

**MALAYSIAN SUSTAINABLE PALM OIL  
- SURVEILLANCE ASSESSMENT ASA3  
Public Summary Report**

<b>TDM Plantation Sdn Bhd</b>
Client company Address: Aras 1-5, Bangunan UMNO Terengganu Lot 3224, Jalan Masjid Abidin 20100 Kuala Terengganu, Terengganu, Malaysia
Certification Unit: Kemaman Palm Oil Mill Tebak Estate, Pelantoh Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate & MAIDAM Estate  Location of Certification Unit: KM 121, Jerangau - Jabor Highway, 24101 Kemaman, Terengganu, Malaysia

**Report prepared by:**

Muhammad Fadzli Masran (Lead Auditor)

**Report Number:** 3091825**Assessment Conducted by:**BSI Services Malaysia,  
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## Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
Company Name	TDM Plantation Sdn. Bhd.		
Mill/Estate	MPOB License No.	Expiry Date	
Kemaman Palm Oil Mill	500041904000	31/3/2021	
Tebak Estate	501373102000	31/3/2021	
Pelantoh Estate	501374002000	31/3/2021	
Jernih Estate	501868102000	31/10/2021	
Air Putih Estate	503558102000	31/7/2021	
Gajah Mati Estate	502036302000	31/8/2021	
MAIDAM Estate	503576002000	31/8/2021	
Address	Head Office: Aras 1-5, Bangunan UMNO Terengganu, Lot 3224, Jalan Masjid Abidin, 20100 Kuala Terengganu, Terengganu Malaysia  Certification Unit: KM 121, Jerangau - Jabor Highway, 24101 Kemaman, Terengganu, Malaysia		
Certification Unit	Kemaman Palm Oil Mill and Supply Base		
Contact Person Name	Mohd. Izwan Haffez bin Che Azmi		
Website	www.tdmberhad.com.my	E-mail	kpom.tdmp@tdmberhad.com.my
Telephone	09-8226566	Facsimile	09-6204803

1.2 Certification Information			
Certificate Number	Mill: MSPO 678572 Plantations: MSPO 686877		
Issue Date	15/12/2017	Expiry date	14/12/2022
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Standard	Mill: MS 2530-4:2013 Part 4: General principles for palm oil mills Estate: MS 2530-3:2013 Part 3: General principles for oil palm plantations and organized smallholders		
Stage 1 Date	N/A (The certification unit is RSPO Certified unit)		
Stage 2 / Initial Assessment Visit Date (IAV)	15 - 17/08/2017		
Continuous Assessment Visit Date (CAV) 1	15 - 17/10/2018		
Continuous Assessment Visit Date (CAV) 2	03 - 06/09/2019		

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Continuous Assessment Visit Date (CAV) 3	07 - 10/09/2020		
Continuous Assessment Visit Date (CAV) 4	-		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 587626	RSPO	BSI Services (M) Sdn Bhd	31/10/2023

1.3 Location of Certification Unit			
Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Longitude	Latitude
Kemaman Palm Oil Mill	KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	103.24761	4.40377
Tebak Estate	KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	103.22650	4.430169
Pelantoh Estate	KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	103.24990	4.405342
Jernih Estate	KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	103.21580	4.43272
Air Putih Estate	KM 121, Jerangau-Jabor Highway, 24101 Kemaman, Terengganu, Malaysia	103.21071	4.25512
Gajah Mati Estate	Lot 140-141, Mukim Bukit Besi, 23200 Dungun, Terengganu, Malaysia	103.20694	4.696111
MAIDAM Estate	AM9, Bandar AMBS, 23400 Dungun, Terengganu, Malaysia	103.20678	4.627660

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<b>1.4 Certified Area</b>					
<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>
Tebak Estate	2922.33	30.46	340.84	3,293.63	88.73
Pelantoh Estate	3,153.27	0.25	138.08	3,291.60	95.80
Jernih Estate	2,822.07	65.46	248.07	3,135.60	90.00
Air Putih Estate	4,042.70	187.70	121.58	4,351.98	94.00
Gajah Mati Estate	3520.87	153.13	208.78	3,882.78	90.68
MAIDAM Estate	755.96	6.74	151.38	914.08	83.32
<b>TOTAL</b>	<b>17,217.20</b>	<b>443.74</b>	<b>1,208.73</b>	<b>18,869.67</b>	

<b>1.5 Plantings &amp; Cycle</b>							
<b>Estate</b>	<b>Age (Years)</b>					<b>Mature</b>	<b>Immature</b>
	<b>0 - 3</b>	<b>4 - 10</b>	<b>11 - 20</b>	<b>21 - 25</b>	<b>26 - 30</b>		
Tebak Estate	564.39	87.39	227.29	1,684.45	358.81	2,357.94	564.39
Pelantoh Estate	1,335.84	0.00	0.00	0.00	1,817.43	1,817.43	1,335.84
Jernih Estate	688.15	82.20	1,517.17	534.55	0.00	2,133.92	688.15
Air Putih Estate	0.00	2,517.73	0.00	1,524.97	0.00	4,042.70	0.00
Gajah Mati Estate	1,087.91	1,524.31	207.12	701.53	0.00	2,432.96	1,087.91
MAIDAM Estate	379.70	0.00	0.00	376.26	0.00	376.26	379.70
<b>Total (ha)</b>	<b>4,055.99</b>	<b>4,211.63</b>	<b>1,951.58</b>	<b>4,821.76</b>	<b>2,176.24</b>	<b>13,161.21</b>	<b>4,055.99</b>

<b>1.6 Certified Tonnage of FFB</b>			
<b>Estate</b>	<b>Tonnage / year</b>		
	<b>Estimated (Oct 2019 - Sep2020)</b>	<b>Actual (Sep 2019 - Aug 2020)</b>	<b>Forecast (Oct 2020 - Sep 2021)</b>
Tebak Estate	69,795.00	33,711.47	35,300
Pelantoh Estate	25,700.00	32,974.39	18,120
Jernih Estate	85,900.00	39,187.52	40,500
Air Putih Estate	61,300.00	54,945.90	66,330
Gajah Mati Estate	24,970.00	27,891.76	24,320
MAIDAM Estate	7,280.00	2,472.78	3,060
<b>Total</b>	<b>274,945.00</b>	<b>191,183.82</b>	<b>187,630</b>

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<b>1.7 Uncertified Tonnage of FFB</b>			
Estate	Tonnage / year		
	Estimated (Oct 2019 - Sep2020)	Actual (Sep 2019 - Aug 2020)	Forecast (Oct 2020 - Sep 2021)
Estate A	N/A	30,053.55	N/A
<b>Total</b>	N/A	30,053.55	N/A

<b>1.8 Certified Tonnage</b>			
Mill Capacity: 60 MT/hr	Estimated (Oct 2019 - Sep2020)	Actual (Sep 2019 - Aug 2020)	Forecast (Oct 2020 - Sep 2021)
	FFB	FFB	FFB
	274,945.00	191,183.82	187,630
SCC Model: MB	CPO (OER: 20.50%)	CPO (OER: 20.01 %)	CPO (OER: 20.16%)
	56,363.73	38,255.88	37,826.21
	PK (KER: 5.00%)	PK (KER: 4.87 %)	PK (KER: 4.75%)
	13,747.25	9,310.65	8,912.43

<b>1.9 Actual Sold Volume (CPO)</b>					
CPO (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
Sep 2019 - Aug 2020	0.00	0.00	0.00	0.00	0.00

<b>1.10 Actual Sold Volume (PK)</b>					
PK (MT)	MSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO		
Sep 2019 - Aug 2020	0.00	0.00	0.00	0.00	0.00

## Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 190 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

### Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 07 - 10/9/2020. The audit programme is included as per item 2.3 Assessment Plan. The approach to the audit was to treat the TDM Plantation Sdn Bhd - Kemaman Palm Oil Mill as a MSPO Certification Unit. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HBVs, declared conservation areas and local communities.

