

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

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

<b>SIME DARBY PLANTATION BERHAD</b>
Client Company / Parent Company Address: Level 11, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia
Certification Unit: <b>Strategic Operating Unit (SOU 18) – Diamond Jubilee Palm Oil Mill</b> Location of Certification Unit: KM 8, Jasin – Simpang Bekoh Road, 77100 Jasin, Melaka, Malaysia
Date of Final Report: 11/10/2023

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## Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	Sime Darby Plantation Berhad		
<b>RSPO Membership Number</b>	1-0008-04-000-00	<b>Membership Approval Date</b>	07/09/2004
<b>Address</b>	Level 11, Main Block, Plantation Tower No 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Strategic Operating Unit (SOU 18) – Diamond Jubilee Palm Oil Mill		
<b>Location / Address</b>	KM 8, Jasin – Simpang Bekoh Road, 77100 Jasin, Melaka, Malaysia		
<b>Website</b>	<a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a>		
<b>Management Representative</b>	Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, GSD) Sharin Lugman ( SOU Chairman)	<b>E-mail</b>	shylaja.vasudevan@simedarbyplantation.com sharin.lugman.hashim@simedarbyplantation.com
<b>Telephone</b>	+(603) 78484000 (Head Office)	<b>Facsimile</b>	+603-78484356 (Head Office)

2. Certification Information			
<b>Certificate Number</b>	RSPO 591224	<b>Certificate Start Date</b>	05/10/2021
<b>Date of First Certification</b>	05/10/2011	<b>Certificate Expiry Date</b>	04/10/2026
<b>Scope of Certification</b>	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
<b>Visit Objectives</b>	The objective of the assessment was to conduct an annual surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by SOU 18 Diamond Jubilee POM and Supply Base's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives.		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the 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		

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<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	25 Mt/Hour
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

<b>3. Other Certifications</b>			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
MSPO 688335	MS 2530- 3:2013 Malaysian Sustainable Palm Oil (MSPO)	BSI Services (M) Sdn Bhd	09/01/2028
MSPO 682043	MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO)	BSI Services (M) Sdn Bhd	09/01/2028
MSPO 714120	MSPO Supply Chain Certification Standard 1 <sup>st</sup> October 2018	BSI Services (M) Sdn Bhd	11/07/2024

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base)</b>	<b>Location</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Diamond Jubilee POM	KM 8, Jasin – Simpang Bekoh Road, 77100 Jasin, Melaka, Malaysia	2° 19' 29" N	102° 28' 59" E
Diamond Jubilee Estate	KM 8, Jasin – Simpang Bekoh Road, 77100 Jasin, Melaka, Malaysia	2° 19' 50" N	102° 29' 18" E
Bukit Asahan Estate	Jalan Asahan 77100 Melaka, Malaysia	2° 23' 38" N	102° 32' 45" E
Welch Estate	Jalan Segamat - Jementah 85200 Segamat, Johor	2° 27' 22" N	102° 39' 12" E

<b>5. Description of Supply Base</b>					
<b>New Planting Development</b>	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
<b>Estate</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Diamond Jubilee Estate	2,623.24	5.58	187.62	2,816.44	92.61
Bukit Asahan Estate	2,965.53	1.36	105.29	3,072.18	96.53
Welch Estate	576.20	0.95	870.67	1,447.82	39.80
<b>Total</b>	<b>6,164.97</b>	<b>7.89</b>	<b>1,163.58</b>	<b>7,336.44</b>	
<b>Note:</b> Diamond Jubilee Estate					

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- a. The total planted and total area for ASA1 (2022) was mistakenly reported. The actual Total Planted and Total Area was 2,626.79 ha and 2,819.99 respectively. Year 2022 area statement for each estate was referred.
- b. Reduction of Total Planted Area by 3.55 Ha due to State Government Land Acquisition.

<b>6. Plantings &amp; Cycle</b>						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Diamond Jubilee Estate	189.33	601.35	1,820.08	12.48	2,433.91	189.33
Bukit Asahan Estate	560.58	235.92	2,169.03	-	2,404.95	560.58
Welch Estate	-	-	543.16	33.04	576.20	-
<b>Total (ha)</b>	749.91	837.27	4,532.27	45.52	5,415.06	749.91

**Note:** Only Mature area is considered as production area

<b>7. Summary of Certified Tonnage of FFB (Own Certified Scope)</b>				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated Last Year (Oct 2022 – Sept 2023)	Actual (Jul 2022 – Jun 2023)		Forecast (Oct 2023 – Sept 2024)
		Previous license period (Jul 2022 – Sep 22)	Current license period (Oct 22 – Jun 23)	
Diamond Jubilee Estate	35,915.00	5363.48	16,891.98	59,021.18
Bukit Asahan Estate	40,000.00	8820.87	20,689.47	53,132.83
Welch Estate	32,000.00	2622.32	4,994.63	10,793.07
<b>Total</b>	<b>107,915.00</b>	<b>59,382.75</b>		<b>122,947.08</b>

**Notes.**

1. Based on the clarification provided by the Estate Management, actual volume was below the estimated volume due to the labour shortage that has effected the estates. This was confirmed via the Labour Statement Records.

<b>8. Summary of Certified Tonnage of FFB (from other certified unit(s))</b>				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated Last Year (Oct 2022 – Sept 2023)	Actual (Jul 2022 – Jun 2023)		Forecast (Oct 2023 – Sept 2024)
		Previous license period (Jul 2022 – Sep 22)	Current license period (Oct 22 – Jun 23)	
Kempas Estate		146.53	-	
Serkam Estate		86.03	-	
Bukit Pilah Estate		-	28.98	
Kok Foh Estate		-	112.14	

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Pertang Estate		-	47.12	
Sg Sabaling Estate		-	19.87	
St Helier Estate		-	38.42	
<b>Total</b>			<b>479.09</b>	

<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
<b>Out growers / smallholders</b>	<b>Tonnage (MT) / year</b>			
	<b>Estimated Last Year (Oct 2022 – Sept 2023)</b>	<b>Actual (Jul 2022 – Jun 2023)</b>		<b>Forecast (Oct 2023 – Sept 2024)</b>
		<i>Previous license period (Jul 2022 – Sep 22)</i>	<i>Current license period (Oct 22 – Jun 23)</i>	
-	-	-	-	-
-	-	-	-	-
<b>Total</b>	-	-	-	-

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply base (mt)</b>	<b>Volume of FFB from uncertified supply base (mt)</b>	<b>Total FFB/Month (mt)</b>
1	Jul 2022	5,978.69	-	5,978.69
2	Aug 2022	5,748.93	-	5,748.93
3	Sept 2022	5,311.61	-	5,311.61
4	Oct 2022	5,055.16	-	5,055.16
5	Nov 2022	4,863.51	-	4,863.51
6	Dec 2022	5,756.82	-	5,756.82
7	Jan 2023	4,200.19	-	4,200.19
8	Feb 2023	5,297.33	-	5,297.33
9	Mac 2023	3,870.21	-	3,870.21
10	April 2023	3,549.92	-	3,549.92
11	May 2023	5,020.86	-	5,020.86
12	June 2023	5,208.61	-	5,208.61
	<b>TOTAL</b>	<b>59,861.84</b>	-	<b>59,861.84</b>

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<b>10. Summary of Certified Tonnage (MT) (not applicable for ISS)</b>			
<b>Estimated last year (Oct 2022 – Sept 2023)</b>	<b>Actual (July 2022 – June 2023)</b>		<b>Forecast (Oct 2023 – Sept 2024)</b>
	<i>Previous license period (Jul 2022 – Sep 22)</i>	<i>Current license period (Oct 22 – Jun 23)</i>	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
107,915.00 mt	17,039.23 mt	42,822.61 mt	122,947.08 mt
	<b>TOTAL</b>	59,861.84 mt	
<b>CPO (OER: 21.50 %)</b>	<b>CPO (OER: 20.42 %)</b>		<b>CPO (OER: 21.50 %)</b>
23,201.93 mt	3,444.65 mt	8,777.87 mt	26,433.62 mt
	<b>TOTAL</b>	12,222.52 mt	
<b>PK (KER: 5.20 %)</b>	<b>PK (KER: 5.23 %)</b>		<b>PK (KER: 5.50 %)</b>
5,611.63 mt	885.74 mt	2,247.47 mt	6,762.09 mt
	<b>TOTAL</b>	3,133.21 mt	

<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (MT)</b>	<b>Certified PK (MT)</b>
1	Jul 2022	1237.53	321.83
2	Aug 2022	1131.04	293.80
3	Sept 2022	1076.08	270.11
4	Oct 2022	994.39	253.58
5	Nov 2022	970.59	250.79
6	Dec 2022	1138.37	311.59
7	Jan 2023	865.97	218.91
8	Feb 2023	1103.92	277.16
9	Mac 2023	826.87	219.28
10	April 2023	765.92	193.17
11	May 2023	1043.66	259.36
12	June 2023	1068.19	263.64
	<b>TOTAL</b>	12,222.53	3,133.22

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<b>11. Summary of Actual Volume sold</b>					
<b>Current License period (Oct 22 – Jun 23)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	7,296.60	-	-	476.40	7,773.00
<b>PK (MT)</b>	2,191.27	-	-	-	2,191.27
<b>Credits</b>	-	-	-	-	-
<b>Previous License period (Jul 2022 – Sep 22)</b>					
<b>CPO (MT)</b>	2,857.49	-	-	560.31	3,417.80
<b>PK (MT)</b>	906.13	-	-	-	906.13
<b>Credits</b>	-	-	-	-	-
<b>Note:</b>					
1. Conventional is RSPO certified material but sold as non-RSPO.					
2. Carry Forward CPO June 2022 – July 2022: 167.81 Mt.					
3. Carry Forward PK June 2022 – July 2022: 190.98 Mt					

<b>11A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	XXX	XXX	10,154.09	-
2	XXX	XXX	-	3,097.40
<b>TOTAL</b>			<b>10,154.09</b>	<b>3,097.40</b>

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

<b>11C. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	XXX	1,036.71	-
<b>TOTAL</b>		<b>1,036.71</b>	<b>-</b>



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

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Oct 22 – Sept 23)			Actual (Jul 2022 – Jun 2023)			Forecast (Oct 23 – Sept 24)		
	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)
-	-	-	-	-	-	-
-	-	-	-	-	-	-
<b>TOTAL</b>		-	-	-	-	-

**Note:** 1 mt = 1 credit

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
<b>Current License period (Oct 22 – Jun 23)</b>							
Credits				-	-	-	-
Physical	-	-	-				
<b>Previous License period (Jul 22 – Sept 22)</b>							
Credits				-	-	-	-
Physical	-	-	-				

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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)
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
<b>TOTAL</b>			-	-	-	-	-
<b>Note:</b>							

## Section 2: Assessment Process

### Certification Body:

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

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

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **03/07/2023 – 06/07/2023**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **30/08/2023**. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification)</b>	<b>Year 2 (ASA1_1)</b>	<b>Year 3 (ASA1_2)</b>	<b>Year 4 (ASA1_3)</b>	<b>Year 5 (ASA1_4)</b>
Diamond Jubilee POM	✓	✓	✓	✓	✓
Diamond Jubilee Estate	✓	✓	✓	✓	✓
Bukit Asahan Estate	✓	✓	✓	✓	✓
Welch Estate	✓	✓	✓	✓	✓

**Tentative Date of Next Visit: July 1, 2024 - July 4, 2024**

**Total Number of Mandays: 12 Mandays**

**2.2 BSI Assessment Team**

<b>Name</b>	<b>Role</b>	<b>Competency</b>
Vijay Kanna Pakirisamy (VKP)	Team Leader	<p><b>Education:</b> Holds a Bachelor Degree in Agribusiness Science Management with Honours, University Utara Malaysia.</p> <p><b>Work Experience:</b> He has 10 years' experience in Oil Palm Estate Management in leading Oil Palm Companies such as KL Kepong Bhd, IOI Plantations and United Plantations. The last position held was Senior Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He has been an sustainable palm oil auditor since 2019.</p> <p><b>Training attended:</b> He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, HCV &amp; HCS Introductory Training, SMETA Requirements Training, Endorsed RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&amp;C and SCCS).</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of Best Management Practice for Mill and Estate, environment aspect, GHG &amp; HCV.</p> <p><b>Language proficiency:</b> He is fluent in English and Bahasa Malaysia languages.</p>

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<p>Mohamed Hidhir bin Zainal Abidin (MHZ)</p>	<p>Team Member</p>	<p><b>Education:</b> Holds a Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006.</p> <p><b>Work Experience:</b> 4½ years working experience in palm oil industry specifically in palm oil mill as Mill Engineer. More than 10 years of auditing experience with accredited certification body for several schemes include ISO9001, ISO14001, OHSAS18001 (now ISO45001), RSPO, MSPO and RBA Labor Ethics</p> <p><b>Training attended:</b> He has completed ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, MSPO Awareness Training, Endorsed RSPO SCCS Lead Auditor Course, HCV &amp; HCS Introductory Training, SMETA Requirements Training, Endorsed RSPO Independent Smallholder (IHS) Auditor Training and Endorsed RSPO Refresher Trainings (P&amp;C and SCCS).</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of social, legal requirements, employee welfare and stakeholder consultation.</p> <p><b>Language proficiency:</b> He is fluent in English and Bahasa Malaysia language.</p>
<p>Muhamad Fadzli Masran</p>	<p>Team Member</p>	<p><b>Education:</b> Bachelor of Forestry Science from University Putra Malaysia</p> <p><b>Work Experience:</b> Started the career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations and had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health &amp; safety, environment conservation and protection at buffer areas and continuous improvement management plans.</p> <p><b>Training attended:</b> Completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in April 2018 endorsed RSPO Lead Auditor Course in July 2018 and Endorsed RSPO Refresher Trainings (P&amp;C and SCCS).</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of Occupation Health Safety requirement, HIRARC, training, GAP and RSPO supply chain requirements.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Malaysia and English Language.</p>

**Accompanying Persons:**

Name	Role
-	-

### 2.3 Assessment Plan

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

Date	Time	Subjects	VKP	MHZ	MFM
Sunday, 02/07/2023	1500 - 1900	Auditors travel to Melaka.	✓	✓	✓
Monday, 03/07/2023	0800 - 0900	Travel from Melaka to <b>Diamond Jubilee Estate</b>	✓	✓	✓
	0900 - 0930	Opening Meeting: - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation).	✓	✓	✓
	0930 - 1230	<b>Diamond Jubilee Estate</b> 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.	✓	✓	✓
	1230 - 1330	LUNCH BREAK			
	1330 - 1630	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.)	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Tuesday, 04/07/2023	0900 - 1230	<b>Diamond Jubilee Palm Oil Mill</b> 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, Lab, weighbridge and palm product storage area, etc.	✓	✓	✓
	1000 - 1200	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	-	✓	-

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Date	Time	Subjects	VKP	MHZ	MFM
	1230 - 1330	LUNCH BREAK			
	1330 - 1630	Document review P1 – P7: Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCCS general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
Wednesday, 05/07/2023	0900 - 1230	<b>Bukit Asahan Estate</b> 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.	✓	✓	✓
	1230 - 1330	LUNCH BREAK			
	1330 - 1630	Document review P1 – P7: Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCCS general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	✓	✓	✓
	1630 - 1700	Interim Closing Briefing	✓	✓	✓
	0900 - 1230	<b>Welch Estate</b> 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.)	✓	✓	✓
Thursday, 06/07/2023	1230 - 1330	LUNCH BREAK			

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Date	Time	Subjects	VKP	MHZ	MFM
	1330 - 1600	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.)	✓	✓	✓
	1600 - 1630	Verify any Outstanding Issues and Preparation for Closing Meeting	✓	✓	✓
	1630 - 1700	Closing Meeting	✓	✓	✓

**Critical NC Close Out On-site Assessment Plan**

Date	Time	Subjects	VKP
Tuesday, 29/08/2023	-	Auditor travel to Melaka.	✓
Wednesday, 30/08/2023	0800 - 0900	Auditor travel from Melaka to Diamond Jubilee Estate.	
	0900 – 1230	Opening Meeting at Diamond Jubilee Estate: 1. Opening Presentation by Audit Team Leader. 2. Confirmation of assessment scope and finalize Audit plan. 3. Verification on Critical NC: • 2364282-202306-M1 • 2364282-202306-M2 4. Workers Interview 5. Document review – implemented evidence	✓
	1230 – 1300	Closing Meeting	✓



### Section 3: Assessment Findings

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

Requirement	Assessment	Compliance
<p>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?</p>	<p>Sime Darby Plantation Berhad TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>On 16/01/2020, Sime Darby Plantation Berhad under its subsidiary Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation – Liberia) to Mano Palm Oil Industries Ltd (MPOI): <a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations">http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</a></p>	<p>Complied</p>
<p>Have all the estates and mills certified within five (5) years after obtaining RSPO membership?</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021</p>	<p>Generally, all estates and mills excepted stated below or in the TBP are certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As of Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 01/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently Sime Darby Plantation Berhad have no control in the management. Refer TBP approval dated 13/07/2023.</p>	<p>Complied</p>
<p>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.</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.</p>	<p>There are no new acquisitions. There is new propose on 2024 for Land legalization still in progress dated approval by RSPO on 13 Julai 2023 for these Estate.</p> <ol style="list-style-type: none"> <li>1. Ladang Panjang Estate-1,796.19 ha</li> <li>2. Rantau Panjang Estate, Napal Estate / Karang Ringin Estate- 1,843.73 ha.</li> <li>3. Mangun Jaya Estate- 1,398.55 ha</li> <li>4. Sungai Jernih Estate- 851.57 ha</li> <li>5. Pelanjau Estate (PT BAL) &amp; Beturus Estate (PT BAL)- 4,071.76 ha</li> </ol>	<p>Complied</p>

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	<p>6. Karya Palma Estate (PT SNP) – 476.70 Ha 7. West and East Estate – 1,452.93 Ha</p>	
<p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p>	<p>Although there is deviation has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties were sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: <a href="http://www.rspo.org/certification/public-announcement">www.rspo.org/certification/public-announcement</a></p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): <a href="http://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations">www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations</a>. ACOP 2020 has been cross-referenced as below: <a href="http://www.rspo.org/members/29">www.rspo.org/members/29</a></p>	<p>Complied</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised</p>	<p>Although there are lapses has been identified at those Indonesia management units, but it has been</p>	<p>Complied</p>

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	justified that these units are still awaiting to receive land titles.	
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as these 2 assets were disposed.	Complied
<b>Un-Certified Units or Holdings</b>		
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.	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units. Refer TBP approval dated 13/07/2023.	Complied
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification.</p> <p>1. NBPOL (Poliamba Limited) 23/05/2020 – no comments  <a href="https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/">https://rspo.org/public-consultation/sime-darby-plantation-berhad-nbpol-poliamba-limited/</a></p> <p>2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/">https://rspo.org/public-consultation/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd/</a></p> <p>3. NBPOL (Ramu Agri Industries Limited) 29/01/2018 – no comments  <a href="https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/">https://rspo.org/public-consultation/nbpol-ramu-agri-industries-ltd/</a></p> <p>4. NBPOL (Ramu Agri Industries Limited) 02/09/2016 – no comments  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-ramu-agri-industries-</a></p> <p>5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-higaturu-oil-palms/</a></p> <p>6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/">https://rspo.org/public-consultation/nbpol-poliamba-limited-lamawan-png/</a></p>	Complied

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	<p>7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/">https://rspo.org/public-consultation/nbpol-poliamba-limited-lamendauen-png/</a></p> <p>8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-roka-mini-estate/</a></p> <p>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/">https://rspo.org/public-consultation/new-britain-palm-oil-ltd-j-estate/</a></p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/">https://rspo.org/public-consultation/new-britain-palm-oil-limited-higaturu-oil-palm/</a></p> <p>11. NBPOL (Ramu Agri Industries Ltd) 06/03/2012 - no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/">https://rspo.org/public-consultation/rail-new-planting-assessment-call-for-comments/</a></p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment/</a></p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-1/</a></p> <p>14. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website  <a href="https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/">https://rspo.org/public-consultation/sime-darby-liberia-plantation-inc-new-planting-assessment-2/</a></p> <p>Management units for 12 – 14 above were disposed</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) have been excluded in the latest TBP as both sites was disposed.</p>	<p>Complied</p>

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<p>Facility, in accordance with RSPO P&amp;C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancies between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of August 2023, 16 out of 19 management units in Indonesia operations completed LUCA review with 1 Concept note (covering all 19 affected manage units) has been endorsed by RSPO.</p> <p>As per Internal Audit conducted in 27 – 28/06/2022, 01 – 06/08/2022 and 23/10/2022, all issues of are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about land conflict has been lodge by stakeholders as at the day of audit.</p>	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 4.2</p>	<p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.</p> <p>As per Internal Audit conducted in 27 – 28/06/2022, 01 – 06/08/2022 and 23/10/2022, no labor dispute issues were reported.</p> <p>It has been further verified through RSPO complaint tracker, Internet (Media) which there is no complaint about labour dispute has been lodge by stakeholders as at the day of audit.</p> <p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>Sime Darby Plantation maintains corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance</p>	<p>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010.</p>	<p>Complied</p>

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statement shall be available and justified.	The issue are mainly awaiting for Land Titles. The last audit was conducted in July 2022. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance. HCV Assessment has been conducted for all SDP operations since 2010, there has been no clearance of HCV areas after the HCV Assessment has been conducted and verified during the annual RSPO External and Internal Audit reports. The liability happened as there were no HCV Assessment done at the time of planting for the cases which were entered into the RACP process.	
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company	Complied

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

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	There is no scheme smallholders or outgrowers included in SDPB SOU18 Diamond Jubilee POM.	Not Applicable

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**Approved Time Bound Plan**

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	Date of Last TBP Verified and Approved by CB	REVISION OF THE TBP <i>(Only applicable when revision is made)</i>			
								Any revision from the last approved TBP? (Yes / No)	New Proposed Year for Certification	Justification of changes for each UoC	Date of approval from RSPO
Manggala	Indonesia	Manggala Mill	13.836	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -1 Estate	4.919	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -2 Estate	4.922	Certified	Not Applicable	23-Nov-10					
	Indonesia	Manggala -3 Estate	3.995	Certified	Not Applicable	23-Nov-10					
Alur Dumai	Indonesia	Alur Dumai Mill	3.759	Certified	Not Applicable	16-Jan-12					
	Indonesia	Alur Dumai Estate	3.759	Certified	Not Applicable	16-Jan-12					
Teluk Siak	Indonesia	Teluk Siak Mill	11,555.31	Certified	Not Applicable	11-Oct-11					
	Indonesia	Teluk Siak Estate	3,321.20	Certified	Not Applicable	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	3,799.21	Certified	Not Applicable	11-Oct-11					
	Indonesia	Pinang Sebatang Estate	448.00	Not Certified	2023	NA		Yes	2024	Land legalization process for 448 ha at Pinang Sebatang Estate is still in process.	13-Jul-23
	Indonesia	Aneka Persada Estate	4,434.90	Certified	Not Applicable	11-Oct-11					

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Blang Simpo	Indonesia	Blang Simpo Mill	8,777.22	Certified	Not Applicable	3-May-13					
	Indonesia	Blang Simpo -1 Estate	3,460.06	Certified	Not Applicable	3-May-13					
	Indonesia	Blang Simpo -2 Estate	2,677.83	Certified	Not Applicable	3-May-13					
	Indonesia	Tamiang (PT PPP) Estate	1,451.99	Certified	Not Applicable	3-May-13					
	Indonesia	Batang Ara (PT PSK) Estate	1,187.34	Certified	Not Applicable	3-May-13					
Teluk Bakau	Indonesia	Teluk Bakau Mill	13,317.81	Certified	Not Applicable	11-Oct-11					
	Indonesia	Teluk Bakau Estate	4,025.07	Certified	Not Applicable	11-Oct-11					
	Indonesia	Nusa Lestari Estate	3,456.74	Certified	Not Applicable	11-Oct-11					
	Indonesia	Nusa Perkasa Estate	5,836.00	Certified	Not Applicable	11-Oct-11					
Mandah	Indonesia	Mandah Mill	12,366.18	Certified	Not Applicable	1-Apr-14					
	Indonesia	Mandah Estate	5,053.18	Certified	Not Applicable	1-Apr-14					
	Indonesia	Rotan Semelur Estate	7,313.00	Certified	Not Applicable	1-Apr-14					
Sungai Pinang	Indonesia	Sungai Pinang Mill	6.513	Certified	Not Applicable	11-Sep-12					
	Indonesia	Sungai Pinang Estate	3,374.42	Certified	Not Applicable	11-Sep-12					
	Indonesia	Bukit Pinang Estate	3,138.58	Certified	Not Applicable	11-Sep-12					
Ladang Panjang	Indonesia	Ladang Panjang Mill	1,202.04	Certified	Not Applicable	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,202.04	Certified	Not Applicable	9-Jul-12					
	Indonesia	Ladang Panjang Estate	1,796.19	Not Certified	2023	NA		Yes	2024	Land legalization process for 1,796.19 ha is still in progress.	13-Jul-23



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Rantau Panjang	Indonesia	Rantau Panjang Mill	10,139.91	Certified	Not Applicable	16-Mar-12					
Rantau Panjang	Indonesia	Bumi Ayu Estate	2,960.98	Certified	Not Applicable	16-Mar-12					
	Indonesia	Rantau Panjang Estate	2,679.74	Certified	Not Applicable	16-Mar-12					
	Indonesia	Rantau Panjang Estate	1,843.73	Not Certified	2023	NA		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Napal Ringin Estate/Karang	4,359.74	Certified	Not Applicable	16-Mar-12					
	Indonesia	Napal Ringin Estate/Karang	1,843.73	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1843.73 ha for Rantau Panjang Estate, Napal Estate / Karang Ringin Estate is still in process.	13-Jul-23
	Indonesia	Mangun Jaya Estate	139.45	Certified	Not Applicable	16-Mar-12					

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	Indonesia	Mangun Jaya Estate	1,398.55	Not Certified	2023	N/A		Yes	2024	Land legalization process of 1398.55 ha is still in process.	13-Jul-23
	Indonesia	Sungai Jernih Estate	851.57	Not Certified	2023	N/A		Yes	2024	Land legalization process of 851.57 ha is still in process.	13-Jul-23
Angsana	Indonesia	Angsana Mill	15,151.19	Certified	Not Applicable	6-Jul-11					
	Indonesia	Angsana Estate	3,250.06	Certified	Not Applicable	6-Jul-11					
	Indonesia	Gunung Sari Estate	2,826.94	Certified	Not Applicable	6-Jul-11					
Mustika	Indonesia	Mustika Mill	14,840.76	Certified	Not Applicable	3-Jul-13					
	Indonesia	Mustika Estate	3,648.74	Certified	Not Applicable	3-Jul-13					
	Indonesia	Pantai bonati Estate	2,534.00	Certified	Not Applicable	6-Jul-11					
Gunung Aru	Indonesia	Gunung Aru Mill	12,740.54	Certified	Not Applicable	5-Jul-11					
	Indonesia	Gunung Aru Estate	2,684.41	Certified	Not Applicable	5-Jul-11					
	Indonesia	Gunung Kemas Estate	3,511.36	Certified	Not Applicable	5-Jul-11					
	Indonesia	Laut Timur Estate	3,207.28	Certified	Not Applicable	5-Jul-11					
	Indonesia	Pantai Timur Estate	3,337.49	Certified	Not Applicable	5-Jul-11					
Ungkaya	Indonesia	Ungkaya Mill	4,145.00	Certified	Not Applicable	10-Jul-12					
	Indonesia	Ungkaya Estate	4,145.00	Certified	Not Applicable	10-Jul-12					
Rantau	Indonesia	Rantau Mill	24,169.56	Certified	Not Applicable	30-Dec-11					

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	Indonesia	Rantau Estate	4,638.00	Certified	Not Applicable	30-Dec-11					
	Indonesia	Matalok Estate	3,082.00	Certified	Not Applicable	30-Dec-11					
	Indonesia	Selabak Estate ( PT SAA)	3,757.67	Certified	Not Applicable	16-Mar-12					
	Indonesia	Randi Estate (PT SAA)	2,882.98	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sangkoh Estate (PT SAA)	3,789.34	Certified	Not Applicable	16-Mar-12					
	Indonesia	Lanting Estate (PT LMR)	3,249.27	Certified	Not Applicable	16-Mar-12					
Betung	Indonesia	Betung Mill	7,579.57	Certified	Not Applicable	1-Apr-14					
	Indonesia	Betung Estate	4,266.00	Certified	Not Applicable	1-Apr-14					
	Indonesia	Sekayu Estate	3,313.57	Certified	Not Applicable	1-Apr-14					
Bebunga	Indonesia	Bebunga Mill	14,274.77	Certified	Not Applicable	16-Mar-12					
	Indonesia	Bebunga Estate	3,958.43	Certified	Not Applicable	16-Mar-12					
	Indonesia	Bakau Estate	5,342.14	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sungai Cengal Estate	4,974.20	Certified	Not Applicable	16-Mar-12					
Pondok Labu	Indonesia	Pondok Labu Mill	15,876.20	Certified	Not Applicable	16-Mar-12					
	Indonesia	Pondok Labu Estate	3,569.53	Certified	Not Applicable	16-Mar-12					
	Indonesia	Binturung Estate	4,072.01	Certified	Not Applicable	16-Mar-12					
	Indonesia	Rampa Estate	3,656.20	Certified	Not Applicable	16-Mar-12					
	Indonesia	Sesulung Estate	4,578.46	Certified	Not Applicable	16-Mar-12					
Sekunyir	Indonesia	Sekunyir Mill	7,734.59	Certified	Not Applicable	23-Nov-10					
	Indonesia	Sekunyir Estate	3,555.19	Certified	Not Applicable	23-Nov-10					
	Indonesia	Seruyan Estate	4,179.40	Certified	Not Applicable	23-Nov-10					
Sukamandang	Indonesia	Sukamandang Mill	14,779.92	Certified	Not Applicable	5-Jul-11					

