (MT)					11,330.45	
		Pesticides Usage record in Maidam Estate 2023 (Jan-May)						
		Chemicals	ai	Unit	a.i %	Total		

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		BM Glyphosate	Glyphosate isopropylamine	Litres	41		
		Garlon Mix 4L	Triclopyr butotyl	Litre	29.48	94.34	
		Butik G2	Chlorophacinone	Kg	0.01	24.30	
		Kenbast 15	Glufosinate-ammonium	Litre	13.50	24.30	
		Total Pesticides				1,350.95	
		Total FFB Production (MT)				11,330.45	
		<p><u>Tebak Estate</u></p> <p>Record of pesticides used and active ingredient found recorded and maintained on monthly basis in 2023 (Jan-September):</p>					
		Chemicals	ai	Unit	a.i %		
		Garlon MX	Triclopyr butotyl	Btl	0.297		
		Glyphosate	Glyphosate isopropylamine	Litres	41		
		Monex HL	MSMA+diuron	Litre	47.30		
		Storm	Flocoumafen	Pail	0.00005		
		Pesticides usage per Ha & MT FFB year 2023					

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		Month	Quantity of a.i./Ha	Quantity of a.i./MT FFB	Planted (Ha)	FFB Produced (MT)	
		January	0.03	0.06	2,510.3	1,273.33	
		February	0.03	0.07	2,510.3	1,276.58	
		March	0.06	0.09	2,510.3	1,482.11	
		April	0.05	0.06	2,510.3	1,554.76	
		May	0.04	0.06	2,510.3	1,791.99	
		Jun	-	-	2,510.3	1,728.94	
		July	0.08	0.09	2,510.3	2,024.43	
		August	0.06	0.06	2,510.3	2,356.47	
		September	0.04	0.04	2,510.3	2,245.79	
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -	Sighted during the site visit at all the Pelantoh Estates and Maidam Estate 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 its place, alternatives such as Glyphosate is used instead. This is in line with IPM Plan sampled.					Complied
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	As verified in all estate, there is evidence of prophylactic use of pesticides in the estates as Chemicals Register stored in all estates visited Pelantoh Estate, Maidam Estate and Tebak Estate.					Complied
7.2.5	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	The stock card and viewed at Chemicals Store in Pelantoh Estate, Maidam Estate and Tebak Estate showed that only class III & IV pesticides were used in the estate. Paraquat and Monocrotophos was eliminated. In its place, less hazardous alternatives such as					Complied

	<p>validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ol style="list-style-type: none"> Judgment of the threat and verify why this is a major threat Why there is no other alternative which can be used Which process was applied to verify why there is no other less hazardous alternative What is the process to limit the negative impacts of the application Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>Glyphosate and Acephate was used instead. As for usage of highly toxic/limited pesticides, the estates acquired permit from Department of Agriculture as required.</p>	
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>All pesticides in Pelantoh Estate, Maidam Estate and Tebak Estate were provided with chemicals handling training including mixing of chemicals as plan in SOP Training Matrix 2023 sampled conducted during Morning Muster. This was verified during interview conducted in Pelantoh Estate and training records in Maidam and Tebak Estate.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>As observed in Chemical Store of Pelantoh Estate and Maidam Estate, pesticides were found stored accordance with the Occupational Safety and Health Act USECHH 2000 and CLASS 2014, Pesticides Act 1974 and their Regulations.</p> <ul style="list-style-type: none"> The stores was locked by the storekeeper was seen to unlock the pad-lock to open entrance door for auditor to inspect the store. 	Complied

		<ul style="list-style-type: none"> • Containment and spill kit facilities provided and standby. • PPE for use if entering the store and ventilation fan/general ventilation. <p>Signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety Data Sheet were available.</p>	
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>In all visited estate (Pelantoh, Maidam and Tebak), and scheduled waste store found empty pesticides containers were triple rinsed and reuse back as premix chemical container. Found maintained inventory records of empty pesticides containers.</p>	Complied
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>As practices and observed during site visit and interview conducted with sprayers found no evidence of aerial spray conducted or implemented.</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p><u>Pelantoh Estate</u> Sighted a Letter dated 03/08/2023 from Estate Manager to Klinik Medik Bestasri Paka & X ray on 26 Namelist of worker to attend Medical Surveillance on 08-09/08/2023</p> <p><u>Maidam Estate</u> Medical Surveillance was conducted on 10/08/2023 on 10 Sprayers (1 unfit and required medical removal, change job and refer to specialist)-Mohamad Nur Hisham, now upkeep at linesite and</p>	Complied

		referred to Klinik Kesihatan Al Muktafibilah on 12/09/2023 and follow monitoring scheduled set by MD. <u>Tebak Estate</u> Medical Surveillance Summary dated 15/10/2023 conducted by Klinik Bestari Sdn Bhd for 13 workers (11 Sprayers, 1 Storekeeper, Clerk) All fit to work as result indicated. No toxicity evidence in liver and skin as mentioned.	
7.2.11	(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance -	Sighted Internal Memorandum on prohibition of pregnant or breastfeeding women or other people that have medical restrictions to work as pesticides operator. The memorandum has been displayed at several information board in the estate and communicated to the workers during training and morning briefing. There is no female workers work as a chemical handler as sampled in Pelantoh Estate and Maidam Estate.	Complied
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance -	The Waste Management Plan (for Estates and Mills) has been established by each operating unit. The documents have the information about type of wastes, methods of disposal and its legal requirements associated to the type of wastes. Wastes are classified to Scheduled Waste, Domestic Waste and Recyclable Waste. Scheduled wastes were disposed via licensed SW Contractors under DOE after being stored at the operating units SW stores. However, the implementation of wastes management plan was not satisfactorily demonstrated. Based on verification through Google Earth, the wastes landfill at Pelantoh Estate (GPS: 4°24'01"N 103°14'10"E), MAIDAM Estate (GPS: 4°38'55"N 103°09'10"E) and Tebak Estate (GPS: 4°26'09"N 103°15'22"E) have residential areas	Non-compliance

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		<p>and/or river or waterways within their 3 km radius distance. This is not in-line with the TDM’s Domestic Wastes procedure, ver. May 2017, Clause 5.2.2 (b) which reads:</p> <ul style="list-style-type: none"> • The landfill shall be located not less than 3 km away from nearest residential, office, or other premises. • The landfill shall be located not less than 3 km away from the nearest river or waterway. <p>Thus, a non-conformity report was assigned due to this lapse.</p> <p><u>Kemaman POM</u></p> <p>Waste Management Plan 2023 was sampled which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics. Among action in the planning such as:</p> <table border="1" data-bbox="1122 858 1906 1310"> <thead> <tr> <th>SW Code</th> <th>Description</th> <th>Location</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>SW102</td> <td>Waste of Lead acid battery</td> <td>Workshop</td> <td>Collect and record qty Storage in SW Store</td> </tr> <tr> <td>SW110</td> <td>Flourescent tube</td> <td>Workshop</td> <td>Labelled</td> </tr> <tr> <td>SW305</td> <td>Spent lubricating oil</td> <td>Workshop</td> <td>Disposed as licensed contractor.</td> </tr> <tr> <td>SW410</td> <td>Rags, paper, filters, contaminated with S/w</td> <td>Workshop</td> <td>Maintain inventory and Consignment note for disposal.</td> </tr> <tr> <td>SW322</td> <td>Waste of halogen organic</td> <td>Chemical Store</td> <td></td> </tr> </tbody> </table>	SW Code	Description	Location	Action Plan	SW102	Waste of Lead acid battery	Workshop	Collect and record qty Storage in SW Store	SW110	Flourescent tube	Workshop	Labelled	SW305	Spent lubricating oil	Workshop	Disposed as licensed contractor.	SW410	Rags, paper, filters, contaminated with S/w	Workshop	Maintain inventory and Consignment note for disposal.	SW322	Waste of halogen organic	Chemical Store		
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		SW409	Disposed containers, bags contaminated with chemicals.	SW Store	
		Domestic Waste	Rubbish	Linesite, office, workshop, store	Recycle material segregate in Recycling bins. Dispose at Pelantoh Estate landfill Create awareness for recycling.
		Industrial waste	POME	Effluent pond	Water discharge Monitoring monthly effluent discharge
			EFB	Mill	Sent to estate for mulching and bio compost fertilizer
			Fibre and shell	Mill	Fibre applied as boiler fuel
			Boiler Ash	Mill	Recycle and applied to bio compost
			Sewerage	Mill	Liase with IWK
			Scrap Metal	Workshop	Recycle and collected by contractor.
		Air Putih Estate			

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		<p>Sighted Waste Management Plan 2023 established and available as sampled:</p> <table border="1"> <thead> <tr> <th>Action Plan</th> <th>Area Concern</th> <th>PIC</th> <th>Time frame</th> </tr> </thead> <tbody> <tr> <td> Management of SW (Spent lubricating oil & Hydraulic) <ul style="list-style-type: none"> Collect and record SW Store SW at gated area Labelled SW Disposed at licensed contractor </td> <td>Workshop</td> <td>Compliance Clerk/Asst Mgr</td> <td>Disposed every 6 month</td> </tr> <tr> <td> <ul style="list-style-type: none"> Management of rags, plastics, paper, filters contaminated with SW. Dispose at license contractor </td> <td>Workshop</td> <td>Compliance Clerk/Asst Mgr</td> <td>Disposed every 6 month</td> </tr> <tr> <td> Management of Domestic Waste <ul style="list-style-type: none"> Collect recyclable materials (paper, plastics, glass) in recycling bin and send to recycler. Collect domestic waste and dispose at landfill. Raise awareness of benefit of recycling. </td> <td>Linesite, office, Store, Workshop</td> <td>Staff/ Asst Manager</td> <td>Weekly</td> </tr> </tbody> </table>	Action Plan	Area Concern	PIC	Time frame	Management of SW (Spent lubricating oil & Hydraulic) <ul style="list-style-type: none"> Collect and record SW Store SW at gated area Labelled SW Disposed at licensed contractor 	Workshop	Compliance Clerk/Asst Mgr	Disposed every 6 month	<ul style="list-style-type: none"> Management of rags, plastics, paper, filters contaminated with SW. Dispose at license contractor 	Workshop	Compliance Clerk/Asst Mgr	Disposed every 6 month	Management of Domestic Waste <ul style="list-style-type: none"> Collect recyclable materials (paper, plastics, glass) in recycling bin and send to recycler. Collect domestic waste and dispose at landfill. Raise awareness of benefit of recycling. 	Linesite, office, Store, Workshop	Staff/ Asst Manager	Weekly	
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		<ul style="list-style-type: none"> • Monitor linesite to avoid waste scattering. 				
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>Management of Scrap Metal</p> <ul style="list-style-type: none"> • Scrap metal is recycled • Storage at dedicated area • Dispose at license contractor. 	Linesite, office, Store, Workshop	Staff/ Asst Manager	Weekly	Complied
		<p>The disposal of all waste material (domestic, recyclable, and toxic) was done in accordance with their established SOP (Domestic Waste and Schedule Waste). Based on interviews with the workers, their understandings on proper disposal of wastes were satisfactory.</p> <p><u>Kemaman POM</u></p> <p>All domestic waste kept in the waste bins provided and disposed at landfill of Pelantoh Estate. Recycling of waste also implemented as seen in the mill. Inventory of Scheduled waste generated monthly as verified and kept as required for 3 years. Latest Inventory under 5th Schedule requirements for month of October 2023:</p> <p>SW110 (Florescent tube) Qty 0.0369 MT SW305 (Spent mineral oil) Qty 1.1680 MT SW322 (Waste of halogenated organic) Qty 0.0280 MT SW409 (Contaminated carboys) Qty 0.0744 MT SW410 (Spent filters) Qty 0.0210MT.</p>				