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. MS 2530-3:2013 and MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The estates or smallholders sample were determined based on formula  $S = r\sqrt{n}$  where n is the number of estates while when applicable, the smallholders sample were determined following the MSPO Certification Requirement. The sampling of smallholders were based on the formula  $(r\sqrt{n})$ ; where r is the risk factor (may defers 1, 1.5 and 2 depending on risk), where n is total number of group members. The sampled smallholder listed in Appendix C.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the MSPO 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 Appendix B.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment are detailed in Section 4.2.

This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

This report was externally reviewed by MSPO approved Peer Reviewer prior to certification decision by BSI.

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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 / Plantation / Group smallholders)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Kemaman POM	X	X	X	X	X
Pelantoh Estate		X		X	
Tebak Estate	X		X		X
Jernih Estate	X		X		X
Air Putih Estate	X		X		X
MAIDAM Estate		X		X	
Gajah Mati Estate		X		X	

**Tentative Date of Next Visit: September 6, 2021 - September 9, 2021**

**Total No. of Mandays: 8 mandays**



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**2.1 BSI Assessment Team**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Muhammad Fadzli Masran	Team Leader	He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. Fluent in Bahasa Malaysia and English Language. During this assessment, he assessed on the aspects of mill and estate best practices, waste management, HCV, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.
Mohd Hidhir Zainal Abidin	Team member	He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers & stakeholders consultation.

**2.2 Accompanying Persons**

<b>No.</b>	<b>Name</b>	<b>Role</b>
	N/A	

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**2.3 Assessment Plan**

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	MFM	MHZA
Sunday 06/09/2020	PM	Audit Team Travelling	√	√
Monday 07/09/2020  Pelantoh Estate Club Kemaman POM	08.30 - 09.00	Opening Meeting: <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan</li> </ul>	√	√
	08.30 - 12.30	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, etc.	√	√
	09.00 - 11.30	Stakeholder interviews		√
	12.30 - 13.30	Lunch	√	√
	13.30 - 16.30	Continue with document review (MSPO part 4) P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition P5: Environment, natural resources, biodiversity and ecosystem services P6 : Best practices	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√
Tuesday 08/09/2020  Gajah Mati Estate	09.00 - 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√
	09.00 - 11.30	Stakeholder interviews		√
	12.30 - 13.30	Lunch	√	√

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Date	Time	Subjects	MFM	MHZA
	13.30 - 16.30	Continue with document review Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices, P7: Development of New Planting (if any )	√  √	√  √
	16.30 - 17.00	Interim Closing briefing.	√	√
Wednesday 09/09/2020  Majlis Agama Islam Estate	09.00 - 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√
	09.00 - 11.30	Stakeholder interviews		√
	12.30 - 13.30	Lunch	√	√
	13.30 - 16.30	Continue with document review Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices, P7: Development of New Planting (if any )	√  √	√  √
	16.30 - 17.00	Interim Closing briefing.	√	√
Thursday 10/09/2020  Pelantoh Estate	08.30 - 12.30	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	√	√
	09.00 - 11.30	Stakeholder interviews		√
	12.30 - 13.30	Lunch	√	√

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Date	Time	Subjects	MFM	MHZA
	13.30 - 16.30	Continue with document review Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices, P7: Development of New Planting (if any )	√	√
	16.30 - 17.00	Preparation of audit report	√	√
	17.00 - 17.30	Closing Meeting	√	√

### Section 3: Assessment Findings

#### 3.1 Details of audit results

This assessment has been assessed using the following MSPO normative requirements. The assessment details are provided in Appendix A.

- MSPO MS 2530-2:2013 – General Principles for Independent Smallholders
- MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders
- MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

#### 3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During the Certification Assessment there were two (2) Minor nonconformities and one (1) OFI raised. The TDM Plantation Sdn Bhd - Kemaman Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Non-conformity(ies) has been verified for its effectiveness and closed accordingly.

Minor Nonconformities:		
<b>Ref:</b> 1955968-202009-N1	<b>Area/Process: Pelantoh Estate</b>	<b>Clause: 4.4.5.9 Part 3</b>
	<b>Issue Date: 10/09/2020</b>	<b>Due Date: Next Assessment</b>
Requirements:	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements	
Statement of Nonconformity:	Wages payment documented on the pay slips was not in line with check roll book and legal regulations (Employment Act 1955)	
Objective Evidence:	Wages payment for one (1) worker (ID: PT17011266) under harvesting gang 05 in July 2020 was not tally with the record in check roll book. Rate per bunch is RM 0.74 and however he was paid for RM 0.25 per bunch.	
Corrections:	Estate management has recalculated the wages for the harvesting Gang 05 at the actual rate for work on Friday and has repaid their salary balance on 20/09/2020.	
Root cause analysis:	The wages payment error is for work on Friday by Gang 05 where the salary rate per bunch used to calculate the salary has been miscalculated by field assistant.	
Corrective Actions:	All check roll book prepared by field assistant (harvesting & maintenance gang) must be cross checked by assistant manager.	
Assessment Conclusion:	As this is Minor Non-Conformity, the effective implementation of the corrective action plan will be assessed during next assessment.	

Minor Nonconformities:		
<b>Ref:</b>	<b>Area/Process: Gajah Mati Estate</b>	<b>Clause: 4.5.3.3 Part 3</b>

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1955968-202009-N2	<b>Issue Date: 10/09/2020</b>	<b>Due Date: Next Assessment</b>
Requirements:	The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.	
Statement of Nonconformity:	Monitoring of Scheduled Waste (clinical waste) generated were not effectively implemented	
Objective Evidence:	Last disposal of SW 404 clinical waste at Gajah Mati Estate was done on 21/1/2020 as per C/N no. 0331922. As per inventory records, first generation of SW 404 after last disposal recorded on 29/1/2020. The evidence shows that the SW were kept for more than 180 days without notification and approval from DOE. This shows that monitoring of clinical waste generated were not effectively implemented. Thus NC were raised.	
Corrections:	21 September 2020, Clinco Waste Management Sdn Bhd has been collecting clinical waste	
Root cause analysis:	<p>The inventory records already implemented based on daily basis, but not in proper monitoring and recording.</p> <p>The effect Pandemic COVID 19 and the implement of a Movement Control Order (MCO) is delayed of schedule for disposal of clinical waste by contactor.</p> <p>Also during MCO, give impact to our planning to conduct refreshment training and briefing to our HA regarding to awareness of schedule waste (clinical waste).</p>	
Corrective Actions:	<p>Monthly inventory via Electronic Scheduled Waste Information System (ESWIS)</p> <p>Monitor schedule of clinical disposal in guideline date form.</p> <p>Training for person in charge regarding to Scheduled Waste (clinical waste). The document will be recorded include attendant list, input and photo.</p>	
Assessment Conclusion:	As this is Minor Non-Conformity, the effective implementation of the corrective action plan will be assessed during next assessment.	

**Opportunity For Improvement**

<b>Ref: 1955968-202009-I1</b>	<b>Area/Process: Kemaman POM and TDMP group estates</b>	<b>Clause: 4.4.5.11</b>
Objective Evidence:	Compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) has yet to be further improved on: i) Consistent monitoring of weekly line site inspection and ii) VMO task and frequency of visit to be clearly assigned as per section 19(3) of Workers' Minimum Standards Housing and Amenities Act 1990 iii) The new Employees Minimum Standards Of Housing, Accommodations And Amenities (Accommodation And Centralized Accommodation) Regulations 2020.	