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	Indonesia	Sukamandang Estate	3,936.56	Certified	Not Applicable	5-Jul-11					
	Indonesia	Sapiri Estate	3,530.90	Certified	Not Applicable	5-Jul-11					
	Indonesia	Baras Danum Estate	3,664.60	Certified	Not Applicable	5-Jul-11					
	Indonesia	Kuala Kuayan Estate	3,647.86	Certified	Not Applicable	5-Jul-11					
Pematang	Indonesia	Pematang Mill	16,601.66	Certified	Not Applicable	5-Jul-11					
	Indonesia	Pematang Estate	3,857.91	Certified	Not Applicable	5-Jul-11					
	Indonesia	Kawan Batu Estate	4,400.00	Certified	Not Applicable	5-Jul-11					
	Indonesia	Hatantiring Estate	3,811.00	Certified	Not Applicable	5-Jul-11					
	Indonesia	Batang Garing Estate	4,532.75	Certified	Not Applicable	5-Jul-11					
Lembiru	Indonesia	Lembiru Mill	9,409.07	Certified	Not Applicable	3-Jul-14					
	Indonesia	Lembiru Estate	4,929.49	Certified	Not Applicable	3-Jul-14					
	Indonesia	Awatan Estate	3,476.79	Certified	Not Applicable	3-Jul-14					
	Indonesia	Pelanjau Estate (PT BAL)	1,002.79	Certified	Not Applicable	3-Jul-19					
	Indonesia	Pelanjau Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus Estate is still in process	13-Jul-23
	Indonesia	Beturus Estate (PT BAL)	4,071.76	Not Certified	2023	N/A		Yes	2024	Land legalization process for 4,071.76 Ha for Pelanjau & Beturus	13-Jul-23

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										Estate is still in process	
	Indonesia	Karya Palma Estate (PT SNP)	476.70	Not Certified	2023	N/A		Yes	2024	Land legalization process for 476.70 ha is still in process.	13-Jul-23
Bukit Ajong	Indonesia	Bukit Ajong Mill	11,498.82	Certified	Not Applicable	18-Oct-10					
	Indonesia	West Estate	4,562.34	Certified	Not Applicable	18-Oct-10					
	Indonesia	West Estate	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha (West and East Estate) is still in process.	13-Jul-23
	Indonesia	East Estate	2,665.48	Certified	Not Applicable	18-Oct-10					
	Indonesia	East Estate/Sei Mawang	1,452.93	Not Certified	2023	N/A		Yes	2024	Land legalization process for 1452.93 ha (West and East Estate) is still in process.	13-Jul-23
Sg. Dingin	Malaysia	Sungai Dingin Oil Mill	19,517.17	Certified	Not Applicable	12-Aug-10	19-20 July 2021				
	Malaysia	Anak Kulim Estate	1,523.35	Certified	Not Applicable	12-Aug-10	19-20 July 2021				
	Malaysia	Sungai Dingin Estate	4,244.03	Certified	Not Applicable	12-Aug-10	19-20 July 2021				

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

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

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



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

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

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

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

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

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

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

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



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

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

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	Papua New Guinea	Smallholders LSS Mosa (1822)	5,008.53	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Smallholders VOP East (1817)	5,324.37	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Smallholders VOP Central (1964)	5,756.57	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Smallholders VOP West (1279)	2,804.10	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Smallholders LSS Kapiura (551)	551.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Smallholders VOP Kapiura (850)	847.00	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
	Papua New Guinea	Smallholders Kaulong/Akami/Pushiki/R epamira/Sakapei (20)	700.37	Certified	Not Applicable	10-Sep-08	19-20 July 2021				
Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd.	Papua New Guinea	Erap Mill	5,399.40	Certified	Not Applicable	27-Mar-20	19-20 July 2021			There is total area for NPP: 710.30 ha which is currently excluded from the certification scope of MFCL until the NPP is approved.	
	Papua New Guinea	Munum Estate	1,734.57	Certified	Not Applicable	27-Mar-20	19-20 July 2021				

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

### 3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were two (2) Critical raised. The SDPB SOU18 Diamond Jubilee 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			
<b>NCR Ref #</b>	2364282-202306-M1	<b>Issued Date</b>	06/07/2023
<b>Due Date</b>	05/10/2023	<b>Closure Date</b>	30/08/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	1.1.3 (Critical)		
<b>Statement of Nonconformity:</b>	Requests for information and responses related to NUPW issues were not effectively maintained.		
<b>Requirement Reference:</b>	Records of requests for information and responses are maintained.		
<b>Objective Evidence:</b>	<p><u>Diamond Jubilee Estate</u>            Chronology of event on NUPW Melaka state request            16/03/2023 – 1<sup>st</sup> joint consultative meeting between the management of Diamond Jubilee Estate and site NUPW representative together with NUPW Melaka state secretary.            19/06/2023 – Letter issued by NUPW Melaka state branch, ref: NUPW/MSB/JCC/2023 for a 2<sup>nd</sup> joint consultative meeting as written in the letter; <i>"Pihak kami sehingga kini masih tidak mendapat apa-apa keputusan mengenai beberapa perkara berikut"</i>            3 pending issues highlighted:</p> <ul style="list-style-type: none"> <li>- Salary payment to supervise Gang Base Team for mandore MXXXXXXXX RXXXXXXXX.</li> <li>- Difference of salary for MTG drivers from 17% to 20%</li> <li>- Claim payment for dependent (travel claim) for Mr TXXXXXXXX NXXXXXXXXX Bukit Kajang Division)</li> </ul> <p>A session with NUPW site representative and NUPW Melaka state secretary was held on 04/07/2023. It was acknowledged that no official response made for the above pending issues by the management to the complainant. The management in response confirmed that they have engaged with them to respond on the progress of the issues. Nevertheless, there were no record evidence available of responses maintained by the management in regards to this matter.            Reference: MAPA/NUPW Collection Agreement 2019, Article 5 – Grievance Redressal Procedure.</p>		
<b>Corrections:</b>	1. A letter to response on request made by worker representative sent on 7 <sup>th</sup> July to Melaka NUPW secretary to inform on the reimbursement of tractor driver salary and medical expenses claim by the worker.		

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	<ol style="list-style-type: none"> <li>2. A meeting with NUPW was set on 11<sup>th</sup> July to discuss on the additional salary / allowance of team-based mandore.</li> <li>3. It was agreed during the meeting that HR Governance &amp; Industrial Relations need to highlight to mechanisation department and will inform on the status by end of July.</li> <li>4. Union representative also was briefed to highlight all issues pertaining to worker welfare during Social Dialogue.</li> </ol>
<p><b>Root Cause Analysis:</b></p>	<p>Lapses in communication between management and the previous Person in Charge (PIC) to monitor the case development since the meeting on 16/3/2023.</p>
<p><b>Corrective Actions:</b></p>	<ol style="list-style-type: none"> <li>1. The management has appointed two (2) key person i.e one from executive and one from office representative. <ul style="list-style-type: none"> <li>– The key person will be responsible to compile requests or complaints received from stakeholders and to be communicated to the management on a regular basis.</li> </ul> </li> </ol>
<p><b>Assessment Conclusion:</b></p>	<ol style="list-style-type: none"> <li>1. The estate management have issued a letter to response on request made by worker representative dated 07/07/2023 to Melaka NUPW secretary to inform on the 3 issues mentioned above.</li> <li>2. A meeting was held by the estate management with the presence of NUPW Secretary (Melaka), Main Division Union Chairman and Regional HR Asst Manager dated 11/07/2023. The meeting minutes was available for verification, documented in "Mesyuarat Perundingan Bersama NUPW". The details as below. <ul style="list-style-type: none"> <li>– Salary payment to supervise Gang Base Team for mandore: It was agreed that the management will be given till end of July 2023 to finalise the payment. The management have updated the NUPW Secretary on the status of the salary payment via email dated 30/08/2023. The management have agreed on a mode of payment and will be backdated and paid to the mandore accordingly. A meeting was conducted on 28/08/2023 with the state NUPW representatives as well to update them on the status of the issue.</li> <li>– Difference of salary for MTG drivers from 17% to 20%: Estate Management to obtain approval from RGM to reimburse the underpaid wages to all MTG Drivers. It was verified that all underpaid wages have been reimbursed to the MTG drivers accordingly.</li> <li>– Claim payment for dependent: Payment to be reimbursed to the worker accordingly. It was verified that the payment has been reimbursed accordingly. Sighted the "Personal Expenses Reimbursement Claim; Doc Number: DJE-CV 001/JULY.2023) reimbursed on 07/07/2023 and acknowledged by the worker.</li> </ul> </li> <li>3. Union representative were briefed to highlight all issues pertaining to worker welfare during Social Dialogue. Sighted the memo titled "<i>Memorandum Tugas-Tugas Wakil Union Dalam Sesi Sosial Dialog</i>" dated 08/07/2023 by the estate manager to union representatives.</li> <li>4. The estate management have appointed the Sr. Assistant Manager (Appointment Letter Dated 01/05/2023) and the Account Admin Officer (Appointment Letter dated 01/08/2023) to be responsible to compile requests or complaints received from stakeholders and to be communicated to the</li> </ol>

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	<p>management on a regular basis. The appointment letters undersigned by the estate manager was available for verification.</p> <p>The implementation of the correction and corrective action plan to address the raised critical non-conformity was able to close the issue. Therefore, the critical non-conformity was successfully closed on 30/08/2023.</p>
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Non-conformity			
<b>NCR Ref #</b>	2364282-202306-M2	<b>Issued Date</b>	06/07/2023
<b>Due Date</b>	05/10/2023	<b>Closure Date</b>	30/08/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	6.2.2 (Critical)		
<b>Statement of Nonconformity:</b>	Compensation for all worked performed was not accurately paid based on information in payroll documents.		
<b>Requirement Reference:</b>	Employment contracts and related documents detailing payments and conditions of employment (e.g., regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.		
<b>Objective Evidence:</b>	<p>Head of Group HR, Governance &amp; NE email dated 12/01/2022 is referred to on the new directive:</p> <ul style="list-style-type: none"> <li>• To stop retaining 3% (Division of Earning) for SD3 system machine operator (MTG) wages (maintenance purpose)</li> <li>• SD3 system machine operator (MO) (MTG) to receive full wages (Division of Earning, DOE @ 20%), previously 17% for SD3 MO driver.</li> </ul> <p><u>Diamond Jubilee Estate</u></p> <p>Based on pay slip for MO ID 144511, for period of January 2022 to June 2023;</p> <ul style="list-style-type: none"> <li>– Jan 2022 - Feb 2022: 20% division of earning (2 months)</li> <li>– Mar 2022 - Jan 2023: 17% division of earning (11 months)</li> <li>– Feb 2023 - June 2023: 20% division of earning (5 months)</li> </ul> <p>The worker has not received accurate division of earning (DOE) @ 20% for the period of 11 months as instructed based on email from Head of Group HR, Governance &amp; NE dated 12/01/2022.</p>		
<b>Corrections:</b>	Estate management has identified the amount shorts in the calculation of the salary of MTG Drivers. The amount has been arranged for reimbursement and will be credited in July 2023 salary.		
<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>1. Lack of monitoring on the system for DOE % in a monthly basis.</li> <li>2. The DOE was pre-set to be @ 20% since January 2022.</li> <li>3. The DOE @ 17% was changed in the system in March 2022.</li> <li>4. Upon noticing the changes in DOE in January 2023, the management immediately consulted IT to change it back to 20%.</li> </ol>		

<b>Corrective Actions:</b>	Assistant manager to review on the DOE allocation in the system before payment being made to workers in a monthly basis.
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. The estate management have identified the amount of underpaid wages to the MTG Drivers. The underpaid wages was computed and available in the document "Under Paid Wages For MTG Driver (QG) From Mar 2022 – Jan 2023".</li> <li>2. The estate management have obtained approval from the RGM, Central West Region, to reimburse the underpaid wages to the MTG Driver. The request memo dated 28/07/2023, undersigned and approved by the RGM, Central West Region and RCEO, Central West Region was available for verification.</li> <li>3. All MTG Drivers have been reimbursed of the underpayment at the month of August 2023 (July 2023 Payslip). The payslips for all MTG Drivers were verified to have included the underpayment, categorised as "Insentif Harvesting". 1 worker was verified to have repatriated. The management have deposited a cheque to the workers bank account amounting to the underpayment. Documents were available for verification. Another worker had been missed out during the under payment computation. The amount has then be calculated and issued a "Variable Allowance Form", where the amount will be credited in the August Payslip. All documents were available for verification.</li> <li>4. The DOE allocation is printed out from the system by the assistant managers at the month end before payments are being finalised. The allocations are checked and approved by the assistant manager before payments are being made. Records of "Division of Earnings – Oil Palm Harvesting" that have been approved by the assistant manager for the month of July 2023 and August 2023 were available for verification.</li> </ol> <p>The implementation of the correction and corrective action plan to address the raised critical non-conformity was able to close the issue. Therefore, the critical non-conformity was successfully closed on 30/08/2023.</p>

<b>Opportunity for Improvements</b>	
OFI #	Description
OFI 1	-

<b>Positive Findings</b>	
PF #	Description
PF 1	Good Commitment from the Management Team towards RSPO Certification.
PF 2	Good Implementation of Agronomic and Environmental Practices.
PF 3	Good understanding by staffs and workers on GAP, H&S and Environment Protections



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

Non-conformity			
<b>NCR Ref #</b>	2221809-202207-M1	<b>Issued Date</b>	07/07/2022
<b>Due Date</b>	06/10/2022	<b>Closure Date</b>	06/10/2022
<b>Indicator &amp; Category (Critical / Minor)</b>	6.2.4 (Critical)		
<b>Statement of Nonconformity:</b>	Compliance with Employee's Minimum Standards of Housing, Accommodations and Amenities Act 1990 and was not effectively demonstrated		
<b>Requirement Reference:</b>	<p>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>Normative reference:</p> <ul style="list-style-type: none"> <li>i. Section 23, weekly inspection of employee's housing               <ul style="list-style-type: none"> <li>- 1 (b): the perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water</li> </ul> </li> <li>ii. Sime Darby Plantation, Peraturan Umum Kompleks Perumahan Pekerja</li> <li>iii. Safe Handling and Storage of Petrol at Employees Housing Procedure, UM/HSE/OCP/06, version:0, effective date: 24/3/2021.</li> </ul>		
<b>Objective Evidence:</b>	<p>Welch Estate Sighted during site visit at line site, parameter drain leading to sedimentation sump and discharge drain found to be clogged. Undergrowth was also found in the parameter drains which blocked the free flow of water.</p> <p>Bukit Asahan Estate Sighted at house No. block B #15 and block A #5, found petrol kept at backyard in jerry can. Safe handling and storage of petrol was not in lined with Safe Handling and Storage of Petrol at Employees Housing Procedure, UM/HSE/OCP/06, version:0, effective date: 24/3/2021. Diamond Jubilee POM Sighted at house #100, found petrol kept in improper container. Safe handling and storage of petrol was not in lined with Safe Handling and Storage of Petrol at Employees Housing Procedure, UM/HSE/OCP/06, version:0, effective date: 24/3/2021. Diamond Jubilee Estate Sighted at the backyard of house # 91 - 93, undergrowth to permit free flow of water was not cleared. Also drain in between house # 92 and # 93 was collapsed and resulting to stagnant and slow free flow of water.</p>		
<b>Corrections:</b>	<p>BAE, DJE &amp; DJ Mill : To remove the petrol can from housing area and briefed workers that the storage of petrol nearby housing area is against the SOP. Instruction from the management not to stored petrol at housing compound. Centralised petrol storage only available at Bk Asahan, Ayer Tekah Div. WE: All the perimeter drain has been cleared off from debris/ undergrowth DJE: Repairing work for collapsed drain at housing compound has started and in progress. The undergrowth was cleared off</p>		

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<b>Root Cause Analysis:</b>	<p>BAE &amp; Mill : Petrol was not stored in accordance with SOP. The employees were not briefed on the SOP for safe storage of petrol since the employer has yet to decide on centralized storage for petrol as mentioned in the SOP.</p> <p>WE: The latest housing inspection which took place before grass cutting has reported a clean perimeter drains and sedimentation sump. The cloggage was due to left over trashes/ dried organic matters resulted from grass cutting that took place after the housing inspection. The containers were washed off from nearby village area during recent heavy rainfall which happened after the housing inspection.</p> <p>DJE: Housing inspection carried a week earlier reported good condition of drains. Soil eroded and collapsed into the drain due to heavy rainfall a day before the following weekly inspection took place. This has resulted in the collapsed drain and stagnant water at the mentioned drain</p>
<b>Corrective Actions:</b>	<p>BAE &amp; Mill : To do regular briefing to workers on safe storage of petrol . To include checking on chemical containers at housing area and inspection of centralized petrol storage at Ayer Tekah Division</p> <p>DJE &amp; WE: To brief the workers on housing cleanliness, grasscut routine and hygiene at housing area. Monitoring on drain repair progress through weekly housing inspection for DJ Estate.</p>
<b>Assessment Conclusion:</b>	<p>Major NC Close Out Evidence:</p> <ol style="list-style-type: none"> <li>1. Briefing to workers on safe storage of petrol was done on 3/8/222 and 20/9/2022 at Bukit Asahan Estate and Diamond Jubilee Estate. Petrol stored at each house/housing area has been cleared and no more petrol stored at respective house based on site verification on 22/9/2022.</li> <li>2. Line site inspection was carried out on weekly basis by respective operating units. Records of line site inspection for August and September 2022 was made available for verification. No evidence of petrol stored at home recorded.</li> <li>3. Briefing of workers to properly disposed trashes of grass cutting was carried out for external party on 18/7/22 and internal 11/7/22) at Welch Estate. Based on pictorial evidence submitted, drain has been cleared and no more debris/undergrowth sighted.</li> <li>4. At Diamond Jubilee Estate, drain repair work is progressively done and clearing off activities was done and verified during site verification on 22/9/2022. Briefing to workers has been done in a few sessions (5 &amp; 12/9/22, 15 &amp; 22/8/22) with regards to house rules.</li> </ol> <p>Implemented evidence was found to be sufficient to close the NC on 6/10/2022. Continuous implementation will be further verified in the audit.</p>
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	<p>SOU18 has continued to implement weekly line site inspection and EWC (Employee Welfare Committee) inspection (quarterly basis) as the mechanism to ensure compliance with Worker’s Minimum Standard of Housing and Amenities Act (Amendment) 2019 and SDPB’s owned house rules written under Workers Housing Management Procedure version 1, dated 30/6/2022. Therefore, the critical nonconformity remains closed.</p>

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<b>Non-conformity</b>			
<b>NCR Ref #</b>	2221809-202207-M2	<b>Issued Date</b>	07/07/2022
<b>Due Date</b>	06/10/2022	<b>Closure Date</b>	06/10/2022
<b>Indicator &amp; Category (Critical / Minor)</b>	4.2.3 (Critical)		
<b>Statement of Nonconformity:</b>	Process to keep parties to a grievance informed of its progress, including against agreed timeframe and the outcome was not effective and communicated to relevant stakeholders.		
<b>Requirement Reference:</b>	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.  Normative reference: IOM (CEOUM/036/06/2022) Foreign Workers Management Process Flow, Leave Request Process - 06 Leave request process (Peninsular Malaysia)		
<b>Objective Evidence:</b>	<p>Feedback raised by 2 (two) foreign workers at Bukit Asahan Estate with regards to leave application process. They have not been informed on the status of leave application (approved or denied) so far. Further check on the records for both workers;</p> <ol style="list-style-type: none"> <li>1. Bikas - leave application dated 13/5/22, apply for 2 months leave (25/9/22 - 25/11/22), leave approved but deferred to 1-3/2023.</li> <li>2. Marsan - leave application letter was just submitted on 1/7/2022. Status of leave in still on-hold.</li> </ol> <p>No evidence of attendance during meeting with workers (for leave application) in June 2022. No minute of meeting or information on the approval/deferment for the said workers.</p>		
<b>Corrections:</b>	BAE: The management has conducted meeting with workers and responded in written to their leave request via and to give response letter towards leave application and get acknowledged of receipt.		
<b>Root Cause Analysis:</b>	BAE: The PIC do not aware of the SOP to response to workers leave request. Hence the response is not as per IOM		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Re-briefing on the SOP to Executive In Charge (EIC).</li> <li>2. EIC has been assigned to monitor on passport management including leave request.</li> <li>3. EIC to ensure the progress or update of leave request is communicated to respective workers</li> </ol>		
<b>Assessment Conclusion:</b>	<p>Major NC Close Out Verification:</p> <ol style="list-style-type: none"> <li>1. Meeting with worker's representative was carried out on 16/7/2022. Details on the workers leave arrangement and date of repatriation was briefed and recorded in the minute of meeting. Interview with workers representative and complainants on 22/09/2022 has confirmed the arrangement of repatriation by management. The workers will received official notification letter from management for leave approval.</li> <li>2. Evidence of re-briefing of SOP and related work stream to executive in charge was done on 16/07/2022.</li> </ol>		

	Implemented evidence was found to be sufficient to close the NC on 6/10/2022. Continuous implementation will be further verified in the audit.
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	SDPB SOU18 has continued to implement the established process, IOM (CEOUM/036/06/2022) Foreign Workers Management Process Flow, Leave Request Process - 06 Leave request process (Peninsular Malaysia). At Diamond Jubilee Estate, sample of leave application/request was verified; ref. no. WKLOVID-230519-00007 approval date 19/05/2023 (1 month leave: 19/6/23 – 18/8/23). Another example at Bukit Asahan Estate, leave application dated 25/4/2023 (2 month leave: 25/05/23 – 19/07/23). All related records to support leave application were made available for verification. Therefore, the critical nonconformity remains closed.

Non-conformity			
<b>NCR Ref #</b>	2221809-202207-M3	<b>Issued Date</b>	07/07/2022
<b>Due Date</b>	06/10/2022	<b>Closure Date</b>	06/10/2022
<b>Indicator &amp; Category (Critical / Minor)</b>	6.7.3 (critical)		
<b>Statement of Nonconformity:</b>	Sighted actual PPE usage and storage not consistently implemented as per requirements of related SOPs in the Bathing Room for sprayers in Bukit Asahan Estate and involving 2 harvesters, MTG Driver, 3 Manurers in Diamond Jubilee Estate.		
<b>Requirement Reference:</b>	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
<b>Objective Evidence:</b>	<ol style="list-style-type: none"> <li>Sighted during site visit at Bathing Room for Sprayer in Bukit Asahan Estate, all PPEs such as Apron, Face Mask, Safety Boots, Goggles, Nitrile Gloves were not found in the cabinet and hang for drying purpose while no spraying activity on the day.</li> <li>According to Safe Operating Procedure Version 1 (01/11/2021), Pesticides Spraying (After) Bathing, washing and changing cloth before going back home.</li> <li>According to SOP/BAE/03/01-2009 Tatacara Kerja Selamat (Keselamatan Penggunaan Bahan Racun), PPE Required Breathing Mask, Apron, Gloves, Safety Boots and Goggles. Para 12 mentioned All Sprayer has to wash all PPEs with soap and keep neatly at the storage cabinet. All apron to be washed and hanged.</li> <li>Sighted 2 harvesters not wearing safety helmets, eye protection and one of them not wearing shirt while harvesting at Field P15B and driver of MTG (Grabber) sighted not wearing helmet while loading FFB from the ground.</li> <li>According to Safe Working G/Lines for harvesting (SOP/DJE/02/01-2009) stated that harvester required to wear PPE and suitable attire such as Gloves, Safety boots (Wellington), Sleeve shirts and long pants, Sickle cover</li> <li>OSH Risk Assessment Register for Harvesting revised and dated 26/05/22 mentioned for hazard of falling bunches (risk level 6), falling of frond (risk level 10) and falling of FFB (risk level 15), all current risk control stated to wear PPE (helmets, safety eyeware).</li> </ol>		

	<ol style="list-style-type: none"> <li>7. OSH Risk Assessment Register for collect FFB using MTG revised and dated 21/12/2021 mentioned for hazard crushed by FFB (risk level 4), current risk control stated provide safety helmet and safety boots.</li> <li>8. Sighted 3 manurers not wearing safety helmets, goggles and using 3M mask, one not wearing long sleeve shirts and white coloured hand obviously due to exposed of fertilizer Ground Magnesium Limestone (GML) 15-18%/MgO, which applied at field P07H.</li> <li>9. According to Safe Working G/lines for Manuring (SOP/DJE/13/01-2009) stated manurer required to wear PPE approved by JKKP such as Breathing protection, Apron, Hand protection, Foot protection.</li> <li>10. OSH Risk Assessment Register for Manuring revised and dated 11/02/22 mentioned for hazard dusty (risk level 6) to wear long sleeve shirt, cloth glove and face mask N95. While hazard of dusty (RP &amp; GML Fertilizer) (risk level 4), current risk control stated long sleeve shirts, cloth gloves &amp; latex gloves, face mask N95 and safety eyeware.</li> <li>11. Sampled PPE Matrix Ladang Diamond Jubilee stated as for Harvesting, PPE applicable (Eye Protection, Vest, Safety helmet, Wellington boots), while for Manurer, PPE applicable (Cotton rubber gloves, Apron, Vest, Safety Helmets, Wellington boots, Face mask.</li> </ol>
<b>Corrections:</b>	<p>BAE: To brief sprayers on the function of bathing room and cabinet. To brief on the Safe Working Procedure</p> <p>DJE : To brief workers on the Safe Working Procedure and correct PPE types as per SWP, CHRA and HIRARC</p>
<b>Root Cause Analysis:</b>	<p>BAE: Sprayers were not briefed on the function of bathing room and cabinet. Sprayers were not briefed on safe working procedure on to wash all PPEs with soap and keep neatly at the storage cabinet.</p> <p>DJE Workers were not trained on control measures in OSH Risk Assessment</p>
<b>Corrective Actions:</b>	<p>BAE: To do regular briefing to the sprayers to wash their PPE and cloths in bathing room and keep in neatly in the cabinet. To make all sprayers logged in their washing activity in Buku Log Mandi provided at Bathing Room, DJE: To do regular briefing on the correct PPE usage, spot check and routine inspection during working.</p>
<b>Assessment Conclusion:</b>	<p>Major NC Close Out Verification:</p> <ol style="list-style-type: none"> <li>1. Briefing to the sprayers on the function of bathing room and cabinet and Safe Working Procedure was done on 17/8/22 and 8/9/22. Records of related training/briefing was made available for verification.</li> <li>2. Log book for sprayer or "Buku Log Mandi" was created to record sprayers washing activity. Records for September 2022 was verified and recorded in the logbook.</li> </ol> <p>Implemented evidence was found to be sufficient to close the NC on 6/10/2022. Continuous implementation will be further verified in the audit.</p>
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	<p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good and working condition. Interview with the sampled workers indicated that they were all well aware that they have to sanitise themselves before returning home. Reviewed the sprayers daily sanitation records in "Sprayers Sanitation Logbook" for the month of April, May and June 2023, confirmed that the workers sanitize themselves prior to returning home from work.</p>

	<p>The estate continuously conducted briefing on PPE awareness and sanitation after spraying works for the workers. Reviewed the briefing records as stated in indicator 3.7.2.</p> <p>No reoccurrences of non-conformity. Therefore, the critical nonconformity remains closed.</p>
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<b>Non-conformity</b>			
<b>NCR Ref #</b>	2221809-202207-M4	<b>Issued Date</b>	07/07/2022
<b>Due Date</b>	06/10/2022	<b>Closure Date</b>	06/10/2022
<b>Indicator &amp; Category (Critical / Minor)</b>	7.2.10 (critical)		
<b>Statement of Nonconformity:</b>	Annual Medical Surveillance for pesticides operators not conducted in 2022 as sampled from related reports.		
<b>Requirement Reference:</b>	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.		
<b>Objective Evidence:</b>	<ol style="list-style-type: none"> <li>In Bukit Asahan Estate, sampled in Medical Surveillance Record Book, available a list of 4 workers (Chemical Mixer, 2 Foreman, Foggers (Workshop Attendant). No sprayer (pesticides operator) sent for Medical Surveillance on 02/06/22 to One Medic Healthcare Sdn Bhd.</li> <li>In Welch Estate, a Medical Surveillance Programme reported by Klinik Segamat as Report No. 032/OHD/2022 for 4 workers (Premixer Unit, Fogger Unit, Workshop Unit and Fogger &amp; Workshop Unit). Report No. 060/OHD/2022 for one worker for Ammonia Unit. 3 Sprayers (Herivant, Aapel and Abdullah) not send for Medical Surveillance in 2022.</li> </ol>		
<b>Corrections:</b>	BAE&WE: To arrange for medical surveillance programme for all pesticide operators		
<b>Root Cause Analysis:</b>	BAE & WE: Lack of clarity on medical surveillance programme whereby the programme was only applicable for affected pesticide operators as listed in CHRA.		
<b>Corrective Actions:</b>	To inform on the requirement of medical surveillance for all pesticide operators as per RSPO requirement through issuance of memo to all estates and mill		
<b>Assessment Conclusion:</b>	<p>Major NC Close Out Verification:</p> <ol style="list-style-type: none"> <li>Medical surveillance was carried out for 18 workers (pesticides operator) from Bukit Asahan Estate on 22/7/22 by registered OHD, HQ/20/DOC/00/00519. From the report, no occupational poisonings/disease reported based on certificate of fitness (USECHH 3) issued by OHD.</li> <li>Medical surveillance was carried out for 12 workers (pesticides operator) from Welch Estate on 21/7/22 by registered OHD, HQ/08/DOC/00/00545. From the report, no occupational poisonings/disease reported based on certificate of fitness (USECHH 3) issued by OHD.</li> <li>Inter Office Memo (IOM) dated 11/7/2022 issued to all operating units under Central West Region was verified. The intent of this memo is to continue annual medical surveillance programme for pesticide operator.</li> </ol> <p>Implemented evidence was found to be sufficient to close the NC on 6/10/2022. Continuous implementation will be further verified in the audit.</p>		