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		<p>SW410 (Spent rags) Qty 0.509 MT</p> <p>The latest disposal of Schedule Waste sighted in consignment Note below:</p> <ul style="list-style-type: none"> • CN#2023100813LHSOIW, dated submitted 08/10/2023 for SW410 (Spent filters) Qty 0.0275 MT. Collected by Pentas Flora, Lorry VAG 9398 (Muhd Munir) • CN#2023100810U26W40, dated submitted 07/10/2023 for SW410 (Spent Rags) Qty 0.0509 MT. Collected by Pentas Flora, Lorry VAG 9398 (Muhd Munir) • CN#2023100810CPHL8G, dated submitted 07/10/2023 for SW322 (Waste of Hallogenated organic) Qty 0.0280 MT. Collected by Pentas Flora, Lorry VAG 9398 (Muhd Munir) • CN#202307041670GI8U, dated submitted 04/07/2023 for SW110 (Fluorescent tube) Qty 0.0293 MT. Collected by KT Was Recycled, JPM 9869 (Mohd Abdul Mutalib) <p>Air Putih Estate</p> <p>2 time a week collection of domestic waste from line site and send to landfill located at field. Sighted record of scheduled waste disposal recorded in Consignment Note below:</p> <p>Serial No. 227422 for SW404 (Clinical waste) Qty 1.00 Kg on 30/03/2023 transported by Edgenta Mediserve Sdn. Bhd. Lorry No. KEV9090 (Driver: Idris Sulaiman). Sampled at Scheduled Waste Store found having padlock, signage of toxic waste, labelled and kept as required by Scheduled Waste Regulations 2005. Sighted SW110 (Fluorescent tube), SW410 (Spent Rags) generated in October 2023.</p>	
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7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Verification and interview with employees at the estate have concluded that there was no use of fire in wastes disposal. Domestic and household wastes were disposed via landfill and based on the site visit to the estate’s landfill, it was observed that all domestic waste were sent to the landfill and buried.</p> <p><u>Kemaman POM & Air Putih Estate</u></p> <p>Sighted during site visit in mill area, no burning of waste practices and use of fire and further sampled at landfill and line site of mill and estate found no use of fire for waste disposal.</p>	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>All the estates and mill operations were guided through the manuals and SOP. The procedures as documented in the manual and SOP were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The SOP included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment</p>	Complied
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Periodic tissue and soil sampling were carried out in the Pelantoh Estate and Maidam Estate to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors</p>	Complied

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		<p>the changes in the pH value, total phosphorus, available phosphorus, organic carbon and total nitrogen, exchangeable cation K, exchangeable cation Mg, exchangeable cation Ca and cation exchangeable capacity.</p> <p>ULC Laboratory Test Report dated 12/12/2022 for soil sampling in the field:</p> <p>PR 2018A2: 0-15 IR PR 2018A2: 15-30 IR PR 2018A2: 0-15 PC PR 2018A2: 15-30 PC</p> <p><u>Tebak Estate</u></p> <p>Soil Analysis Result dated 26/03/2023 as sampled on 10/06/2022 was conducted and result provided by Agronomy Advisory Department. Sample collected from Manuring Blocks</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><u>Maidam Estate</u></p> <p>EFB application records found available in the estate as below:</p> <table border="1" data-bbox="1124 1023 1908 1157"> <thead> <tr> <th>Block</th> <th>Size (Ha)</th> <th>1st Half (MT)</th> <th>2nd Half</th> <th>Applied (MT)</th> <th>Balance</th> </tr> </thead> <tbody> <tr> <td>18A</td> <td>168.69</td> <td>172.53</td> <td>540.80</td> <td>114.65</td> <td>598.68</td> </tr> </tbody> </table> <p><u>Tebak Estate</u></p>	Block	Size (Ha)	1 st Half (MT)	2nd Half	Applied (MT)	Balance	18A	168.69	172.53	540.80	114.65	598.68	<p>Complied</p>
Block	Size (Ha)	1 st Half (MT)	2nd Half	Applied (MT)	Balance										
18A	168.69	172.53	540.80	114.65	598.68										

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		<p>Empty Fruits Bunches (EFB)/Bio Organic Fertilizer (BOF) application program and record found available and showed action for optimal use of inorganic fertilizer.</p> <table border="1" data-bbox="1124 488 1906 817"> <thead> <tr> <th>Block</th> <th>Size (Ha)</th> <th>Program 2023</th> <th>Actual 2023</th> </tr> </thead> <tbody> <tr> <td>Mature: 20A1, 20A2, 13A2, 15A1, 17A1, 17A2, 17B1, 18A1, 18A2, 19A1, 19A2</td> <td>1,949</td> <td>3,304.34</td> <td>3,622.36</td> </tr> <tr> <td>Immature: PR21A1, PR21A2, PR23A1, PR23A2</td> <td>1,103.10</td> <td>-</td> <td>-</td> </tr> <tr> <td>Total</td> <td>4,797.50</td> <td>3,304.34</td> <td>3,622.36</td> </tr> </tbody> </table>	Block	Size (Ha)	Program 2023	Actual 2023	Mature: 20A1, 20A2, 13A2, 15A1, 17A1, 17A2, 17B1, 18A1, 18A2, 19A1, 19A2	1,949	3,304.34	3,622.36	Immature: PR21A1, PR21A2, PR23A1, PR23A2	1,103.10	-	-	Total	4,797.50	3,304.34	3,622.36																	
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7.4.4	<p>Records of fertiliser inputs are maintained. - Minor compliance -</p>	<p><u>Pelantoh Estate</u> Sampled Fertilizer receipt and application report (as at January-September 2023):</p> <table border="1" data-bbox="1124 940 1906 1337"> <thead> <tr> <th>Month</th> <th>Type</th> <th>Received</th> <th>Applied</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>February</td> <td>BOF 3 (Organic) Bulk</td> <td>340.59</td> <td>340.59</td> </tr> <tr> <td>March</td> <td>BOF 3 (Organic) Bulk</td> <td>395.23</td> <td>395.23</td> </tr> <tr> <td>April</td> <td>BOF 3 (Organic) Bulk</td> <td>523.63</td> <td>523.63</td> </tr> <tr> <td>May</td> <td>BOF 3 (Organic) Bulk</td> <td>523.63</td> <td>523.63</td> </tr> <tr> <td>June</td> <td>BOF 3 (Organic) Bulk</td> <td>564.9333</td> <td>564.93</td> </tr> <tr> <td>July</td> <td>BOF 3 (Organic) Bulk</td> <td>646.67</td> <td>646.67</td> </tr> </tbody> </table>	Month	Type	Received	Applied	January	-	-	-	February	BOF 3 (Organic) Bulk	340.59	340.59	March	BOF 3 (Organic) Bulk	395.23	395.23	April	BOF 3 (Organic) Bulk	523.63	523.63	May	BOF 3 (Organic) Bulk	523.63	523.63	June	BOF 3 (Organic) Bulk	564.9333	564.93	July	BOF 3 (Organic) Bulk	646.67	646.67	Complied
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		August	BOF 3 (Organic) Bulk	674.73	674.73
		September	BOF 3 (Organic) Bulk	688.49	688.49
		<u>Tebak Estate</u>			
		Available monthly fertilizer application as recorded on monthly basis. Sighted Manuring To date Year for month of September 2023 as below:			
		Available Fertilizer recommendation 2023 for mature and immature oil palm dated 28/03/2023 from Agronomy Advisory Department.			
		Mature			
		Fertilizer	Program	Completed	% Completed
		Kieserite-Borate	37.90	38.70	102
		Compacted (ASNK2)	-	2.10	0
		CPD 33	615.10	194.00	32
		MOP	183.10	166.45	91
		Boromag	22.50	2.25	10
		GML	32.80	-	
		CPD 38	-	9.10	0
		Total	891.40	412.60	46
		Immature			

		<table border="1"> <thead> <tr> <th>Fertilizer</th> <th>Program</th> <th>Completed</th> <th>% Competed</th> </tr> </thead> <tbody> <tr> <td>Rock Phosphate</td> <td>14.40</td> <td>-</td> <td>0</td> </tr> <tr> <td>CRF 2</td> <td>40.10</td> <td>62.50</td> <td>156</td> </tr> <tr> <td>CPD 38</td> <td>53.40</td> <td>46.90</td> <td>88</td> </tr> <tr> <td>CRF 1</td> <td>-</td> <td>-</td> <td>0</td> </tr> <tr> <td>Total</td> <td>119.40</td> <td>109,40</td> <td>92</td> </tr> </tbody> </table>	Fertilizer	Program	Completed	% Competed	Rock Phosphate	14.40	-	0	CRF 2	40.10	62.50	156	CPD 38	53.40	46.90	88	CRF 1	-	-	0	Total	119.40	109,40	92	
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Criterion 7.5: Practices minimise and control erosion and degradation of soils.																											
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Maps identifying marginal and fragile soils, including steep terrain, are available in Maidam Estate as below:</p> <table border="1"> <thead> <tr> <th>Soil Series</th> <th>Size Area (Ha)</th> </tr> </thead> <tbody> <tr> <td>Bukit Tuku</td> <td>6</td> </tr> <tr> <td>Cempaka</td> <td>110</td> </tr> <tr> <td>Kuala Brang</td> <td>184</td> </tr> <tr> <td>Kuala Brang</td> <td>451</td> </tr> <tr> <td>Kuala Brang</td> <td>173</td> </tr> <tr> <td>Steepland</td> <td>50</td> </tr> </tbody> </table>	Soil Series	Size Area (Ha)	Bukit Tuku	6	Cempaka	110	Kuala Brang	184	Kuala Brang	451	Kuala Brang	173	Steepland	50	Complied										
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7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>Found documented and established a Slope Protection and River Buffer Zone Policy signed by the CEO dated 01/04/2021. Among statement included:</p> <ul style="list-style-type: none"> • For area with slope more than 25° must be excluded from new planting development and replanting program. • For area with slopes less than 25 degrees, existing crops and plants should be properly maintained. <p>Maidam Estate and Tebak Estate as site visit, continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. SOP for Buffer Zone & 25-degree slope, SOP Land Preparation for Terracing established and used as reference.</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>As verified and observed during site visit in all estates, no new planting or land clearing conducted in the certification units since 15/11/2018.</p>	Complied
<p>Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>			
7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>In all estate, a soil surveys were conducted and available as requested a soil map for Maidam, Tebak and Air Putih Estates. A topographic map also found available which are both used to plan and manage the drainage and road works in the estates.</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>Extensive planting on marginal and fragile soils, was avoided and in accordance with Slope Protection and River Buffer Zone Policy, SOP for Buffer Zone & 25-degree slope for best practices.</p>	Complied