**Noteworthy Positive Comments**

1	Good commitment from the management
2	Good document retrieval

**3.3 Status of Nonconformities Previously Identified and OFI**

<b>Major Nonconformities:</b>		
<b>Ref:</b> 1820365-201908-M1	<b>Area/Process: Palm oil Mill</b>	<b>Clause: 4.4.4.2 Part 4</b>
	<b>Issue Date: 06/09/2019</b>	<b>Due Date: 5/11/2019</b>
Requirements:	(b) The risk of all operations shall be assessed and documented.	
Statement of Nonconformity:	The above requirement was not adequately addressed.	
Objective Evidence:	Kemaman Palm Oil Mill: The mill HIRARC Register last reviewed February 2019 had not included identification of hazards and assessment of risk at Bio Compost Plant	
Corrections:	HIRARC for new item and updated machine will be established and implemented accordingly	
Root cause analysis:	HIRARC was already reviewed and implemented. However, HIRARC for new item or any updated machine related to operation was not fully covered	
Corrective Actions:	HIRARC will be reviewed annually related to any updated of operation in Compost Plant	
Assessment Conclusion:	CAP has been accepted and evidence of CAP submitted confirmed that the CAP taken was efficient to address the NC. Hence, Major NC was closed on 5/11/2019	
Verification Statement	No reoccurrence of non-conformity. The evidences sighted found adequate and effectively implemented. Thus, the Major NC was effectively closed.	

<b>Major/Minor Nonconformities:</b>		
<b>Ref:</b> 1820365-201908-M2	<b>Area/Process: Palm oil Mill</b>	<b>Clause: 4.5.1.2 Part 4</b>
	<b>Issue Date: 06/09/2019</b>	<b>Due Date: 5/11/2019</b>
Requirements:	The environmental management plan shall cover: b) The aspects and impacts analysis of all operations.	
Statement of Nonconformity:	The above requirement was not adequately addressed.	
Objective Evidence:	Kemaman Palm Oil Mill: The mill Environmental Aspect Impact Register last reviewed 3.2.2019 had not included environmental risk at Lubricant Store and old shaping machine.	
Corrections:	The Environmental Aspect Impact related to this matter will be updated and captured in the continuous improvement plan and pollution prevention plan  To clean and to maintain housekeeping checklist	
Root cause analysis:	During the visit to the lubricant store, found that oil contaminated at old shaping machine is not well maintained	
Corrective Actions:	<ul style="list-style-type: none"> <li>• To provide refresher training on schedule was disposal system</li> <li>• To provide maintenance schedule for related machine</li> </ul>	
Assessment Conclusion:	CAP has been accepted and evidence of CAP submitted confirmed that the CAP taken was efficient to address the NC. Hence, Major NC was closed on 5/11/2019	

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Verification Statement	No reoccurrence of non-conformity. The evidences sighted found adequate and effectively implemented. Thus, the Major NC was effectively closed.
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Major/Minor Nonconformities:		
Ref: 1820365-201908-M3	Area/Process: Plantations	Clause: 4.4.4.2 Part 3
	Issue Date: 06/09/2019	Due Date: 5/11/2019
Requirements:	(b) The risk of all operations shall be assessed and documented.	
Statement of Nonconformity:	The above requirement was not adequately addressed.	
Objective Evidence:	Air Putih & Jernih Estate: The estates HIRARC Register 2019 had not included identification of hazards and assessment of risk at Lubricant store (Jernih and Air Putih Estate), Diesel Storage tank (Jernih Estate)	
Corrections:	Updated HIRARC to handling 200 liters drum of lubricant oil  Updated HIRARC and safety requirement design by install the climbing ladder for opening the tank hatch door purpose  Estate immediately to use 3mt Shop Crane to load drum onto drum stage/bay.  That activity done by estate with proper PPE such as safety boot and leather glove	
Root cause analysis:	To load lubricant drum to Drum Stage/Bay, that activity was handle by pushing drum onto stage with conventional method	
Corrective Actions:	<ul style="list-style-type: none"> <li>• Switch 200 liters to 18 liters lubricant oil container for estate vehicle use</li> <li>• Install a safety climbing ladder for opening the tank hatch door purposes</li> </ul>	
Assessment Conclusion:	CAP has been accepted and evidence of CAP submitted confirmed that the CAP taken was efficient to address the NC. Hence, Major NC was closed on 5/11/2019	
Verification Statement	No reoccurrence of non-conformity. The evidences sighted found adequate and effectively implemented. Thus, the Major NC was effectively closed.	

Major/Minor Nonconformities:		
Ref: 1820365-201908-M4	Area/Process: Plantations	Clause: 4.5.1.2 Part 3
	Issue Date: 06/09/2019	Due Date: 5/11/2019
Requirements:	The environmental management plan shall cover (b) The aspects and impacts analysis of all operations.	
Statement of Nonconformity:	The above requirement was not adequately addressed.	
Objective Evidence:	Air Putih, Jernih & Tebak Estate: The Environmental Aspect Impact Register last reviewed 18.3.2019 had not included environmental risk Scheduled Waste 102 Storage battery disposal.	
Corrections:	Apply permit SW102 from DOE	
Root cause analysis:	Usually, used battery was trade-in with new battery from supplier	
Corrective Actions:	To request permit letter from DOE to give approval to Pentas Flora to dispose SW102. This take 3 weeks for approval letter requested for permit	



Assessment Conclusion:	CAP has been accepted and evidence of CAP submitted confirmed that the CAP taken was efficient to address the NC. Hence, Major NC was closed on 5/11/2019
Verification Statement	No reoccurrence of non-conformity. The evidences sighted found adequate and effectively implemented. Thus, the Major NC was effectively closed.

<b>Major/Minor Nonconformities:</b>		
<b>Ref:</b> 1820365-201908-N1	<b>Area/Process: Plantations</b>	<b>Clause: 4.5.1.2 Part 3</b>
	<b>Issue Date: 06/09/2019</b>	<b>Due Date: 10/09/2020</b>
Requirements:	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.	
Statement of Nonconformity:	The above requirement was not adequately addressed.	
Objective Evidence:	Air Putih, Jernih & Tebak Estate: LAP has not fenced up the 3rd landfill plot, no safety warning signage erected and no records of disposal. LJV has no records of disposal displayed at landfill. TBK frequency of collection from line-site to be improved.	
Corrections:	To fence all the damage immediately To lock the landfill gate 24 hours Rubbish collection to be schedule as per requirement	
Root cause analysis:	<ul style="list-style-type: none"> <li>Landfill plot fencing was damaged due to encroachment by cattle</li> <li>The schedule disposal record was not displayed at the landfill</li> <li>No proper schedule of rubbish collection at linesite</li> </ul>	
Corrective Actions:	To request permit letter from DOE to give approval to Pentas Flora to dispose SW102. This take 3 weeks for approval letter requested for permit	
Assessment Conclusion:	CAP has been accepted. Evidence of CAP effectiveness to be verified in next coming audit.	
Verification Statement	Evidence verified <ul style="list-style-type: none"> <li>All the landfill for the sampled estates in ASA 2 has been fenced. Rubbish collection schedule has been displayed at the landfill area.</li> <li>Verified the implementation in all estates sampled in ASA 3, all landfill has been fenced.</li> <li>Rubbish collection schedule has been displayed at the landfill</li> <li>Sighted the rubbish collection records at all estates visited</li> </ul> The correction and corrective action plan has been effectively implemented. Hence, Major NC was closed on 10/9/2020	