<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	<p>The estates send the chemical handlers for medical surveillance to ensure all workers are fit to works as chemical handlers. Reviewed the medical surveillance reports as follows:</p> <p><u>Diamond Jubilee Estate</u></p> <p>Annual medical surveillance was conducted on 27/02/2023 by OHD with DOSH reg. no. HQ/17/OHD/00/00094. 12 workers were sent, and 1 worker were found with abnormal results and require for retest. Retest were conducted on 02/06/2023 and found fit to work.</p> <p><u>Bukit Asahan Estate</u></p> <p>FY 2022, medical surveillance was conducted on 21/06/2022 and 22/07/2022 for workers exposed to organophosphate and manganese. The surveillance was conducted by OHD with DOSH reg. no. HQ/20/DOC/00/00519. 18 workers were sent for surveillance and found fit to work. FY 2023, medical surveillance has been conducted on 31/05/2023 by same OHD for workers exposed to organophosphate and manganese. The report has yet to be received by the estate during the audit.</p> <p><u>Welch Estate</u></p> <p>Annual Medical Surveillance for workers exposed with organophosphate and manganese FY 2023 were conducted on 17/04/2023 by OHD with DOSH reg. no. HQ/08/DOC/00/545. 11 workers were sent for surveillance and found fit to work.</p> <p>No reoccurrences of non-conformity. Therefore, the critical nonconformity remains closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	2221809-202207-N1	<b>Issued Date</b>	07/07/2022
<b>Due Date</b>	06/07/2023	<b>Closure Date</b>	06/07/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	3.3.2 (Minor)		
<b>Statement of Nonconformity:</b>	The Water Quality Monitoring SOP was not adequately implemented.		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures is in place.		
<b>Objective Evidence:</b>	<p>Referred to Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System; SOP for Water Quality Monitoring; Date: 01/06/2016; 5.5 Evaluation of Laboratory Test Results.</p> <ul style="list-style-type: none"> <li>– Upon receiving the complete results, the Head of Operating Unit shall check whether it exceeds, or no not meet the related requirement. If the results are off limit, an investigation shall be initiated to solve the issue.</li> <li>– Arrangement for a re-sampling and analysis of the parameter of concern shall be done concurrently with the investigation and sent to the laboratory within 1 week of receiving the results.</li> </ul> <p>Bukit Asahan Estate monitors the water quality (River Water) for the stream that flows adjacent to the estate as per the Water Management Plan. Water Analysis Test Report were received with non-conforming results and the implementation there after was not in accordance with the SOP.</p>		

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	<ol style="list-style-type: none"> <li>The corrective/preventive action report for non-conforming water analysis results were not done for Water Analysis Test Report dated 08/01/2022 (Report Number: PL121/2022) and 06/07/2021 (Report Number:IE738/2021)</li> <li>Resampling was not done within a week of receiving the off spec results for Water Analysis Test Report dated 14/03/2022 (Report Number: IE349/2022), 08/01/2022 (Report Number: PL121/2022), 29/11/2021 (report Number: IE1170/2021) and 06/07/2021 (Report Number:IE738/2021)</li> </ol>
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>To arrange for investigation for off spec in parameters.</li> <li>To arrange for resampling if required upon investigation within the stipulated time</li> </ol>
<b>Root Cause Analysis:</b>	The PIC did not follow the procedure as per in SOP.
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>PIC is briefed on the follow up procedure for water analysis.</li> <li>PIC is responsible to arrange for investigation and resampling.</li> </ol>
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>Water Quality Monitoring Reports were verified for the year 2022 and 2023. All reports showed that the results were within the permitted specifications.</li> <li>Records of briefing to the PIC responsible for monitoring the water quality at the mill and estates were available for verification. Interview with the sampled workers concluded that they are aware on the procedures in case an Offspecs results are received.</li> </ol> <p>The implementation of the CAP was found to be able to address the raised non-conformity, therefore the minor non-conformity is successfully closed on 06/07/2023.</p>

Non-conformity			
<b>NCR Ref #</b>	2221809-202207-N2	<b>Issued Date</b>	07/07/2022
<b>Due Date</b>	06/07/2023	<b>Closure Date</b>	06/07/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	7.3.2 (minor)		
<b>Statement of Nonconformity:</b>	Waste Materials were not disposed responsibility and in accordance with national legal requirements.		
<b>Requirement Reference:</b>	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
<b>Objective Evidence:</b>	<p><u>Bukit Asahan Estate</u> Sighted the disposal of 11 units of Scheduled Waste items – SW102 (spent batteries) to JG Utek Sdn Bhd on 01/07/2022. Nevertheless, it was verified that the contractor does not have the required DOE License to transport the scheduled waste items out of the generator’s premise.</p> <p><u>Welch Estate</u> During the field visit at field P02C1, it was sighted there were two 20 liters containers in the stream.</p>		
<b>Corrections:</b>	BAE: To stop dispose spent batteries to the contractor. To arrange for disposal as scheduled wastes.		



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	WE: To clear the containers from the location and arrange for disposal as scheduled wastes.
<b>Root Cause Analysis:</b>	BAE: There is no validation on contractor has been carried out whether or not the contractor is allowed to collect the wastes. WE: The containers were washed off from nearby villagers during heavy rainfall.
<b>Corrective Actions:</b>	BAE: To monitor and keep a copy of permit / approval of DOE to contractor to collect Scheduled Wastes WE: To consult with villagers on the waste management including on storage of waste. To do periodic monitoring for wastes in estate and to dispose it accordingly.
<b>Assessment Conclusion:</b>	<p>a. The waste disposal was verified at all operating units. It was identified that all waste were disposed via licensed scheduled waste contractors where applicable. Records of disposal of Scheduled Waste were available for verification.</p> <p>b. Visit o the streams and rivers indicated that here were no waste being disposed there. All waste have been segregated at the sources and handled and disposed in accordance with the operating unit’s Waste Management Plans.</p> <p>The implementation of the CAP was found to be able to address the raised non-conformity, therefore the minor non-conformity is successfully closed on 06/07/2023.</p>

<b>Opportunity for Improvement</b>	
<b>OFI#</b>	<b>Description</b>
<b>OFI 1</b>	<p><b>2221809-202207-I1</b></p> <p>Indicator 3.6.1: All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented</p> <p><b>OFI Statement:</b></p> <p>The hazard identification and risk assessment as in OSH Risk Assessment Register to further enhanced and reviewed in line with introduction of the mechanisation programme under Continuous Improvement Plan Both hazard and risk further considered with recommendation for Additional Risk Control to be more specifically mentioned such as PPE and consistent with what stated in the SOPs.</p> <p><b>Verification / Follow-up actions:</b></p> <p>Reviewed the HIRARC register in all operating units noted that all details such as Process/Section, Location, Work Activity, Hazard, Hazard Category, Cause and effect, Existing Risk Control, probability value justification, risk evaluation, additional risk control, risk re-evaluation and PIC included in the register. Details of action plan has been spelled out in the Additional Risk Control column.</p>

**3.3.2 Summary of the Nonconformities and Status**

<b>CAR Ref.</b>	<b>Category (Critical / Minor)</b>	<b>P&amp;C Indicator</b>	<b>Issued Date</b>	<b>Status &amp; Date (Closure)</b>
1358112M1	Major	6.5.2	22/7/2016	Closed out on 05/08/2016
1358112N1	Minor	2.1.2	22/7/2016	Closed out on 12/7/2017
1358112N2	Minor	4.7.6	22/7/2016	Closed out on 12/7/2017
1358112N3	Minor	6.10.3	22/7/2016	Closed out on 12/7/2017

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1501387-201707-N1	Minor	4.6.10	12/7/2017	Closed out on 07/09/2018
1501387-201707-N2	Minor	5.3.3	12/7/2017	Closed out on 07/09/2018
1678718-201806-N1	Minor	6.9.3	7/09/2018	Closed out on 09/08/2019
1678718-201806-N2	Minor	5.1.3	7/09/2018	Closed out on 09/08/2019
1810910-201906-M1	Critical	SCCS 5.4.1	09/08/2019	Closed out on 06/11/2019
1810910-201906-N1	Minor	4.7.3	09/08/2019	Closed out on 10/07/2020
1927569-202007-M1	Critical	3.6.1	10/07/2020	Closed out on 18/09/2020
1927569-202007-N1	Minor	6.7.2	10/07/2020	Closed out on 14/07/2021
1927569-202007-N2	Minor	6.7.5	10/07/2020	Closed out on 14/07/2021
1927569-202007-N3	Minor	7.3.2	10/07/2020	Closed out on 14/07/2021
1927569-202007-N4	Minor	7.8.1	10/07/2020	Closed out on 14/07/2021
2132778-202111-N1	Minor	6.7.2	18/11/2021	Closed out on 07/07/2022
2132778-202111-N2	Minor	4.2.3	18/12/2021	Upgraded to Critical NC
2221809-202207-M1	Critical	6.2.4	07/07/2022	Closed out on 06/10/2022
2221809-202207-M2	Major	4.2.3	07/07/2022	Closed out on 06/10/2022
2221809-202207-M3	Major	6.7.3	07/07/2022	Closed out on 06/10/2022
2221809-202207-M4	Major	7.2.10	07/07/2022	Closed out on 06/10/2022
2221809-202207-N1	Minor	3.3.2	07/07/2022	Closed out on 06/07/2023
2221809-202207-N2	Minor	7.3.2	07/07/2022	Closed out on 06/07/2023
2364282-202306-M1	Critical	1.1.3	06/07/2023	Closed out on 30/08/2023
2364282-202306-M2	Critical	6.2.2	06/07/2023	Closed out on 30/08/2023

**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 SDPB SOU18 Diamond Jubilee Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Contractor	XXX Healthcare, XXX Enterprise	Face to face
Union	NUPW Representatives	Face to face
Communities	JPKK Tehel	Face to face
Internal	Gender committee, local and foreign workers representative	Face to face
External/NGO	Melaka State NUPW	Face to face
Governmental Department	SJK(T) Ladang Bukit Kajang, Bukit Asahan Police Station	Face to face

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks:</b> NUPW Representatives</p> <p>They informed always give good cooperation and participate any meeting conduct by management to discuss any issues related to workers. The were made aware on the status of latest Collective Agreement (CA) under MAPA/NUPW is still pending and any revision to the latest rates will be based on the latest Minimum Wages Order 2022 @ RM 1500.</p> <p><b>Audit Team verification and response:</b> Management always given full cooperation to union and support their activities without any interference. Management always give freedom to workers to join any associations.</p>
<b>2</b>	<p><b>Feedbacks:</b> Contractor/vendors</p> <p>During interview sessions with contractors informed they signed contract agreement with Sime Darby Plantation Berhad prior to provide services. The terms and conditions being briefed by estate management prior to signed the contract included the payment term. During the briefing, the contractors agreed VCOBC and Integrity Pledges are signed prior the agreement signed. Payment made promptly after invoicing issued by the contractors and meet payment terms timeline. They informed, estate and mill management monitor their performance by monthly which includes due diligence consist of employment contract, pay slip and other related applicable requirement.</p> <p><b>Audit Team verification and response:</b> Reviewed due diligence document is available together with VCOBC and Vendor Integrity Pledges form signed by both parties. No issues of late payment based on the records verified.</p>
<b>3</b>	<p><b>Feedbacks:</b> Foreign workers representative/Social Dialog Representative</p> <p>They did not pay any recruitment fee for getting job in Sime Darby Plantation Berhad. They have been briefed on the terms and conditions and working environment in the plantations while they were in home country. Their wages are paid according to Minimum Wage Order 2022 and Collective Agreement. Some of them been selected as workers representative to the Employee Workers Committee (EWC) to discuss workers matter including benefits and wages by voting among themselves without management interfere. Engagement session named social dialog held every fortnightly basis used as medium to raise any issues to the management. Foreign workers from each nationality were elected to represent their group. As for those elected as social dialog representative, they will receive allowance of RM 25 per attendance/meeting.</p>

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	<p><b>Audit Team verification and response:</b> No issues on management and continuously communicate with foreign workers during social dialog session on fortnightly basis. Any issue raised will be registered and follow up using social dialog tracker.</p>
4	<p><b>Feedbacks:</b> Field workers (local and foreign workers)</p> <p>For locals, they apply work with estate and mill based on the vacancy information spread through WhatsApp/word of mouth. They have been briefed on the terms and conditions and working environment in the plantation during the interview before been offer with the job they acquired. Their wages are paid according to Minimum Wage Order 2022 and Collective Agreement. They interested to join as member of union, and they not been stop by management. One (1) foreign worker has highlighted that his salary was not correctly paid based on Division Of Earning (DOE) for MTG driver. Under his knowledge, the percentage of DOE should be 20% from the group earning and he’s getting less DOE of 17%.</p> <p><b>Audit Team verification and response:</b> Verification made with the management of Diamond Jubilee and confirmed that the MTG driver salary was wrongly paid for a few months. Wrong DOE assigned in the payroll system. A Major NC was raised as detailed out under indicator 6.2.2</p>
5	<p><b>Feedbacks:</b> Melaka State NUPW</p> <p>Current updates on the Collective Agreement (CA) based on the latest Minimum Wages Order 2022 is still pending under court decision. Melaka State NUPW continuously update and brief site NUPW representatives to explain the reason for the delay and arrears for those impacted under package as written under Article 6 – rates of pay for harvesting which involve price bonus, special gratuitous payment and productivity incentive. Other issue discussed with regards to one (1) request for information which still pending from the management of Diamond Jubilee Estate with reference to the letter (ref: NUPW/MSB/JCC/2023) dated 27/6/2023. As to date, there was no official response in writing to the Melaka State NUPW office as confirmed through interview.</p> <p><b>Audit Team verification and response:</b> Verification made with the management of Diamond Jubilee and confirmed that no official response yet to the Melaka State NUPW secretary pertaining to the request. A Major NC was raised as detailed out under indicator 1.1.3.</p>
6	<p><b>Feedbacks:</b> Gender committee</p> <p>They informed that the management treated the female workers equally with male workers includes job opportunity and promotion of work based on work performance and capability. They also informed that no case of discrimination, sexual harassment and domestic violence reported. They are aware on the reporting channel if any case of sexual harassment and domestic violence occur in the estate and mill. Request from new mothers were also entertained by the management as to facilitate in handling their newborn for routine medical check (ante and post-natal) and nutritional support.</p> <p><b>Audit Team verification and response:</b> Reviewed records of meeting minutes for Gender Committee verified the discussion been recorded. Onsite interview confirmed no discrimination and sexual harassment lodged by female workers and minutes.</p>
7	<p><b>Feedbacks:</b> Community (JPKK Tehel), Government Department (SKT(T) Ladang Bukit Kajang, Asahan Police Station</p> <p>During interview with the school headmaster, he informed that the school has good relationship and good communication with management continuously on focus area includes social, safety and environmental. The representative will continuously request from management to provide manpower for upkeeping at school surrounding and donation for school activities. As for the community, continuous support given by the estate management to upkeep the football field and drain maintenance as to ensure no flood or back flow of water to the village. One (1) concern raised by representative from Asahan Police Station is with regards to road safety of estate workers.</p>

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	<p><b>Audit Team verification and response:</b> The management will continue to support and assist whenever possible. As for the road safety issue, auxiliary police continuously monitor the movement of motorcyclist and ensure full safety equipment worn by the rider before exiting the estate compound to gazetted government road</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
Not applicable as all estates has undergone the 2 <sup>nd</sup> cycle of planting.					

Previous land owner / user comment	
<b>NA</b>	<p><b>Feedbacks:</b> -</p> <p><b>Audit Team verification and response:</b> -</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 SDPB SOU18 Diamond Jubilee 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 SDPB SOU18 Diamond Jubilee is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
<b>Name: Vijay Kanna Pakirisamy</b>	<b>Name: Shylaja Devi Vasudevan Nair</b>
<b>Company Name: BSI Services (Malaysia) Sdn Bhd</b>	<b>Company Name: Sime Darby Plantation Bhd</b>
<b>Title: Client Manager</b>	<b>Title: Head, Sustainability Compliance Unit, GSD</b>
<b>Signature:</b> 	<b>Signature:</b> <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
<b>Date: 02/09/2023</b>	<b>Date: 09/09/2023</b>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance
<b>Principle 1: Behave ethically and transparently</b>		
<b>Criterion 1.1:</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1	<p><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p> <p>- Critical (Major) compliance -</p> <p>SOU18 continued to disseminate public information management documents such as land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans. All operating units have individual documents and records to demonstrate compliance to this indicator.</p> <p>Other publicly available documents such as policies, company statement and annual reports were made available in the website; <a href="http://www.simedarbyplantation.com/">http://www.simedarbyplantation.com/</a>.</p> <p>For CSR related activities, information relating to social program on education, environment, community and health, Yayasan Sime Darby as the Foundation has expanded its wings from offering scholarships to outstanding and deserving individuals to funding impactful conservation, outreach and development programmes. The Yayasan Sime Darby's website address <a href="http://www.yayasansimedarby.com/">http://www.yayasansimedarby.com/</a>.</p> <p>Figures of gender distribution within all workers categorized by management, administrative staff and workers (both permanent casual workers, piece rate workers) were made available at estate</p>	Complied

		and mill office with record titled 'SEMUA – EMPLOYEE MASTER LISTING'.	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Information available in appropriate languages and accessible to relevant stakeholders through sample meeting latest conducted at each specific operating unit. For SOU18, stakeholder meeting was carried out on 12/5/2023 (Diamond Jubilee Estate and mill). Stakeholder bulletin (complaint and grievance procedure, fire prevention and RSPO requirements) and social dialogue reinforcement were discussed in the meeting with internal stakeholders. Information (in bi-lingual English and Malay) can be seen in the strategic area within estate and mill compound	Complied
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained. - Critical (Major) compliance -	Should there be any request for information that are specified in the RSPO P&C from any stakeholders, record of request can be maintained in few ways such as Communication Logbook, and filing of correspondence documents e.g., email printout, and letter. Engagement process via email/letter to stakeholders were also done together with feedback form if there is any issue to be reported or highlighted to the management. <u>Diamond Jubilee Estate</u> Chronology of event on NUPW Melaka state request 16/03/2023 – 1 <sup>st</sup> joint consultative meeting between the management of Diamond Jubilee Estate and site NUPW representative together with NUPW Melaka state secretary. 19/06/2023 – Letter issued by NUPW Melaka state branch, ref: NUPW/MSB/JCC/2023 for a 2 <sup>nd</sup> joint consultative meeting as written in the letter; “ <i>Pihak kami sehingga kini masih tidak mendapat apa-apa keputusan mengenai beberapa perkara berikut</i> ” 3 pending issues highlighted:	Non-compliance



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		<ul style="list-style-type: none"> <li>- Salary payment to supervise Gang Base Team for mandore MXXXXXXXX RXXXXXXXX.</li> <li>- Difference of salary for MTG drivers from 17% to 20%</li> <li>- Claim payment for dependant (travel claim) for Mr TXXXXXXXX NXXXXXXXXX Bukit Kajang Division)</li> </ul> <p>A session with NUPW site representative and NUPW Melaka state secretary was held on 04/07/2023. It was acknowledged that no official response made for the above pending issues by the management to the complainant. The management in response confirmed that they have engaged with them to respond on the progress of the issues. Nevertheless, there were no record evidence available of responses maintained by the management in regards to this matter.</p> <p>Reference: MAPA/NUPW Collection Agreement 2019, Article 5 – Grievance Redressal Procedure.</p> <p>Thus, a Critical Non-Conformity was issued.</p>	
<p>1.1.4</p>	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Critical (Major) compliance -</p>	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. The procedure has been communicated to all stakeholders during the Stakeholder Consultation Meetings at each operating units.</p>	<p>Complied</p>
<p>1.1.5</p>	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>The estates and the mill continued to maintain the stakeholder’s information (address, contact number, nominated representatives) which included the contractors, vendors/suppliers, foreign recruitment agencies, embassy, government agencies, schools, local communities and CPO/PK customers. The list of stakeholders has been established by the mill. The list was updated on for 2023</p>	<p>Complied</p>

		comprises of various parties, neighbouring communities and Government Agencies.	
<b>Criterion 1.2:</b> 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>Sime Darby Plantation Berhad has implemented Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The policy was developed in Bahasa Malaysia and English.</p> <p>The latest Group Sustainability &amp; Quality Policy Statement also includes the clause 'promoting good governance and transparency: abiding by the Group Policies &amp; Authorities (GPA) and the Code of Business Conduct (COBC) signed by Group Managing Director on 02/12/2019. Sime Darby has imposed the implementation of the COBC to all its contractors and vendors by signing the Vendors Integrity Pledge document. Copies of the signed pledges were kept by all the operating units and made available for verification. Besides, policies were briefed to stakeholders during the stakeholder meeting. COBC briefing for contractor/vendor was done during contract/VIP signing i.e ABC on June 2023</p>	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	<p>Sime Darby Plantation Berhad has established the Vendor Integrity Pledge (VIP) and Vender COBC as a due diligence for external parties engaged by Operating Units. Sighted sampled as below:</p> <ul style="list-style-type: none"> <li>i. XXX Enterprise (MA-0040150-X)</li> <li>ii. YYY Sdn Bhd (MA628700-K)</li> <li>iii. ABC (23196-X)</li> <li>iv. DEF Sdn Bhd (251845-H)</li> </ul> <p>At the operating unit level, the system to monitor is mainly by regular checking of the contractors' legal compliance and</p>	Complied

		employees' welfare by the management. Apart from that, annual internal audit is also one of the methods to ensure whether the management is monitoring the compliance and implementation of the policy of the counterparties.	
<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p><b>(C)</b> The Unit of Certification complies with legal requirements          - Critical (Major) compliance -</p>	<p>The operating units continued to comply with the legal requirements.          Among the evidence of legal compliance as follows:  <u>Diamond Jubilee POM</u></p> <ol style="list-style-type: none"> <li>1. DOE license no. 004043 with compliance schedule no. JAS.MHQ.600-3/1/1, valid till 30/06/2024</li> <li>2. MPOB License no. 500288804000, valid till 30/06/2024</li> <li>3. Private Installation license no. 002688/2023, valid for 1 year from 16/03/2023</li> <li>4. Fire certificate no. JBPM: MK/7/119/2022, valid till 26/07/2023</li> <li>5. Water Abstraction License no. BKSAM 01255, valid till 31/10/2023</li> <li>6. SPAN license no. LK/3/22/00383, valid till 17/08/2025</li> <li>7. Competency             <ol style="list-style-type: none"> <li>a. Steam engineer grade 2 no. JKPP/2023/JS02/320</li> <li>b. Steam engineer grade 2 no. JKPP/2022/JS02/153</li> <li>c. Engine Driver grade 1 no. MA 52/2005</li> <li>d. Engine Driver grade 2 no. MA 50/2005</li> <li>e. Engine Driver grade 2 no. MK/22/EIS/02/00106</li> </ol> </li> </ol>	Complied

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		<ul style="list-style-type: none"> <li>f. AGTES no. HQ/19/AGTES/01/04114</li> <li>g. CePSWaM certificate no. CePSWaM/2217814</li> <li>h. CePPOME certificate no. CePPOME/2218248</li> </ul> <p>8. Machinery Certificate of Fitness</p> <ul style="list-style-type: none"> <li>a. PMD-MK/23 42931 valid till 15/06/2024</li> <li>b. PMA-MK/23 42932 valid till 15/06/2024</li> <li>c. PMT-MK/23 42935 valid till 15/06/2024</li> </ul> <p>9. Weighbridge calibration certificate no. C123902289 with safety sticker no. DE18 004529, valid for 1 year from 30/08/2022.</p> <p><u>Diamond Jubilee Estate</u></p> <ul style="list-style-type: none"> <li>1. MPOB License no. 522967002000, valid till 30/09/2023</li> <li>2. MPOB License for Nursery no. 550648011000, valid till 30/06/2024</li> <li>3. Permit for Scheduled Controlled Goods, Diesel Purchase and Storage permit no. M001059, valid till 24/10/2024</li> <li>4. Water Abstraction License no. BKSAM 01270, valid till 31/12/2023</li> <li>5. Air compressor Certificate of Fitness no. PMT-MK/22 35617 and PMT-MK/22 35616, valid till 26/07/2023.</li> </ul> <p><u>Bukit Asahan Estate</u></p> <ul style="list-style-type: none"> <li>1. MPOB License no. 527615002000, valid till 29/02/2024</li> <li>2. Permit for Scheduled Controlled Goods, Diesel Purchase and Storage permit no. M001106, valid till 24/01/2025</li> </ul>	
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		<ol style="list-style-type: none"> <li>3. Special Permit for Scheduled Controlled Goods, Petrol Purchase and Storage permit no. PK/2023/B/M-000012, valid till 10/01/2024</li> <li>4. Water Abstraction License no. BKSAM 01271, valid till 31/12/2023</li> <li>5. Air compressor Certificate of Fitness no. PMT-MK/23 44389 and PMT-MK/23 44392, valid till 07/09/2024</li> <li>6. Medical Assistance Annual Renewal certificate no. 18697/2023 valid till 31/12/2023</li> <li>7. Weighbridge calibration certificate no. B546705270 with safety sticker no. DE18 004547, valid for 1 year from 07/10/2022</li> </ol> <p><u>Welch Estate</u></p> <ol style="list-style-type: none"> <li>1. MPOB License no. 522499002000, valid till 31/07/2023. Renewal has been done as per payment voucher no. PV2306/08 dated 23/06/2023</li> <li>2. Permit for Scheduled Controlled Goods, Diesel and Petrol Purchase and Storage permit no. J006055, valid till 11/08/2024</li> <li>3. Air compressor Certificate of Fitness no. PMT-JH/23 205436, valid till 16/07/2024</li> <li>4. Weighbridge calibration certificate no. B345967492 with safety sticker no. DE18 010358, valid for 1 year from 22/05/2023</li> </ol>	
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>Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10/12/2008. A mechanism to ensure compliance to legal and other requirement has been documented in</p>	Complied

		<p>EQMS &amp; MQMS (Estate &amp; Mill Quality Management System) under Standard Operation Manual distributed to all operating units. Group Sustainability Department (GSD) and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p>All operating units have Legal &amp; Other Requirements Register (LORR) covering all the necessary regulatory requirements. Refer to legal register dated January 2023 with addition to applicable laws as follows:</p> <ol style="list-style-type: none"> <li>1. Minimum Wages Order 2022</li> <li>2. Fire Service Act 1988 (Act 341) Amendment 2020</li> <li>3. Human Resources Development Act 2001</li> <li>4. Anti-Sexual Harassment Act 2021</li> <li>5. Employees' Social Security (Amendment) Act 2022</li> <li>6. Employees' Insurance System (EIS) (Amendment) Act 2022</li> <li>7. Control of Supplies Act 1961</li> <li>8. Employment (Amendment) Act 2022</li> </ol>	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>The mill located in Diamond Jubilee Estate area. The mill compound was clearly demarcated with fences.</p> <p>The estate legal boundary was clearly demarcated with red and whited concrete pole and security trenches as sighted during site visit in Diamond Jubilee Estate at field P06H adjacent with smallholders' farms, Bukit Asahan Estate at field P10A adjacent with Kem Syed Sirajudin and P22A adjacent with Kg. Bukit Asahan and at Welch Estate at field P02C1 adjacent to Cheng Lim Realty Estate.</p>	Complied
<p><b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			

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2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>A list of contracted parties maintained by all operating units within SOU18 in their respective List of Stakeholders Information FY 2023 which consists of current stakeholders among Local Community Heads, Neighbours, Local Authorities, Vendors (Contractors &amp; Suppliers) and Outside Crop Purchase (OCP) Suppliers (Mill only).</p>	Complied												
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>Contracts contain specific clauses on meeting applicable legal requirements available in the Vendor Integrity Pledge records for sampled contractors/vendor/buyer i.e.</p> <ol style="list-style-type: none"> <li>1. XXX Sdn Bhd (MA628700-K), scope of work : machinery hire agreement (JCB) valid until 31/12/2023.</li> <li>2. YYY Enterprise (MA0040150-X), scope of work :machinery hire agreement (backhoe) valid until 31/12/2023.</li> </ol> <p>Evidence of due diligence process carried out via yearly vendor evaluation process under Contractor Key Performance Indicator (KPI) evaluation. 5 criteria evaluated as per the following:</p> <p>KPI 1: Completion of work          KPI 2: Accident rate          KPI 3: Non-compliance to ESH          KPI 4: Non-compliance to Security Procedure          KPI 5: Complaints by estates and mill</p> <table border="1" data-bbox="1137 1107 1930 1391"> <thead> <tr> <th>Contractor/vendor</th> <th>Rated given/evaluation</th> <th>Evaluation rating</th> </tr> </thead> <tbody> <tr> <td>YYY</td> <td>4</td> <td rowspan="4">                     Rating:                      Excellent – 5                      Good – 4                      Satisfactorily – 3                      Fair – 2                 </td> </tr> <tr> <td>XXX Sdn Bhd</td> <td>4</td> </tr> <tr> <td>ABC Enterprise</td> <td>4</td> </tr> <tr> <td>XYZ Sdn Bhd</td> <td>3.8</td> </tr> </tbody> </table>	Contractor/vendor	Rated given/evaluation	Evaluation rating	YYY	4	Rating: Excellent – 5 Good – 4 Satisfactorily – 3 Fair – 2	XXX Sdn Bhd	4	ABC Enterprise	4	XYZ Sdn Bhd	3.8	Complied
Contractor/vendor	Rated given/evaluation	Evaluation rating													
YYY	4	Rating: Excellent – 5 Good – 4 Satisfactorily – 3 Fair – 2													
XXX Sdn Bhd	4														
ABC Enterprise	4														
XYZ Sdn Bhd	3.8														