	- Minor compliance -																										
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p><u>Air Putih Estate</u> Soils series map, topographic map available which are both used to manage the drainage and road works in the estates. The slope analysis pattern of the estate as shown below:</p> <table border="1" data-bbox="1122 571 1910 871"> <thead> <tr> <th>Slope Degree</th> <th>Slope Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>0°-6°</td> <td>39.48</td> </tr> <tr> <td>6°-10°</td> <td>30.90</td> </tr> <tr> <td>10°-15°</td> <td>19.53</td> </tr> <tr> <td>15°-25°</td> <td>8.89</td> </tr> <tr> <td>>25°</td> <td>1.20</td> </tr> </tbody> </table> <p><u>Maidam Estate</u> Similar map available and the slope pattern as below:</p> <table border="1" data-bbox="1122 962 1910 1262"> <thead> <tr> <th>Slope Degree</th> <th>Slope Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>0°-2°</td> <td>0.61</td> </tr> <tr> <td>2°-6°</td> <td>11.18</td> </tr> <tr> <td>6°-12°</td> <td>18.7</td> </tr> <tr> <td>12°-20°</td> <td>45.83</td> </tr> <tr> <td>>25°</td> <td>23.68</td> </tr> </tbody> </table>	Slope Degree	Slope Percentage (%)	0°-6°	39.48	6°-10°	30.90	10°-15°	19.53	15°-25°	8.89	>25°	1.20	Slope Degree	Slope Percentage (%)	0°-2°	0.61	2°-6°	11.18	6°-12°	18.7	12°-20°	45.83	>25°	23.68	Complied
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		<p><u>Tebak Estate</u></p> <p>As referred to Soil Map dated 20/12/2011 as released by Jabatan Pertanian Terengganu with soil series and used as guide for plantation activities and planning.</p> <table border="1" data-bbox="1160 536 1890 959"> <thead> <tr> <th>Bil</th> <th>Soil Series</th> <th>Slope</th> <th>Ha</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bukit Tungku</td> <td>Flat (0-2)</td> <td>6</td> <td>0.61</td> </tr> <tr> <td>2</td> <td>Cempaka</td> <td>Flat (2-6)</td> <td>110</td> <td>11.18</td> </tr> <tr> <td>3</td> <td>Kuala Brang</td> <td>Undulating (6-12)</td> <td>184</td> <td>18.7</td> </tr> <tr> <td>4</td> <td>Kuala Brang</td> <td>Slight Hilly (12-20°)</td> <td>451</td> <td>45.83</td> </tr> <tr> <td>5</td> <td>Kuala Brang</td> <td>Hilly (20-25°)</td> <td>173</td> <td>17.58</td> </tr> <tr> <td>6</td> <td>Steepland</td> <td>Deep slope (>25°)</td> <td>173</td> <td>5.0</td> </tr> <tr> <td>7</td> <td colspan="2">River, pond, lake</td> <td>10</td> <td>1.02</td> </tr> <tr> <td colspan="3">Total</td> <td>984</td> <td>100</td> </tr> </tbody> </table>	Bil	Soil Series	Slope	Ha	%	1	Bukit Tungku	Flat (0-2)	6	0.61	2	Cempaka	Flat (2-6)	110	11.18	3	Kuala Brang	Undulating (6-12)	184	18.7	4	Kuala Brang	Slight Hilly (12-20°)	451	45.83	5	Kuala Brang	Hilly (20-25°)	173	17.58	6	Steepland	Deep slope (>25°)	173	5.0	7	River, pond, lake		10	1.02	Total			984	100	
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<p>Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>																																																
<p>7.7.1</p>	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -</p>	<p>NA as no new planting after 15/11/2018 nor peat area at all the supply bases.</p> <p>As verified in all estate, no peat soil or soil categorized as marginal or fragile soil as sampled. There was also no new planting in the estates.</p>	<p>Not Applicable</p>																																													
<p>7.7.2</p>	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p>	<p>NA as no new planting after 15/11/2018 nor peat area at all the supply bases.</p>	<p>Not Applicable</p>																																													

	<p>PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -</p>	<p>As verified in all estate, no peat soil or soil categorized as marginal or fragile soil as sampled. There was also no new planting in the estates.</p>	
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -</p>	<p>NA as no new planting after 15/11/2018 nor peat area at all the supply bases.</p> <p>As verified in all estate, no peat soil or soil categorized as marginal or fragile soil as sampled. There was also no new planting in the estates.</p>	Not Applicable
7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>NA as no new planting after 15/11/2018 nor peat area at all the supply bases.</p> <p>As verified in all estate, no peat soil or soil categorized as marginal or fragile soil as sampled. There was also no new planting in the estates.</p>	Not Applicable
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p>	<p>NA as no new planting after 15/11/2018 nor peat area at all the supply bases.</p> <p>As verified in all estate, no peat soil or soil categorized as marginal or fragile soil as sampled. There was also no new planting in the estates.</p>	Not Applicable

	<p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>		
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>NA as no new planting after 15/11/2018 nor peat area at all the supply bases.</p> <p>As verified in all estate, no peat soil or soil categorized as marginal or fragile soil as sampled. There was also no new planting in the estates</p>	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>NA as no new planting after 15/11/2018 nor peat area at all the supply bases.</p> <p>As verified in all estate, no peat soil or soil categorized as marginal or fragile soil as sampled. There was also no new planting in the estates.</p>	Not Applicable
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p>	<p>The sampled estates and mill have established their Water Management Plan which are reviewed annually. The objectives of the plan are to maintain water source, ensure efficient use of water, and avoidance of surface and ground water contamination. Among the plans established and implemented were:</p> <ul style="list-style-type: none"> - Rainwater harvesting at the office and workers housing 	Complied

	<p>b) Workers have adequate access to clean water. - Minor compliance -</p>	<p>- Monitoring and identifying of pipeline leakage All the water supply at the workers housing is provided by the state government.</p> <p><u>Kemaman POM</u> Available Action Plan to Reduce Fresh Water Usage for Financial year 2023 that included rain water collection, large water containers allocated at strategic area to collect rain water. Available Contingency Plan During Water Shortage for Financial Year 2023. This to ensure continued availability of water sources and to avoid negative impacts on other users:</p> <ul style="list-style-type: none"> • Water shortage/Dry spell: Purchase water supply from Syarikat Air Terengganu (SATU). Obtain water supply from nearby estate. • Severe Water Pollution/Contamination: continued availability of water sources and to avoid negative impacts on other users. Perform treatment of polluted waters <p><u>Air Putih Estate</u> The document called Water Management Plan dated 15/04/2023 was established and implemented with action, PIC, Time Frame and status recorded and monitored. Among in the plan included:</p> <ul style="list-style-type: none"> • Water samples are taken annually by appointed consultant to ensure no pollution in river due to estate activities. • Rainwater canal built in workshop area, vehicle and garage to reduce use of tap water from SATU use for washing activities. 	
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		<ul style="list-style-type: none"> • Ensure no leakage and minimize waste of water tap at housing area. <p>River water quality monitoring was conducted by ERALab (KT) Sdn. Bhd. at 4 points: W1 (Upstream of Sg. Bandi) W2 (Middle of Sg. Bandi) W3 (QDownstream of Sg. Bandi) W4 (Nursery Outlet)</p> <p>Conclusion: The river water quality monitoring program had been successfully conducted and compliance to Class IIA/IIB of National Water Quality Standard for Malaysia (NWQSM).</p>	
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>The protection of watercourses is guided by the Protection of Slope & River Buffer Zone Policy, dated 23/02/2023. Riparian buffer zones have been established along all the main rivers that flow through the estates and verified during the site visit. The management have erected signages prohibiting of works such as manuring and spraying to be done within the riparian buffers. Workers have been provided awareness trainings and documents of trainings were available for verification.</p> <p>However, based on site verification at the buffer zones of Pelantoh Estate (Field no. 21A, along Sungai Tebak), MAIDAM Estate (Field no. 18A1, along Sungai Angka) and Tebak Estate (Field no. 19/A2, along Sungai Mas and 19/A1, along Sungai Tebak), the following lapses were found:</p> <ol style="list-style-type: none"> 1) The buffer zones have been replanted with oil palm in 2021 (Pelantoh Estate), 2018 (MAIDAM Estate), and 2019 (Tebak 	Non-compliance