### 3.4 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1512739-201708-M1	Major	17/08/2017	Closed on 13/11/2017

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1512739-201708-M2	Major	17/08/2017	Closed on 13/11/2017
1512739-201708-M3	Major	17/08/2017	Closed on 13/11/2017
1512739-201708-M4	Major	17/08/2017	Closed on 13/11/2017
1512739-201708-M5	Major	17/08/2017	Closed on 13/11/2017
1512739-201708-M6	Major	17/08/2017	Closed on 13/11/2017
1512739-201708-M7	Major	17/08/2017	Closed on 13/11/2017
1512739-201708-N1	Minor	17/08/2017	Closed on 15/10/2018
1512739-201708-N2	Minor	17/08/2017	Closed on 15/10/2018
1697065-201810-M1	Major	17/10/2018	Closed on 03/01/2019
1697065-201810-M2	Major	17/10/2018	Closed on 03/01/2019
1820365-201908-M1	Major	06/09/2019	Closed on 05/11/2019
1820365-201908-M2	Major	06/09/2019	Closed on 05/11/2019
1820365-201908-M3	Major	06/09/2019	Closed on 05/11/2019
1820365-201908-M4	Major	06/09/2019	Closed on 05/11/2019
1820365-201908-N1	Minor	06/09/2019	Closed on 10/09/2020
1955968-202009-N1	Minor	10/09/2020	Open
1955968-202009-N2	Minor	10/09/2020	Open

**3.5 Issues Raised by Stakeholders**

IS #	Description
1	<p><b>Feedbacks:</b></p> <ul style="list-style-type: none"> <li>- Contractors</li> <li>- Payment issue delayed from composting contractor (bagging) [Laere]</li> <li>- Late payment &gt; 30 days after invoice (Chong)</li> <li>- Concord Biotech (20 years BOT), starting March 2020 (biogas plant)</li> <li>- Replanting contractor – delayed payment (Pelantoh Estate)</li> <li>- Contractor (CK Tanjung – Replanting contractor &amp; KITT Plantation (Internal transport)</li> </ul> <p><b>Management Responses:</b></p> <p>Management has acknowledged the late payment issue. Delayed is mainly due to MCO in March to June 2020. Most of the delayed payment has been settled.</p> <p><b>Audit Team Findings:</b></p> <p>Further trailed on the late payment issues at the visited estates. The latest payment in the month of July and August were promptly made. No issue of delayed payment noted.</p>
2	<p><b>Feedbacks:</b></p> <p>MPKK Padang Kubu – Tenant complaint about shop damage, to check the terms and conditions contract under the tenancy agreement.</p>

	<p>SK Padang Kubu – Good relationship with estate management</p> <p>Gajah Mati Estate’s Mosque Representative – Mosque is located in the estate compound and shared with neighbouring communities. Fully support given by the estate management for any programme organized such as “Majlis Korban” , religious talk etc.</p> <p><b>Management Responses:</b></p> <p>The management will maintain good relationship with the local communities and provide any CSR if necessary.</p> <p>Issue highlighted by tenant will be further investigated</p> <p><b>Audit Team Findings:</b></p> <p>No issue.</p>
3	<p><b>Feedbacks:</b></p> <p>Union Representatives (NUPW) – No issue with the management. They are happy to work in the company. Free and new housing are provided to them. Wages are accordingly to the Minimum Wage Order 2020 since February 2020 with the new salary RM1,200</p> <p><b>Management Responses:</b></p> <p>The management will ensure the workers are treated equally.</p> <p><b>Audit Team Findings:</b></p> <p>No other issue.</p>
4	<p><b>Feedbacks:</b></p> <p>Gender Representatives – They are aware of the function of the committee and reported that there was no sexual harassment case reported. They were given equal opportunity to work in the company.</p> <p><b>Management Responses:</b></p> <p>The management will ensure the welfare and safety of female workers are protected.</p> <p><b>Audit Team Findings:</b></p> <p>No further issue.</p>
5	<p><b>Feedbacks:</b></p> <p>Workers representative (Indonesia, Bangladesh): No issue with the management and always open for consultation and assistance. Equal opportunity to all workers regardless of their nationality, gender and race.</p> <p><b>Management Responses:</b></p> <p>No favouritism and all workers are equally treated.</p> <p><b>Audit Team Findings:</b></p> <p>No further issue.</p>

**Section 4: Assessment Conclusion and Recommendation**

<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>	
Based on the findings during the assessment TDM Plantation SdnBhd – Kemaman Palm Oil Mill and Supply Base Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of TDM Plantation SdnBhd – Kemaman Palm Oil Mill and Supply Base Certification Unit is approved and/or continued.	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<b>Name:</b> Haji Hassan Osman	<b>Name:</b> Muhammad Fadzli Masran
<b>Company name:</b> TDM Plantation S/B ,Kemaman Palm Oil Mill	<b>Company Name:</b> BSI Services Malaysia SdnBhd
<b>Title:</b> Mill Manager	<b>Title:</b> Client Manager
<b>Signature:</b> 	<b>Signature:</b> 
<b>Date:</b> 15/02/2021	<b>Date:</b> 10/02/2021

**Appendix A: Summary of the findings by Principles and Criteria**

**MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders**

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	A policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	On group level, policy for the implementation of MSPO established as TDM Berhad Sustainability Policy; signed by the new CEO dated 1 <sup>st</sup> July 2020.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. <b>- Major compliance -</b>	The policy emphasized the commitment by management in all its management aspect through: <ul style="list-style-type: none"> <li>- Commitment and responsible management</li> <li>- Transparency</li> <li>- Compliance towards legal requirements</li> <li>- Responsibility in social, health, safety and employment condition - Environmental, natural resources, biodiversity and ecosystem</li> <li>- Best management practices</li> <li>- Responsible new development</li> </ul> The policy also included on the commitment to implement continual improvement through gainful utilization of resources among human, process and technology to ensure sustainability production of palm products.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			

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Criterion / Indicator		Assessment Findings	Compliance								
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.  - <b>Major compliance</b> -	Internal audit was conducted on 21/7/20 (Gajah Mati Estate), 22/7/20 (MAIDAM Estate) and Pelantoh Estate (26/7/20). Records of internal audit report and findings shown the internal audit able to determine the strong and weak points and potential area for further improvement.	Complied								
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.  - <b>Major compliance</b> -	Internal audit procedure established as TDM Plantation Sdn. Bhd. KPOM MSPO Internal Audit Standard Operating Procedure; Date: 1/8/2017; Edition: TDMP/01; Rev.: TDMP-01/2017. Identified findings recorded in Sustainability Audit Non-Compliance Findings & Recommendations as well as Visual Inspections & Site Visit form as per sighted for the latest audit conducted as per schedule. Sighted the Corrective Action Report on Non-compliance Findings on the analysis of nonconformity raised.	Complied								
<b>4.1.2.3</b>	Report shall be made available to the management for their review.  - <b>Major compliance</b> -	The internal audit report has distributed to the POM management and reported to TDM Plantation Sdn Bhd management. Refer to internal audit report as per summary below: <table border="1" data-bbox="1048 979 1648 1177"> <thead> <tr> <th>Estate</th> <th>Report date</th> </tr> </thead> <tbody> <tr> <td>Gajah Mati</td> <td>21/7/20</td> </tr> <tr> <td>MAIDAM</td> <td>22/7/20</td> </tr> <tr> <td>Pelantoh</td> <td>26/7/20</td> </tr> </tbody> </table>	Estate	Report date	Gajah Mati	21/7/20	MAIDAM	22/7/20	Pelantoh	26/7/20	Complied
Estate	Report date										
Gajah Mati	21/7/20										
MAIDAM	22/7/20										
Pelantoh	26/7/20										
<b>Criterion 4.1.3 – Management Review</b>											
<b>4.1.3.1</b>	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.	The latest management review was carried out on 12/8/20 combined with Monthly Operational Meeting. Review on the continuous suitability, adequacy and effectiveness of the requirements for	Complied								