			Poor – 1	
2.2.3	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. - Minor compliance -	The contract documents and Vendor Integrity Pledge (VIP) records sighted in the indicator 2.2.2 above also contain clauses disallowing child, forced and trafficked labour. No young workers are employed by contractors and vendors.		Complied
<b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.				
2.3.1	<b>(C)</b> For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul> - Critical (Major) compliance -	The mill receives FFB from its own supply base estates under SOU 18 and FFB diversion from other SDPB certified SOU. The FFB suppliers were listed in the Diamond Jubilee POM FFB Supplier list. The mill has the information on the geo-location, evidence of the ownership status to the land and valid MPOB license.		Complied
2.3.2	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. - Minor compliance -	The mill only received FFB from Sime Darby Plantation Berhad estates. The mill has the information on the geo-location, evidence of the ownership status to the land and valid MPOB license. Hence there are no indirectly sourced FFB for Diamond Jubilee POM.		Not Applicable
<b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b>				
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.				
3.1.1	<b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	SOU 18 has continued its commitment to long term sustainability and improvements through a capital expenditure program. The management has forecasted 5 years business plan from FY 2023 – FY 2027 Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning.		Complied



		<p>Sighted the annual budget FY 2023 and business plan FY 2023 – FY 2027</p> <p>In the 5 years business plan include items as follows:</p> <ul style="list-style-type: none"> <li>a. Palm oil mill             <ul style="list-style-type: none"> <li>i. Mill intake – FFB input</li> <li>ii. Production of CPO</li> <li>iii. Production of PK</li> <li>iv. Total Palm Oil Extraction</li> <li>v. Total Palm Kernel Extraction</li> <li>vi. Mill cost</li> </ul> </li>   <li>b. Oil Palm Estate             <ul style="list-style-type: none"> <li>i. Total crop projection and yield potential</li> <li>ii. Activity direct cost                 <ul style="list-style-type: none"> <li>a. Mature upkeep</li> <li>b. Manuring</li> <li>c. Harvesting and collection</li> <li>d. Transportation</li> <li>e. Nursery</li> </ul> </li> <li>iii. Estate administration                 <ul style="list-style-type: none"> <li>a. Admin Cost</li> </ul> </li> <li>iv. Labour overhead</li> <li>v. Road and bridges</li> <li>vi. Cost of production.</li> </ul> </li> </ul>	
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		The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2027) and well documented upon request.																									
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	<p>SOU 18 has long range replanting program until FY 2028. Replanting planned for the palm older than 25 years, non-performance field (yield) and Ganoderma infected palm. Observed the replanting program for the next financial year as follows:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> <th>2028</th> </tr> </thead> <tbody> <tr> <td>Diamond Jubilee Estate</td> <td>74.92</td> <td>63.88</td> <td>103.32</td> <td>99.35</td> <td>-</td> </tr> <tr> <td>Bukit Asahan Estate</td> <td>122.68</td> <td>130.53</td> <td>187.03</td> <td>137.40</td> <td>159.59</td> </tr> <tr> <td>Welch Estate</td> <td>73.04</td> <td>85.90</td> <td>79.65</td> <td>67.51</td> <td>87.82</td> </tr> </tbody> </table>	Estate	2024	2025	2026	2027	2028	Diamond Jubilee Estate	74.92	63.88	103.32	99.35	-	Bukit Asahan Estate	122.68	130.53	187.03	137.40	159.59	Welch Estate	73.04	85.90	79.65	67.51	87.82	Complied
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3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	<p>Management review was conducted on annually basis by Operating Unit as per SOP established. Among the agenda discussed in the meeting as follows:</p> <ol style="list-style-type: none"> <li>Matters Arising from Previous Meeting</li> <li>Changes in Regulations, Standards, Policies and Procedures in Relation to Sustainability Management System</li> <li>Review on Operation Performance and Product Conformity</li> </ol>	Complied																								

		<ol style="list-style-type: none"> <li>4. Review on Management Plans</li> <li>5. Results from System Audits and Assessment</li> <li>6. Stakeholder Feedback and Complaints</li> <li>7. Resources for System Implementation</li> <li>8. Continual Improvement Plan</li> <li>9. Conclusion and Meeting Outputs</li> <li>10. Results of internal audits covering MSPO/RSPO/SCCS</li> <li>11. Customer feedback</li> <li>12. Status of preventive and corrective actions</li> <li>13. Follow up action from management review</li> <li>14. Changes that could affect the management system</li> <li>15. Recommendation for improvement</li> <li>16. Improvement of effectiveness of the management system and process</li> <li>17. Resources needs</li> </ol> <p>Latest management review meeting was conducted at each operating unit as follows:</p> <table border="1" data-bbox="1169 1152 1895 1382"> <thead> <tr> <th>Operating Unit</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Diamond Jubilee POM</td> <td>15/06/2023</td> </tr> <tr> <td>Diamond Jubilee Estate</td> <td>16/05/2023</td> </tr> <tr> <td>Bukit Asahan Estate</td> <td>03/01/2023</td> </tr> </tbody> </table>	Operating Unit	Date	Diamond Jubilee POM	15/06/2023	Diamond Jubilee Estate	16/05/2023	Bukit Asahan Estate	03/01/2023	
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		Welch Estate	22/05/2023											
<p><b>Criterion 3.2:</b> The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>														
3.2.1	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The estates and mill have established the main social and environment improvement plans as stated in the Social Impact Assessment Plan and Environmental Management Plan. The Action plans were developed based on the areas and issues of concern that have been raised. Continuous Improvement Plan developed as per the following:</p> <p><u>Diamond Jubilee POM</u></p> <table border="1"> <thead> <tr> <th>Continuous Improvement Plans</th> <th>Implementation Verified During the Assessment</th> </tr> </thead> <tbody> <tr> <td>To reduce mill breakdown due to fuel shortage.</td> <td>Shredded EFB was used as boiler fuel to prevent insufficient fuel being fed into boiler during mill hiccups.</td> </tr> <tr> <td>To reduce oil losses in Raw Effluent.</td> <td>Installation of High Speed Separator is in progress.</td> </tr> <tr> <td>To execute any unsafe condition and unsafe act immediately.</td> <td>The Mill has implemented E SIME+ System.</td> </tr> <tr> <td>To ensure safety in in place before work commencement.</td> <td>The mill have established pre start checklist which is used before starting work at designated stations.</td> </tr> </tbody> </table>		Continuous Improvement Plans	Implementation Verified During the Assessment	To reduce mill breakdown due to fuel shortage.	Shredded EFB was used as boiler fuel to prevent insufficient fuel being fed into boiler during mill hiccups.	To reduce oil losses in Raw Effluent.	Installation of High Speed Separator is in progress.	To execute any unsafe condition and unsafe act immediately.	The Mill has implemented E SIME+ System.	To ensure safety in in place before work commencement.	The mill have established pre start checklist which is used before starting work at designated stations.	Complied
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		<p>To ensure used cooking oil is disposed properly</p>	<p>The mill has initiated Used Cooking Oil Collection Program. Posters have been displayed at the mill compound.</p>	
		<p>To initiate frequent CSR Program with any local communities.</p>	<p>The mill has conducted various CSR Programs to date with the local communities. For example, during the month of Ramadhan, the mill has contributed food to the neighbouring Mosque.</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><b>PROCEDURAL NOTE:</b>  The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.</p> <p>Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>RSPO metric template version 2.1 is used for the reporting of SDPB SOU18 Diamond Jubilee Certification Unit’s metrics (economic, social and environment). Data reporting period is January to December 2022 for (social and environment metrics) and economic metrics from June 2022 – May 2023 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p>		Complied
<p><b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.</p>				
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p>	<p>SDPB has established SOP, Sustainable Plantation Management System (SPMS), ver. 1 dated 01/11/2008 and Mill Quality Management System (MQMS) ver. 1 dated 01/11/2008. The SOP</p>		Complied

	<p>- Critical (Major) compliance -</p>	<p>were distributed to all operating units as a guidance document to conduct operation.</p> <p>For estates operation, the estate adopted the Sime Darby Plantation Agricultural Reference Manual, issue no. 2, dated June 2021. The SOP covers as follows:</p> <ol style="list-style-type: none"> <li>1. Planting Materials</li> <li>2. Nursery Techniques</li> <li>3. Replanting</li> <li>4. Land Preparation</li> <li>5. Planting Density</li> <li>6. Maturity Age</li> <li>7. Field upkeep</li> <li>8. Manuring</li> <li>9. Canopy Management</li> <li>10. Water Management in Coastal and Peat Planting</li> <li>11. Ablation</li> <li>12. Ripeness Standard</li> <li>13. Harvesting Interval</li> <li>14. Loose fruit collection</li> <li>15. Crop Protection</li> <li>16. Weed Control</li> <li>17. Leguminous Cover Crop Establishment</li> <li>18. Rainfall Recording</li> </ol>	
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		<p>For palm oil mill operation, the mill adopted the Sime Darby Plantation Berhad Standard Operating Procedure for Palm Oil Mills, doc. no. SDP/SOP/01, ver. 2, rev. 0 dated 01/01/2019.</p> <p>For Health, Safety and Environment, both mill and estates, Sime Darby has issued Health, Safety and Environment (HSE) Management System and Standard Operating Procedures. The SOP covers as follows:</p> <ol style="list-style-type: none"> <li>1. Reception Station</li> <li>2. Fruit Handling Station</li> <li>3. Sterilization Station</li> <li>4. Threshing Station</li> <li>5. Pressing Station</li> <li>6. Clarification Station</li> <li>7. Depericarping Station</li> <li>8. Kernel Recovery Station</li> <li>9. Boiler Station</li> <li>10. Power Generation</li> <li>11. Product Storage and Dispatch</li> <li>12. Laboratory</li> <li>13. Oil Recovery Station</li> <li>14. Water Treatment Plant</li> <li>15. Effluent Treatment Plant</li> <li>16. EFB Disposal Station</li> </ol> <p>SDPB continuously updated the SOP established. Among the latest updated SOP as follows:</p> <ol style="list-style-type: none"> <li>1. UM HSE Management System Manual, UM/HSE/MS/01</li> </ol>	
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		<ol style="list-style-type: none"> <li>2. First Aid in Workplace Procedure, UM/HSE/OCP/01</li> <li>3. Safety Harvesting Procedure, UM/HSE/OCP/02</li> <li>4. Personal Protective Equipment Procedure, UM/HSE/OCP/03</li> <li>5. Chemical Safety Management Procedure, UM/HSE/OCP/04</li> <li>6. Permit to Work (PTW) Procedure, UM/HSE/OCP/05</li> <li>7. OSH Risk Management Procedure, UM/HSE/SP/01</li> </ol>	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	SDPB has established mechanism to check the effective implementation of the procedure. Among the mechanism such as, Performance Monitoring Visit, Structured Oil Recovery Assessment (SORA), Structured Crop Recovery Assessment (SCRA) & Mature Upkeep Assessment visit, Agronomist visit and Internal Audit visit.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<p>The operating units maintains the records and reports of visit conducted and the action taken on the comments/recommendations. Reviewed the visit reports as follows:</p> <ol style="list-style-type: none"> <li>1. SORA, SCRA and Mature Upkeep Assessment (MUA) Summary Report for visit conducted on 09 – 17/01/2023</li> <li>2. SORA for Diamond Jubilee POM Summary Report for visit conducted on 09 – 13/01/2023</li> <li>3. Performance Monitoring Visit for Diamond jubilee Estate dated 20/01/2023</li> <li>4. 2023 Agronomic and Fertiliser Recommendations Report – Oil Palm for Diamond Jubilee Estate dated 22/08/2022</li> <li>5. 2023 Agronomic and Fertiliser Recommendations Report – Oil Palm for Bukit Asahan Estate dated 25/08/2022</li> <li>6. Estate Mature Upkeep Assessment Report for Bukit Asahan Estate dated 17/01/2023</li> </ol>	Complied



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		7. Performance Monitoring Visit for Welch Estate dated 11/01/2023	
<b>Criterion 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting in all estates within SOU 18. Social impact assessment (SIA) was carried out on 12-15/07/16 for SOU 18 by Social &amp; Environment Projects Unit, Sustainability Compliance Unit, Group Sustainability Department formerly known as PSQM Department. Environment Impact Assessment was conducted in Jan 2023 and available for verification.</p> <p>The methodology of the assessment was through field interview with stakeholders, site observation and documentation review. The assessment has involved the affected stakeholders such as contractors, officers from government authorities and internal workers. For existing operations, the operating unit of SOU 18 has documented the continual improvement plan for social in the Social Management Plan. Identified main social and environment aspects and impacts from SIA and EIA considered in the plan including the following categories:</p> <ul style="list-style-type: none"> <li>- Workers' Housing Condition/Living Improvement</li> <li>- Workers' Working Condition</li> <li>- External stakeholders feedbacks</li> <li>- Responsible Waste Management</li> <li>- Protection of Waterbodies within and surrounding the operating units.</li> </ul> <p>Improvements conducted by individual operating units within SOU 18 including housing improvement programs, minimum wages achievement monitoring and community contribution programs.</p>	Complied

<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>SOU 18 Diamond Jubilee has a separate Social Impact Assessment (SIA) and Environmental Impact Assessment reports. The management plans mentioned the objectives, category, action, frequency, person in charge and monitoring period.</p> <p>Among others as summarized below:</p> <ul style="list-style-type: none"> <li>a. To ensure compliance to SOP and legal requirement regarding social (appointment of person in charge/committee to handle social matters, communication on policies/SOP on social to relevant stakeholders, monitoring of pay and agreement of workers and contractor’s workers and to maintain housing and facilities provided to workers). based on inputs received from external stakeholders during stakeholder meetings, union meetings, EWC meetings, and Gender Committee</li> <li>b. To contribute to local communities development based on inputs received from external stakeholders during the stakeholder meetings, union meetings, EWC meetings and Genders Committee meetings.</li> </ul> <p>There is no new planting in SOU 18 (Diamond Jubilee POM Certification Unit). Methodology of assessment is based on interview at workstation for harvesters, sprayers, union representatives, gender committee, contractor, supplier, local community, neighbouring estate, government &amp; School. The secondary data collection – document review/file checking also been made. Main aspects/concerns identified by the assessor:</p> <ul style="list-style-type: none"> <li>- Housing condition/living improvement</li> <li>- Working condition</li> </ul> <p>Environment Impact Assessment for all activities such as construction work, compound, dispensary, field, harvesting and</p>	<p>Complied</p>
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		<p>collection, main entrance, pest and disease control, petrol and diesel, power station, replanting, road, schedule waste store, workshop were available for verification.</p> <p>Once the Environmental Aspect and Impact is completed, the Environmental Impact Evaluation is conducted with the participation of the relevant stakeholders to evaluate the impact severity using a format (Environmental Impact Evaluation Form). There are 3 classifications of impact established in order to justify the action plan (mitigations) required i.e.:</p> <p>Methodology of assessment is based on interview at workstation for harvesters, sprayers, union representatives, gender committee, contractor, supplier, local community, neighbouring estate, government &amp; School. The secondary data collection – document review/file checking also been made and available for verification.</p> <p>Environmental Management Plans are further developed, consisting of EAI &amp; EIE, Waste Management Plan, Water Management Plan, HCV Area &amp; Biodiversity, Energy Management &amp; Pollution Prevention and IPM Management which were available for verification.</p>	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>The Social Impact Assessment Management Plan available for each unit were made available and having information i.e issues, management plan, PIC and time frame. The inputs gathered from the meeting minutes as per the following;</p> <ol style="list-style-type: none"> <li>a. Gender Committee (once every 2 months), NUPW @ Union meeting (at least once a year)</li> <li>b. Safety Meeting (quarterly)</li> <li>c. Complaint &amp; Request from internal &amp; external stakeholders and muster briefing).</li> <li>d. Stakeholders meeting (annual meeting)</li> </ol>	Complied

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		<p>e. Social dialog (every fortnight), EWC (Employee Welfare Committee – quarterly)</p> <p>The inputs will be used to monitor the performance of the established plan and to review and update the plan in participatory way.</p> <p>Environmental Management Plans were developed, consisting of EAI &amp; EIE, Waste Management Plan, Water Management Plan, HCV Area &amp; Biodiversity, Energy Management &amp; Pollution Prevention and IPM Management which were available for verification. Among the implantation of the environment management plan were mainly focused on environmental conservations and reductions of pesticides and fossil fuels. Among the implementation that were verified included the implementation of IPM in the estates such as the well-established beneficial plants, segregation of waste and disposal in accordance with legal requirements, bi-annual monitoring of smoke emission at the mill, well established buffer zones and periodic water quality monitoring among others. The Environment Management Plan is reviewed yearly, usually at the beginning of the year with inputs obtained from the management and workers representatives.</p>	
<b>Criterion 3.5:</b> 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>Workers Management Unit based in HQ has established Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019 and Migrant Worker Responsible Recruitment Procedure effective 20 August 2021 with the additional foreign workers management process flow (IOM dated 25<sup>th</sup> March 2022, ref: CEOUM/014/03/2022) for 6 processes namely:</p> <ul style="list-style-type: none"> <li>- 01: Arrival of new workers and Deployment to Operating Unit</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- 02: Permit endorsement for newly arrived workers</li> <li>- 03: Permit renewal</li> <li>- 04: Repatriation</li> <li>- 05: Abscondment</li> <li>- 06: Leave request</li> </ul> <p>The additional documents established to further defined related recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries.</p>	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Application form, employment interview assessment form, medical check-up report and employment contract was sighted for new recruited employees. The latest recruitment of workers (foreign workers) in Diamond Jubilee Estate was on 9<sup>th</sup> June 2023. All related personal and induction records were kept for reference (identity information (ID), PDPA declaration, briefing). Interviewed with the clerk confirmed that if there is any job vacancy available, they will publish job vacancy advertisement/flyer at the places nearby the villages.</p>	Complied
<p><b>Criterion 3.6:</b> An occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>			
3.6.1	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad (SDPB) has established SOP for OSH Risk management. Refer UM HSE Management System, OSH Risk Management Procedure ver. 1, effective date 09/03/2021. Under section 10. Monitoring and Overview stated the review conducted when:</p> <ol style="list-style-type: none"> <li>1. Significant changes in work activity, process, practices or procedures</li> <li>2. Change in working environment including changes in organization structure and personnel changes</li> </ol>	Complied

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		<p>3. Evidence that control measures are not working as intended e.g accidents, incidents, and equipment’s failure hazard reports.</p> <p>4. When directed by the Director General DOSH</p> <p>The operating units has conducted assessment for risk covers all main operations and support operations. The HIRARC was reviewed at minimum once a year, if accident occur or changes on the operation.</p> <p>Reviewed the risk assessment as follows:</p> <p><u>Diamond Jubilee POM</u></p> <ol style="list-style-type: none"> <li>1. Baseline Noise Risk Assessment was conducted on 04/02/2020 by assessor with DOSH reg. no. HQ/16/PEB/00/158. Refer report ref. no. HQ/LPROYKPEB/20/00078. Additional Noise Risk Assessment was conducted on 04/10/2022. Refer report ref. no. HQ/LPROYKPEB/23/00884.</li> <li>2. Chemical Health Risk Assessment has been conducted on 08/07/2020 by assessor with DOSH reg. no. HR/15/ASS/00/363. Refer report ref. no. HR/15/ASS/00/363 – 2020-107. Additional CHRA for Biocatalyst Application Process was conducted on 14/12/2022 by assessor with DOSH reg. no. HQ/11/ASS/00/296. Refer report ref. no. HQ/11/ASS/00/296-2022/46.</li> <li>3. HIRARC review with additional of new operation in mill was conducted on 30/12/2022 with addition of Biocatalyst Application Process. FY 2023, HIRARC review was conducted on 27/06/2023, 26/06/2023 and 05/05/2023 on Pressing Station, General Cleaning, Threshing Station, Kernel Storage and Dispatch, workshop mechanical, Moving vehicle and Kernel recovery operation.</li> </ol>	
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		<p>4. The mill currently in progress to Install High Speed Separator. The contractor has provided the Job Safety Analysis for the installation works. Reviewed the JSA dated 30/03/2023.</p> <p><u>Diamond Jubilee Estate</u></p> <ol style="list-style-type: none"> <li>1. Chemical Health Risk Assessment has been conducted on 08/07/2020 by assessor with DOSH reg. no. HR/15/ASS/00/363. Refer report ref. no. HR/15/ASS/00/363 – 2020-108</li> <li>2. Noise Risk Assessment has been conducted on 10/08/2020 by assessor with DOSH reg. no. HQ/16/PEB/00/158. Refer report ref. no. HQ/LPROYKPEB/21/00298</li> <li>3. HIRARC review FY 2023 was conducted on 04/03/2023 on tractor driver operation due to audiometric test results and 28/03/2023 due to accident cases occurred on 14/03/2023 and 22/05/2023 for harvesting operation due to accident occurred on 19/05/2023.</li> </ol> <p><u>Bukit Asahan Estate</u></p> <ol style="list-style-type: none"> <li>1. Noise Risk Assessment has been conducted on 13/08/2020 by assessor with DOSH reg. no. HQ/16/PEB/00/158. Refer report ref. no. HQ/LPROYKPEB/21/00271</li> <li>2. Chemical Health Risk Assessment has been conducted on 07/07/2020 by assessor with DOSH reg. no. HR/15/ASS/00/363. Refer report ref. no. HR/15/ASS/00/363 – 2020-109</li> </ol>	
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		<p>3. Latest HIRARC review was conducted on 26/06/2023 due to accident occur in fertiliser application operation on 16/03/2023.</p> <p><u>Welch Estate</u></p> <p>1. Chemical Health Risk Assessment has been conducted on 10/06/2020 by assessor with DOSH reg. no. HR/15/ASS/00/363. Refer report ref. no. HR/15/ASS/00/363 – 2020-084</p> <p>2. Noise Risk Assessment has been conducted on 13/08/2020 by assessor with DOSH reg. no. HQ/16/PEB/00/158. Refer report ref. no. HQ/LPROYKPEB/21/00272</p> <p>3. HIRARC review FY 2023 was conducted on 08/06/2023 due to accident occur in tractor driver operation on 08/06/2023, 28/04/2023 in harvesting operation due to accident occur on 28/04/2023 and 09/04/2023 in FFB carrier operation due to accident occur on 09/04/2023.</p>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.          - Critical (Major) compliance -</p>	<p>Sime Darby has established SDP Upstream Malaysia Health, Safety &amp; Environment (HSE) Policy dated 01/06/2020 signed by the Chief Executive Officer, Upstream Malaysia.</p> <p>In the policy stated the company commitment to the well-being of its employee, providing safe and healthy working environment, pre-emptively preventing our employees and external parties in the operations from injury and ill health as well as operating in an environmentally responsible manner at global operating sites.</p> <p>Policy also stated the commitment to comply with statutory requirements, inculcating the culture of safety and health, improving the management of occupational safety, health related and environmental matters eliminating or minimizing any potential</p>	Complied



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		<p>adverse effect on the environment arising from or business activities and to educate and encourage stakeholders in maintaining and enhancing the quality of the health, safety and environment.</p> <p>The GSD Department is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition.</p> <p>The estates sampled established Safety and Health Plan and reviewed on annually basis. The plan covers on OSH Legal Compliance, Emergency Response Plan, OSH Management System and Risk Management, HIRADC, training, OSH committee meeting, workplace inspection and medical surveillance.</p> <p>Reviewed the implementation of the management plan as follows:</p> <p><u>Diamond Jubilee POM</u></p> <ol style="list-style-type: none"> <li>1. The mill conducted workplace inspection on quarterly basis prior to Osh committee meeting. Reviewed the latest inspection FY 2023 conducted on 20 – 23/02/2023 and 19 – 20/05/2023. The results were discussed in the OSH committee meeting dated 24/02/2023 and 22/05/2023.</li> <li>2. Latest fire drill was conducted on 20/06/2022 in collaboration with Jasin Fire Department. The evacuation time was recorded at 1 minutes 25 seconds. Latest firefighting training was conducted on 21/02/2023</li> <li>3. The mill conducted first aid kit monitoring on monthly basis. reviewed the monitoring records dated 13/04/2023, 09/05/2023 and 15/06/2023</li> <li>4. To ensure the backhoe, tractors and trailers were in good and safe condition, the mill conducted the vehicle inspection on</li> </ol>	
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		<p>daily basis. Reviewed the monitoring records for the month of April, May and June 2023</p> <ol style="list-style-type: none"> <li>5. The mill conducted inspection on fire extinguisher on monthly basis. Reviewed the monitoring records for the month of April, May and June 2023</li> <li>6. Annual medical surveillance was conducted for workers exposed with Manganese, Chromium and Hexane. 19 workers were sent for surveillance conducted on 20 &amp; 23/02/2023 by OHD with DOSH reg. no. HQ/17/OHD/00/00094. 3 workers were found with abnormal results and were advised for Medical Removal Protection for 3 months and medical retest. Retest were conducted on 22/05/2023 and all were found fit to work. The results of medical surveillance have been communicated to the workers on 30/03/2023.</li> <li>7. Latest annual Audiometric Test was conducted on 13, 14 and 17/10/2022 and 13, 14, and 17/04/2023 by OHD with DOSH reg. no. HQ/17/OHD/00/00094. 50 workers were sent for test and 3 workers were found with hearing impairment and NIHL. JKKP 7 notification to DOSH has been done on 24/02/2023 and 17/04/2023.</li> </ol> <p><u>Diamond Jubilee Estate</u></p> <ol style="list-style-type: none"> <li>1. Annual medical surveillance was conducted on 27/02/2023 by OHD with DOSH reg. no. HQ/17/OHD/00/00094. Workers who exposed to Cholinesterase, Manganese and Chromium such as foreman and sprayers were send for surveillance. 12 workers were sent, and 1 worker were found with abnormal results and require for retest. Retest were conducted on 02/06/2023 and found fit to work.</li> </ol>	
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		<ol style="list-style-type: none"> <li>2. Annual Audiometric Test was conducted on 28/02/2023 – 01/03/2023 by OHD with DOSH reg. no. HQ/17/OHD/00/00094. 27 workers were sent for test and 4 workers were found with hearing impairment and NIHL. JKPP 7 notification to DOSH has been done on 03/03/2023.</li> <li>3. The estate conducted workplace inspection on quarterly basis prior to OSH committee meeting. Reviewed the inspection records dated 02/05/2023 and 06/02/2023.</li> <li>4. The estate conducted monthly medical screening for sprayers during VMO visit. Reviewed the screening records for the month of March, April and May 2023.</li> </ol> <p><u>Bukit Asahan Estate</u></p> <ol style="list-style-type: none"> <li>1. FY 2022, medical surveillance was conducted on 21/06/2022 and 22/07/2022 for workers exposed to organophosphate and manganese. The surveillance was conducted by OHD with DOSH reg. no. HQ/20/DOC/00/00519. 18 workers were sent for surveillance and found fit to work. FY 2023, medical surveillance has been conducted on 31/05/2023 by same OHD for workers exposed to organophosphate and manganese. The report has yet to be received by the estate during the audit.</li> <li>2. A FY 2022, audiometric test was conducted by assessor with DOSH reg. no. HQ/13/DOC/00/330 on 20/04/2022 and 09/05/2023. 1 workers were found with STS. FY 2023, audiometric test was conducted on 16/05/2023. 36 workers were sent for test. The report has yet to be received by the estate during the audit.</li> <li>3. To ensure the estates vehicle and machineries were in good and safe condition, the estate conducted the vehicle inspection on daily basis. Reviewed the monitoring records for the month</li> </ol>	
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		<p>of April, May and June 2023 for vehicle no TF 015, T 56 and HM 202.</p> <p>4. The estate updated the chemical register on annually basis. Reviewed the chemical register dated 01/01/2023. During the site visit to the chemical store, it was justified that there were only class II, III and IV chemicals being used.</p> <p><u>Welch Estate</u></p> <p>1. Annual Medical Surveillance for workers exposed with organophosphate and manganese FY 2023 were conducted on 17/04/2023 by OHD with DOSH reg. no. HQ/08/DOC/00/545. 11 workers were sent for surveillance and found fit to work.</p> <p>2. Annual and Baseline audiometric test FY 2023 was conducted on 09/02/2023 and 23/05/2023 by OHD with DOSH reg. no. HQ/20/DOC/00/0519. 13 workers were sent for test and 1 were found with STS and required for medical examination with OHD. The estate has made arrangement for the examination on 25/07/2023.</p> <p>3. The estate conducted monthly medical screening for sprayers during VMO visit. Reviewed the screening records for the month of March, April and May 2023.</p> <p>4. The mill conducted first aid kit monitoring on monthly basis. reviewed the monitoring records dated 29/04/2023, 31/05/2023 and 28/06/2023.</p>	
<p><b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable</p>	<p>All operation units within SOU 18 established and documented a training plan base on training need analysis conducted on annual basis. Reviewed the Training Need Analysis and Training Schedule</p>	<p>Complied</p>

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	<p>aspects of the RSPOP&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>FY 2022 and 2023 which covers all job designation including the contractors. The training program covers areas such as Safety, Environment and Management Systems.</p> <p>No scheme smallholders and out-growers within SOU 18.</p>	
<p>3.7.2</p>	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The operating units maintained the training records conducted. Reviewed the training records as follows:</p> <p><u>Diamond Jubilee POM</u></p> <ol style="list-style-type: none"> <li>1. Safety sharing and fire extinguisher training dated 21/02/2023</li> <li>2. First aid training dated 26/06/2023</li> <li>3. Safety townhall 2023 dated 12/06/2023</li> <li>4. Sexual harassment awareness training dated 15 and 17/04/2023</li> <li>5. Take 5 for safety briefing dated 20/03/2023</li> <li>6. Permit to Work (PTW) training dated 07/03/2023</li> <li>7. Hazard at workplace training dated 15/12/2022</li> <li>8. Scheduled waste management training dated 05/12/2022</li> <li>9. Demonstration of safety harness during working training dated 03/10/2023</li> </ol> <p><u>Diamond Jubilee Estate</u></p> <ol style="list-style-type: none"> <li>1. First Aid training dated 06/05/2023</li> <li>2. High Conservation Value briefing dated 10/03/2023</li> <li>3. Chemical handling for Alion by ICP training dated 20/03/2023</li> <li>4. Workers rights' (Soliciting Money) briefing dated 29/08/2022</li> <li>5. PPE Awareness training dated 22/10/2022</li> <li>6. Petrol safe keeping training dated 12/07/2022</li> </ol>	<p>Complied</p>