		<p>Estate). This is not in-line with TDM’s Slope and River Buffer Zone Policy.</p> <p>2) The number of marking poles (blue/white stripes pegs) was not as many as required in the TDM’s Agriculture Policy No. 01.02 Survey and Boundary Demarcation.</p> <p>3) Some trace of herbicides application at Pelantoh Estate and trace of fertilizer application at Tebak Estate within the buffer zones were seen.</p> <p>Thus, a non-conformity report was assigned.</p> <p><u>Air Putih Estate</u></p> <p>River and water course were protected and maintained with restoring appropriate riparian buffer zones along the natural waterways.</p> <p>No evidence of chemical application at the buffer zone area in the estate during site visit. Sighted the vegetation along the area was well growth. Sighted a Policy signed by the CEO dated 01/04/2021. In the policy stated that river buffer zone must be maintained at both side of river bank as per schedule below:</p> <p><u>Kemaman POM</u></p> <p>Mill has generated a total of 150,576.48 M3 of POME in period of 2022 as stated in Effluent Report (POME) Discharge for Year 2022. While in 2023 (Jan-Sep) found total discharged at 109,117.77 M3.</p> <p>Sighted Monthly water sampling conducted by ERALab (KT) Sdn. Bhd. (Accredited Lab) as Certificate of Analysis verified at Final Discharge Point conducted monthly and among results:</p> <table border="1" data-bbox="1124 1233 1906 1316"> <thead> <tr> <th>Parameter</th> <th>Units</th> <th>limit</th> <th>12/09/23</th> <th>11/05/23</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>-</td> <td>5-9</td> <td>7.6</td> <td>8.2</td> </tr> </tbody> </table>	Parameter	Units	limit	12/09/23	11/05/23	pH	-	5-9	7.6	8.2	
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		<table border="1"> <tr> <td>Biochemical Oxygen Demand (BOD)</td> <td>mg/L</td> <td>100</td> <td>40</td> <td>18</td> </tr> <tr> <td>Total Suspended Solid (TSS)</td> <td>mg/L</td> <td>400</td> <td>76</td> <td>72</td> </tr> <tr> <td>Ammoniacal Nitrogen</td> <td>mg/L</td> <td>150</td> <td>44.35</td> <td>ND (<0.2)</td> </tr> <tr> <td>Total Nitrogen</td> <td>mg/L</td> <td>200</td> <td>55.44</td> <td>ND (<0.08)</td> </tr> <tr> <td>Oil and grease</td> <td>mg/L</td> <td>50</td> <td>9</td> <td>2</td> </tr> </table>	Biochemical Oxygen Demand (BOD)	mg/L	100	40	18	Total Suspended Solid (TSS)	mg/L	400	76	72	Ammoniacal Nitrogen	mg/L	150	44.35	ND (<0.2)	Total Nitrogen	mg/L	200	55.44	ND (<0.08)	Oil and grease	mg/L	50	9	2						
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7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p><u>Kemaman POM</u></p> <p>Mill has generated a total of 150,576.48 M3 of POME in period of 2022 as stated in Effluent Report (POME) Discharge for Year 2022. While in 2023 (Jan-Sep) found total discharged at 109,117.77 M3.</p> <p>Sighted Monthly water sampling conducted by ERALab (KT) Sdn. Bhd. (Accredited Lab) as Certificate of Analysis verified at Final Discharge Point conducted monthly and among results:</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Units</th> <th>limit</th> <th>12/09/23</th> <th>11/05/23</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>-</td> <td>5-9</td> <td>7.6</td> <td>8.2</td> </tr> <tr> <td>Biochemical Oxygen Demand (BOD)</td> <td>mg/L</td> <td>100</td> <td>40</td> <td>18</td> </tr> <tr> <td>Total Suspended Solid (TSS)</td> <td>mg/L</td> <td>400</td> <td>76</td> <td>72</td> </tr> <tr> <td>Ammoniacal Nitrogen</td> <td>mg/L</td> <td>150</td> <td>44.35</td> <td>ND (<0.2)</td> </tr> <tr> <td>Total Nitrogen</td> <td>mg/L</td> <td>200</td> <td>55.44</td> <td>ND (<0.08)</td> </tr> </tbody> </table>	Parameter	Units	limit	12/09/23	11/05/23	pH	-	5-9	7.6	8.2	Biochemical Oxygen Demand (BOD)	mg/L	100	40	18	Total Suspended Solid (TSS)	mg/L	400	76	72	Ammoniacal Nitrogen	mg/L	150	44.35	ND (<0.2)	Total Nitrogen	mg/L	200	55.44	ND (<0.08)	Complied
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p><u>Kemaman POM</u> In Year 2022, a water usage recorded at 156,850.50 MT FFB Processed and water usage at 312,850 Litre. A water use (litre)/FFB Processed (MT) at 2.01. While in 2023, monitoring was recorded as below:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB Processed (MT)</th> <th>Baseline (Litre)</th> <th>Water Usage (Litre)</th> <th>Water/FFB Processed (Lt/MT)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>9,796.09</td><td>35,633.00</td><td>19,475.00</td><td>1.99</td></tr> <tr><td>Feb</td><td>4,564.60</td><td>35,633.00</td><td>9,000.00</td><td>1.97</td></tr> <tr><td>Mac</td><td>8,814.80</td><td>35,633.00</td><td>17,500.00</td><td>1.99</td></tr> <tr><td>Apr</td><td>10,518.64</td><td>35,633.00</td><td>20,825.00</td><td>1.98</td></tr> <tr><td>May</td><td>12,584.66</td><td>35,633.00</td><td>24,875.00</td><td>1.98</td></tr> <tr><td>Jun</td><td>11,862.16</td><td>35,633.00</td><td>23,500.00</td><td>1.98</td></tr> <tr><td>Jul</td><td>16,391.40</td><td>35,633.00</td><td>33,425.00</td><td>2.04</td></tr> <tr><td>Aug</td><td>18,315.10</td><td>35,633.00</td><td>39,300.00</td><td>2.15</td></tr> <tr><td>Sep</td><td>20,816.89</td><td>35,633.00</td><td>45,800.00</td><td>2.20</td></tr> <tr><td>To date</td><td>113,664.34</td><td></td><td>233,700.00</td><td>2.03</td></tr> </tbody> </table>	Month	FFB Processed (MT)	Baseline (Litre)	Water Usage (Litre)	Water/FFB Processed (Lt/MT)	Jan	9,796.09	35,633.00	19,475.00	1.99	Feb	4,564.60	35,633.00	9,000.00	1.97	Mac	8,814.80	35,633.00	17,500.00	1.99	Apr	10,518.64	35,633.00	20,825.00	1.98	May	12,584.66	35,633.00	24,875.00	1.98	Jun	11,862.16	35,633.00	23,500.00	1.98	Jul	16,391.40	35,633.00	33,425.00	2.04	Aug	18,315.10	35,633.00	39,300.00	2.15	Sep	20,816.89	35,633.00	45,800.00	2.20	To date	113,664.34		233,700.00	2.03	Complied
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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>At the estates, the plan to optimise the usage of diesel is by regular maintenance of diesel-powered machinery and educational programme for the operators on fuel saving. At the mill, the utilisation of fibre and shell as biofuel for boiler operation is consistently implemented to generate electricity through turbines. This helps to reduce the dependency to fossil fuel.</p> <p><u>Kemaman POM</u></p> <p>In Year 200, a record of diesel usage recorded a total of 194,600 litres and FFB production recorded as 156,850 ,50 MT. Monitoring of Diesel Use Per Tonne FFB 2023 was sampled and found monthly use (Litre) and FFB production (MT) recorded with baseline. Below are monthly monitoring data of diesel use:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Month</th> <th>FFB Production (MT)</th> <th>Diesel Used (Litre)</th> <th>Diesel/FFB (Litre/MT)</th> <th>Baseline</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>9,796.09</td> <td>16,080</td> <td>1.64</td> <td>25,626.88</td> </tr> <tr> <td>February</td> <td>4,564.60</td> <td>14,760</td> <td>3.23</td> <td>29,387.25</td> </tr> <tr> <td>March</td> <td>8,814.80</td> <td>18,881</td> <td>2.14</td> <td>34,688.80</td> </tr> <tr> <td>April</td> <td>10,518.64</td> <td>18,550</td> <td>1.76</td> <td>34,881.57</td> </tr> <tr> <td>May</td> <td>12,584.66</td> <td>22,972</td> <td>1.83</td> <td>28,370.83</td> </tr> <tr> <td>Jun</td> <td>11,862.16</td> <td>17,211</td> <td>1.45</td> <td>42,026.18</td> </tr> <tr> <td>July</td> <td>16,391.40</td> <td>23,267</td> <td>1.42</td> <td>25,959.20</td> </tr> <tr> <td>August</td> <td>18,315.10</td> <td>24,745</td> <td>1.35</td> <td>39,700.85</td> </tr> </tbody> </table>	Month	FFB Production (MT)	Diesel Used (Litre)	Diesel/FFB (Litre/MT)	Baseline	January	9,796.09	16,080	1.64	25,626.88	February	4,564.60	14,760	3.23	29,387.25	March	8,814.80	18,881	2.14	34,688.80	April	10,518.64	18,550	1.76	34,881.57	May	12,584.66	22,972	1.83	28,370.83	Jun	11,862.16	17,211	1.45	42,026.18	July	16,391.40	23,267	1.42	25,959.20	August	18,315.10	24,745	1.35	39,700.85	Complied
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		September	20,816.89	32,528	1.56	44,631.99																																														
		<p>In Year 2022 available a Diesel Reduction Strategy as continuously monitored. Among actions included:</p> <ul style="list-style-type: none"> • Engine room: Optimizing steam generation from boiler • Biogas plant: Install/construct new TNB Substation • Mill: Minimizing prime mover operation. <p><u>Air Putih Estate</u></p> <p>In year 2022 (Jan-Dec) a total diesel use was 169.273 Litres for production of 53,802.84 MT FFB. A rate of Diesel/FFB produces was 4.76. A diesel usage and monitoring record sighted for use per ton FFB:</p>																																																		
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Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.							
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other GHG emissions identified including CO, SOx and NOx from various sources such as fossil fuel, chemical and fertilizer consumptions mainly from estates activities. The emission value is recorded and calculated through the utilisation of RSPO’s Palm GHG Calculator ver. 4. Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4.0 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was correct.					Complied
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	NA since no new development by the certification unit since 2014. No proposed development and major potential sources of emissions that may result directly from the development are estimated within Kemaman POM and its Supply Base since 2014.					Not Applicable
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -	Other significant pollutants were identified through the assessment of all polluting activities as of the environment impact assessment. Plans to reduce or minimise the pollutants were then established in various formats such as wastes management plans, water					Complied

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		<p>management plan, and pollution prevention plans to name a few. The implementation and monitoring of the plans were found to be satisfactorily delivered.</p> <p><u>Kemaman POM</u> Environmental Improvement Plan/Pollution Prevention Plan (Kemaman POM) reviewed annually (02/10/2023). Environmental issues, mitigation measures, Action By (Responsible person), Time Frame and Status. Among issues captured and having actions and monitored included:</p> <ul style="list-style-type: none"> • Leakage of used engine oil and lubricant from workshop • Leakage from chemicals at store area • Spillage of engine oil and lubricant while washing vehicles • High Noise level from exhaust blow pipe of boiler • Improper drainage system at workers' housing • Dangerous gases and fumes in Laboratory <p>Noise coming from Engine Room and others (total all 20)</p>	
<p>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</p>			
<p>7.11.1</p>	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>Based on the site visit of the replanting area at the estate, there was no evidence that fire had been used for land preparation. Oil palms were felled, chipped, and windrowed.</p> <p>Plantation has a policy of no open burning. Sampled in all estate, found practiced zero burning. In the replanting area visited observed</p>	<p>Complied</p>

		no burning and all palms were felled, shredded, windrowed and left to decompose. No fire was used for waste disposal too.	
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 -	<p>TDMP has established fire prevention and control measures documented in Standard Operating Procedure, Emergency Preparedness and Response, edition: TDM/01, revision: TDMP-01/2018 dated 01/01/2018. The fire prevention plan was basically described through the following flowcharts of the procedure:</p> <ul style="list-style-type: none"> - Fig. 4.4a – Emergency Response Plan in the Event of Fire - Fig. 4.4b – Emergency Response Plan in the Event of an Explosion <p><u>Air Putih Estate</u></p> <p>Established and available a SOP, Emergency Preparedness and Response, Edition: TDM/01, Rev. TDMP-01/2018 dated 01/01/2018. The fire prevention plan as shown in the flowchart as follows:</p> <ul style="list-style-type: none"> • Emergency Response Plan in the Event of Fire • Emergency Response Plan in the Event of an Explosion <p>Emergency drill conducted on annually basis to prepare everyone of any case of emergency and emergency contact number for Bomba found posted (911) and available in case of fire fighting services support required by the estate.</p>	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	The above-mentioned fire prevention and control measures were communicated to the stakeholders via providing the procedure to the identified stakeholders. The stakeholders have acknowledged received of the document and it was available for verification.	Complied

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		<p><u>Air Putih Estate</u></p> <p>Meeting with stakeholders was conducted on 24/08/2023 at LPT Training Room at 3.30pm and attended by 43 stakeholders, local community and adjacent stakeholders (SK Air Putih) only one attended the event. However, sighted an invitation letter dated 11/05/2023 to adjacent stakeholders such as Chairman of JPJK Kg. Air Putih, JPJK Kg. Teladas, JPJK Kg. Jenang Baru, Klinik Kesihatan Air Putih, HM SK. Air Putih to attend Fire Awareness, Protection and Use of Fire Extinguisher at Air Putih Office compound on 17/05//2023 at 7.00am.</p>	
<p>Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
<p>7.12.1</p>	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting or land clearing conducted in the certification units since 15/11/2018.</p> <p>TDM Plantation Sdn. Bhd. has conducted latest HCV assessment in May 2022 for TDM Kemaman Complex (covering Pelantoh Estate, Tebak Estate, Jernih Estate, and Air Putih Estate), and in June and July 2022 for TDM Bukit Besi Complex (covering Gajah Mati Estate, MAIDAM Estate, Pinang Emas Estate, and Jerangau Estate). Report dated 30/12/2022 titled High Conservation Value (HCV) Assessment Report: TDM-Kemaman Complex and High Conservation Value (HCV) Assessment Report: TDM-Bukit Besi Complex are properly retained by each operating unit.</p>	<p>Not Applicable</p>
<p>7.12.2</p>	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15</p>	<p>There has been no land clearing done by the certification unit since 15/11/2018. Nonetheless, TDMP Sdn. Bhd. has reconducted their HCV assessment in mid-2022 for all their three complexes i.e., Kemaman, Bukit Besi, and Sungai Tong. It was carried out by a</p>	<p>Complied</p>

	<p>November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019). - Critical (Major) compliance -</p>	<p>consultant and reports dated 30/12/2022 was made available for verification. The main objective of the assessment is to reevaluate the presence of HCV within the certification unit. Recommendations from the assessor were also included in the report where the CU has taken them into consideration to establish their HCV management plans.</p> <p>For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018. Referred to the Table 4.1 (Identification and Analysis of HCV’s Presence Within the Study Area) of the latest HCV Assessment Report, the identified HCV area as below:</p> <table border="1" data-bbox="1124 746 1928 1257"> <thead> <tr> <th>Biodiversity Area</th> <th>HCV Status</th> <th>Remarks</th> <th>Assessor Advice</th> </tr> </thead> <tbody> <tr> <td colspan="4" style="text-align: center;"><u>Pelantoh Estate</u></td> </tr> <tr> <td>Graveyard (Muslim)</td> <td>HCV 6</td> <td>Area of religious significant</td> <td>The area needs to be protected due to religious aspect.</td> </tr> <tr> <td>Masjid Ladang Pelantoh North</td> <td>HCV 6</td> <td>Worship house</td> <td>The area needs to be protected due to religious aspect.</td> </tr> <tr> <td>Surau - Pelantoh South Estate</td> <td>HCV 6</td> <td>Worship house</td> <td>The area needs to be protected due to religious aspect.</td> </tr> <tr> <td>Sg. Tebak (2.77ha)</td> <td>HCV 4</td> <td>Erosion control</td> <td>The area needs to be protected due to its important towards the hydrology and to minimize the impact on the soil erosion.</td> </tr> </tbody> </table>	Biodiversity Area	HCV Status	Remarks	Assessor Advice	<u>Pelantoh Estate</u>				Graveyard (Muslim)	HCV 6	Area of religious significant	The area needs to be protected due to religious aspect.	Masjid Ladang Pelantoh North	HCV 6	Worship house	The area needs to be protected due to religious aspect.	Surau - Pelantoh South Estate	HCV 6	Worship house	The area needs to be protected due to religious aspect.	Sg. Tebak (2.77ha)	HCV 4	Erosion control	The area needs to be protected due to its important towards the hydrology and to minimize the impact on the soil erosion.	
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<u>Tebak Estate</u>			
River buffer zone Sg Tebak (3.69ha) Sg Mas (1.45ha)	HCV 4	Erosion control	The area needs to be protected due to its important towards the hydrology and to minimize the impact on the soil erosion.
Masjid Kampung Ladang Tebak	HCV 6	Worship house	The area needs to be protected due to religious aspect.
<u>Jernih Estate</u>			
HCV area 1 (69.23ha)	HCV 4	Slope >25°	The area needs to be protected due to its sloping area and its biodiversity.
HCV area 2 (1.86ha)	HCV 4	Slope >25°	The area needs to be protected due to its sloping area and its biodiversity.
HCV area 2 (1.86ha)	HCV 4	Border with Forest	The area needs to be protected due to its biodiversity. Based on evidence during the survey showed that the area is a wildlife roaming route.
River buffer zone Sg. Mas (7.46ha)	HCV 4	Erosion control	The area needs to be protected due to its important towards the hydrology and to minimize the impact on the soil erosion.
Masjid Sungei Mas	HCV 6	Worship house	The area needs to be protected due to religious aspect.