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Criterion / Indicator		Assessment Findings	Compliance
	- <b>Major compliance</b> -	effective implementation of MSPO has been discussed and presented in the meeting.	
Criterion 4.1.4 – <b>Continual Improvement</b>			
<b>4.1.4.1</b>	<p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p>- <b>Major compliance</b> -</p>	<p>Continual improvement plan and CAPEX was based on consideration of the main social and environmental impact and opportunities of the company. Example of CAPEX allocation in 2020:</p> <p><u>MAIDAM Estate</u></p> <p>Continual improvement plan included in CAPEX for each year.</p> <p>To mitigate environmental impact elephant intrusion</p> <p>Elephant trenches 10' x 8' x 6' c/w service road PR20A1</p> <p>Electric fences (labour &amp; material) @ PR20A1 for 8 km</p> <p><u>Pelantoh Estate</u></p> <p>Road, bridge and path – concrete pile (30 feet length)</p> <p>Plant and machinery – new FFB tipping trailer</p> <p>Building – workers quarters 4 units</p>	Complied
<b>4.1.4.2</b>	<p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p>- <b>Major compliance</b> -</p>	<p>The estate has optimised the use of mechanised operations to reduce pollutions. For in-field collection, mechanised buffalo will be introduced for mechanization to mitigate the labour shortage issue The new technology has been introduced for plant census using drone by agronomist unit under TDM plantation.</p>	Complied
<b>4.1.4.3</b>	<p>An action plan to provide the necessary resources including training, to implement the new techniques or new</p>	<p>The action plan was established as Continuous Improvement Plan for 2019/2020</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<p>industry standard or technology (where applicable) shall be established.</p> <p><b>- Major compliance -</b></p>		
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
<b>4.2.1.1</b>	<p>The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.</p> <p><b>- Major compliance -</b></p>	<p>Records of communication with stakeholders were sighted. Most of them were related to request for assistance such as donation for sports day, Raya celebration, transportation, and netball pole. The management has responded and provided with assistance. The mill and estates have developed the stakeholder list which included all relevant stakeholders such as local communities, government authorities, contractors and suppliers and etc.</p> <p>Stakeholder meeting was conducted on 19/8/2020 for whole Kemaman Complex with stakeholders such as local communities, managers from other estates, workers’ representatives, school representatives and etc. Issues raised during the stakeholders was explained in the meeting and unresolved issue has incorporated into the Social Action Plan to monitor on the progress.</p>	Complied
<b>4.2.1.2</b>	<p>Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p><b>- Major compliance -</b></p>	<p>There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. Documents that publicly available are such as social and environment impact assessment, action plan, meeting minutes and audit reports. Besides, policies were also displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p>	Complied



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Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication with the relevant stakeholders. <b>- Major compliance -</b>	TDM Plantation Sdn Bhd has developed a Communication Procedure with POM/ Estates and Flowchart to Handle Social Issue; Version # 2.0/2017. Maximum 28 working days shall be taken to resolve the issues. All internal and external stakeholders were briefed on this procedure.	Complied
<b>4.2.2.2</b>	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. <b>- Minor compliance -</b>	All Estate Managers were appointed as the management officials as per Letter from Group Human Resource Manager; ref. # TDMP/HR/PSNGEN(MSPO/RSPO); dated 18/9/2017.	Complied
<b>4.2.2.3</b>	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. <b>- Major compliance -</b>	Stakeholder list was developed where all the affected stakeholders were included into the list such as government authorities, local communities, contractors and supplier, neighboring schools and etc. for the sampled 3 estates. Sampled records maintained as following: <ul style="list-style-type: none"> <li>- Register of stakeholders 2020 list</li> <li>- External communications letters received</li> <li>- Communication of workers and contractors form</li> </ul> Stakeholder meeting was conducted on 19/8/20 for whole Kemaman Complex with stakeholders such as local communities, managers from other estates, workers’ representatives, school representatives and etc. Issues raised during the stakeholders was explained in the meeting and unresolved issue has incorporated into the Social Action Plan to monitor. Seen the meeting minutes and attendance list. No issue was raised during the meeting.	Complied
<b>Criterion 4.2.3 – Traceability</b>			

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.2.3.1</b>	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). <b>- Major compliance -</b>	SOP on the traceability of the FFB has established and described in the TDM Plantation Sdn. Bhd. Standard Operating Procedure dated 21/8/2017. Assistant Manager is responsible and the records were kept by harvesting supervisors.	Complied
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	Estate supervisor will verify the records related to the traceability of FFB. Sighted the harvesting record for the month August 2020 for all estates.	Complied
<b>4.2.3.3</b>	The management should identify and assign suitable employees to implement and maintain the traceability system. <b>- Minor compliance -</b>	The appointed Traceability Person In Charge (TPIC) for each estates will be assigned to implement and maintain the traceability system based on MSPO Traceability SOP, TDM/KPOM/01 dated 1/8/17.	Complied
<b>4.2.3.4</b>	Records of sales, delivery or transportation of FFB shall be maintained. <b>- Major compliance -</b>	Records of sales and delivery/transportation of FFB were maintained and updated on daily basis as part of estate production report. <u>MAIDAM Estate</u> Delivery note no. 03003 dated 6/9/20. Lorry no. TBH5104, block 98A1, weight: 7.9 mt <u>Pelantoh Estate</u> Delivery note no. 39135 dated 9/9/20. Lorry no. TBE3054, block 92B1, weight: 9.43 mt	Complied
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
<b>4.3.1.1</b>	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.	Compliance to each applicable law and regulation is monitored by the operating units. Sighted the sampled evidence of compliancy to the regulation as follows:	Complied

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Criterion / Indicator	Assessment Findings	Compliance								
<p><b>- Major compliance -</b></p>	<p>Gajah Mati Estate  MPOB License no. 502036302000, valid till 31/8/2021  MPOB Nursery License no. 562823011000, valid till 30/6/2021  Weighbridge permit for equipment no. 182350414 with security sticker no. 2.1KQ.018375  Certificate of fitness (CF) no. for air receiver no. TG PMT 4867 valid till 14/10/2020  Diesel permit no. T 000026 valid till 19/11/2020  MAIDAM Estate  MPOB License no. 503576002000, valid till 31/8/2021  Diesel permit no. T 000018 valid till 9/10/2020  Pelantoh Estate  MPOB License no. 501374002000, valid till 31/3/2021  Certificate of fitness (CF) no. for air receiver no. TG PMT 4818 valid till 17/9/2021  Diesel permit no. T 001598 valid till 22/1/2021  Firearms License</p> <table border="1" data-bbox="1093 1185 1854 1383"> <thead> <tr> <th>Book no.</th> <th>License no.</th> </tr> </thead> <tbody> <tr> <td>358431</td> <td>KMN/CU/1032</td> </tr> <tr> <td>366616</td> <td>KMN/CU/1098</td> </tr> <tr> <td>366619</td> <td>KMN/CU/1095</td> </tr> </tbody> </table>	Book no.	License no.	358431	KMN/CU/1032	366616	KMN/CU/1098	366619	KMN/CU/1095	
Book no.	License no.									
358431	KMN/CU/1032									
366616	KMN/CU/1098									
366619	KMN/CU/1095									