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		<ol style="list-style-type: none"> <li>7. Hearing conservation training dated 04/03/2023 and 31/03/2023</li> <li>8. Personal hygiene and health (housing and PPE) briefing dated 07/01/2023, 27/05/2023 and 17/07/2023</li> <li>9. Emergency Respond Team (spillage, poisoning, fire drill and lightning) training dated 10/06/2023</li> <li>10. Chemical awareness training dated 24/06/2023</li> <li>11. Spraying techniques and safety aspects and maintenance of Inter Sprayer training dated 11/10/2022</li> <li>12. HCTP for harvester training dated 08 – 09/05/2023</li> </ol> <p><u>Bukit Asahan Estate</u></p> <ol style="list-style-type: none"> <li>1. HCV awareness for spraying gang training dated 22/06/2023</li> <li>2. Crop quality, harvesting technique, PPE and safety training dated 22/06/2023</li> <li>3. SOP before and after spraying activity training dated 21/06/2023</li> <li>4. Preventive maintenance vehicle training dated 19/06/2023</li> <li>5. Fire drill and firefighting training dated 15/06/2023</li> <li>6. Basic first aid treatment and CPR training dated 12 – 13/06/2023</li> <li>7. Harvesting competency training dated 26/05/2023</li> <li>8. Hearing conservation program training dated 16/05/2023</li> <li>9. Spraying techniques and safety aspects and maintenance of Inter Sprayer training dated 03/04/2023</li> <li>10. HIRARC, role and responsibilities of ESH committee training dated 07/02/2023</li> </ol>	
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		<p><u>Welch Estate</u></p> <ol style="list-style-type: none"> <li>1. FFB Loaders and tractor driver training dated 20/12/2022</li> <li>2. Safety refresher training dated 27/12/2022</li> <li>3. SOP for tractor driver training dated 28/09/2022</li> <li>4. Harvesting competency training dated 02/08/2022</li> <li>5. First aid and Emergency Response Plan training dated 01/07/2022</li> <li>6. Waste management training dated 02/06/2023</li> <li>7. PPE (earplug) and hearing conservation training dated 18/06/2023</li> <li>8. First Aider training collaboration with PBSM training dated 12 – 13/06/2023</li> <li>9. First aid kit/box training dated 26/04/2023</li> <li>10. Firefighting demonstration and training collaboration with RSPP training dated 16/03/2023</li> </ol>	
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>The mill continuously provided training to the personnel involved in SCCS. Reviewed the training records as follows:</p> <ol style="list-style-type: none"> <li>1. RSPO SCCS Training – 22/02/2023</li> <li>2. RSPO SCCS Training for Contractors – 24/02/2023</li> </ol> <p>The trainings were attended by participants from various departments of the mill such as administration, security, supervisors, weighbridge, laboratory, and CPO Transport contractor.</p>	Complied

**Criterion 3.8:** Supply chain requirement for mills

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

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3.8.1	<p><b>Identity Preserved Module</b></p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>FFB Processed by SOU18 Diamond Jubilee POM were obtained from all Sime Darby RSPO certified estates only (Own Supply Base and diverted from Sime Darby sister Estates) . There were no third party’s crop nor non-certified FFB received by the mill. This was verified during the stakeholders meeting, transaction records and site visit at the mill weighbridge. Thus, the mill has opted for Identity Preserved Module.</p>	Complied
3.8.2	<p><b>Mass Balance Module</b></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>FFB were obtained from all Sime Darby certified estates only. There was no third party’s crop nor non-certified FFB received by the mill. This was verified during the stakeholders meeting and site visit at mill. Thus, this indicator is not applicable.</p>	Not Applicable
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&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in section 1 (Table 10) of this public summary report.</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 registration of PalmTrace is carried out by the Global Trading Department, HQ. All transaction are registered in the PalmTrace.</p>	Complied
3.8.5	<p>Documented procedures</p>	<p>Documented Procedures</p>	Complied



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	<p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ul>	<ul style="list-style-type: none"> <li>a. Sime Darby Plantation Berhad has develop Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability. Refer Sustainable Supply Chain and Traceability Procedure, Document No: SD/SDP/GSD/SCCS/0522/01 ver.1; Effective Date: 01/06/2022.</li> <li>b. Completed and up to date records and reports that complied with RSPO SCCS requirements were available and verified. Sampled documents as below. <ul style="list-style-type: none"> <li>- Mass Balance Records.</li> <li>- Training Records (Refer Indicator 3.7.3)</li> <li>- Internal Audit Report dated 11/05/2023.</li> <li>- Records of Incoming FFB and Outgoing CPO and PK.</li> </ul> </li> <li>c. The mill management has appointed the Assistant Manager as person in charge to implement Supply Chain Certification System in the mill as stated in the appointment letter “Appointment as Person-in-charge for Environmental/Quality Management System” dated 01/09/2022, undersigned by the mill manager. Interview with the mentioned person indicated that they were able to demonstrate awareness on RSPO SCCS implementations.</li> <li>d. Procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP Mill has been detailed out in the Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability. Refer Sustainable Supply Chain and Traceability Procedure, Document No: SD/SDP/GSD/SCCS/0522/01 ver. 1; Effective Date: 01/06/2022.</li> </ul>	
3.8.6	Internal Audit	The internal audit was conducted as per Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022	Complied

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	<ul style="list-style-type: none"> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:               <ul style="list-style-type: none"> <li>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b. Effectively implements and maintains the standard requirements within its organisation.</li> </ul> </li> <li>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.</li> </ul>	<p>under section 18.0 Internal Audit. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure. Refer SOP ref. no. SD/SDP/PSQM/IAP.</p> <p>Latest Internal Audit was conducted on 11/05/2023 by Group Sustainability Department (GSD). During the audit 1 non-conformity on SCCS were raised. The mill has submitted the corrective action and evidence of implementation to GSD. The nonconformity was accepted and closed on 10/06/2023.</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> <li>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul>	<p>Purchasing Goods In</p> <ul style="list-style-type: none"> <li>a. The Weighbridge Reception plays the role to verify all incoming FFB into the mill. All incoming FFB provide FFB Chits to the Weighbridge Reception where they verify the documents to include all required information prior to receiving the FFB. All FFB received by Diamond Jubilee POM are from RSPO certified source. Interview with the weighbridge operator confirmed that she could demonstrate understanding on the process of verifying the documents and documenting the sources and tonnage of the FFB. This process is overseen by the Mill Manager.</li> <li>b. The mill are aware that they are to inform the CB immediately if there are any projected overproduction of certified tonnage. As of to date there were no projected overproduction from the mill.</li> <li>c. Mechanism for handling non-conforming FFB and/or documents are detailed out in the Sustainable Supply Chain and Traceability Procedure, Document No:</li> </ul>	<p>Complied</p>

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		SD/SDP/GSD/SCCS/0522/01; Effective Date: 01/06/2022; Section 11.0.	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ol>	<p>Sales and Goods Out</p> <p>SOU18 Diamond Jubilee POM have ensured that the required information for RSPO Certified Products were available in the related documents. Sample of documents for the sale of RSPO Certified CPO and PK were verified to include all required information. Evidences as below.</p> <ol style="list-style-type: none"> <li>1. CPO RSPO-IP (Contract Number: S/PSD/2306/CPO0043FB)             <ol style="list-style-type: none"> <li>a. Buyer: XXX (Information Available)</li> <li>b. Seller: Diamond Jubilee Oil Mill</li> <li>c. Despatch Date: 26/06/2023</li> <li>d. Document Date: 26/06/2023</li> <li>e. RSPO Certificate Number: RSPO 591224</li> <li>f. Product: Crude Palm Oil (CPO) – RSPO IP</li> <li>g. Quantity: 40,100 Kg</li> <li>h. Related Documents: Borang MPOB L3, Authorisation For Despatch of Oil.</li> <li>i. Weighbridge Ticket Number: 011503</li> </ol> </li> <li>2. PK RSPO-IP (Contract Number: S/PSD/2306/PK0038)             <ol style="list-style-type: none"> <li>a. Buyer: XXX (Information Available)</li> <li>b. Seller: Diamond Jubilee Oil Mill</li> <li>c. Despatch Date: 26/06/2023</li> <li>d. Document Date: 26/06/2023</li> <li>e. RSPO Certificate Number: RSPO 591224</li> </ol> </li> </ol>	Complied

		<ul style="list-style-type: none"> <li>f. Product: Palm Kernel (CPO) – RSPO IP</li> <li>g. Quantity: 29,800 Kg</li> <li>h. Related Documents: Previous Load Declaration Form, Authorisation For Despatch of Oil.</li> <li>i. Weighbridge Ticket Number: 011505</li> </ul>	
3.8.9	<p><b>Outsourcing Activities</b></p> <ul style="list-style-type: none"> <li>i) The mill shall not outsource its milling activities. In cases where the mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</li> <li>ii) The mill shall ensure the following: <ul style="list-style-type: none"> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</li> </ul> </li> </ul>	<p>SDPB has established Sustainable Supply Chain and Traceability Procedure For Upstream Malaysia, Document ID: SD/SDP/GSD/SCCS/0522/01 ver. 1; Effective Date: 01/06/2022. The procedure states under Section 13.0 the procedures related to Outsourced Contractor which complies with the requirements of the indicator.</p> <p>The mill does not outsource any of its milling activities to any third party. The transport of CPO to the buyers is contracted out to third party transporters. It is stated in the contract agreement between Diamond Jubilee POM and the contractors in Annexure 3, RSPO Supply Chain Certification Standard and requirements will be complied by the contractor.</p> <ul style="list-style-type: none"> <li>a. The mill maintains legal ownership of CPO and PK during the transportation by the contractor to the buyer.</li> <li>b. Sighted the contract agreement with MXXXX AXXXX SXX BXX (Duration Contract: 01/08/2022 – 31/10/2023) and TXX TXXX KXXX SXX BXX (Duration Contract: 07/05/2022 – 07/08/2023) available for verification. The contract agreement states under Annexure 3 that the certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c. The Sustainable Supply Chain and Traceability Procedure For Upstream Malaysia has been communicated to the contractors during the RSPO SCCS Training for Contractors – 24/02/2023.</li> </ul>	Complied

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		d. The Transporter Contract Agreement states under Annexure 3 that they commit to provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.	
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.	Details of contractors are available in the list of contractors. There are no changes on the list of contractors when comparing from previous audit result.	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.	The list of contractors is updated from time to time by the mill. The information of any newly appointed contractor is shared with BSI through pre-audit information request prior to the audit. The information is provided to the assessment team. There are no changes on the list of contractors when comparing from previous audit result.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> <li>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</li> </ul> </li> </ul>	<p>Record Keeping</p> <ul style="list-style-type: none"> <li>a. The mill maintained all records covering the RSPO SCCS requirements. Records such as mass balance records, training records, despatch documents and internal audits were available for verification.</li> <li>b. The document retention period for maintaining traceability records is 3 years as stated in Section 5 - Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability Procedure, Doc. ID:SD/SDP/GSD/SCCS/0522/01 ver. 1, Effective Date: 01/06/2022.</li> <li>c. The mill recorded and balanced all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real time basis. This was evident in the "<i>KKS Diamond Jubilee Mass Balance Sheet July 2022 – June 2023</i>" excel sheet. Verified the data against the mill monthly production record, dispatch records and PalmTrace records to be all tally.</li> </ul>	Complied

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	<p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>d. Section (iv) is Not Applicable as SOU18 Diamond Jubilee POM uses the IP Module.</p>	
3.8.13	<p><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The extraction rate for mill is calculated in daily production detail report. Conversion factor of CPO and PK production is depending on the actual OER and KER.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Conversion factor of CPO and PK production is depending on the actual OER and KER. The OER and KER is calculated on a daily basis and recorded in the monthly production report.</p>	Complied
3.8.15	<p><b>Processing</b></p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>The mill produces only CPO RSPO-IP and PK RSPO-IP only. No non certified oil palm products produced by the mill therefore there is no requirement for separation.</p>	Complied
3.8.16	<p><b>Registration of Transactions</b></p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p>	<p>The registration of PalmTrace is carried out by the Sime Darby's Global Trading Department, HQ. All transaction will be registered in the PalmTrace.</p> <p>Based on the announcement summary, all the registrations were found to be in order and announced within the 3 months after despatch. Sampled despatch of CPO and PK as below.</p>	Complied

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	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>a. CPO RSPO-IP; Contract Number: S/PSD/2302/CPO00150C; Despatch Date: 18/03/2023; PalmTrace Announcement Date: 20/04/2023.</p> <p>b. CPO RSPO-IP; Contract Number: S/PSD/2304/CPO0001C; Despatch Date: 06/04/2023; PalmTrace Announcement Date: 11/05/2023.</p> <p>c. PK RSPO-IP; Contract Number: S/PSD/2303/PK0020; Despatch Date: 23/03/2023; PalmTrace Announcement Date: 17/04/2023.</p> <p>d. PK RSPO-IP; Contract Number: S/PSD/2303/PK0036; Despatch Date: 06/03/2023; PalmTrace Announcement Date: 17/04/2023.</p>	
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>	The mill does not use RSPO trademark. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
<b>General corporate communications</b>			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	The Sime Darby Plantation Berhad website was reviewed and confirmed that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil. The communication did not imply in any way that being an RSPO member means it is certified towards RSPO related certifications.	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p> <p>b. Display the RSPO web address (www.rsपो.org)</p> <p>c. State that the member supports the work of the RSPO</p>	The Sime Darby Plantation Berhad website was reviewed and confirm that the communication made did not explicitly highlight its RSPO membership but had communicated its commitments towards production of sustainable palm oil.	Complied

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	<p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at <a href="http://www.rspo.org">www.rspo.org</a>’ where the link must lead to the member’s profile page.</p>	The website had not displayed the RSPO website and had not displayed any RSPO Trademark.	
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	The communication did not imply any such that being an RSPO member means had certified to RSPO related certifications and selling of its oils are considered RSPO certified.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	The Sime Darby Plantation Berhad website was reviewed and confirmed that the communications are mainly on the efforts and commitments of SDPB towards production of sustainable palm oil. The website has published reports, statements, policies, procedures and performances of such implementation. The website did not specifically publish its products as RSPO certified products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by SOU18 Diamond Jubilee POM and verified through document and site review (notice board, business card and shipping documentation).	Complied
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication was demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	As per interview with the weighbridge operator, mentioned that the weighbridge ticket will be stated the info i.e: product/commodity with SCC model (Crude Palm Oil RSPO IP) and the RSPO certificate number. Verified the documents found that the supply chain model and certificate number were stated on the ticket.	Complied



5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	SOU18 Diamond Jubilee POM was not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	CPO produce for IP certified containing 100% oil palm content	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	CPO produce for IP certified containing 100% oil palm content	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	CPO produce for IP certified containing 100% oil palm content	Complied
<b>Labelling and trademark (IP)</b>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>RSPO trademark which includes the tag 'CERTIFIED' or</li> </ul>	SOU18 Diamond Jubilee POM is producing crude palm product and does not involve in any labelling of end product.	Not Applicable

	<ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</li> </ul>		
<b>Messaging (IP)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>	<p>SOU18 Diamond Jubilee POM is producing crude palm product and does not involve in any labelling of end product.</p>	<p>Not Applicable</p>
<b>Principle 4: Respect community and human rights and deliver benefits</b>			
<b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			

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4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has established Group Sustainability &amp; Quality Policy Statement dated 02/12/2019 signed by Group Managing Director where the company is respecting, upholding &amp; no exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) latest revised in 2020.</p> <p>Besides, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/03/2020. Sime Darby Plantation Berhad respect and safeguard human rights, notion of democracy and its institution. They recognize that Human Rights Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with SDP.</p> <p>The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate. For example training was conducted at Bukit Asahan Estate on 24/5/2023 - Induction Course to Newly Joined workers, COBC Briefing, SD Policy Charter, Grievance Channel, Agreement Briefing, Sexual Harassment Briefing and PDPA.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the estates within SOU 18 do not instigate violence or use any form of harassment in their operations</p>	Complied
<p><b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-</p>	<p>Sime Darby Plantation Berhad has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions</p>	Complied

	blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	and not violate the rights of others. They recognise the important role Human Rights Defenders, whistle blowers, complainants and community spokespersons play by lodging complaints in confidence.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Sime Darby Plantation Berhad has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in <a href="https://simedarbyplantation.com/who-we-are/corporate-governance/report-your-concerns/">https://simedarbyplantation.com/who-we-are/corporate-governance/report-your-concerns/</a> Besides, external stakeholders were briefed during the stakeholder meeting. Interviewed with the internal and external stakeholders confirmed that they have been briefed and understood on the complaint mechanism implemented by the company. The latest initiative introduced (Worker’s Helpline) effective from 27/8/2021.	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 -	A Standard Operating Manual (SOM) was established and maintained i.e. Sime Darby Plantation Estate Quality Management System as a system for dealing with complaints and grievance was defined in Sub-section 5.5 Management Responsibility, Appendix 5.5.3.2 Procedure for External Communication, version 2, issue 0, dated 25/5/2015. The complaints and grievances are open to effected parties including internal and external stakeholders. The time frame to deal with external communications should be within two weeks of the date of receipt for communication requiring direct feedback (Clause 6.3 of the procedure) and within one week of the completion of the	Complied

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		<p>investigation, for communication required investigation. The latest training was carried out on 29/3/2023.</p> <p>Grievance channels was stated in the employment contract (Item 21) as follows:-</p> <ul style="list-style-type: none"> <li>• Union representative at operating unit.</li> <li>• Workers helpline at 0162991411 (via Whatsapp) and call toll free number 1800819741.</li> <li>• Suara Kami at 1800818771 or sms 01130116031.</li> <li>• Whistleblowing channel at 1800223388 or +60192797553 (08.30 am – 17.30 pm) or email to <a href="mailto:whistleblowing@simedarbyplantation.com">whistleblowing@simedarbyplantation.com</a></li> </ul> <p>All requests and grievances found to be responded within short time by respective recipients mainly workers as verified during on-site consultation.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow</p>	Complied
<p><b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Contributions made as per sample as following:</p> <ul style="list-style-type: none"> <li>i) Rice distribution (XX kg per worker)</li> <li>ii) School and festival token (RMXXX per worker)</li> <li>iii) Meat contribution for <i>Eid Aidil Adha</i></li> </ul>	Complied

		iv) Worker’s line site and amenities annual upkeep and cleaning																													
<b>Criterion 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.																															
4.4.1	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Copies of land titles were available and verified. Details of the respective land titles (sample) to demonstrate the right to use the land as shown below. Quit rents were paid accordingly. There was no evidence of any part of the land overlapping with customary landowners.</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Estates</th> <th colspan="4">Land title</th> </tr> <tr> <th>HS(D) No.</th> <th>PTD/lot Ref</th> <th>Size (ha)</th> <th>Expiry date/land use type</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bukit Asahan Estate Total of 44 land titles (3,072.18 ha)</td> <td>14XXX</td> <td>Lot 223</td> <td>209.8 292 ha</td> <td>Freehold (no specific term)</td> </tr> <tr> <td>2</td> <td>Welch Estate Total of 6 land titles (1,440.44 ha)</td> <td>92XXX</td> <td>971</td> <td>254.4 457 ha</td> <td>Freehold (no specific term)</td> </tr> <tr> <td>3</td> <td>Diamond Jubilee Estate Total of 32 land titles (2,623.24 ha)</td> <td>1XXX</td> <td>1157</td> <td>0.614 9</td> <td>Freehold (no specific term)</td> </tr> </tbody> </table>		Estates	Land title				HS(D) No.	PTD/lot Ref	Size (ha)	Expiry date/land use type	1	Bukit Asahan Estate Total of 44 land titles (3,072.18 ha)	14XXX	Lot 223	209.8 292 ha	Freehold (no specific term)	2	Welch Estate Total of 6 land titles (1,440.44 ha)	92XXX	971	254.4 457 ha	Freehold (no specific term)	3	Diamond Jubilee Estate Total of 32 land titles (2,623.24 ha)	1XXX	1157	0.614 9	Freehold (no specific term)	Complied
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4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. This has also been evident through interview with the local communities.	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 was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information.	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 was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information.	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 was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.3	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied

	- Minor compliance -		
4.4.5	<b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
<b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information	Not Applicable
4.5.2	<b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information	Not Applicable
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples.	No new planting and issues of customary land occurs in all estates There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information	Not Applicable



	Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance -		
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	No new planting and issues of customary land occurs in all estates There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information	Not Applicable
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	No new planting and issues of customary land occurs in all estates There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information	Not Applicable
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	No new planting and issues of customary land occurs in all estates There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new planting and issues of customary land occurs in all estates There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information	Not Applicable
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information	Not Applicable

<b>Criterion 4.6:</b> Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	<p><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	Complied
4.6.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.</p> <p>- Minor compliance -</p>	<p>There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities. There are no scheme small holdings as well within the certification unit. Therefore the indicator is not applicable.</p>	Not Applicable

4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>No new planting and issues of customary land occurs in all estates          There was no evidence that the certification unit diminished the legal, customary or user rights of other users. Consultation with relevant stakeholders conducted on-site confirmed the information</p>	Not Applicable
<p><b>Criterion 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	Complied
4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p>	<p>There was no community that had lost access and rights to land as well as no expansion of plantation by the certification unit.</p>	Not Applicable

	- Minor compliance -		
<b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	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 -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.	Complied
4.8.2	<b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	There has been no issue related to loss of legal customary rights with indigenous people, local communities and other stakeholders reported. This has also been evident through interview with the local communities.	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 -	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has the details about the process of handling any issues reported by local communities regarding land dispute. Should there be any issue, a negotiation process will be initiated where the Estate Management, Land Management Department, Regional	Complied

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		Heads, Zone Heads, third parties' involvement including stakeholders are involved. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary by Region. The mill didn't receive any FFB from smallholders or external FFB. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SDPB.	Complied
5.1.2	<b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SDPB.	Not Applicable
5.1.3	<b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SDPB.	Not Applicable
5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Critical (Major) compliance -	The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SDPB.	Not Applicable

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5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SDPB.	Not Applicable
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SDPB.	Not Applicable
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SDPB.  The weighbridge was calibrated as per requirement under "Akta Timbang Sukat 1972". Latest calibration was conducted on 30/08/2022. Refer Weighbridge calibration certificate no. C123902289 with safety sticker no. DE18 004529, valid for 1 year.	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	No independent smallholders under SOU 18. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SDPB.	Not Applicable
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	No independent smallholders under SOU 18. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SDPB.  SDPB has established SOP to handle any grievances documented in Grievance Response Standard Operating Procedure, ver. No. 2 dated 18/07/2022.	Complied

**Criterion 5.2:** The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.

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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 -	No independent smallholders under SOU 18. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SDPB.	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 -	No independent smallholders under SOU 18. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SDPB.	Not Applicable
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	No independent smallholders under SOU 18. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SDPB.	Not Applicable
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	No training conducted for small holders as there is no independent smallholders under SOU 18. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SDPB.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	No independent smallholders under SOU 18. The mill didn't receive any FFB from smallholders or external FFB supplier. The mill only received FFB from sister estate in SOU 18 or diversion from other certified estate from other SOU under SDPB.	Not Applicable

**Principle 6: Respect workers' rights and conditions**

**Criterion 6.1:** Any form of discrimination is prohibited.

6.1.1	<p><b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has developed Human Rights Charter to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. They will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy could be downloaded from <a href="https://simedarbyplantation.com/sustainability/reports-policies-and-statements/">https://simedarbyplantation.com/sustainability/reports-policies-and-statements/</a></p>	Complied
6.1.2	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Critical (Major) compliance -</p>	<p>Interviewed with the workers comprises of different gender and nationalities confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers, no charging of recruitment fees for the foreign workers and offered job based on capability. The worker can request for job transfer if they found they unfit for the job assigned to them.</p> <p>Based on group interview with a group of workers consist of (gender committee, workers representatives and union representatives), all of them have not been discriminated against including charging of recruitment fees for foreign 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>Sime Darby Plantation Berhad has developed a Career Progression for Workers Level (both local and foreign workers), Doc. No.: SDP/HRUM/2020/SOP01 where the promotion of workers is based on the work performance, suitability, and the leadership quality of</p>	Complied



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	- Minor compliance -	the worker. The recruitment of foreign is through Human Resource Department in HQ based the regulatory requirements. This was confirmed during the interview with the supervisors and staffs on the availability of trainings and promotions at the management units.	
6.1.4	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. - Minor compliance -	Interviewed with the new female employee (join date: in Diamond Palm Oil Mill and has confirmed that pregnancy testing is not part of employment procedure. There was no specific clause in the contract mentioning on the requirement for pregnancy testing. They still will be able to offer for work if they are pregnant.	Complied
6.1.5	<b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly. SDPB has introduced the new Terms of Reference (TOR) for Gender Representatives and Gender Committee, dated March 2021 which supersede the previous Gender Committees Gender Committee Handbook, First Edition 2014. In this new TOR, a more definitive roles, and responsibilities as well as governance structure and programmes were added in.  Gender Committee were established by the mill and estates management and verified at each operating unit. Meetings conducted once every 2 months or whenever necessary and for SOU gender representative carried out on monthly basis. Meetings conducted at respective units as below: SOU18 meeting: 28/3/2023, 25/05/23 There was no sexual harassment case reported so far at SOU18.	Complied
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Based on the sampled payslips, which consists of both genders, it was noted that workers were paid equally for the same job scope.	Complied

		They were paid according to the Minimum Wage Order 2022 without any form of discrimination. This was also evident through interview with sampled workers	
<b>Criterion 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	Sime Darby Plantation Berhad has signed the Collective Agreement with National Union of Plantation Workers (NUPW). Sample of employment contracts are reviewed and the agreements are signed in both English and home country language (i.e. Hindi, Bahasa Malaysia/Indonesia). Upon the foreign workers arriving to the estate, they will be inducted for the terms and conditions of employment contract and briefed on the company's policies. This has confirmed by interviewed with the foreign workers.	Complied
6.2.2	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions and maternity entitlement. The terms are in compliance with the Employment Act 1955, Minimum Wages Order 2022, SOCSO Act 1969, EPF Act 1991, EIS Act 2017, and the MAPA/NUPW agreement. However, it was found that compensation for worked performed was not accurately paid based on information in payroll documents. Head of Group HR, Governance &amp; ER email dated 12/01/2022 is referred to on the new directive:</p> <ul style="list-style-type: none"> <li>To stop retaining 3% (Division of Earning) for SD3 system machine operator (MTG) wages (maintenance purpose)</li> <li>SD3 system machine operator (MO) (MTG) to receive full wages (Division of Earning, DOE @ 20%), previously 17% for SD3 MO driver.</li> </ul>	Non-compliance

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		<p><u>Diamond Jubilee Estate</u> Based on pay slip for MO ID 144511, for period of January 2022 to June 2023; i) Jan 2022 - Feb 2022: 20% division of earning (2 months) ii) Mar 2022 - Jan 2023: 17% division of earning (11 months) iii) Feb 2023 - June 2023: 20% division of earning (5 months) The worker has not received accurate division of earning (DOE) @ 20% for the period of 11 months as instructed based on email from Head of Group HR, Governance &amp; NE dated 12/01/2022. Thus, a major NC was issued.</p>										
6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements. - Critical (Major) compliance -</p>	<p>Based on review of punch cards, workers' employment contracts and payslips, evidence was available that Diamond Jubilee POM and estate were able to demonstrate compliance with Employment Act 1955 related to regular working hours, overtime, sickness and holiday entitlement and maternity leave. This includes statutory deductions (SOCSSO, EPF, EIS) and non-statutory deductions (e.g. union/NUPW, water and electricity bills) in accordance with Labour Office permits. Sampled during the audit were the following workers' employment contracts and payslips for the month of December 2022 (peak), April 2023 (low) and November 2022 (average/medium). <u>Welch Estate</u> (7 workers sampled out of 108 workers). Sample of workers as per the following:</p> <table border="1" data-bbox="1137 1225 1928 1374"> <tr> <td>ID XXX202</td> <td>ID XXX512</td> <td>ID XXX211</td> </tr> <tr> <td>ID XXX204</td> <td>ID XXX688</td> <td></td> </tr> <tr> <td>ID XXX500</td> <td>ID XXX758</td> <td></td> </tr> </table>	ID XXX202	ID XXX512	ID XXX211	ID XXX204	ID XXX688		ID XXX500	ID XXX758		Complied
ID XXX202	ID XXX512	ID XXX211										
ID XXX204	ID XXX688											
ID XXX500	ID XXX758											

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Diamond Jubilee Estate

13 workers sampled out of 258 workers). Sample of workers as per the following:

ID XXX511	ID XXX552	ID XXX654
ID XXX702	ID XXX662	ID XXX359
ID XXX812	ID XXX397	ID XXX298
ID XXX186	ID XXX261	ID XXX516
ID XXX155		

Bukit Asahan Estate

12 workers sampled out of 218 workers). Sample of workers from employee listing checked as follows:

#3	#24	#35
#89	#99	#112
#134	#161	#163
#203	#208	#216

Diamond Jubilee POM

6 workers sampled out of 63 workers). Sample of workers as per the following:

ID XXX544	ID XXX562	ID XXX351
ID XXX610	ID XXX309	ID XXX940

There were no issues of legal non-compliance for regular working hours, deductions, overtime, sickness, holiday entitlement,