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<u>Air Putih Estate</u>			
HCV Area 1	HCV 4	Slope >25°	Area needs to be protected due to its sloping area
HCV Area 2 (47.77ha)	HCV 4	Slope >25°	Area needs to be protected due to its sloping area
HCV Area 3 (51.89ha)	HCV 4	Slope >25°	Area needs to be protected due to its sloping area
River buffer zone Sg. Paloh Jenang (25.31ha)	HCV 4	Erosion Control	Area needs to be protected due to its important to hydrology and minimize soil erosion.
	HCV 6	Worship house Masjid Ladang Air Putih	Area needs to be protected due to religious aspect.
<u>Gajah Mati Estate</u>			
"Kawasan Pemuliharaan Habitat" (Habitat Conservation Area) (62.02ha)	HCV 4	Area contains of flora and fauna	The area needs to be protected due to the sloping area and its biodiversity.
	HCV 4	Slope >25°	This area is observed sloping at certain elevation. This area is potential to be developed for less than 25-degree slope.
	HCV 4	Wildlife routes	According to the evidence during the survey, there were footprints of wildlife. Based on the camera trap

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			installed at the site, it captured Sun Bear, Panther, Tapir and Wildboar.
Masjid Ladang Gajah Mati	HCV 6	Worship house	The area needs to be protected due to religious aspect.
<u>MAIDAM Estate</u>			
HCV 2 area Border with forest area (3.99ha)	HCV 4	Area contains of flora and fauna	The area needs to be protected due to its biodiversity. Based on evidence during the survey conducted shows that the area is a wildlife roaming route.
Border with forest area	HCV 4	Area contains of flora and fauna	The area needs to be protected due to its biodiversity. Based on evidence during the survey conducted shows that the area is a wildlife roaming route.
HCV 1 area (1.21ha)	HCV 4	Slope >25°	Area needs to be protected due to its sloping area
River buffer zone Sg Angka (2.32ha)	HCV 4	Erosion Control	Area needs to be protected due to its important to hydrology and minimize soil erosion.
Surau Ladang MAI 1	HCV 6	Worship house	The area needs to be protected due to religious aspect.
<p>Based on this information, the GIS AAD Department of TDM Plantation Sdn Bhd has conducted latest survey and mapping for each operating unit, which concluded in March 2023. The area (ha) of each HCVs were clearly outlined in the survey report. The report also includes HCV location maps for all TDM estates, and the maps</p>			

		<p>were used as reference and guidance by the audit team during physical audit.</p> <p>In addition, TDM reiterated that there was no HCV loss nor clearance of HCV within 2022 – 2023. The change of hectareage was based on the reassessment report and TDM management purely adheres to the figures provided by the HCV assessors.</p>	
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	Not applicable.	Not Applicable
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>Based on the latest HCV assessment reports dated 30/12/2022, among the HCV areas identified were HCV 4 (e.g., river buffer zones, >25 deg steep areas, border with forest), HCV 6 (e.g., worship houses). The estates conducted HCV/conservation area monitoring once every 2 months. The monitoring covers on animal sighting, trace of hunting, trace of animal shelter, HCV disturbance, erosion and chemical application in the area. Records of monitoring were made available for verification. The estates had erected signboards at the HCV areas to signify the HCV numbers, prohibition of agrochemical application and hunting. The estates conducted water sampling for river flow through the estate on annually basis. Latest water sampling for Tebak Estate was conducted on 14/08/2023. Among the parameters analysed were pH, BOD, COD, TSS, AN, and P. Apart from that, presence of pesticides and organochlorine was also analysed.</p> <p>High Conservation Value (HCV) Assessment Report was sighted for TDM Kemaman Kompleks dated 30/12/2022, which based on the HCV identified in the report, the estate has established management plan.</p>	Complied

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>There were no rights of local communities identified to be present in HCV areas, HCS forest after 15/11/2018, peat land and other conservation areas.</p> <p>As verified in all estate there was no rights of local communities been identified in HCV areas, HCS forest after 15/11/2018, peat land and other conservation areas</p>	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The estates management continue to promote awareness on HCV/RTE to the workers during morning briefing and training. The estates have also erected signage at strategic designated places such as at the premise entrance, office, housing area and notice boards to create awareness on the HCV and RTE. The estates communicated the information about HCV and RTE to all stakeholders during stakeholders meeting.</p> <p>As sighted during site visit in all estate, in identified HCV/ Biodiversity area, signages and reminder of no hunting in the estates such as at the estates entrance, office, housing area and notice board to ensure the awareness on the HCV and RTE. The estate has also communicated the information on HCV and RTE to all stakeholders during stakeholders meeting as sampled.</p>	Complied
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>There was no new HCVs, HCS forests peatland and other conservation areas been identified after 15/11/2018 in all the sampled estates. Monitoring of these areas are made through the daily field supervision by the field staff and executives. The sampled estates conducted their HCV/conservation area monitoring once every 2 months. The monitoring includes animal sighting, trace of</p>	Complied

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		<p>hunting, trace of animal shelter, HCV disturbance, erosion and chemical application in the area.</p> <p>As verified in all estates, no new HCVs, HCS forests peatland and other conservation areas been identified after 15/11/2018. Monitoring of these areas are made through the daily field supervision by the field staff and executives. The HCV/Biodiversity conservation area monitoring continuously implemented as recorded. The monitoring covers on animal sighting, trace of hunting, trace of animal shelter, HCV disturbance, erosion and chemical application in the area.</p>	
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>There was no land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15/11/2008 2018 within certification unit.</p> <p>As verified in all estate, found no land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15/11/2018 within certification unit.</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2023 for Kemaman POM and supply base was calculated using the PalmGHG Calculator Version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2023 for Kemaman POM and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.27
PKO	1.27

Extraction	%
OER	19.78
KER	4.54

Production	t/yr
FFB Processed	157,102.65
CPO Produced	31,070.83
PKO Produced	7,134.26

Land Use	Ha
OP Planted Area	28,125.01
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	482.45
Total	28,607.46

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	202,252.42	1.29	0.00	0.00	0.00	0.00	202,252.42	1.29
CO ₂ Emission from Fertilizer	16,195.89	0.58	0.00	0.00	0.00	0.00	16,195.89	0.58
NO ₂ Emission from Peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NO ₂ Emission from Fertilizer	928.96	0.01	0.00	0.00	0.00	0.00	928.96	0.01
Fuel Consumption	2,485.82	0.02	0.00	0.00	0.00	0.00	2,485.82	0.02
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-174,118.03	-1.11	0.00	0.00	0.00	0.00	-174,118.03	-1.11
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	47,745.05	0.30	0.00	0.00	0.00	0.00	47,745.05	0.30

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0.00	0.00
Fuel Consumption	607.15	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	607.15	0.00

Summary of Kernel Crusher Emission and Credit (if applicable)

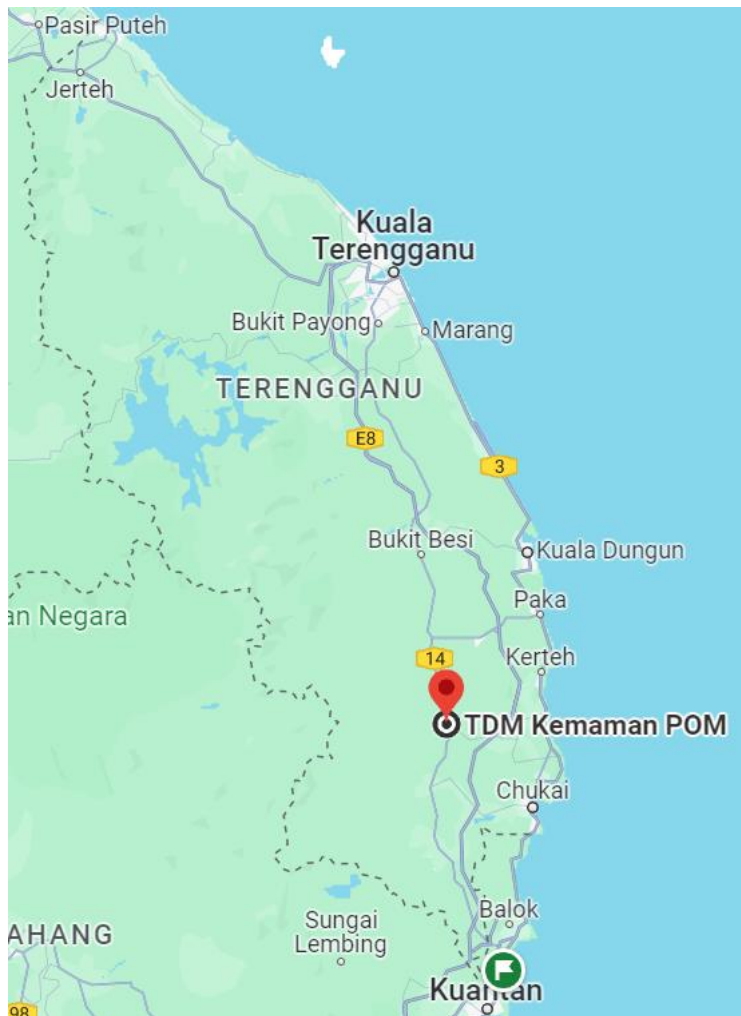
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	20
Divert to anaerobic diversion (%)	80