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Criterion / Indicator		Assessment Findings	Compliance
		317117      KMN/CU/954	
<b>4.3.1.2</b>	The management shall list all laws applicable to their operations in a legal requirements register. <b>- Major compliance -</b>	All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. Refer to legal register for 2020.	Complied
<b>4.3.1.3</b>	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. <b>- Major compliance -</b>	The latest legal register for 2020 was sighted. Among the applicable legal laws registered are EQA, OSHA, Factory & Machinery Act, Employment Act, Workers' Minimum Standard of Housing and Amenities Act Regulation 2020, Minimum Wages order 2020 to name a few. Other related legal for COVID19 pandemic under Prevention and Control of Infectious Diseases (Measure Within The Infected Local Areas) Regulation 2020 was also has been identified.	Complied
<b>4.3.1.4</b>	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. <b>- Minor compliance -</b>	Person in charge for legal compliance for TDM Estates is estate's assistant manager. For example, at Pelantoh Estate 1/1/20.	Complied
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users. <b>- Major compliance -</b>	The was no evidence to show that oil palm cultivation activities had diminished the land use rights of others. Verified documents to show legal ownership of its land.	Complied
<b>4.3.2.2</b>	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of the land. <b>- Major compliance -</b>	TDM Plantation has acquired the land ownership (leased) from the Terengganu State Government. TDM Plantations have the document to proof the land used rights and available for review.  Land title Gajah Mati Estate	Complied

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Criterion / Indicator		Assessment Findings			Compliance
		Title no	Lot	Area	
		H.S(D) 72	PT140	11,966 acre	
		H.S(D) 73	PT141	1,544 acre	
		<p>MAIDAM Estate</p> <p>The land belong to Majlis Agama Islam dan Adat Melayu Terengganu (MAIDAM). TDM Plantation has been appointed as management agency to manage the land as per Memorandum of Agreement dated 10/3/1997. Sighted the sampled land title under MAIDAM as follows:</p>			
		Title no	Lot	Area	
		H.S(D) 583	Lot 1083	179.800 ha	
		H.S(D) 704	Lot 1097	68.750 ha	
		H.S(D) 499	Lot 971	93.280 ha	
		H.S(D) 498	Lot 970	47.820 ha	
		H.S(D) 497	PT 934	273.561 ha	
		<p>Pelantoh Estate</p>			
		Title no	Lot	Area	
		H.S(D) 9198	Lot 28	3439.831 ha	
		12618	Lot 822	68.712 ha	
		12509	Lot 821	35.450 ha	
		12756	Lot 2523	114400.300 m <sup>2</sup>	

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.3.2.3</b>	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p><b>- Major compliance -</b></p>	<p>The estates visited has clearly demarcated the legal parameter boundary with red and white color PVC pole/GI pipe.</p> <p>Gajah Mati Estate</p> <p>Sighted the legal parameter demarcation at field P2020 adjacent with Ulu Paka Estate demarcated with red and white colour pole.</p> <p>MAIDAM Estate</p> <p>Sighted the legal parameter demarcation at field P18A adjacent with Jengal Forest Reserve and P98A1 adjacent with Besul Forest Reserve.</p> <p>Pelantoh Estate</p> <p>Sighted the legal parameter demarcation at field P20C adjacent with Ketengah Jaya Estate demarcated with red and white colour pole.</p>	Complied
<b>4.3.2.4</b>	<p>Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC).</p> <p><b>- Minor compliance -</b></p>	<p>There is no land dispute in TDM Kemaman complex at the time of audit. The land belongs to TDM and land ownership documents verified.</p>	Complied
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	<p>Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.</p> <p><b>- Major compliance -</b></p>	<p>No any lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available. <b>- Minor compliance -</b>	No any lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Complied
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. <b>- Major compliance -</b>	No any lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Complied
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. <b>- Minor compliance -</b>	<p>SIA was conducted on November 2011 by SRA Consultancy. The assessment was covered the whole Kemaman Complex which included Kemaman POM, Pelantoh Estate, Jernih Estate, Air Putih Estate, Gajah Mati Estate, MAIDAM Estate and Tebak Estate. The assessment team has interviewed with the relevant stakeholders such contractors, local communities, internal workers included local and foreign and etc. The mill and estates have developed SIA Action Plan for Y2018 which covered the social profile such as safety &amp; health, education, housing &amp; infrastructure and etc.</p> <p><u>Gajah Mati Estate</u></p> <p>Latest SIA action review was carried out on 19/8/20. A few issues have been identified based on inputs from workers complaint/grievance and also from stakeholder meeting.</p> <p><u>Pelantoh Estate</u></p> <p>SIA action plan has been updated for 2020. 9 areas of concern identified by assessor. Timeline for completion is until 2024.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.4.2:</b> Complaints and grievances			
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented. <b>- Major compliance -</b>	TDM Plantation Sdn Bhd has established a flowchart on handling social issue. Two-way communication was the method been utilized by the management. The management has to discuss the issue raised by stakeholders within 2 weeks for the first meeting. According to the procedure, all the complaints and grievances will be recorded in each individual form.	Complied
<b>4.4.2.2</b>	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. <b>- Major compliance -</b>	The forms can be filling and drop into the suggestion box at the office or send to PIC. The estate management has implemented House Maintenance Records to record any complaints related to housing by the workers. For eg: roof was leaking, water pipe broken and etc. The management has taken action to rectify the problem.	Complied
<b>4.4.2.3</b>	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. <b>- Minor compliance -</b>	Complaint Logbook for Linesite Repair and Complaint/ Request form was established and implemented. No external stakeholders were recorded related on complaint and grievances.	Complied
<b>4.4.2.4</b>	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. <b>- Minor compliance -</b>	Grievances procedure flowchart also displayed on the office signboard and security post. Checked the complainants file noted that acknowledgement was evident in the complaint form. Interviewed with the workers' representatives confirmed that the management has addressed the issues raised by them.	Complied
<b>4.4.2.5</b>	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. <b>- Major compliance -</b>	Grievances procedure flowchart and complaint form displayed on the office signboard.	Complied



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Criterion / Indicator	Assessment Findings	Compliance
<b>Criterion 4.4.3:</b> Commitment to contribute to local sustainable development		
<b>4.4.3.1</b> Growers should contribute to local development in consultation with the local communities. <b>- Minor compliance -</b>	Estates has made contributions to the local communities and stakeholders such as below: a. Payment for "Al-Quran reciting class" (month fees) Review the pay slip of Gajah Mati employees pay statements has been their basic salary wages are comply with Minimum Wage Order 2020 46.15 / day b. Housing cleanliness programme on 4/9/20 For MAIDAM estate :- a. Corporate Smart Internship Programme with "Jabatan Penjara Malaysia" on 27 <sup>th</sup> July 2020. b. Placement for internship student from June to September 2020. c. Donation for Yaman humanity mission under "Tabung Terengganu For Yaman" in February 2020. <u>Pelatoh Estate</u> a. Donation to SK Padang Kubu Teachers and Parents Association @ PIBG for Academic Excellent Programme in August 2020. b. Request for van for pre-school/kindergarten programme at TATIU Kemaman in November 2019.	Complied
<b>Criterion 4.4.4:</b> Employees safety and health		
<b>4.4.4.1</b> An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. <b>- Major compliance -</b>	TDM Plantation has established Safety and Health Policy dated 1/7/2020 signed by the CEO. In the policy stated the company commitment to:	Complied