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		maternity leave, reasons for dismissal, period of notice and other legal labour requirement verified from the workers sampled.											
6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has established Workers Housing Management Procedure and ‘OilPalmPal’ Digital Housing Complaint System (OPP DHCS) to effectively monitor and update house repair works. In addition to the said procedures, additional guidelines on repair completion timeline in workers housing management procedure ver. 1 dated 30/6/2022, ref: CEOUM/HSE/018/06/2022) is referred to. General house rule is written under “Peraturan Umum Kompleks Perumahan Pekerja”. Linesite inspection (housing complex/nest/community hall weekly inspections (PIOA) carried out as per the following:</p> <table border="1"> <thead> <tr> <th>Estate/mill</th> <th>Date of inspection</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Diamond Jubilee Estate</td> <td>28/6/23, 23/6/23, 16/6/23, 9/6/23</td> <td rowspan="3">No major issues reported and evaluated as comply</td> </tr> <tr> <td>Bukit Asahan Estate</td> <td>26/6/23, 19/6/23, 13/6/23, 7/6/23</td> </tr> <tr> <td>Welch Estate</td> <td>3/7/23, 27/6/23, 19/6/23, 6/6/23</td> </tr> </tbody> </table>	Estate/mill	Date of inspection	Remarks	Diamond Jubilee Estate	28/6/23, 23/6/23, 16/6/23, 9/6/23	No major issues reported and evaluated as comply	Bukit Asahan Estate	26/6/23, 19/6/23, 13/6/23, 7/6/23	Welch Estate	3/7/23, 27/6/23, 19/6/23, 6/6/23	Complied
Estate/mill	Date of inspection	Remarks											
Diamond Jubilee Estate	28/6/23, 23/6/23, 16/6/23, 9/6/23	No major issues reported and evaluated as comply											
Bukit Asahan Estate	26/6/23, 19/6/23, 13/6/23, 7/6/23												
Welch Estate	3/7/23, 27/6/23, 19/6/23, 6/6/23												
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>There were sundry shops located in the estates compound. The workers can easily access to adequate, sufficient, and affordable foods and goods. Price of goods was displayed at the sundry shops. Interview with group of workers (gender committee, worker’ representative and union representative) confirmed that they can easily purchase foods at the nearest shop or choose to go nearest town away from the estate by using their transport until the main guard post and public transport to the nearest town. Sundry shop price was monitored by estate on monthly/quarterly basis. Latest</p>	Complied										

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		record of monitoring has shown no sudden price hike and control goods/item sell as per control price set.	
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in</p>	SOU 18 has carried out the Prevailing Wage Assessment and calculated individual local and foreign workers current salary including non-monetary benefit given average SOU 18 Diamond Jubilee for local worker RM: 1,937.89; FW: RM 2,361.67. DLW assessment conducted by Group Sustainability Department (GSD) Sime Darby Plantation Berhad.	Complied

	<p>accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage). The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> <li>• The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul>		
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	- Minor compliance -		
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>There are no casual workers hired at SOU18. All employees hired are permanent employee (for locals and foreign workers) as well under contractor's workers. All permanent and full-time employment or contract workers used as the general worker, mandore and staff. based on their employment contract sighted in clause 6.2.2. employment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.2.2 above. No casual, temporary and day labour employed within all operating units within SOU 18 as confirmed and verified based on the workers master list, daily job allocation and interview with the contractor and sampled workers.</p>	Complied
<p><b>Criterion 6.3:</b> The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The SDPB's Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:          We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</li> <li>• Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> <li>• Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively.</li> </ul>	Complied



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		<p>During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union.</p>													
<p>6.3.2</p>	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.</p> <p>- Minor compliance -</p>	<p>Trade union meeting carried out at each respected operating unit were verified. The meeting involved the representative from employer and employee. Date of meetings summarized as per below:</p> <table border="1" data-bbox="1137 646 1926 992"> <thead> <tr> <th>Estate/mill</th> <th>Date of meeting</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Diamond Jubilee Estate</td> <td>16/3/2023</td> <td rowspan="4">Annual official meeting</td> </tr> <tr> <td>Diamond Jubilee POM</td> <td>14/6/2023</td> </tr> <tr> <td>Welch Estate</td> <td>5/6/2023</td> </tr> <tr> <td>Bukit Asahan Estate</td> <td>17/2/2023</td> </tr> </tbody> </table> <p>Minutes of meetings available for verification at each visited operating units.</p>	Estate/mill	Date of meeting	Remarks	Diamond Jubilee Estate	16/3/2023	Annual official meeting	Diamond Jubilee POM	14/6/2023	Welch Estate	5/6/2023	Bukit Asahan Estate	17/2/2023	<p>Complied</p>
Estate/mill	Date of meeting	Remarks													
Diamond Jubilee Estate	16/3/2023	Annual official meeting													
Diamond Jubilee POM	14/6/2023														
Welch Estate	5/6/2023														
Bukit Asahan Estate	17/2/2023														
<p>6.3.3</p>	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Based on the worker's interview, the selection of NUPW representative made from the election among the NUPW member without management interference. Foreign workers included in the committee formation and appointment letter sighted. The selection also based on the election meeting.</p>	<p>Complied</p>												
<p><b>Criterion 6.4:</b> Children are not employed or exploited.</p>															

6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography.</p> <p>They are eradicating the child labour in all their supply chain by promoting no employment of anyone under the age of 18 years.</p> <p>All the contractors are required to read through Vendor COBC before signing the Vendor Integrity Pledge where they are be required to comply with labour and respect human rights. The contractors had also been briefed on the human right charter and prohibition of child labour. This was also confirmed with the stakeholders through consultation session. Verification of workers master list (direct employed and contract workers) confirmed that there is no child labour hired.</p> <p>For contractors, the clause 5.8 abolishment of child labour &amp; protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children</p>	Complied
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Critical (Major) compliance -</p>	<p>The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, Migrant Worker Responsible Recruitment Procedure effective 20 August 2021, under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).</p>	Complied

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6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.          - Critical (Major) compliance -</p>	<p>There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Employee Master Listing and through interviewed with the stakeholders.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.          - Minor compliance -</p>	<p>The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders. For example, COBC briefing was given on 24/5/23 at Bukit Asahan Estate. During integrity day on 17//5/23 held at Sua Betong, the management team of SOU18 attended the session for COBC mechanism and integrity assessment.</p>	Complied
<p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.          - Critical (Major) compliance -</p>	<p>The SDPB's Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:          We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims.</li> <li>• Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation.</li> </ul> <p>The policy was communicated during muster briefing on 6/5/2023 at Diamond Jubilee POM.</p>	Complied
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.          - Critical (Major) compliance -</p>	<p>SDPB maintained the current Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019. The policies are evidence of management to a better society on respecting, upholding &amp; no-exploitation of fundamental human</p>	Complied

		<p>rights. Providing safe and healthy workplaces and protecting workers' welfare, engaging and empowering communities.</p> <p>SDPB maintained the current Human Rights Charter established has emphasize includes respect the rights of workers and will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights.</p> <p>The policy displayed on the notice board accessible by the workers. Onsite interviewed with sampled estates and mill workers informed that they been briefed on the policies during morning muster and the policies was displayed at the notice board outside the office.</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>The assessment of needs for new mothers was conducted by Gender Committee in SOU18. Among issues identified based on assessment outcome:</p> <ul style="list-style-type: none"> <li>- Request for break time/leave to go for post-natal check after delivery.</li> <li>- Request for break time for breast feed (30 minutes per session)</li> </ul> <p>Management has no objection to approve the request by new mothers and confirmed with the interview with them.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has revised Terms of Reference for Gender Representatives and Gender Committees dated March 2021. Flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008 was implemented as well. In addition to the said process, a Grievance Response SOP, version:2 dated 18/7/2023 was development as to clearly outline procedural aspect on handling the intake and logging of grievances received through formal and informal channels, assignment of grievances received for investigation and cancelling, withdrawing, closing or reopening and investigation. Initial negotiation between the management and the</p>	Complied

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		<p>dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e- Form, email address and toll free number/ hotline can be found in <a href="https://simedarbyplantation.com/who-we-are/corporate-governance/report-your-concerns/">https://simedarbyplantation.com/who-we-are/corporate-governance/report-your-concerns/</a>.</p> <p>Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally. Apart from that, the company has implemented "Suara Kami Helpline" as a platform for the workers to raise any issue which respects anonymity and protects complainants. The workers have been communicated about the platform through morning muster and display on notice boards. The procedure is also accessible on the SDPB's website (<a href="https://simedarbyplantation.com/sustainability/reports-policies-and-statements/">https://simedarbyplantation.com/sustainability/reports-policies-and-statements/</a>).</p>	
<b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees.</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> </ul>	<p>The recruitment cost was declared by the labour agent from source country for the applicable fees. Sampled for PT Primadaya Pratama Pandukarya &amp; PT Sudinar Artha for Indonesia effective date on 13/7/2022 and valid for 2 years (13/7/22 – 12/7/24) documents required, medical, insurance and transportation. No other hidden recruitment fees paid to agent. Under contract terms and condition, clause 3.3 no charging of recruitment fees has been clearly defined as listed below:</p>	Complied

	<ul style="list-style-type: none"> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> <li>- Levy</li> <li>- VISA (multiple entry/visa with reference), VISA processing fees, VISA pass (PLKS)</li> <li>- Assurance bond</li> <li>- Attestation fees</li> <li>- Agency service charge (MRA)/Agency fees</li> <li>- Medical Examination (FOMEMA)</li> <li>- Foreign Workers Management System (BESTINET/online medical)</li> <li>- Processing fees, VISA fees</li> <li>- Immigration security clearance</li> <li>- One Stop Centre</li> <li>- PPN 10% (Indonesian tax)</li> <li>- Air ticket</li> <li>- Medical examination (source country)</li> <li>- Transportation, food and accommodation – during process following selection</li> <li>- Transportation, food and accommodation – to point of departure/airport</li> <li>- Pre-departure training (source country)</li> <li>- Passport &amp; other ID</li> </ul> <p>All of the above fees will be paid by Sime Darby Plantation Berhad.</p> <p>Passport was kept by workers themselves and locker has been provided at their house for safe keeping.</p>	
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		<p>There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia and India was same with the employment contract signed between worker and estate/mill.</p> <p>Based on the workers interview, the overtime was given voluntarily if any work offered. The termination of service clearly stated that the termination of employment if:</p> <ol style="list-style-type: none"> <li>1. The company is not satisfied with your performance</li> <li>2. You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term.</li> <li>3. You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime.</li> <li>4. You have breached any express or implied terms of your employment.</li> <li>5. Fail medical examination based on FOMEMA result.</li> </ol>	
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.          - Critical (Major) compliance -</p>	<p>SDPB has implemented a Sime Darby’s Human Rights Charter revised 2020 and can be easily access via <a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a> where they committed as below:</p> <ol style="list-style-type: none"> <li>a. Providing equal opportunity</li> <li>b. Respecting freedom of association</li> <li>c. Eradicating any form of exploitation</li> <li>d. Providing decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs</li> </ol>	Complied

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		<p>e. Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution.</p> <p>All the foreign workers will be provided with induction training prior to work. Besides, they were provided with decent living condition and free from any discrimination. The workers informed that they were treated equally without any discrimination and allow joining NUPW freely. No contract substitution has occurred through interviewed with the workers</p>	
<b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The respective Sr. Managers/ Managers in Operating Unit in SOU 18 has been appointed as Person Responsible / Chairman for Safety and Health in the estate as per appointment letter signed by the Regional CEO, Central West Region and Safety and Health Committee Procedures, ver. 0 dated 17/11/2021 under section 4. Roles &amp; Responsibilities and section 6. Composition of Safety and Health Committee under subsection 6.2. Appointment of Chairman, Secretary and Other Members. Refer doc. No. UM/HSE/OCP/08.</p> <p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, workplace inspection, and training.</p> <p>The operating units conducted safety and health committee meeting as per Safety and Health Committee Procedures, ver. 0</p>	Complied



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		<p>dated 17/11/2021 under section 7. Meetings of Safety and health Committee under subsection 7.1. Frequency of Meetings of Committee. Reviewed the latest 4 minutes meeting conducted for every operating unit as follows:</p> <table border="1" data-bbox="1137 499 1926 874"> <thead> <tr> <th></th> <th>02/2023</th> <th>01/2023</th> <th>04/2022</th> <th>03/2022</th> </tr> </thead> <tbody> <tr> <td>Diamond Jubilee POM</td> <td>22/05/2023</td> <td>24/02/2023</td> <td>15/12/2022</td> <td>15/09/2022</td> </tr> <tr> <td>Diamond Jubilee Estate</td> <td>05/05/2023</td> <td>06/02/2023</td> <td>11/11/2022</td> <td>04/08/2022</td> </tr> <tr> <td>Bukit Asahan Estate</td> <td>09/05/2023</td> <td>07/02/2023</td> <td>11/11/2022</td> <td>19/08/2022</td> </tr> <tr> <td>Welch Estate</td> <td>19/06/2023</td> <td>21/03/2023</td> <td>29/12/2022</td> <td>28/09/2022</td> </tr> </tbody> </table>		02/2023	01/2023	04/2022	03/2022	Diamond Jubilee POM	22/05/2023	24/02/2023	15/12/2022	15/09/2022	Diamond Jubilee Estate	05/05/2023	06/02/2023	11/11/2022	04/08/2022	Bukit Asahan Estate	09/05/2023	07/02/2023	11/11/2022	19/08/2022	Welch Estate	19/06/2023	21/03/2023	29/12/2022	28/09/2022	
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Welch Estate	19/06/2023	21/03/2023	29/12/2022	28/09/2022																								
<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.                      - Minor compliance -</p>	<p>SDPB has established Accident and emergency procedures under procedure as follows:</p> <ol style="list-style-type: none"> <li>1. Incidents, Accidents and Non-compliance Management Procedures, ver. 1, dated 01/06/2022. Refer doc. no. UM/HSE/SP/03</li> <li>2. Emergency Preparedness Response Procedure, ver. 0, dated 17/11/2021. Refer doc. no. UM/HSE/SP/02</li> <li>3. First Aid in Workplace Procedure, ver. 0, dated 09/03/2021. Refer doc. No. UM/HSE/OCP/01</li> </ol> <p>The operating units maintain the records of accidents including JKKP 6 forms reported to DOE, medical leaves certificates, accidents investigations reports and HIRARC review. The accidents occurrences were reported to the Headquarters through Rapid 4</p>	<p>Complied</p>																									

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		<p>systems and DOSH by submitting the JKKP 6 form through MyKKP system.</p> <p>The operating units maintains the records of accident occur in the estate and reported to the main office through Rapid 4 system and to DOSH through form JKKP in MyKKP system. Reviewed document related to the accident such as Rapid 4, JKKP 6, accident investigation reports or SOCSO claim as follows:</p> <p><u>Diamond Jubilee POM</u></p> <ol style="list-style-type: none"> <li>1. Accident occurs in Kernel plant operation on 26/06/2023. Reviewed incident report in Rapid 4 system dated 30/06/2023</li> <li>2. Accident occurs in thresher plant operation on 25/06/2023. Reviewed incident report in Rapid 4 system dated 27/06/2023</li> <li>3. Accident occurs in moving vehicle operation on 31/05/2023. Reviewed incident report in Rapid 4 system dated 06/06/2023</li> </ol> <p><u>Diamond Jubilee Estate</u></p> <ol style="list-style-type: none"> <li>1. Accident occurs in harvesting operation on 19/05/2023. Reviewed the accident investigation reports dated 23/05/2023, incident report in Rapid 4 system dated 22/05/2023, JKKP 6 notification to DOSH dated 24/05/2023 and SOCSO application letter dated 08/06/2023.</li> <li>2. Accident occurs in tractor driving operation on 14/03/2023. Reviewed the accident investigation reports dated 20/03/2023, incident report in Rapid 4 system dated 22/03/2023, JKKP 6 notification to DOSH dated 22/03/2023 and SOCSO application letter dated 29/03/2023.</li> </ol>	
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		<p>Bukit Asahan Estate</p> <ol style="list-style-type: none"> <li>1. Accident occurs on 16/03/2023 in fertiliser application. Reviewed the accident investigation reports dated 17/03/2023, incident report in Rapid 4 system dated 20/03/2023 JKPP 6 notification to DOSH dated 20/03/2023.</li> </ol> <p>Welch Estate</p> <ol style="list-style-type: none"> <li>1. Accident occurs in tractor driver operation on 08/06/2023. Reviewed the accident investigation reports dated 21/06/2023, incident report in Rapid 4 system dated 21/06/2023</li> <li>2. Accident occurs harvesting operation on 09/04/2023. Reviewed the accident investigation reports dated 17/04/2023, incident report in Rapid 4 system dated 06/05/2023</li> <li>3. Accident occurs harvesting operation on 24/12/2022. Reviewed the accident investigation reports dated 29/12/2022, incident report in Rapid 4 system dated 29/12/2022 and JKPP 6 notification to DOSH dated 27/12/2022.</li> </ol> <p>The operating units provided first aid boxes at the estates and mill and placed in designated places or handled by trained first aider. The operating units continuously provided training to ensure the understanding on first aid usage to the first aider. Reviewed the training records conducted as per criteria 3.7.2.</p> <p>The first aid was monitored on monthly basis. Reviewed the monitoring records for the month of April, May and June 2023. Noted during site visit and interview with the spraying and harvesting mandores, the understanding on the first aid kit treatment and condition of the first aid box was satisfactory.</p>	
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		<p>The Operating units has established the ERP Team lead by the Estate Manager as Safety Commander. The team was divided into Accident, Storm and flood, Spillage Team, fire, Rescue and search Team and First Aider Team. The operating units continuously provided training to ensure the understanding on the Emergency Response Plan to the ERP Team. Reviewed the training records conducted as per criteria 3.7.2.</p>													
<p>6.7.3</p>	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The mill and estates visited provided appropriate PPE to all workers according to the job type. The PPE given as per CHRA report, NRA report, HIRARC, Safety Work Procedure Oil Palm Estate Operation dated 01/11/2021 and Personal Protective Equipment (PPE) Procedure, doc ref. no. UM/HSE/OCP/03 dated 09/03/2021.</p> <p>All workers in the operating units have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge.</p> <p>During the field visit to the Spraying Gang and Harvesting Gang at the estate and FFB Ramp, Laboratory, and Workshop at the mill, it was sighted that all required appropriate PPEs were worn by the personals. The understanding on importance of PPE were acceptable among the workers.</p> <p>Reviewed the Workers PPE issuance records for the months April – June 2023 as follows:</p> <table border="1" data-bbox="1137 1125 1928 1369"> <thead> <tr> <th data-bbox="1137 1125 1532 1166">Diamond Jubilee POM</th> <th data-bbox="1532 1125 1928 1166">Diamond Jubilee Estate</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 1166 1532 1208">Workshop</td> <td data-bbox="1532 1166 1928 1208">Harvester</td> </tr> <tr> <td data-bbox="1137 1208 1532 1249">1. 1xxx98</td> <td data-bbox="1532 1208 1928 1249">1. 1xxx19</td> </tr> <tr> <td data-bbox="1137 1249 1532 1291">2. 4xx86</td> <td data-bbox="1532 1249 1928 1291">2. 1xxx15</td> </tr> <tr> <td data-bbox="1137 1291 1532 1332">3. 6xx94</td> <td data-bbox="1532 1291 1928 1332">3. 1xxx80</td> </tr> <tr> <td data-bbox="1137 1332 1532 1374">4. 1xxx73</td> <td data-bbox="1532 1332 1928 1374">4. 1xxx16</td> </tr> </tbody> </table>	Diamond Jubilee POM	Diamond Jubilee Estate	Workshop	Harvester	1. 1xxx98	1. 1xxx19	2. 4xx86	2. 1xxx15	3. 6xx94	3. 1xxx80	4. 1xxx73	4. 1xxx16	<p>Complied</p>
Diamond Jubilee POM	Diamond Jubilee Estate														
Workshop	Harvester														
1. 1xxx98	1. 1xxx19														
2. 4xx86	2. 1xxx15														
3. 6xx94	3. 1xxx80														
4. 1xxx73	4. 1xxx16														

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		Wiremen 5. 1xxx00 General Workers 6. 1xxx64	5. 1xxx17 6. 1xxx73 7. 1xxx46	
		Bukit Asahan Estate Sprayers 1. 1xxx71 2. 1xxx48 3. 1xxx84 4. 1xxx78 5. 9xxx6 6. 1xxx17	Welch Estate Sprayers 1. 1xxx73 2. 1xxx77 3. 8xxx3 4. 1xxx04 5. 1xxx99	
		<p>The estate conducted PPE inspection periodically to ensure the workers wear the PPE provided.</p> <p>The estates have well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they were all well aware that they have to sanitise themselves before returning home. Reviewed the sprayers daily sanitation records in Sprayers Sanitation Logbook for the month of April, May and June 2023.</p>		
6.7.4	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. - Minor compliance -	Medical care is provided to all the employees. Reviewed on workers profile records found that all workers are covered by the accident insurances.		Complied

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		<p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Reviewed the form 8A, "Jadual Caruman" for the month April, May and June 2023 for all operating units.</p> <p>For accident eligible for SOCSO claim, the operating units has made claim to SOCSO. Reviewed the SOCSO claim as per criteria 6.7.2.</p>																
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2022 as reported to DOSH as follows:</p> <table border="1" data-bbox="1256 799 1809 1177"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Diamond Jubilee POM</td> <td>6</td> <td>15</td> </tr> <tr> <td>Diamond Jubilee Estate</td> <td>9</td> <td>143</td> </tr> <tr> <td>Bukit Asahan Estate</td> <td>7</td> <td>99</td> </tr> <tr> <td>Welch Estate</td> <td>21</td> <td>131</td> </tr> </tbody> </table>	Operating units	Accident Cases	LTA	Diamond Jubilee POM	6	15	Diamond Jubilee Estate	9	143	Bukit Asahan Estate	7	99	Welch Estate	21	131	Complied
Operating units	Accident Cases	LTA																
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Diamond Jubilee Estate	9	143																
Bukit Asahan Estate	7	99																
Welch Estate	21	131																
<p><b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b></p>																		
<p><b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>																		
7.1.1	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>The estates have established Integrated Management Plan with objective to ensure the pesticides usage at optimum level. Among the plans as follows:</p>	Complied															

		<ol style="list-style-type: none"> <li>1. To maintain progressive planting of <i>Tunera subulata</i>, <i>Cassia cobanensis</i>, and <i>Antigonon leptopus</i> at immature area</li> <li>2. Leguminous Cover Crop (LCC) Planting</li> <li>3. Installation of barn owl box</li> <li>4. To do census on barn owl, rat bait and Ganoderma</li> <li>5. To maintain grass cutting program to reduce the use of herbicide</li> </ol> <p>Reviewed the implementation of the IPM Plan as follows:</p> <p><u>Diamond Jubilee Estate</u></p> <ol style="list-style-type: none"> <li>1. The estate conducted rat baiting every 6 months. Reviewed the latest rat baiting conducted in January 2023.</li> <li>2. Barn Owl Box census was conducted once every 6 months. Reviewed the census records as of January 2023 with occupancy records at 54.67% with barn owl box ratio at 1:23 ha</li> </ol> <p><u>Bukit Asahan Estate</u></p> <ol style="list-style-type: none"> <li>1. Barn Owl Box census was conducted once every 6 months. Reviewed the census records as of February 2023 with occupancy records at 85.23% with barn owl box ratio at 1:11 ha</li> <li>2. The estate conducted rat baiting every 6 months. Reviewed the latest rat baiting conducted in January - April 2023.</li> </ol> <p><u>Welch Estate</u></p>	
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		<ol style="list-style-type: none"> <li>1. The estate conducted rat baiting every 6 months. Reviewed the latest rat baiting conducted in February – March 2023.</li> <li>2. Barn Owl Box census was conducted once every 6 months. Reviewed the census records as of February 2023 with occupancy records at 62.50% with barn owl box ratio at 1:12 ha</li> </ol>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>This is not practiced in the estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.</p> <p>3 plant species were used for IPM to control pest. The beneficial plant planted such as <i>Tunera subulata</i>, <i>Cassia cobanensis</i>, and <i>Antigonan leptopus</i>.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>No evidence and records of fire usage for pest control at all estate visited.</p> <p>Addressed in the Sime Darby Planation Berhad’s Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 02/12/2019 and Responsible Agriculture Charter Revised 2020 under section 3.2: Protect and enhance forest:</p> <p>“We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:</p> <p>ix. Zero tolerance of the use of fire within our land boundaries and conservation areas, and the establishment of effective monitoring and prevention systems, as well as protective firefighting measures in and around our operation.”</p>	Complied
<b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p>	<p>The written justification in Standard Operating Procedure (SOP) of all agrochemicals are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby</p>	Complied



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	<p>- Critical (Major) compliance -</p>	<p>Plantation Berhad. Refer to Sime Darby Plantation Agricultural Reference Manual, latest update issue no. 2, dated June 2021 under section 16: Weed Control.</p>																																																					
<p>7.2.2</p>	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.          - Critical (Major) compliance -</p>	<p>Records of pesticides used (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) is maintained by the estate and submitted to the Head Quarters on a monthly basis. Sampled the a.i/ha for chemicals used in 2022 as below: -</p> <table border="1" data-bbox="1137 644 1912 1313"> <thead> <tr> <th>Operating Unit</th> <th>Diamond Jubilee Estate</th> <th>Bukit Asahan Estate</th> <th>Welch Estate</th> </tr> </thead> <tbody> <tr><td>Jan 2022</td><td>0.051</td><td>1.427</td><td>0.051</td></tr> <tr><td>Feb 2022</td><td>0.086</td><td>1.049</td><td>0.036</td></tr> <tr><td>Mar 2022</td><td>0.080</td><td>0.641</td><td>0.363</td></tr> <tr><td>Apr 2022</td><td>0.065</td><td>1.342</td><td>0.228</td></tr> <tr><td>May 2022</td><td>0.034</td><td>1.556</td><td>0.000</td></tr> <tr><td>Jun 2022</td><td>0.039</td><td>1.911</td><td>0.000</td></tr> <tr><td>Jul 2022</td><td>0.076</td><td>1.844</td><td>6.133</td></tr> <tr><td>Aug 2022</td><td>0.049</td><td>3.042</td><td>0.958</td></tr> <tr><td>Sep 2022</td><td>0.062</td><td>2.438</td><td>1.674</td></tr> <tr><td>Oct 2022</td><td>0.080</td><td>2.100</td><td>0.778</td></tr> <tr><td>Nov 2022</td><td>0.121</td><td>4.458</td><td>0.820</td></tr> <tr><td>Dec 2022</td><td>0.059</td><td>4.356</td><td>0.651</td></tr> </tbody> </table>	Operating Unit	Diamond Jubilee Estate	Bukit Asahan Estate	Welch Estate	Jan 2022	0.051	1.427	0.051	Feb 2022	0.086	1.049	0.036	Mar 2022	0.080	0.641	0.363	Apr 2022	0.065	1.342	0.228	May 2022	0.034	1.556	0.000	Jun 2022	0.039	1.911	0.000	Jul 2022	0.076	1.844	6.133	Aug 2022	0.049	3.042	0.958	Sep 2022	0.062	2.438	1.674	Oct 2022	0.080	2.100	0.778	Nov 2022	0.121	4.458	0.820	Dec 2022	0.059	4.356	0.651	<p>Complied</p>
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7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The estate has established and implemented Chemical Reduction Plan where they have stated the intention to reduce the usage of chemical through implementation of Integrated Pest Management Plan with objective to ensure the pesticides usage at optimum level. Among the plans as follows:</p> <ol style="list-style-type: none"> <li>1. To maintain progressive planting of <i>Tunera subulata</i>, <i>Cassia cobanensis</i>, and <i>Antigonan leptopus</i> at immature area</li> <li>2. LCC Planting</li> <li>3. Installation of barn owl box</li> <li>4. To do census on barn owl, rat bait and Ganoderma</li> <li>5. To maintain grass cutting program to reduce the use of herbicide</li> </ol>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There is no evidence of prophylactic use of pesticides in the estates.</p>	Not Applicable
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ol style="list-style-type: none"> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> </ol>	<p>Sighted in the Chemical Registers showed that only class III &amp; IV chemicals were used at the estates. During the site visit to the chemical store, it was justified that there were only class II, III and IV chemicals being used. Paraquat was eliminated. In its place, alternatives such as Glyphosate was used instead. Monocrotophos was eliminated and in its place, Acephate is used.</p> <p>As recommendation in CHRA report, the estate updated the chemical register report on annually basis. Reviewed the Chemical Register dated 03/01/2023 for Diamond Jubilee Estate, 01/01/2023 for Bukit Asahan Estate and 07/01/2023 for Welch Estate.</p>	Complied

	<p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>		
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers in the estate.</p> <p>The estates keep the training records as per criteria 3.7.2.</p>	Complied
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in the mill and estate's Chemical Store in accordance with the Occupational Safety and Health Act 1994 (Act 514) and Pesticides Act 1974 (Act 149) and their Regulations. The stores were at all times locked and at the time of visit the store clerk was seen to unlock the padlock to open entrance door for auditor to inspect the store. At the entrance door, signage requiring donning of PPE were visibly posted. The Chemical Store signage with required Hazard Symbols were available at the entrance. The facility ventilation fan was found working with adequate ventilation available, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available.</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Excess chemical containers that were not used for premixing have been triple rinsed and punctured was categorized under recycle waste. The chemical containers are stored in the Empty Chemical Container Store and disposed through waste contractors responsibly. Visit to the Empty Chemical Store indicated that the chemical containers were indeed triple rinsed and punctured prior to being stored. Records of empty chemical containers disposal were also maintained and verified for each operating units.</p>	Complied

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		<p>a. <u>Diamond Jubilee POM</u> Disposed via Licensed Scheduled Waste Contractor. SW409 – Empty Chemical Containers; Date: 14/02/2023; Consignment Note Number: 2023021509RWQLAI; Quantity: 0.1640 Mt.</p> <p>b. <u>Diamond Jubilee Estate</u> Empty Pesticide Containers were disposed via SX SXXXX TXXXXXXXX EXXXXXXXX. Sighted the latest disposal of Empty Pesticide Containers dated 22/06/2023, together with other recyclable waste such as sacks, boxes and papers.</p> <p>c. <u>Bukit Asahan Estate</u> Empty Pesticide Containers were disposed via SX SXXXX TXXXXXXXX EXXXXXXXX. Sighted the latest disposal of Empty Pesticide Containers dated 22/06/2023.</p> <p>d. <u>Welch Estate</u> Disposed via Licensed Scheduled Waste Contractor. SW409 Empty Chemical Container; Date: 14/01/2023; Consignment Note Number: 20230111412DUI62A; Quantity: 0.0180 Mt.</p>	
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -</p>	SOU 18 estates do not use aerial spraying in their operations.	Complied
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -</p>	<p>The estates also send the chemical handlers for medical surveillance to ensure all workers are fit to works as chemical handlers. Reviewed the medical surveillance reports as follows: <u>Diamond Jubilee Estate</u></p>	Complied