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

Appendix C: Location Map of Certification Unit and Supply bases



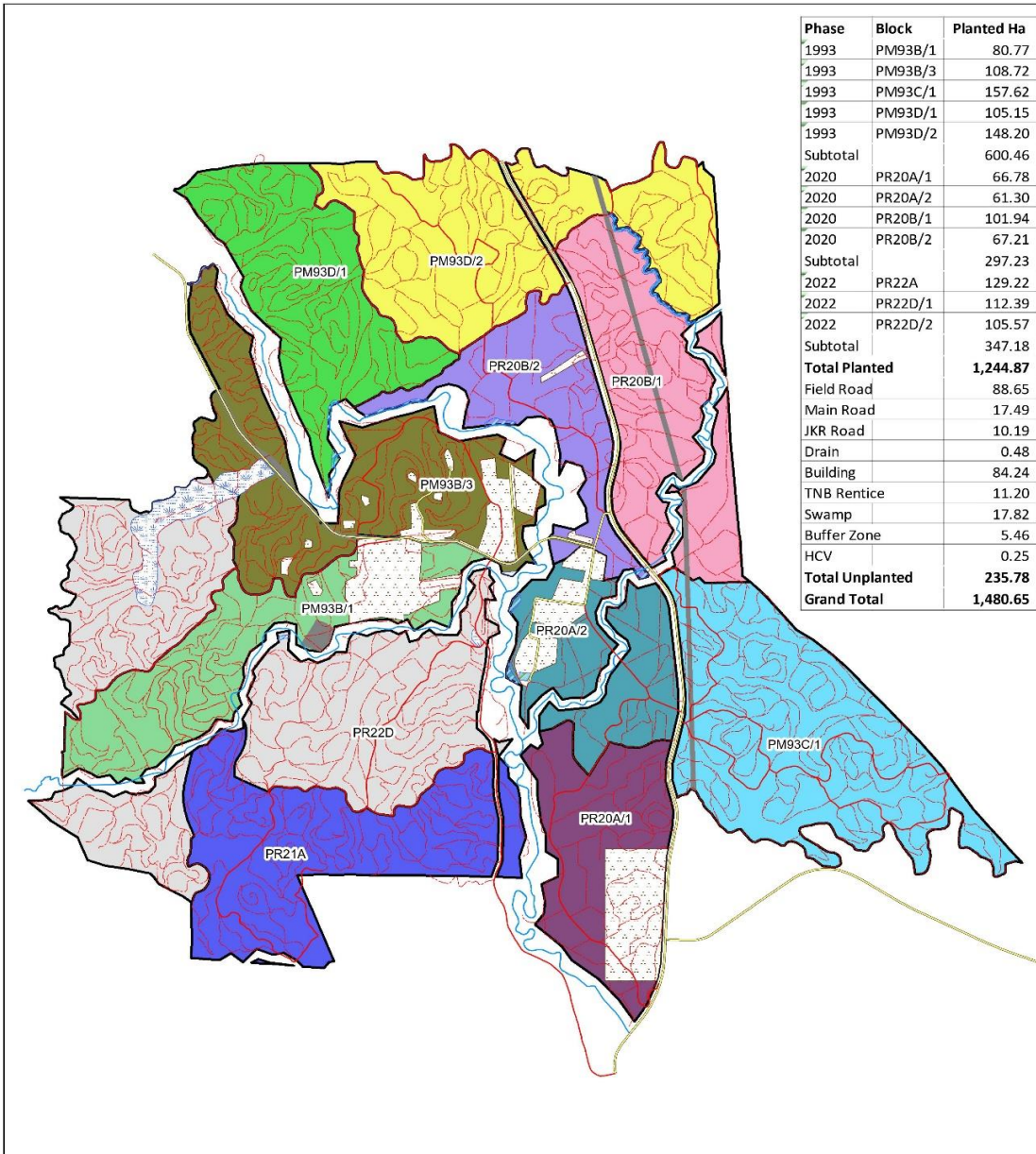


Appendix D: Estate Field Map



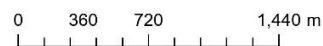
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Ladang Pelantoh North



Phase	Block	Planted Ha
1993	PM93B/1	80.77
1993	PM93B/3	108.72
1993	PM93C/1	157.62
1993	PM93D/1	105.15
1993	PM93D/2	148.20
Subtotal		600.46
2020	PR20A/1	66.78
2020	PR20A/2	61.30
2020	PR20B/1	101.94
2020	PR20B/2	67.21
Subtotal		297.23
2022	PR22A	129.22
2022	PR22D/1	112.39
2022	PR22D/2	105.57
Subtotal		347.18
Total Planted		1,244.87
Field Road		88.65
Main Road		17.49
JKR Road		10.19
Drain		0.48
Building		84.24
TNB Rentice		11.20
Swamp		17.82
Buffer Zone		5.46
HCV		0.25
Total Unplanted		235.78
Grand Total		1,480.65

Legend		



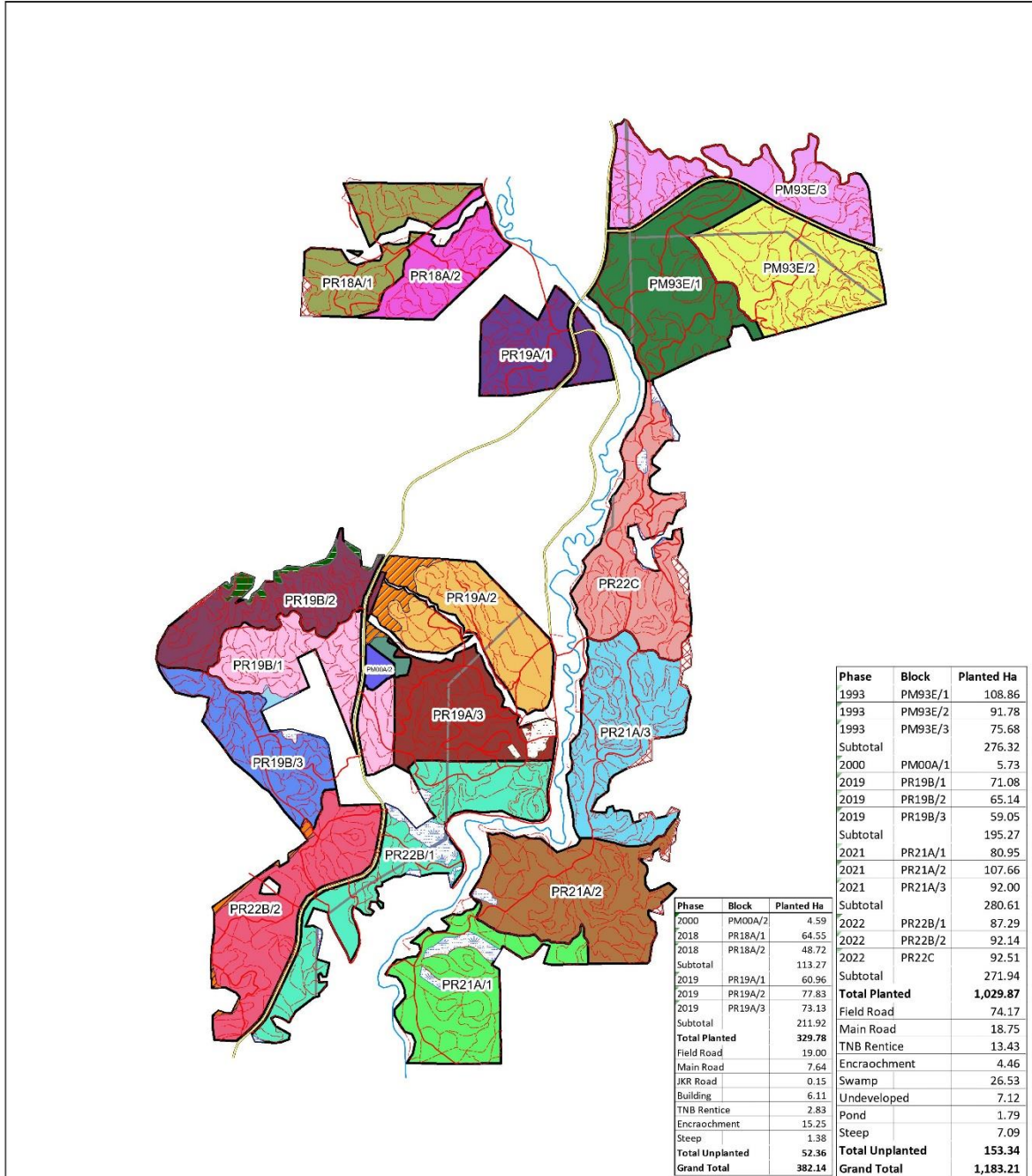
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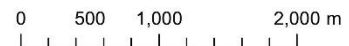


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Ladang Pelantoh South



Legend		
	Field Road	
	Main Road	
	Drain / River	
	Govt Road	
	Steep	
	Undeveloped	



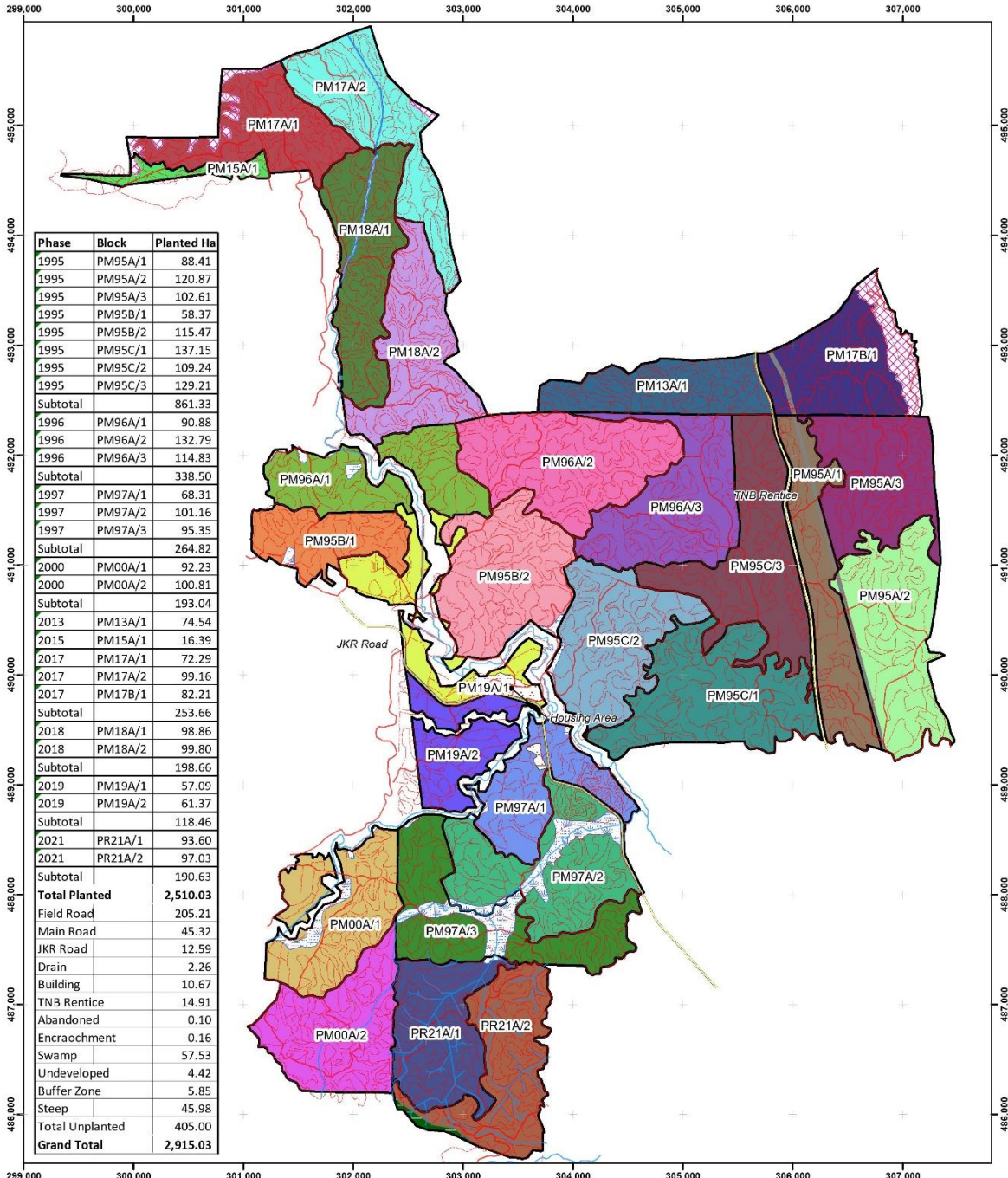
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Projection: UTM N48 WGS84

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Revision 15 (Nov 2023)



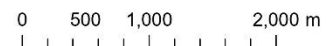
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Ladang Tebak