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	<p>Provide continuous training and development in order to increase awareness among the employees</p> <p>Instilling a culture of safety and health among employees</p> <p>Complied with safety and health legal requirements, guidelines and best practices</p> <p>Made safety and health factors as main element to develop and run the company operations</p> <p>Improve the safety and health management base on Occupational Safety and Health Act 1994 and Factory and Machinery Act 1967.</p> <p>The estates has established the H&amp;S plan documented in OSH Plan 2020. The plan cover on OSH legal compliance, emergency response plan, OSH management system, risk management and safety committee. Sighted the implementation as follows:</p> <p>Gajah Mati Estate</p> <p>Medical surveillance was conducted on annually basis. Latest surveillance was conducted on 18/7/2020 till 8/8/2020 by registered OHD with reg. no. HQ/08/DOC/00/352. 25 workers were sent for surveillance and found fit to to work as chemical handlers.</p> <p>Workplace inspection was conducted on quarterly basis prior to safety and health committee meeting. Sighted the inspection records dated 3/6/2020 and 5/2/2020. The results of the inspection was discussed in the safety and health committee meetings.</p> <p>MAIDAM Estate</p>	

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		<p>Chemical register were reviewed on annually basis. Latest review was conducted on 2/1/2020. No class Ia and Ib chemical was used in the estate as per chemical register.</p> <p>Annual medical surveillance was conducted by OHD with reg. no. HQ/08/DOC/00/352 on 18/8/2020. The report has yet to be received by the estate.</p> <p>Workplace inspection was conducted on monthly basis. Sighted the inspection records dated 27/8/2020, 20/8/2020, 6/8/2020 and 4/8/2020. The result of workplace inspection were discussed in the Safety committee meeting.</p> <p>Pelantoh Estate</p> <p>Annual medical surveillance was conducted by OHD with reg. no. HQ/08/DOC/00/352 on 28/1/2020. 13 workers were sent for surveillance and found fit to to work as chemical handlers.</p> <p>The estates has provided 17 first aid box and place at several place in the estates and hold by the field mandore. The first aid box inspection was conducted on monthly basis. Sighted the inspection records for box no. 1,3 and 5 dated 9/6/2020, 12/5/2020 and 8/3/2020</p> <p>Firefighting equipment inspection was conducted on monthly basis. Sighted the inspection records dated 22/7/2020 and 5/2/2020.</p>	
<b>4.4.4.2</b>	<p>The occupational safety and health plan shall cover the following:</p> <p>A safety and health policy, which is communicated and implemented.</p> <p>The risks of all operations shall be assessed and documented.</p>	<p>a. TDM Plantation has established Safety and Health Policy dated 1/7/2020 signed by the CEO.</p> <p>b. TDM Plantations has established the SOP for risk assessment to identify H&amp;S issue documented in the Standard Operating Procedure (HIRARC) edition TDMP/01, rev. no. TDMP-02/2018 dated 22/10/2018.</p>	Complied

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<p>An awareness and training programme which includes the following requirements for employees exposed to pesticides:</p> <p>all employees involved shall be adequately trained on safe working practices</p> <p>all precautions attached to products shall be properly observed and applied</p> <p>The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust must have knowledge and access to latest national regulations and collective agreements.</p> <p>The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p>	<p>The risk assessment process has been describe in the SOP accordingly. As per SOP, HIRARC review to be conducted as follows:</p> <p>At least once a year</p> <p>Immediately whenever there is an accident, near miss or dangerous occurrence</p> <p>When there is changes in the work method</p> <p>When new machines and technology are introduced</p> <p>When there is new activity, process or operations</p> <p>The estates visited has established HIRARC Team lead by the Estate Manager. The team reviewed the HIRARC as per SOP established.</p> <p>Gajah Mati Estate</p> <p>FY 2020, the annual HIRARC review was conducted on 1/7/2020 with no changes in the HIRARC register</p> <p>MAIDAM Estate</p> <p>FY 2020, the annual HIRARC review was conducted on 13/1/2020 with no changes in the HIRARC register. Latest HIRARC review due to accident occurrence was conducted on 12/7/2020 for weeding operation, 10/6/2020 for transporting workers and 19/4/2020 in harvesting operation.</p> <p>Pelantoh Estate</p> <p>FY 2020, the annual HIRARC review was conducted on 17/3/2020 with no changes in the HIRARC register.</p> <p>c. The pesticides operators have been given training regarding the usage safety and health issue and proper way for chemical application.</p>	

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<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>Sighted the training records for the pesticides operators as stated in criteria 4.4.6.1.</p> <p>d. The management provide appropriate PPE to the employee's base on the job type. The PPE given as per HIRARC and Standard Operating Procedure. PPE issuance was recorded in 'Borang Penyerahan Peralatan kerja dan Pengambilan Barang' PPE by individual basis.</p> <p>Noted during interview with pesticides operators, chemical handlers, manurer and workshop foreman and fitter, the employee was provided appropriate PPE as per SOP established such as safety goggle, respirator/N95 mask, nitrile gloves, apron and wellington boots for sprayers and welding shield, leather gloves, N95 mask and safety boots for foreman and fitter.</p> <p>Sighted the sample PPE issuance records for workers with employment ID no. as follows;</p> <p>PT 17012xx PT 10005xx PT 001xx MA17004xx MA17004xx MA17003xx MA17004xx</p> <p>e. TDM Plantation has established the Agrochemical Management Policy dated 1/7/2020 signed by the CEO.</p>	

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	<p>The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Standard Operating Procedure A12: Weeding –Immature, A13 – Mature, A14 – Lallang Eradication, rev. 2, May 2017.</p> <p>f. The estates manager has been appointed as person responsible for safety and health cum chairman for safety and health committee in the CU.</p> <p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee.</p> <p>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 matters arising, OSH objective and program, compliance to legal and requirement, Accident statistic and report, external and internal compliant, training and competency, workplace inspection report and other matters.</p> <p>g. Sighted the minutes meeting as follows:</p> <table border="1" data-bbox="1048 1042 1861 1246"> <thead> <tr> <th>Operating units</th> <th>1</th> <th>2</th> <th>3</th> <th>4</th> </tr> </thead> <tbody> <tr> <td>Gajah Mati Estate</td> <td>16/06/20</td> <td>16/03/20</td> <td>23/12/19</td> <td>24/09/19</td> </tr> <tr> <td>MAIDAM Estate</td> <td>12/07/20</td> <td>15/06/20</td> <td>15/03/20</td> <td>24/12/19</td> </tr> <tr> <td>Pelantoh Estate</td> <td>10/06/20</td> <td>10/03/20</td> <td>11/12/19</td> <td>11/09/19</td> </tr> </tbody> </table> <p>h. TDM Plantations has established the SOP for Accident and emergency procedures documented in the Standard Operating Procedure – Emergency Preparedness and Response edition TDM/01,</p>	Operating units	1	2	3	4	Gajah Mati Estate	16/06/20	16/03/20	23/12/19	24/09/19	MAIDAM Estate	12/07/20	15/06/20	15/03/20	24/12/19	Pelantoh Estate	10/06/20	10/03/20	11/12/19	11/09/19	
Operating units	1	2	3	4																		
Gajah Mati Estate	16/06/20	16/03/20	23/12/19	24/09/19																		
MAIDAM Estate	12/07/20	15/06/20	15/03/20	24/12/19																		
Pelantoh Estate	10/06/20	10/03/20	11/12/19	11/09/19																		