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		<ol style="list-style-type: none"> <li>1. Annual medical surveillance was conducted on 27/02/2023 by OHD with DOSH reg. no. HQ/17/OHD/00/00094. Workers who exposed to Cholinesterase, Manganese and Chromium such as foreman and sprayers were send for surveillance. 12 workers were sent, and 1 worker were found with abnormal results and require for retest. Retest were conducted on 02/06/2023 and found fit to work.</li> <li>2. The estate conducted monthly medical screening for sprayers during VMO visit. Reviewed the screening records for the month of March, April and May 2023.</li> </ol> <p><u>Bukit Asahan Estate</u></p> <ol style="list-style-type: none"> <li>1. FY 2022, medical surveillance was conducted on 21/06/2022 and 22/07/2022 for workers exposed to organophosphate and manganese. The surveillance was conducted by OHD with DOSH reg. no. HQ/20/DOC/00/00519. 18 workers were sent for surveillance and found fit to work. FY 2023, medical surveillance has been conducted on 31/05/2023 by same OHD for workers exposed to organophosphate and manganese. The report has yet to be received by the estate during the audit.</li> </ol> <p><u>Welch Estate</u></p> <ol style="list-style-type: none"> <li>1. Annual Medical Surveillance for workers exposed with organophosphate and manganese FY 2023 were conducted on 17/04/2023 by OHD with DOSH reg. no. HQ/08/DOC/00/545. 11 workers were sent for surveillance and found fit to work.</li> <li>2. The estate conducted monthly medical screening for sprayers during VMO visit. Reviewed the screening records for the month of March, April and May 2023.</li> </ol>	
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<p>7.2.11</p>	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Addressed in the Sime Darby Plantation Berhad, Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Human Rights Charter under section 3.2 Respect and Uphold Labour Rights stated as follows:</p> <p>“3.2.3 Providing a safe and healthy working environment by delivering accident prevention training, risk minimisation focused training, and providing appropriate protective equipment.”</p> <p>“3.2.5 Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. We will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights.”</p> <ul style="list-style-type: none"> <li>- It was sighted during the visit to the stores there were signage stating that pregnant and breast-feeding women are not allowed to enter the chemical stores.</li> <li>- There were no female workers assigned for chemical related works in the estates visited.</li> <li>- SOU18 Certification Unit does not recruit workers under the age of 18. This was confirmed via verification done on the workers master list and interview with the workers and worker’s representatives.</li> <li>- Interview with the sampled chemical handlers confirmed that all chemical handlers undergo annual medical surveillance assessments. The workers further confirmed that those who are diagnosed to be not fit to work with chemicals are removed from chemical related works and are offered alternative work.</li> </ul>	<p>Complied</p>
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<b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.																		
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>SDPB SOU18 Diamond Jubilee mill and estates have established a Waste Management Plan, incorporated in the Environmental Management Plan 2023 which was available for verification. The objective of the management plan is for proper disposal of waste in accordance to SOP and Legal Requirements, as well as towards waste utilisation wherever possible. The waste has been identified and summarised as below at the estates.</p> <p><u>Diamond Jubilee Estate, Bukit Asahan Estate &amp; Welch Estate</u></p> <table border="1"> <thead> <tr> <th>Category</th> <th>Types/Location</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Domestic Waste</td> <td>Rubbish (Workers Housing Complex, Office, Workshop, Store, Shop)</td> </tr> <tr> <td>Sewage (Septic Tank at Workers Housing Complex &amp; Office)</td> </tr> <tr> <td>Industrial Waste</td> <td>Scrap Metal &amp; Used Pesticide Containers</td> </tr> <tr> <td>Scheduled Waste</td> <td>Used Lubricant, Hydraulic, Filter, Rag – Workshop and Clinical Waste</td> </tr> <tr> <td>Recyclable Waste</td> <td>Empty Pesticide Containers</td> </tr> </tbody> </table> <p>The waste has been identified and summarised as below at the mill.</p> <table border="1"> <thead> <tr> <th>Category</th> <th>Types/Location</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Household Waste</td> <td>Domestic Waste, Organic Waste, Paper, Glasses, Used Cooking Oil.</td> </tr> <tr> <td>Sewage</td> </tr> </tbody> </table>	Category	Types/Location	Domestic Waste	Rubbish (Workers Housing Complex, Office, Workshop, Store, Shop)	Sewage (Septic Tank at Workers Housing Complex & Office)	Industrial Waste	Scrap Metal & Used Pesticide Containers	Scheduled Waste	Used Lubricant, Hydraulic, Filter, Rag – Workshop and Clinical Waste	Recyclable Waste	Empty Pesticide Containers	Category	Types/Location	Household Waste	Domestic Waste, Organic Waste, Paper, Glasses, Used Cooking Oil.	Sewage
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Complied

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		<table border="1"> <tr> <td data-bbox="1137 368 1373 539">Scheduled Waste</td> <td data-bbox="1373 368 1928 539">Used Lubricant &amp; Hydraulic Oil, Used Empty Chemical Containers, Spent Chemical from Lab, Contaminated Rags, Contaminated PPE, Discarded or Offspecs paints or other waste from maintenance activities.</td> </tr> <tr> <td data-bbox="1137 539 1373 587">Industrial Waste</td> <td data-bbox="1373 539 1928 587">Scrap Metal</td> </tr> <tr> <td data-bbox="1137 587 1373 715">Operational Waste and By-Products</td> <td data-bbox="1373 587 1928 715">EFB, Palm Kernel Shell, POME, Construction Debris</td> </tr> </table> <p>The Waste Management Plan also details out the action plan as in to manage the disposal or reuse of the waste by the mill and estate. Evidence of the implementation of the action plan were sampled and verified. Evidences stated under indicator 7.3.2 for each operating unit.</p>	Scheduled Waste	Used Lubricant & Hydraulic Oil, Used Empty Chemical Containers, Spent Chemical from Lab, Contaminated Rags, Contaminated PPE, Discarded or Offspecs paints or other waste from maintenance activities.	Industrial Waste	Scrap Metal	Operational Waste and By-Products	EFB, Palm Kernel Shell, POME, Construction Debris	
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Industrial Waste	Scrap Metal								
Operational Waste and By-Products	EFB, Palm Kernel Shell, POME, Construction Debris								
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>Generally the interviewed workers have demonstrated good understanding in proper disposal of generated waste in the estate and mill. The visited labour quarters were observed to be in clean condition, free from scheduled waste and recyclable waste.</p> <p>As mentioned above, all operating units have established a Waste Management Plan incorporated in the Environmental Management Plan 2023. The disposal of the waste were identified to be implemented in accordance with the action plans stated in the waste management plan.</p> <p><u>Diamond Jubilee POM</u></p> <ol style="list-style-type: none"> <li>Domestic Waste were collected from the housing complex and mill compound via mill tractor and placed in a bin, which is located at the mill compound. The mill has contracted a 3<sup>rd</sup> Party Contractor to collect the domestic waste from the estate to be</li> </ol>	Complied						



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		<p>disposed at the Municipal Council authorised waste dumping site. The contractor collects the waste 4 times a month. Visit to the bin indicated that only domestic waste were disposed and no evidence of recyclable or scheduled waste were disposed via the process. Sighted the contract agreement for the contractor dated 01/02/2023 and payment for the contractor (Invoice Number: 90109338) dated 31/03/2023 for the month of March 2023.</p> <p>2. Waste materials classified as Scheduled Waste were disposed via licensed Scheduled Waste Contractor, PXXXXX FXXXX (MXXXXXX) SXX BXX. Records of Consignment Notes were available for recent disposal and verified as below.</p> <ul style="list-style-type: none"> <li>a. SW305 – Spent Lubricant Oil; Date: 14/02/2023; Consignment Note Number: 2023021509N3Y651; Quantity: 0.0970 Mt.</li> <li>b. SW322 – Spent Hexane; Date: 14/02/2023; Consignment Note Number: 20230215097CARI6; Quantity: 0.0614 Mt.</li> <li>c. SW322 – Spent IPA; Date: 14/02/2023; Consignment Note Number: 2023021509Q2HKLX; Quantity: 0.1191 Mt.</li> <li>d. SW410 – Contaminated Rags; Date: 14/02/2023; Consignment Note Number: 20230215095JW17H; Quantity: 0.3890 Mt.</li> <li>e. SW409 – Empty Chemical Containers; Date: 14/02/2023; Consignment Note Number: 2023021509RWQLAI; Quantity: 0.1640 Mt.</li> </ul> <p><u>Diamond Jubilee Estate</u></p> <p>1. Domestic Waste were collected from the housing complex and office via estate tractor and placed in a bin, which is located at</p>	
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		<p>the housing complex. The estate has contracted a 3<sup>rd</sup> Party Contractor to collect the domestic waste from the estate to be disposed at the Municipal Council authorised waste dumping site. The contractor collects the waste 11 times a month. Visit to the bin indicated that only domestic waste were disposed and no evidence of recyclable or scheduled waste were disposed via the process. Sighted the contract agreement for the contractor dated 01/01/2023 and payment for the contractor (Doc Number: 4300632438) dated 01/07/2023 for the month of June 2023.</p> <ol style="list-style-type: none"> <li>2. Waste materials classified as Scheduled Waste were disposed via licensed Scheduled Waste Contractor, PXXXXX FXXXX (MXXXXXX) SXX BXX. Records of Consignment Notes were available for recent disposal and verified as below.             <ul style="list-style-type: none"> <li>– Latest disposal of SW 305 (0.50 Mt), SW 306 (0.20 Mt), SW 410 – Oil Filter (0.15 Mt) and SW 410 – Rags (0.03 Mt) was done on 20/06/2023 with Consignment Note (Note Number: M06357) of disposal available for verification.</li> <li>– Latest disposal of SW 404 – Clinical Waste was disposed via VMO with latest disposal dated 17/06/2023.</li> </ul> </li> <li>3. Empty Pesticide Containers were disposed via SX SXXXX TXXXXXXXXXXXXXXXXX. Sighted the latest disposal of Empty Pesticide Containers dated 22/06/2023, together with other recyclable waste such as sacks, boxes and papers.</li> </ol> <p><u>Bukit Asahan Estate</u></p> <ol style="list-style-type: none"> <li>1. Domestic Waste was collected by 3<sup>rd</sup> Party Contractor, hired by the management to collect domestic waste from the estate housing complex. The contractor collects the domestic waste twice a week and disposes them at Municiple Council approved</li> </ol>	
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		<p>dumping site. Sighted the Memorandum of Agreement between the contractor and Bukit Asahan Estate, Valid from 01/01/2023 – 31/12/2023.</p> <p>2. Waste materials classified as Scheduled Waste were disposed via licensed Scheduled Waste Contractor, PXXXXX FXXXX (MXXXXXX) SXX BXX. Records of Consignment Notes were available for recent disposal and verified as below.</p> <ul style="list-style-type: none"> <li>- SW410 Used Filter, Rags and Plastic; Date: 31/05/2023; Consignment Note Number: 20230531174KM29F; Quantity: 0.0050 Mt.</li> <li>- SW409 Used PPE &amp; Rags; Date: 31/05/2023; Consignment Note Number: 20230531175M9Z8L; Quantity: 0.4500 Mt.</li> <li>- SW 312 Oil or Grease Interceptor; Date: 31/05/2023; Consignment Note Number: 2023053118MTBS0U; Quantity: 0.1000 Mt</li> <li>- SW305 Spent Lubricant Oil; Date: 13/04/2023; Consignment Note Number: 2023041314DPGX1O; Quantity: 0.3700 Mt.</li> </ul> <p>3. Empty Pesticide Containers were disposed via SX SXXXX TXXXXXXXX EXXXXXXXX. Sighted the latest disposal records of Empty Pesticide Containers dated 24/06/2023.</p> <p><u>Welch Estate</u></p> <p>1. Domestic Waste was collected by 3<sup>rd</sup> Party Contractor, hired by the management to collect domestic waste from the estate housing complex. The contractor collects the domestic waste twice a week and disposes them at Municiple Council approved dumping site. Sighted the Memorandum of Agreement between</p>	
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		<p>the contractor and SDPB Welch Estate, Valid from 01/01/2023 – 30/06/2023.</p> <p>2. Waste materials classified as Scheduled Waste were disposed via licensed Scheduled Waste Contractor, PXXXXX FXXXX (MXXXXXX) SXX BXX. Records of Consignment Notes were available for recent disposal and verified as below.</p> <ul style="list-style-type: none"> <li>- SW109 Fluorescent Tube; Date: 07/06/2023; Consignment Note Number: 2023060709PE17WV; Quantity: 0.0150 Mt.</li> <li>- SW410 Used PPE Equipments and Used Rags; Date: 11/04/2023; Consignment Note Number: 2023041111AXT3BD; Quantity: 1.5870 Mt.</li> <li>- SW305 Spent Lubricating Oil; Date: 14/02/2023; Consignment Note Number: 2023021413LOV217; Quantity: 0.2220 Mt.</li> <li>- SW409 Empty Chemical Container; Date: 14/01/2023; Consignment Note Number: 20230111412DUI62A; Quantity: 0.0180 Mt.</li> </ul>	
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>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 estates. Waste generated by the estate were disposed in compliance with the organisation's SOP and legal requirements and in a responsible manner. There were no evidence that open fire were used to dispose waste generated in the estate and mill.</p>	Complied
<b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p>	<p>SDPB have established Agricultural Reference Manual (ARM) – Oil Palm Planting as a guideline for plantation management. The Section 8 of the ARM covers the procedure for Oil Palm Planting –</p>	Complied

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	<p>- Minor compliance -</p>	<p>Manuring, for both immature and mature. The procedure provides the guideline on type of fertilisers to be used, timing to apply, dosage and placement to optimize yield and minimise environmental impacts.</p>	
<p>7.4.2</p>	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>SDPB have established the Plantation Quality Management System – Sustainability Plantation Management System; Appendix 11; SOP For Taking Soil Samples; Issued Date: 01/08/2009; Version: 01. The SOP states that the soil sampling is carried out every 5 years.</p> <p>SDPB have established the Estate Quality management System; SOP – Manuring; Version: 1; Year: 2008; Issue Date: 01/11/2008. The SOP states R&amp;D Department will make schedule visit to the estates to take foliar sampling for the purpose of formulating fertiliser recommendations. This is to ensure that constant supplies of the right type of nutrients are made available to all palms to promote maximum vegetative growth and to achieve optimum yields.</p> <p><u>Diamond Jubilee Estate</u></p> <ol style="list-style-type: none"> <li>1. Latest Soil Analysis Test was conducted on 09/05/2022, refer Soil Analysis Test Report No. S37/2022, conducted by Sime Darby Research Sdn Bhd verified during the assessment.</li> <li>2. Latest Plant Analysis Test was conducted by Sime Darby Research Sdn Bhd on 18/04/2023. Plant Analysis Test Report No P163/2023 was available for verification during the assessment.</li> </ol> <p><u>Bukit Asahan Estate</u></p> <ol style="list-style-type: none"> <li>1. Latest Soil Analysis Test was conducted on 29/03/2022, refer Soil Analysis Test Report No. S33/2022, conducted by Sime Darby Research Sdn Bhd verified during the assessment.</li> </ol>	<p>Complied</p>

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		<p>2. Latest Plant Analysis Test was conducted by Sime Darby Research Sdn Bhd on 21/03/2023. Plant Analysis Test Report No P131/2023 was available for verification during the assessment.</p> <p><u>Welch Estate</u></p> <p>1. Latest Soil Analysis Test was conducted on 16/08/2022, refer Soil Analysis Test Report No. S60/2022, conducted by Sime Darby Research Sdn Bhd verified during the assessment.</p> <p>2. Latest Plant Analysis Test was conducted by Sime Darby Research Sdn Bhd on 10/08/2022. Plant Analysis Test Report No P434/2022 was available for verification during the assessment.</p>	
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>EFB and POME application is done as part of nutrient recycling strategy and recorded regularly. All EFB and POME were sourced from SDPB SOU18 Diamond Jubilee POM.</p> <ul style="list-style-type: none"> <li>- Bukit Asahan Estate applies the EFB as mulching in the fields as verified during the site visits. The application was done at rate 25Mt/Ha. Records of application were available for verification.</li> <li>- The POME is applied at Diamond Jubilee Estate via Surface Application as verified during the site visits. Records of application were available at the mill and estates.</li> <li>- Palm Residues such as cut fronds were stacked along the palms and left to decay which in returns the nutrients to the ground.</li> </ul>	Complied
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>The estates maintain records of manuring application as per recommendation by the agronomist.</p> <p>Observed sampled application records as per agronomist recommendation:</p>	Complied

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<u>Diamond Jubilee Estate</u>		
Fertiliser	Month	Fertilizer Applied (kg)
CCM 45	April 2023	33,900
Borate 48	May 2023	3,950
Rock Phosphate	Apr 2023	117,250
	May 2023	1,250
Ground Magnesium Limestone	June 2023	5,400
<u>Bukit Asahan Estate</u>		
Fertiliser	Month	Fertilizer Applied (kg)
NKC 1	June 2023	142,600
Borate	June 2023	8,400
Kieserite	April 2023	46,100
Rock Phosphate	April 2023	2,900
<u>Welch Estate</u>		
Fertiliser	Fertilizer Applied 2023 To Date (kg)	Status
Rock Phosphate	27,750	Complete

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		Compact NKC1	223,600	Complete	
		Kieserite	35,900	In Progress	
<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.					
7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Maps of Soil Series, Slope and Waterways Model were available at all visited operating units. Soil map prepared by R&amp;D-RSGA Precision Agriculture Unit (SHMNA).</p> <p>1. <u>Diamond Jubilee Estate</u></p> <ul style="list-style-type: none"> <li>- Soil map was available for Diamond Jubilee Estate – Main Division, prepared by Precision Agriculture Unit (NHS) dated 14/06/2021. The soil series identified in the estate were Jerangau Series (4.51%), Rengam Series (81.51%), and Malacca Series (13.78%).</li> <li>- The soil map was available for Bukit Kajang Division, prepared by AAT - Precision Unit dated June 2019. Soil series identified in the estate were Rengam Series 68.42%, Jerangau Series 23.68% and Seremban Series 7.89%. No fragile soils identified in the estate.</li> <li>- There were no marginal or fragile soil identified in the estate.</li> </ul> <p>2. <u>Bukit Asahan Estate</u></p> <ul style="list-style-type: none"> <li>- Soil map was available for Bukit Asahan Estate, prepared by R&amp;D-TTAS Precision Agriculture Unit (NHM) dated June 2014. The map was available for verification.</li> <li>- There were no marginal or fragile soil identified in the estate.</li> </ul> <p>3. <u>Welch Estate</u></p>			Complied



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		<ul style="list-style-type: none"> <li>- Soil map was available for Welch Estate, prepared by R&amp;D-RSGA Precision Agriculture Unit (AJZ) dated April 2017. The map was available for verification.</li> <li>- There were no marginal or fragile soil identified in the estate.</li> </ul>	
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>There was no replanting on steep slopes at the sampled estates. Generally, the areas with slopes above 25 degrees were left unplanted and regeneration of plants growth was observed.</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>No new planting at all the estates under SDPB SOU18 Diamond Jubilee Certification Unit.</p>	Complied
<b>Criterion 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<p><b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>Soil surveys are made and available in a soil map at the estates. Topographic contour map are also available which are both used to manage operation 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>- Minor compliance -</p>	<p>Soil surveys are made and available in a soil map at the estates. Based on the soil survey there were no soils classified as fragile or marginal soils in the estate.</p>	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>Soil surveys are made and available in a soil map at the estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.</p>	Complied
<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			

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7.7.1	<p><b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no peat soil in this certification unit. Confirmation based on Soil Map and Agronomist Report.	Not Applicable
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	Not applicable as no peat soil in this certification unit. Confirmation based on Soil Map and Agronomist Report.	Not Applicable
7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no peat soil in this certification unit. Confirmation based on Soil Map and Agronomist Report.	Not Applicable
7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no peat soil in this certification unit. Confirmation based on Soil Map and Agronomist Report.	Not Applicable
7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p>	Not applicable as no peat soil in this certification unit. Confirmation based on Soil Map and Agronomist Report.	Not Applicable

	<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><b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no peat soil in this certification unit. Confirmation based on Soil Map and Agronomist Report.	Not Applicable
7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no peat soil in this certification unit. Confirmation based on Soil Map and Agronomist Report.	Not Applicable
<p><b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.</p>			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>Water Management Plan has been established and incorporated in the Environmental Management Plan 2023 for the mill and estates. The water management plan details out the contingency plans on managing water in the mill and estate, as well as water conservation plans.</p> <p><u>Diamond Jubilee POM</u></p> <p>a. Workers are provided continuous access to clean water via Syarikat Air Melaka Berhad (SAMB), the government linked water service provider of the state.</p> <p>b. As for the Mill Canteen, access to clean water is provided via own treated water at the mill. Water Sampling is conducted on</p>	Complied

		<p>a monthly basis to monitor the water quality supplied to the canteen. Sampled the Water Sampling Results as below.</p> <ul style="list-style-type: none"> <li>- Water Analysis Test Report; Date: 22/05/2023; Test Report Number: IE642/2023; Results conforms with NSDWQ for Domestic Use.</li> <li>- Microbiology Water Samples Analysis; Date: 10/05/2023; Test Report Number: ML445/2023; Results indicated that E. Coli and Total Coliform were not detected.</li> </ul> <p><u>Diamond Jubilee Estate</u></p> <ol style="list-style-type: none"> <li>a. Workers are provided continuous access to clean water via Syarikat Air Melaka Berhad (SAMB), the government linked water service provider of the state.</li> <li>b. It was verified that there were no river that passes through the estate. Nevertheless there were a water catchment pond and streams in the estate. Visit to the area indicated that there were well established buffers and no traces of chemical or fertiliser applications along the buffers.</li> </ol> <p><u>Bukit Asahan Estate</u></p> <ol style="list-style-type: none"> <li>a. Workers are provided continuous access to clean water via Syarikat Air Melaka Berhad (SAMB), the government linked water service provider of the state.</li> <li>b. Verified based on the Estate map and HCV Report that there are 2 Water Catchment Pond situated in the estate and Sungai Asahan that flows along the estate boundary. Visit to the areas indicated that there were well established buffers and no traces of chemical or fertilizer applications along the buffers. The water catchment was fenced to prohibit trespasses from entering the area.</li> </ol>	
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		<p>As for the Sungai Asahan, Water Sampling is conducted quarterly to monitor the river water quality with results available for verification. Latest Water Analysis Test Report (Report Number: IE414/2023) dated 14/03/2023 was verified with results conforming with Class IIA/IIB of NWQS Natural Waterways.</p> <p><u>Welch Estate</u></p> <ol style="list-style-type: none"> <li>Workers are provided continuous access to clean water via Syarikat Air Johor (SAJ), the government linked water service provider of the state.</li> <li>Verified based on the estate map and HCV Report that there was a water catchment within the estate. There were also streams flowing through the estate. Visit to the areas indicated that there were well established buffers along the water catchment and streams. There were signages erected at the water catchment indicating the prohibition of agrochemical and fertiliser application surrounding the area.</li> </ol>	
7.8.2	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the site observation at each water courses at the estates it was confirmed that appropriate buffer zones have been established. There were no traces of agrochemicals or fertilizers being applied at the area. The buffer zones have been well demarcated with signages being erected at the area as well. Further details as below.</p> <p><u>Diamond Jubilee Estate</u></p> <p>Verified based on the Estate map and HCV Report that there is a Water Catchment Pond situated in the estate. Visit to the area indicated that there were well established buffers and no traces of</p>	Complied

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		<p>chemical or fertilizer applications along the buffers. The water catchment was fenced to prohibit trespasses from entering the area.</p> <p><u>Bukit Asahan Estate</u> Verified based on the Estate map and HCV Report that there are 2 Water Catchment Pond situated in the estate and Sungai Asahan that flows along the estate boundary. Visit to the areas indicated that there were well established buffers and no traces of chemical or fertilizer applications along the buffers. The water catchment was fenced to prohibit trespasses from entering the area.</p> <p>As for the Sungai Asahan, Water Sampling is conducted quarterly to monitor the river water quality with results available for verification. Latest Water Analysis Test Report (Report Number: IE414/2023) dated 14/03/2023 was verified with results conforming with Class IIA/IIB of NWQS Natural Waterways.</p> <p><u>Welch Estate</u> Verified based on the estate map and HCV Report that there was a water catchment within the estate. There were also streams flowing through the estate. Visit to the areas indicated that there were well established buffers along the water catchment and streams. There were signages erected at the water catchment indicating the prohibition of agrochemical and fertiliser application surrounding the area.</p>	
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>The Mill effluent is treated in compliance with the Department of Environment (DOE); Compliance Schedule (License Number: 004043; License Validity: 01/07/2023 – 30/06/2024).</p> <p>The mill monitors the effluent on a monthly basis and reports to DOE on a quarterly basis via the Online Environment Reporting</p>	Complied

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		<p>(OER) System, which were available for verification during the assessment.</p> <p>Effluent Analysis Report results were available for verification as below:</p> <table border="1" data-bbox="1137 507 1926 938"> <thead> <tr> <th>Parameter</th> <th>May 2023</th> <th>April 2023</th> <th>Mar 2023</th> </tr> </thead> <tbody> <tr> <td>Effluent Test Report Number</td> <td>EP274/2023</td> <td>EP210/2023</td> <td>EP159/2023</td> </tr> <tr> <td>pH (°C)</td> <td>7.68</td> <td>7.65</td> <td>7.88</td> </tr> <tr> <td>BOD (mg/L)</td> <td>1,730</td> <td>3,280</td> <td>1,700</td> </tr> <tr> <td>SS (mg/L)</td> <td>35,500</td> <td>30,800</td> <td>60,900</td> </tr> <tr> <td>TN (mg/L)</td> <td>977</td> <td>662</td> <td>974</td> </tr> <tr> <td>AN (mg/L)</td> <td>324</td> <td>298</td> <td>234</td> </tr> <tr> <td>O&amp;G (mg/L)</td> <td>9</td> <td>9</td> <td>5</td> </tr> </tbody> </table> <p>The report indicated that all results conforms with parameter limits for land application.</p>	Parameter	May 2023	April 2023	Mar 2023	Effluent Test Report Number	EP274/2023	EP210/2023	EP159/2023	pH (°C)	7.68	7.65	7.88	BOD (mg/L)	1,730	3,280	1,700	SS (mg/L)	35,500	30,800	60,900	TN (mg/L)	977	662	974	AN (mg/L)	324	298	234	O&G (mg/L)	9	9	5	
Parameter	May 2023	April 2023	Mar 2023																																
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill continues to monitor its water use per tonne FFB processed which data obtained from flowmeters i.e. at mill process, boiler operation and fire hydrant. Based on the records, the mill has consumed:</p> <table border="1" data-bbox="1146 1168 1917 1364"> <thead> <tr> <th>Month</th> <th>Water (m<sup>3</sup>)</th> <th>Water/FFB (m<sup>3</sup>/Mt)</th> </tr> </thead> <tbody> <tr> <td>July 2022</td> <td>9367</td> <td>1.57</td> </tr> <tr> <td>Aug 2022</td> <td>8695</td> <td>1.51</td> </tr> <tr> <td>Sept 2022</td> <td>7719</td> <td>1.45</td> </tr> </tbody> </table>	Month	Water (m <sup>3</sup> )	Water/FFB (m <sup>3</sup> /Mt)	July 2022	9367	1.57	Aug 2022	8695	1.51	Sept 2022	7719	1.45	Complied																				
Month	Water (m <sup>3</sup> )	Water/FFB (m <sup>3</sup> /Mt)																																	
July 2022	9367	1.57																																	
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Sept 2022	7719	1.45																																	

		Oct 2022	7168	1.42	
		Nov 2022	7024	1.44	
		Dec 2022	8746	1.52	
		Jan 2023	6784	1.62	
		Feb 2023	7475	1.41	
		Mar 2023	6850	1.77	
		Apr 2023	6681	1.88	
		May 2023	8498	1.69	
		Jun 2023	8606	1.65	

**Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised**

<p>7.9.1</p>	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.          - Minor compliance -</p>	<p>The mill and estates have developed the Energy Management Plan, incorporated in the Environment Management Plan 2023.          At Diamond Jubilee POM, the mill has opted to use solar power for street lights to reduce dependency on electricity. The mill continues to use bio-diesel as an alternative for diesel and continue to educate workers on fuel saving practices.          Among the action plans implemented by the estates are by doing preventive maintenance of vehicles and machineries and educational programme for the workers on fuel and electricity saving. The fossil fuel consumption are recorded as part of monitoring.          The use of Diesel, Electricity and Water were monitored on a monthly basis in the mill and estates and records were as follows.           Diamond Jubilee POM</p>	<p>Complied</p>
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Month	Diesel (L/Mt FFB)	Electricity (kWh/Mt FFB)
July 2022	0.12	11.73
Aug 2022	0.12	12.67
Sept 2022	0.13	14.57
Oct 2022	0.10	14.85
Nov 2022	0.16	15.02
Dec 2022	0.14	15.82
Jan 2023	0.15	18.39
Feb 2023	0.16	15.69
Mar 2023	0.23	19.49
Apr 2023	0.17	19.69
May 2023	0.11	14.95
Jun 2023	0.13	14.38

Diamond Jubilee Estate

Month	Diesel (L/Mt FFB)	Electricity (kWh/Mt FFB)	Water (m <sup>3</sup> /Mt FFB)
July 2022	1.14	4.11	2.72
Aug 2022	1.07	4.89	4.33
Sept 2022	1.72	6.87	4.34