Phase	Block	Planted Ha
1995	PM95A/1	88.41
1995	PM95A/2	120.87
1995	PM95A/3	102.61
1995	PM95B/1	58.37
1995	PM95B/2	115.47
1995	PM95C/1	137.15
1995	PM95C/2	109.24
1995	PM95C/3	129.21
	Subtotal	861.33
1996	PM96A/1	90.88
1996	PM96A/2	132.79
1996	PM96A/3	114.83
	Subtotal	338.50
1997	PM97A/1	68.31
1997	PM97A/2	101.16
1997	PM97A/3	95.35
	Subtotal	264.82
2000	PM00A/1	92.23
2000	PM00A/2	100.81
	Subtotal	193.04
2013	PM13A/1	74.54
2015	PM15A/1	16.39
2017	PM17A/1	72.29
2017	PM17A/2	99.16
2017	PM17B/1	82.21
	Subtotal	253.66
2018	PM18A/1	98.86
2018	PM18A/2	99.80
	Subtotal	198.66
2019	PM19A/1	57.09
2019	PM19A/2	61.37
	Subtotal	118.46
2021	PR21A/1	93.60
2021	PR21A/2	97.03
	Subtotal	190.63
	Total Planted	2,510.03
	Field Road	205.21
	Main Road	45.32
	JKR Road	12.59
	Drain	2.26
	Building	10.67
	TNB Rentice	14.91
	Abandoned	0.10
	Encroachment	0.16
	Swamp	57.53
	Undeveloped	4.42
	Buffer Zone	5.85
	Steep	45.98
	Total Unplanted	405.00
	Grand Total	2,915.03

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



Prepared By: AAD
 Map Date: 13 Mar 2023
 Projection: UTM N48 WGS84

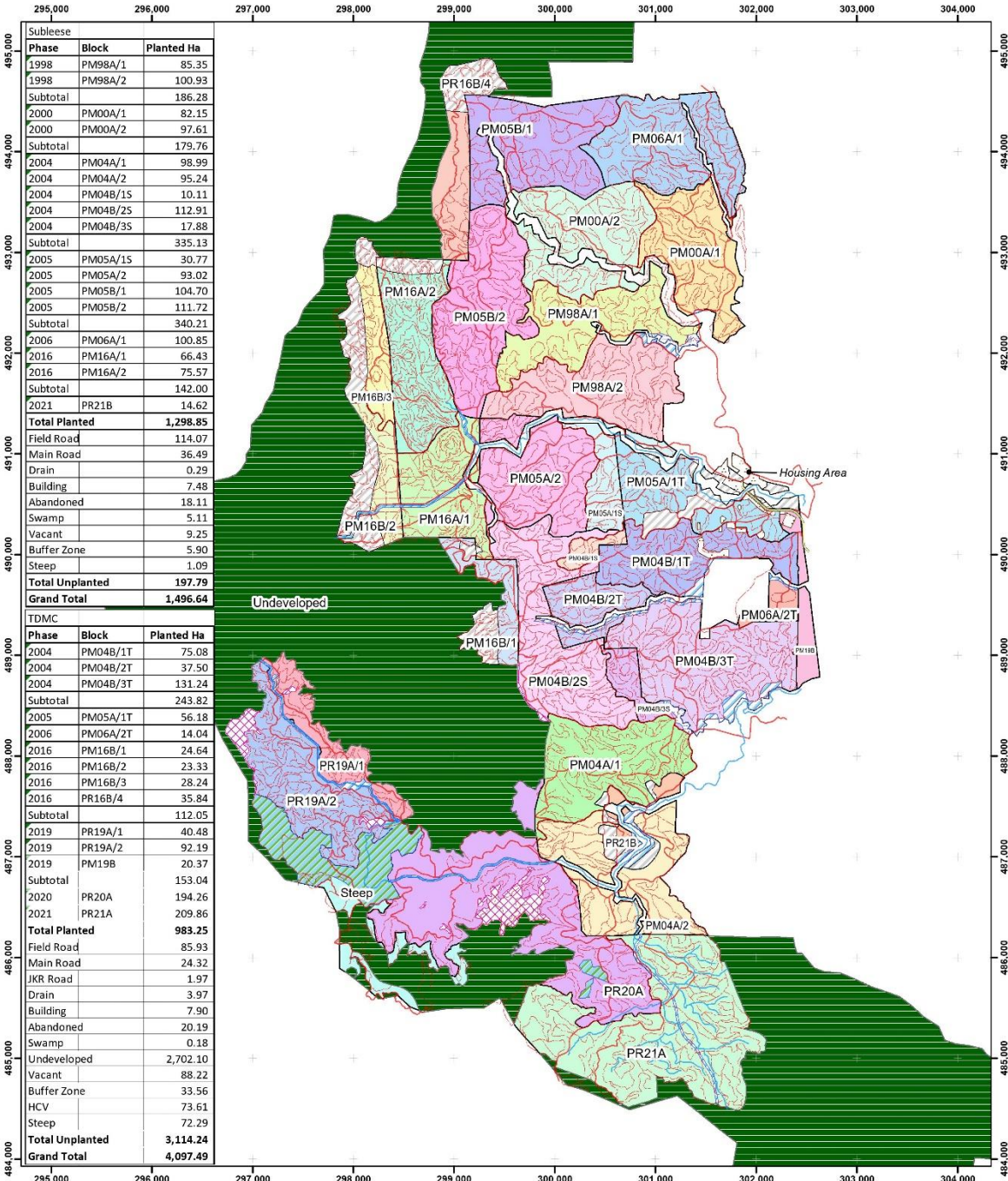
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Ladang Jernih



Sublease	Phase	Block	Planted Ha
	1998	PM98A/1	85.35
	1998	PM98A/2	100.93
	Subtotal		186.28
	2000	PM00A/1	82.15
	2000	PM00A/2	97.61
	Subtotal		179.76
	2004	PM04A/1	98.99
	2004	PM04A/2	95.24
	2004	PM04B/1S	10.11
	2004	PM04B/2S	112.91
	2004	PM04B/3S	17.88
	Subtotal		335.13
	2005	PM05A/1S	30.77
	2005	PM05A/2	93.02
	2005	PM05B/1	104.70
	2005	PM05B/2	111.72
	Subtotal		340.21
	2006	PM06A/1	100.85
	2016	PM16A/1	66.43
	2016	PM16A/2	75.57
	Subtotal		142.00
	2021	PR21B	14.62
	Total Planted		1,298.85
	Field Road		114.07
	Main Road		36.49
	Drain		0.29
	Building		7.48
	Abandoned		18.11
	Swamp		5.11
	Vacant		9.25
	Buffer Zone		5.90
	Steep		1.09
	Total Unplanted		197.79
	Grand Total		1,496.64

TDMC	Phase	Block	Planted Ha
	2004	PM04B/1T	75.08
	2004	PM04B/2T	37.50
	2004	PM04B/3T	131.24
	Subtotal		243.82
	2005	PM05A/1T	56.18
	2006	PM06A/2T	14.04
	2016	PM16B/1	24.64
	2016	PM16B/2	23.33
	2016	PM16B/3	28.24
	2016	PM16B/4	35.84
	Subtotal		112.05
	2019	PR19A/1	40.48
	2019	PR19A/2	92.19
	2019	PM19B	20.37
	Subtotal		153.04
	2020	PR20A	194.26
	2021	PR21A	209.86
	Total Planted		983.25
	Field Road		85.93
	Main Road		24.32
	JKR Road		1.97
	Drain		3.97
	Building		7.90
	Abandoned		20.19
	Swamp		0.18
	Undeveloped		2,702.10
	Vacant		88.22
	Buffer Zone		33.56
	HCV		73.61
	Steep		72.29
	Total Unplanted		3,114.24
	Grand Total		4,097.49

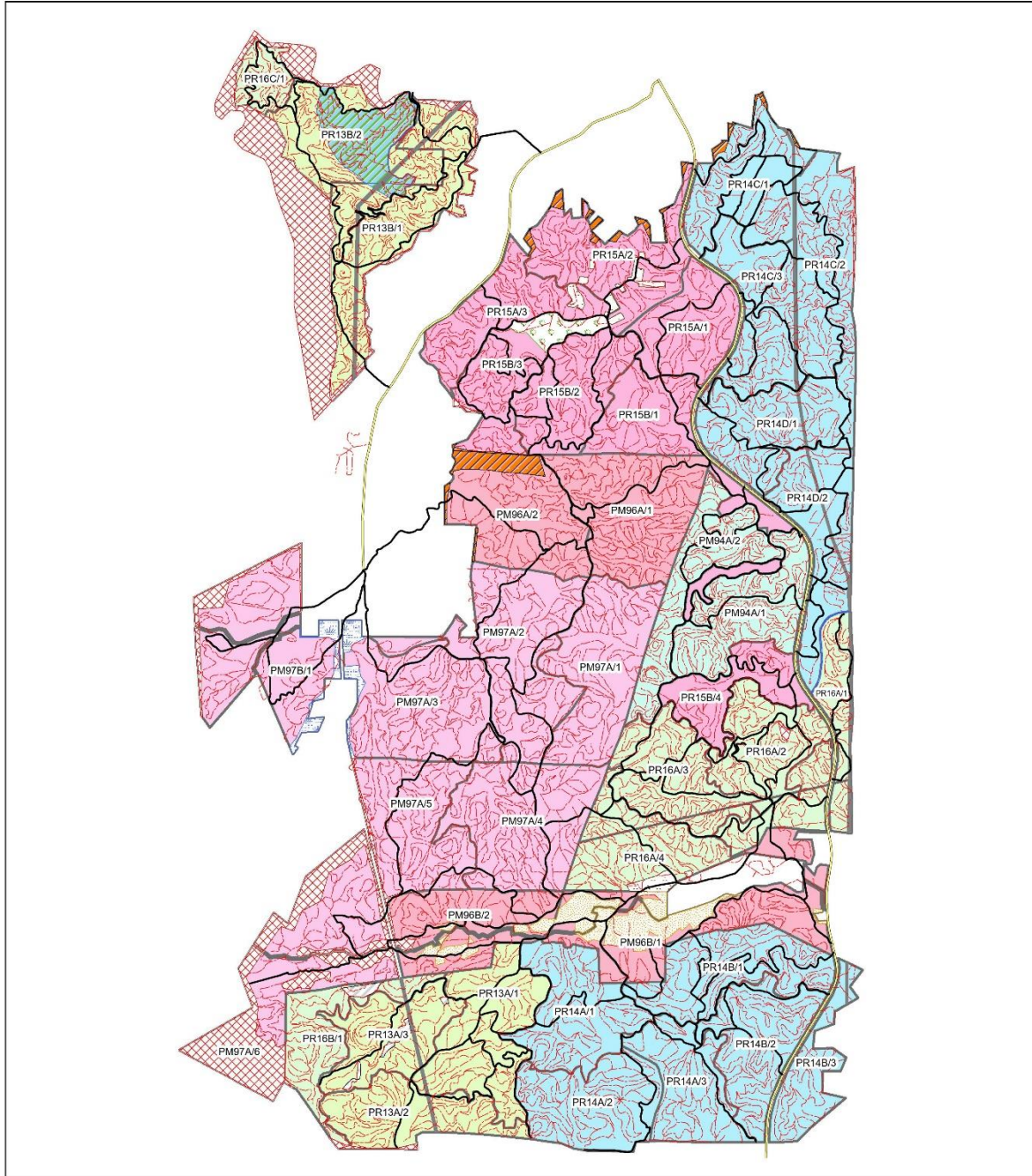
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 Projection: UTM N48 WGS84

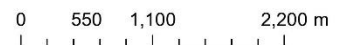


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Ladang Air Putih



Legend			
Field Road	Abandoned	Encroachment	Govt Infra
Main Road	Buffer Zone	Ex-mining	Nursery / Orchard
Drain / River	Building	HCV	Steep
Govt Road	Swamp		



Prepared By: AAD
 Map Date: 30 Jun 2022
 Projection: UTM N48 WGS84

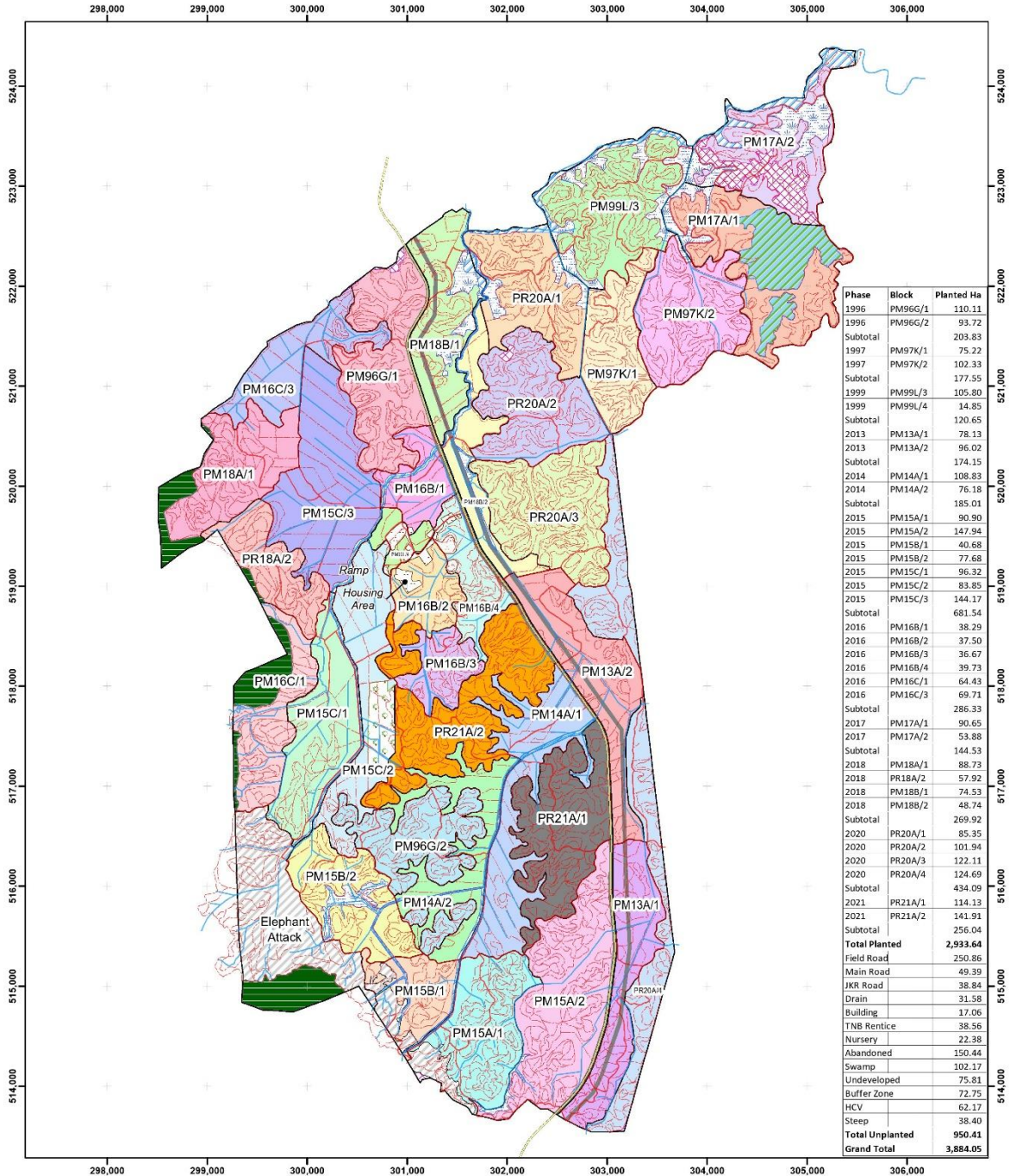
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Ladang Gajah Mati



Legend

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

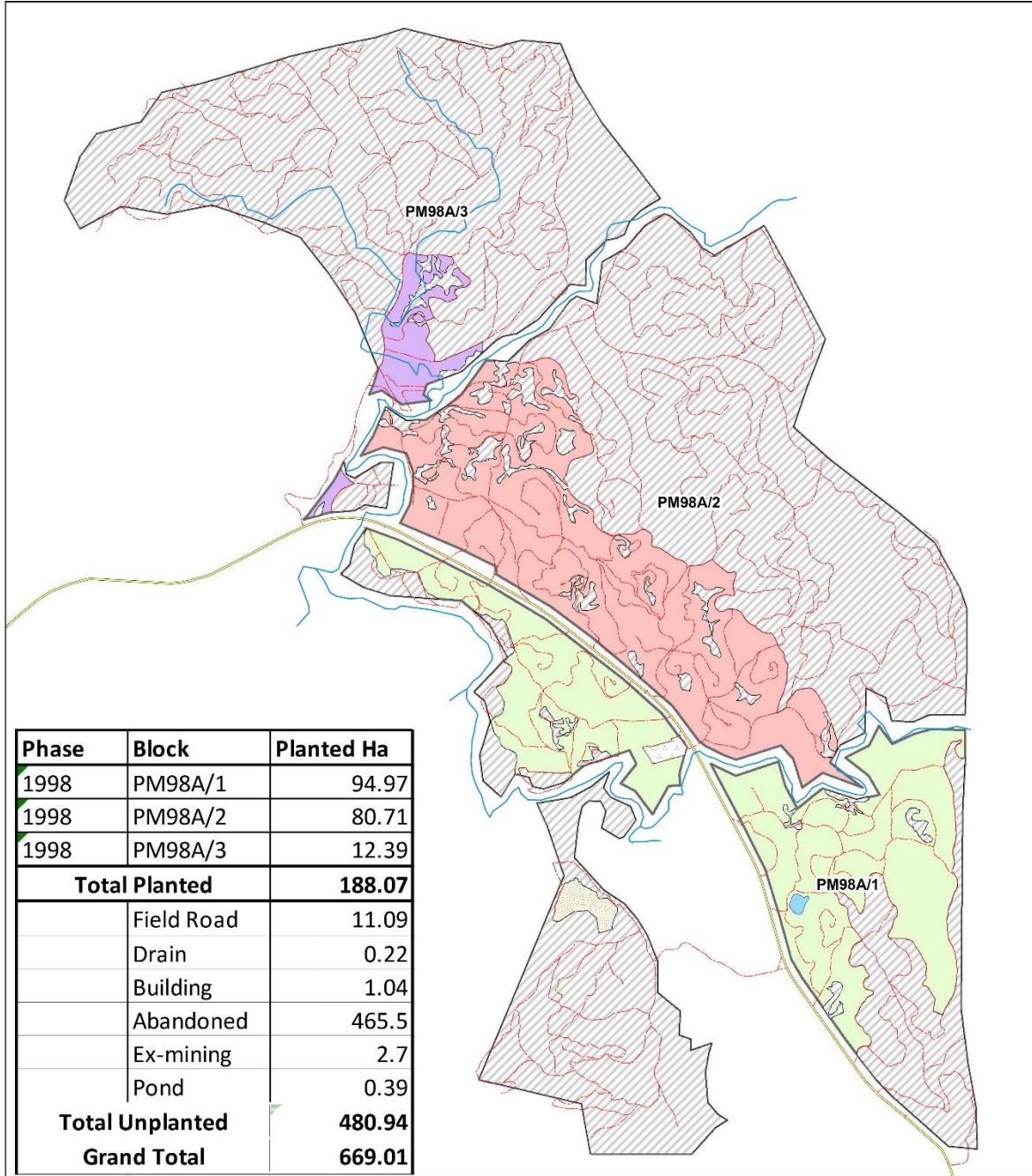
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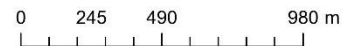


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Ladang MAI 1



Legend	
	Field Road
	PM98A/1
	Abandoned
	Building
	Main Road
	PM98A/2
	Drain / River
	PM98A/3
	Govt Road
	Ex-mining
	Pond

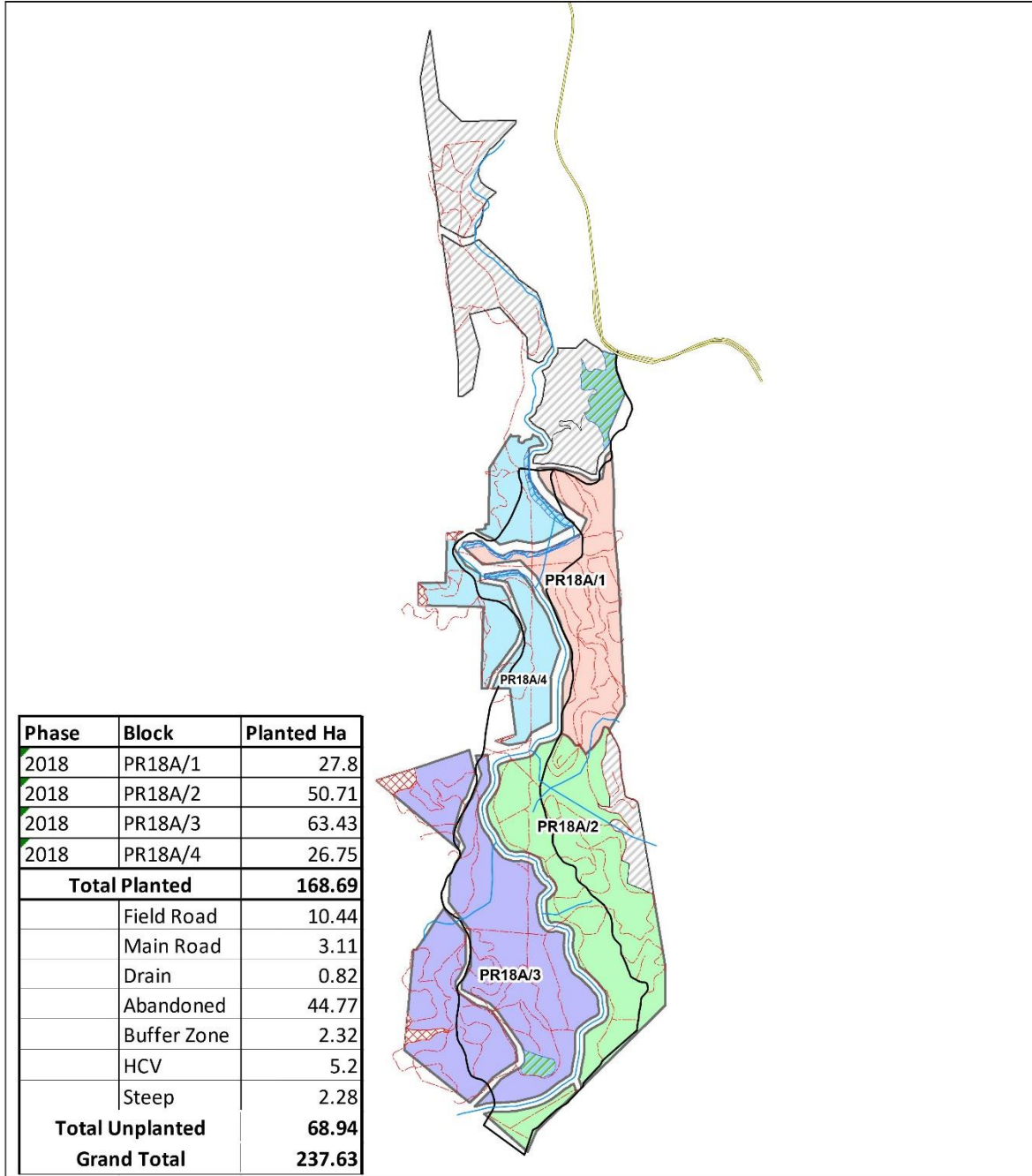


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Ladang MAI 2



Legend

Field Road	PR18A/1	Abandoned	Buffer Zone	HCV
Main Road	PR18A/2			Steep
Drain / River	PR18A/3			
Govt Road	PR18A/4			



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 Map Date: 30 Jun 2022
 Projection: UTM N48 WGS84

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Appendix E: List of Smallholder Registered and/or sampled

Sampling Group	Current Certification	Scope Extension	Other: <i>Please specify</i>
Risk Factor Applied	N/A	N/A	N/A
Justification of Risk Factor Applied	N/A	N/A	N/A
Number of samples	N/A	N/A	N/A
Remarks	N/A	N/A	N/A

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
Not Applicable									
Total					N/A	N/A	N/A		

Note: * are smallholders sampled in this audit.

Appendix F: List of Abbreviations

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