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		Oct 2022	1.64	5.69	2.55
		Nov 2022	1.78	7.35	3.87
		Dec 2022	1.95	5.59	3.21
		Jan 2023	2.05	8.15	3.71
		Feb 2023	2.17	8.06	3.59
		Mar 2023	2.35	8.70	4.12
		Apr 2023	1.96	15.48	6.03
		May 2023	1.47	7.29	3.90
		Jun 2023	1.34	3.22	1.42
		<p>- Usage for the month of April 2023 was high due to low FFB produced by the estate. Statement was verified and justified.</p>			
		<p><u>Bukit Asahan Estate</u></p>			
		Month	Diesel (L/Mt FFB)	Electricity (kWh/Mt FFB)	Water (m <sup>3</sup> /Mt FFB)
		July 2022	2.11	18.77	4.57
		Aug 2022	2.42	21.01	4.39
		Sept 2022	2.31	20.15	4.65
		Oct 2022	2.46	18.16	3.66
		Nov 2022	2.37	22.12	3.92
		Dec 2022	2.23	14.08	3.24

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		Jan 2023	1.71	18.71	4.08
		Feb 2023	2.26	19.31	3.72
		Mar 2023	2.89	16.91	4.14
		Apr 2023	2.77	26.11	5.06
		May 2023	2.85	16.10	4.71
		Jun 2023	2.14	15.92	3.82
		<u>Welch Estate</u>			
		Month	Diesel (L/Mt FFB)	Electricity (kWh/Mt FFB)	Water (m <sup>3</sup> /Mt FFB)
		July 2022	2.59	19.68	9.15
		Aug 2022	2.75	18.57	10.55
		Sept 2022	2.74	18.67	8.00
		Oct 2022	2.86	22.62	21.91
		Nov 2022	3.01	22.60	17.15
		Dec 2022	3.09	20.32	19.71
		Jan 2023	4.88	29.25	23.81
		Feb 2023	4.31	26.12	4.58
		Mar 2023	4.14	27.24	7.99
		Apr 2023	3.15	33.47	10.21
		May 2023	3.38	32.55	13.09

<b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Main sources of GHG emission identified were methane (CH4) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO’s Palm GHG Calculator ver. 4. The data were verified against the mill and estate issuance records and bin cards and were found to be accurate.</p>	Complied
7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>It has been verified that there are no new development at the estates under SDPB SOU18. Hence, this indicator is not applicable.</p>	Not Applicable
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB SOU18 Diamond Jubilee Mill and estates have implemented Energy Management Plan and Pollution Prevention Plan. The sources of pollutants in the estate and mill have been identified and action plans to control and monitor the pollutants were established and available for verification. Implementation of the Energy Management Plan and Pollution Prevention Plans were monitored by the management on a regular basis. Sighted the Implementation as follows.</p> <p><u>Diamond Jubilee POM</u></p> <ol style="list-style-type: none"> <li>1. Ambient Air Monitoring was monitored annually as per DOE Compliance Schedule Requirements. Ambient Air Monitoring Report was available for verification as below.</li> </ol>	Complied

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		<p>Environmental Air Monitoring – In Compliance With Malaysia Ambient Air Quality Standard, 2020; lab Number: E/A/2305/31646; Reference Number: ETD/A/KSDJ/2023-05/24540; Date Monitored:10 – 12/05/2023; Report Date: 25/05/2023; Assessor: Spectrum Laboratories (Johore) Sdn Bhd.</p> <p>Based on the ambient monitoring results, it shows that the concentration of Particulate matter (PM 10) monitored were within the standard limit of 100 µg/m<sup>3</sup> as stipulated under the Malaysia Air Quality Guidelines.</p> <p>2. Stack Emission Monitoring was conducted for the Boiler by Spectrum Laboratories (Johore) Sdn Bhd twice during the DOE Compliance Schedule License Period. (01/07/2022 – 30/06/2023). Emission test results as below.</p> <table border="1" data-bbox="1184 837 1921 1315"> <thead> <tr> <th>Test Parameter</th> <th colspan="2">Monitoring Result</th> <th>DOE Standards Limit (mg/m<sup>3</sup>)</th> </tr> </thead> <tbody> <tr> <td>Description</td> <td>Boiler No. 1</td> <td>Boiler No. 2</td> <td rowspan="3">-</td> </tr> <tr> <td>Lab Number</td> <td>E/SE/2301/30984B</td> <td>E/SE/2301/30984A</td> </tr> <tr> <td>Date Monitored</td> <td>18/01/2023</td> <td>11/01/2023</td> </tr> <tr> <td>Particulate Matter (Dust Particulate)</td> <td>28.12 mg/m<sup>3</sup></td> <td>33.76 mg/m<sup>3</sup></td> <td>150 mg/m<sup>3</sup></td> </tr> </tbody> </table> <p>Based on the monitoring results, it shows that the concentration of dust particulate emitted through Boiler No. 1 and Boiler No.</p>	Test Parameter	Monitoring Result		DOE Standards Limit (mg/m <sup>3</sup> )	Description	Boiler No. 1	Boiler No. 2	-	Lab Number	E/SE/2301/30984B	E/SE/2301/30984A	Date Monitored	18/01/2023	11/01/2023	Particulate Matter (Dust Particulate)	28.12 mg/m <sup>3</sup>	33.76 mg/m <sup>3</sup>	150 mg/m <sup>3</sup>	
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		<p>2 does not exceed the standard limit as specified under the Malaysia Air Quality Guidelines, 2014.</p> <p>3. All liquid wastes are treated in POME before being discharged to the estate via land application. Parameter of BOD &lt; 20mg/m<sup>3</sup>.</p> <p>4. All waste were managed and disposed in a responsible manner and in compliance with legal requirements. Refer 7.3.2.</p> <p><u>Diamond Jubilee, Bukit Asahan and Welch Estate</u></p> <p>1. Well established cover crop were seen around the field of the estates to control erosion.</p> <p>2. All waste were stored and disposed in compliance to procedures and legal requirements. Refer 7.3.2.</p> <p>3. Oil Trap at the workshop area was verified to be regularly maintained and free from spillages.</p> <p>4. Signages stating "<i>Dilarang Membuat Pembakaran Terbuka</i>" was erected and sighted at the linesite. During the site visit there were no evidence of open burning conducted by the mill and estates. Weekly housing inspection is conducted at the mill and the estates to monitor on open burning incidents.</p>	
<b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB has established the Responsible Agriculture Charter, revised 2020 which states, 3.2.5 – "<i>Zero use of fire for land preparation and establish effective monitoring and prevention as well as proactive firefighting measures within a reasonable radius beyond our operational boundaries</i>".</p> <p>During the assessment, it was verified that the estates practiced zero burning in replanting operations. In the replants visited during</p>	Complied

		the audit in the estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used for replanting land preparation. There were no new planting at all visited estates.	
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 -	Hotspot monitoring managed by HQ (Fire Hotspot Monitoring Team) – if any fire detected, inform estate. Sime Darby Daily Hotspot Monitoring system has been in place since November 2013 using NASA satellite data [ref.: <a href="http://www.simedarbyplantation.com/sustainability/hotspot-dashboard/">http://www.simedarbyplantation.com/sustainability/hotspot-dashboard/</a> ]. The system monitors any possible occurrence of fire within or nearby the concession areas throughout Sime Darby Plantation Upstream operation globally. At the estates level, there are fire prevention team established. Among the mechanisms to prevent fire are training on firefighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Engagement with adjacent stakeholders were done during the stakeholder consultation by bulletin distribution which consist of fire prevention and control measure matters. The engagement with adjacent stakeholders done via the stakeholder consultation was verified via the stakeholder consultation meeting minutes verified during the assessment. a. Diamond Jubilee Estate: 12/05/2023 b. Bukit Asahan Estate: 15/06/2023 c. Welch Estate: 05/05/2023 For those invited adjacent stakeholders that could not attend the stakeholder consultation, a bulletin containing the information on Fire Prevention and Control Measures were provided to them.	Complied

<b>Criterion 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.																						
7.12.1	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new planting affecting present HCV and primary forest. There was no land clearing activities made nor had damaged any forest to protect or enhance the HCV. Therefore, this indicator was not applicable.</p>	Not Applicable																			
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b>            Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>HCV Re-assessment for SOU 18 Diamond Jubilee was done in July 2016 with the final report dated 2017 available for verification. In summary the list of HCV areas present are summarised below.</p> <table border="1" data-bbox="1137 815 1926 1145"> <thead> <tr> <th>Estate</th> <th>Assessment Area</th> <th>Ha</th> <th>Present HCV</th> </tr> </thead> <tbody> <tr> <td>Diamond Jubilee Estate</td> <td>Water Catchment</td> <td>5.58</td> <td>HCV 4</td> </tr> <tr> <td rowspan="2">Bukit Asahan Estate</td> <td>Water Catchment (Ayer Tekah Division)</td> <td>0.69</td> <td>HCV 4</td> </tr> <tr> <td>Water Catchment (Main Division)</td> <td>0.67</td> <td>HCV 4</td> </tr> </tbody> </table> <p>As for Welch Estate, as the estate was previously grouped under SOU 19 Pagoh, the HCV assessment was reported under HCV Re-Assessment For SOU 19 Pagoh Report dated August 2016. The HCV present was reported as below.</p> <table border="1" data-bbox="1137 1331 1926 1380"> <thead> <tr> <th>Estate</th> <th>Assessment Area</th> <th>Ha</th> <th>Present HCV</th> </tr> </thead> <tbody> </tbody> </table>	Estate	Assessment Area	Ha	Present HCV	Diamond Jubilee Estate	Water Catchment	5.58	HCV 4	Bukit Asahan Estate	Water Catchment (Ayer Tekah Division)	0.69	HCV 4	Water Catchment (Main Division)	0.67	HCV 4	Estate	Assessment Area	Ha	Present HCV	Complied
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	Water Catchment (Main Division)	0.67	HCV 4																			
Estate	Assessment Area	Ha	Present HCV																			



		Welch Estate	Water Catchment	0.95	HCV 4		
		It was verified that there were no new land clearing in all the estates after 15/11/2018.					
7.12.3	<i>Indicator is not applicable in Malaysia context</i>	NA				Not Applicable	
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>SDPB SOU18 Diamond Jubilee Certification Unit estates have identified HCVs and conservation areas as stated under indicator 7.12.2.</p> <p>To ensure the HCVs and Conservation Areas are protected and conserved, the estates have established a HCV Management Plan, incorporated in the Environmental Management Plan 2023. The objective of the HCV Management Plan are as below:</p> <ul style="list-style-type: none"> <li>- Management of Human Wildlife Conflict</li> <li>- Enhancement of HCV areas and biodiversity in the estates.</li> </ul> <p>Verified the implementation of the HCV Management Action Plan as below.</p> <ol style="list-style-type: none"> <li>a. Sighted signages being erected at HCV areas stating no hunting, no fishing, no chemical and fertiliser application.</li> <li>b. Regular HCV Monitoring being done by the management, including patrolling with records available for verification.</li> <li>c. HCV and RTE Awareness Training was conducted at the estates. <ul style="list-style-type: none"> <li>- HCV Awareness Training conducted at Diamond Jubilee POM on 08/05/2023 and 01/06/2023.</li> <li>- Protect, Conserve Biodiversity and Ecosystem Training conducted at Diamond Jubilee Estate on 04/03/2023.</li> <li>- HCV Awareness Briefing for Pesticide Operators conducted on 22/06/2023 at Bukit Asahan Estate.</li> </ul> </li> </ol>				Complied	

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		<ul style="list-style-type: none"> <li>- Welch Estate conducted HCV Training for their workers on 04/04/2023 with records of training available for verification.</li> <li>d. Well established riparian reserves and fences were sighted along the water bodies within the estates. There were no evidence of agrochemicals or fertilisers being applied within the conservation areas.</li> <li>e. Regular water sampling were done at rivers and streams to monitor the water quality of the rivers and effects of estate operations on the water bodies. Records of water sampling were available for verification.</li> <li>- A portion of Sungai Asahan flows through Bukit Asahan Estate. The estate management have established 3 sampling points along the river to monitor the effects of estate operations on the river. Water Sampling is conducted quarterly with results available for verification. Latest Water Analysis Test Report (Report Number: IE414/2023) dated 14/03/2023 was verified with results conforming with Class IIA/IIB of NWQS Natural Waterways.</li> </ul> <p>The HCV Management Plan, incorporated in the Environmental Management Plan is reviewed on a yearly basis with the latest review done in 2023.</p>	
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>Not applicable since there is no land clearing after November 2005.</p>	<p>Not Applicable</p>

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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 have established a HCV Management Plan, incorporated in the Environmental Management Plan 2023. The action plan of the management plan states the need to educate and create awareness to the workers on protection of RTE species.</p> <p>The estates continue to train the workers on RTE Species protection. Records of training and awareness briefings were available for verification as stated under indicator 7.12.4. Signages on prohibition of illegal hunting or fishing within the estate were erected at the estate entrance and housing area to educate the workers and visitors.</p> <p>As of to date there were no reports of RTE species being captured, harmed, collected, traded, possessed or killed in the estates.</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>The estates have developed a checklist titled "Monitoring of HCV &amp; Conservation Areas" where it is being used to monitor concerns such as encroachment, sighting of trespassing, wildlife sightings or conflicts, pollution and erosion issues. The checklist were available for verification at all estates. Monitoring is currently being done on a monthly basis and results from the monitoring is used to develop and revise the Environmental Management Plan on a yearly basis.</p>	Complied
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>No land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within SOU18 Diamond Jubilee certification unit. Thus, this indicator is not applicable.</p>	Not Applicable



**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2022** for SDPB SOU18 Diamond Jubilee and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2022** for SDPB Diamond Jubilee and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.68
PK	0.68

Extraction	%
OER	20.85
KER	4.92

Production	t/yr
FFB Process	74,483.89
CPO Produced	15,527.79
PK Produced	3,665.34

Land Use	Ha
OP Planted Area	12,355.08
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
<b>Total</b>	<b>12,355.08</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	58812.86	0.79	109.30	0.56	0.00	0.00	58922.15	-
CO <sub>2</sub> Emission from fertilizer	6375.53	0.09	12.80	0.07	0.00	0.00	6388.33	-
NO <sub>2</sub> Emission	3612.90	0.05	11.18	0.06	0.00	0.00	3624.07	-
Fuel Consumption	25.53	0.00	1.01	0.01	0.00	0.00	26.55	-
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
<b>Sink</b>								
Crop Sequestration	-55746.78	-0.75	-103.60	-0.53	0.00	0.00	-55850.38	-
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
<b>Total</b>	<b>13080.04</b>	<b>0.18</b>	<b>30.69</b>	<b>0.16</b>	<b>0.00</b>	<b>0.00</b>	<b>13110.73</b>	<b>-</b>

*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	0.00	0.00
Fuel Consumption	1.33	0.00
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>1.33</b>	<b>0.00</b>

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

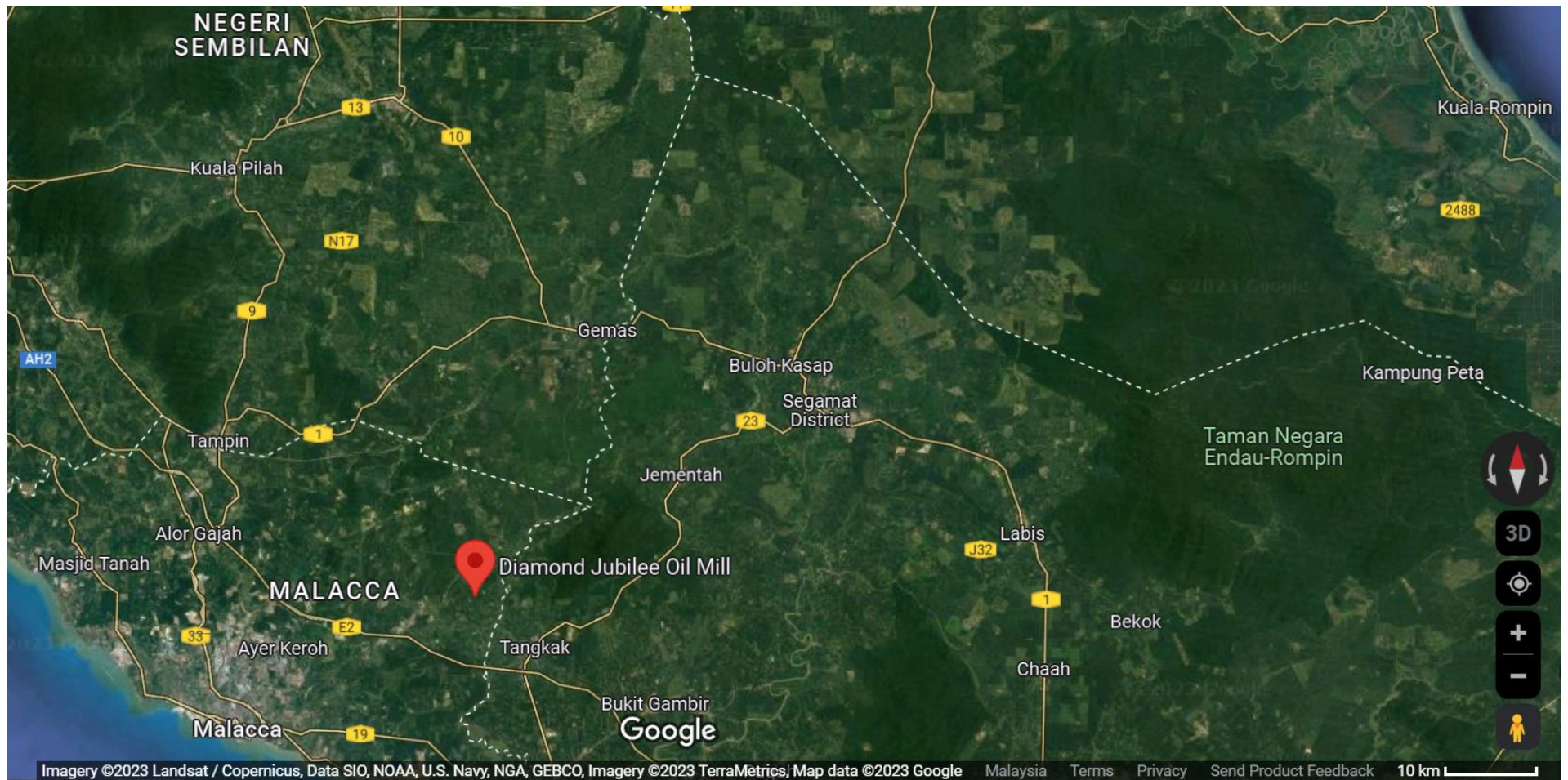
Emissions	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

\*This mill has no kernel crusher operation.

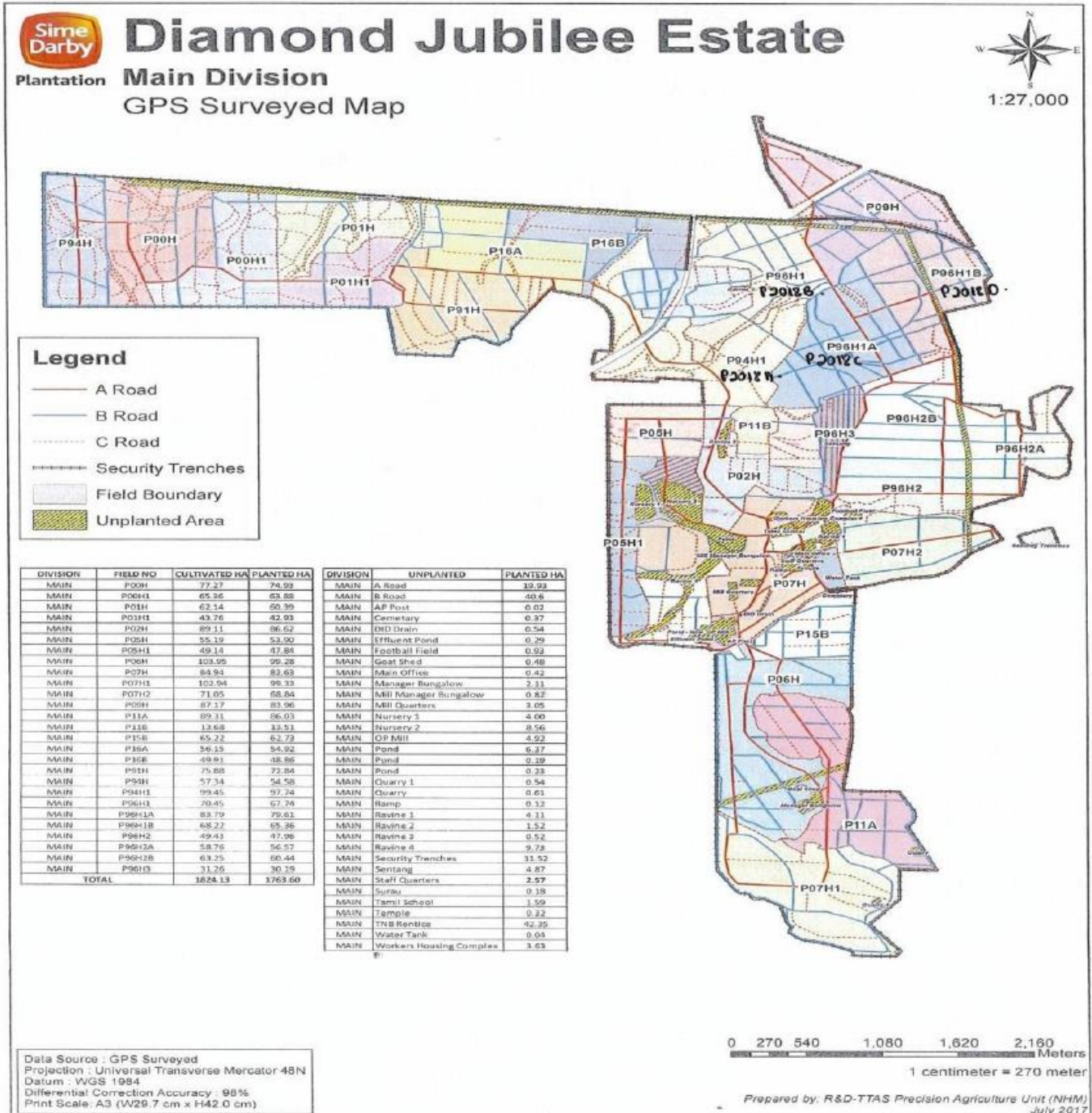
<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

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

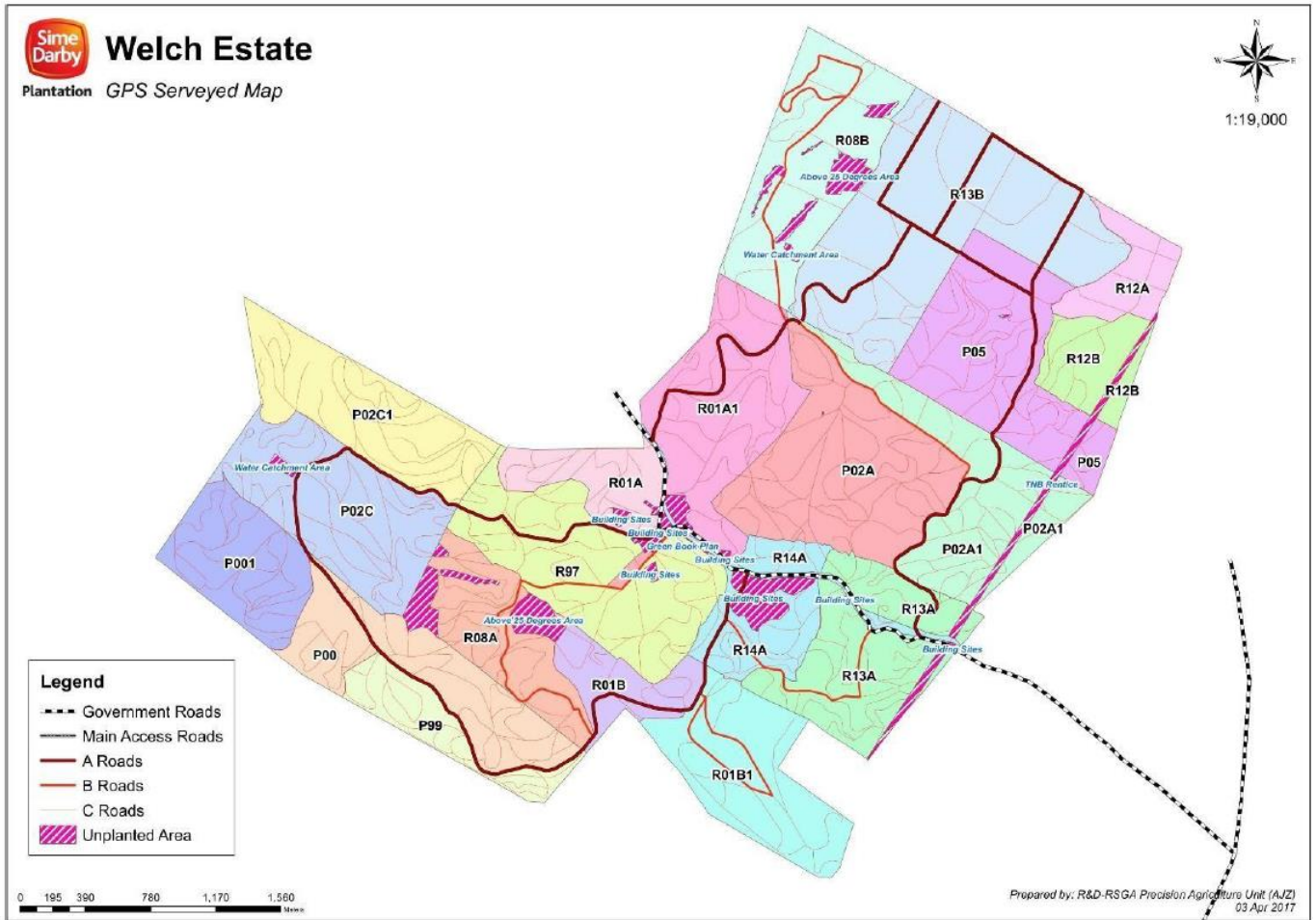


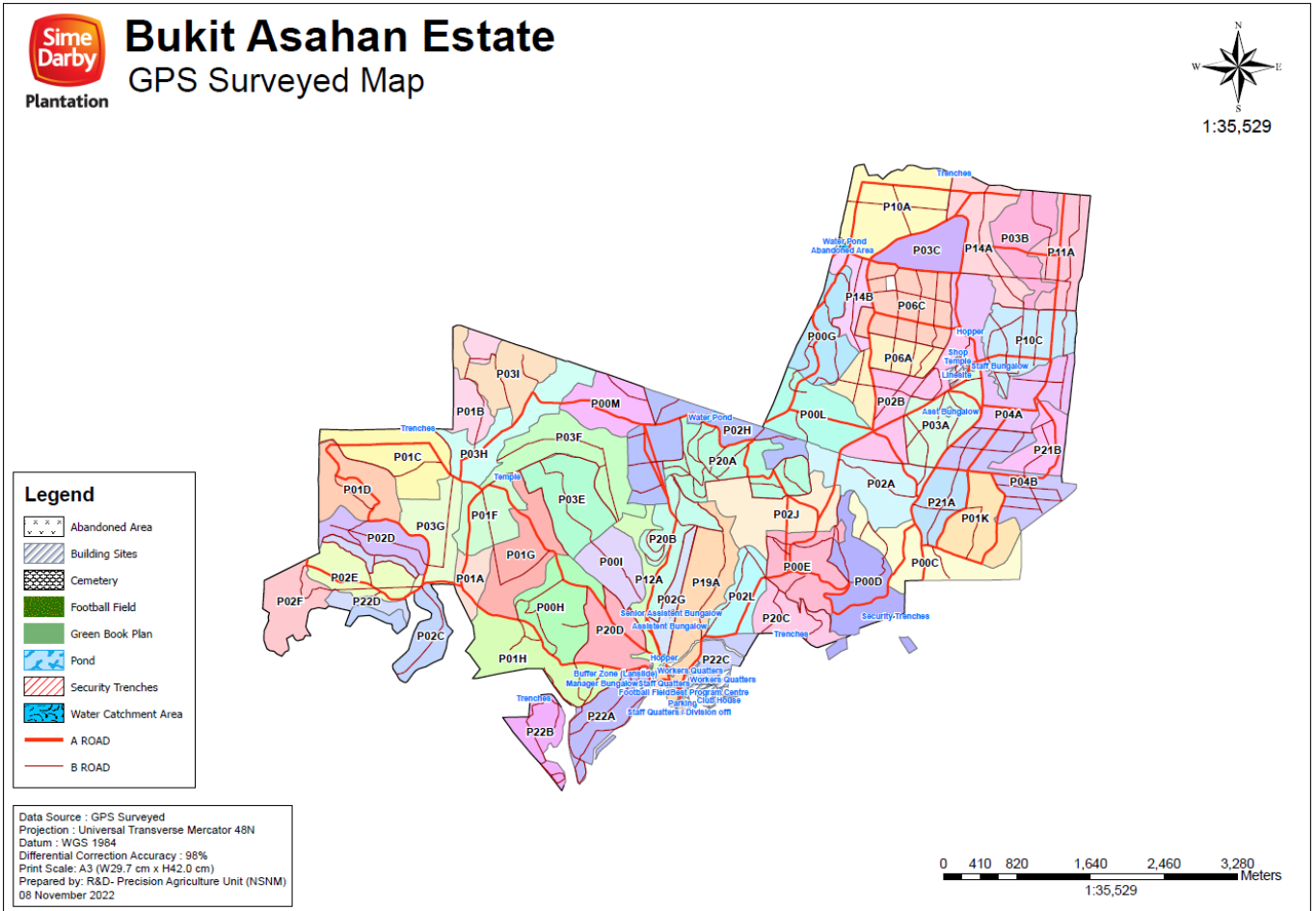
**Appendix D: Estate Field Map**





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

NA

## 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
SDPB	Sime Darby Plantation Berhad
SIA	Social Impact Assessment
SOP	Standard Operating Procedure