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	<p>rev. no. TDMP-02/2018 dated 1/1/2018. In the SOP, the emergency plan and ERT to be activated according to the emergency situations as follows:</p> <p>Fig. 4.0 – Event of environmental and OSH emergencies including accident/incident</p> <p>Fig. 4.4a – Event of fire</p> <p>Fig. 4.4b – Event of Explosion</p> <p>Fig. 4.4c – Event of Oil Spillage</p> <p>Fig. 4.4d – Event of Effluent Spillage (mills).</p> <p>The Emergency Response Plan Flow Chart has been displayed at strategic places in the mill and estates.</p> <p>The mill and estates visited has established Emergency response team. Training has been conducted regularly to ensure the awareness on the ERP. Sighted the training records of the ERP as stated in criteria 4.4.6.1.</p> <p>Noted during interview with workers, the workers were aware regarding the location of firefighting equipment, first aid box and the competent first aider in the estate.</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 2019 as reported to DOSH as follows:</p> <table border="1" data-bbox="1048 1348 1823 1396"> <tr> <td data-bbox="1048 1348 1308 1396">Operating units</td> <td data-bbox="1308 1348 1565 1396">Accident Cases</td> <td data-bbox="1565 1348 1823 1396">LTA</td> </tr> </table>	Operating units	Accident Cases	LTA	
Operating units	Accident Cases	LTA			

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		Gajah Mati Estate	1	14	
		MAIDAM Estate	0	0	
		Pelantoh Estate	1	2	
<b>Criterion 4.4.5: Employment conditions</b>					
<b>4.4.5.1</b>	The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.  - <b>Major compliance</b> -	TDM Plantation Sdn Bhd has newly revised the Human Rights Policy on 1/7/20. The management is committed to support the principle of Universal Declaration of Human Rights and ILO Core Convention on Labour Standards. They evaluated and managed the human rights activities parallel to the policy such as workers, contractors and suppliers, local communities and etc. The policy was displayed at the notice board in front of office and muster ground area.			Complied
<b>4.4.5.2</b>	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.  - <b>Major compliance</b> -	TDM Plantation Sdn Bhd has newly revised the Social Policy dated 1/7/2020 where they are committed to treat all the workers equally during the recruitment and promotion process without discrimination based on nationality, race, ethnic, religion, sexual orientation, age and etc. There were no evidences of any form of discrimination based on race, national origin, religion, gender, union and political affiliation and is covered in the policy as well.			Complied
<b>4.4.5.3</b>	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.  - <b>Major compliance</b> -	The payroll and pay slip records of employees showed that all employees are paid with the monthly salary are compliance with the local minimum wages requirements. Payslip of month February, May and July 2020 for the sampled workers as below:  i) GM0901764 ii) GM0901832			Complied



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	<p>iii) GM0901852            iv) GM0901590            v) GM0901609            vi) GM0901749</p> <p>Review the pay slip of Gajah Mati employees pay statements has been carried out and confirm that their basic salary wages are comply with Minimum Wage Order 2020 of RM 1200/ month or RM 46.15 / day.</p> <p><u>MAIDAM Estate</u></p> <p>Local workers</p> <p>MA1500357            MA1700394            MA1700403</p> <p>Foreign workers</p> <p>MA1800491            MA1900503            MA1900519</p> <p>Review the pay slip of MAIDAM Estate employees pay statements has been carried out and confirm that their basic salary wages are comply with Minimum Wage Order 2020 of RM 1200/ month or RM 46.15 / day</p>	

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		<p><u>Pelantoh Estate</u></p> <p>Foreign workers</p> <p>PT1701164</p> <p>PT1701266</p> <p>PT1701288</p> <p>PT1000555</p> <p>PT1000602</p> <p>Local workers</p> <p>PT0900347</p> <p>PT1601083</p> <p>PT1601064</p> <p>PT1701119</p> <p>PT00181</p> <p>Review the pay slip of Pelantoh Estate employees pay statements has been carried out and confirm that their basic salary wages are comply with Minimum Wage Order 2020 of RM 1200/ month or RM 46.15 / day.</p>	
<b>4.4.5.4</b>	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.	<p>Contract of employment and payslip under Bumi Emas Plant Enterprise employees of contractor was verified;</p> <p>August 2020 salary – meeting the minimum wages order 2020.</p>	Complied

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	- <b>Minor compliance</b> -		
4.4.5.5	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p>- <b>Major compliance</b> -</p>	<p>The management have a list or record for all workers and record under master list workers contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p>	Complied
4.4.5.6	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p>- <b>Major compliance</b> -</p>	<p>There is a contract and agreement for staff and workers including foreign workers and pay and conditions are documented and are above the industry minimum standard. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker.</p> <p><u>Gajah Mati Estate</u></p> <p>Copies of Employment Contract for each local workers indicated in the employment records are available. Sample of employment contract available for the local workers:</p> <ul style="list-style-type: none"> <li>i) GM0901232</li> <li>ii) GM0901414</li> <li>iii) GM0901554</li> <li>iv) GM0901716</li> <li>v) GM0901956</li> </ul> <p>For foreign workers contract, employment contract varies from 2-3 years based on nationality in line with VISA/work permit issued by Immigration Department. Sample of employment contract checked:</p>	Complied

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	<p><u>Foreign workers</u></p> <p>i) GM0901764            ii) GM0901832            iii) GM0901852            iv) GM0901590            v) GM0901609            vi) GM0901749</p> <p><u>MAIDAM Estate</u></p> <p>Copies of Employment Contract for each local workers indicated in the employment records are available. Sample of employment contract available for the local workers:</p> <p>MA1500357            MA1700394            MA1700403</p> <p>For foreign workers contract, employment contract varies from 2-3 years based on nationality in line with VISA/work permit issued by Immigration Department. Sample of employment contract checked</p> <p>MA1800491            MA1900503            MA1900519</p>	

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		<p><u>Pelantoh Estate</u></p> <p>For foreign workers contract, employment contract varies from 2-3 years based on nationality in line with VISA/work permit issued by Immigration Department. Sample of employment contract checked:</p> <p>PT1701164            PT1701266            PT1701288            PT1000555            PT1000602</p> <p>Copies of Employment Contract for each local workers indicated in the employment records are available. Sample of employment contract available for the local workers:</p> <p>PT0900347            PT1601083            PT1601064            PT1701119            PT00181</p>	
<b>4.4.5.7</b>	The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.	Estates established a time recording system using Check Roll Book for all employees at different station. The working hours for all employees has been clearly documented in the Check Roll Book as well as their pay slip under OT section to ensure transparent for both	Complied

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	- <b>Major compliance</b> -	employees and employer. Time recording system has been carried out manually on daily basis for field and office staff & executives. For office staff & executives, the working hours are recorded in the Executives & Staff Attendance List. For field workers, they record the working hours in the Daily Time Record. The overtime working hours always approved by the assistant manager. The documented working hours available in the daily check roll records	
<b>4.4.5.8</b>	The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.  - <b>Major compliance</b> -	Through the verification of the O/T form, overtime sheet and also the sampled payslip. There is no overtime more than the legal permitting 104 hours.	Complied
<b>4.4.5.9</b>	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.  - <b>Major compliance</b> -	Pay slips of all employees are available as evidence of salary payment. The pay slip contains the following information: a. Opening Balance b. Price bonus c. Wages d. Pendahuluan tunai e. EIS f. EPF g. SOCSO h. Bayaran Lebih masa  <u>Pelantoh Estate</u>	Minor Non-Conformity

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		Wages payment for one (1) worker (ID: PT17011266) under harvesting gang 05 in July 2020 was not tally with the record in check roll book. Rate per bunch is RM 0.74 and however he was paid for RM 0.25 per bunch. Thus, a minor NC was issued.													
<b>4.4.5.10</b>	Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.  <b>- Minor compliance -</b>	The management also provides free housing facilities with water and electricity. In addition, clinic facilities are prepared in the estate and the VMO visit twice per month.	Complied												
<b>4.4.5.11</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.  <b>- Major compliance -</b>	<p>On-site living quarters are provided to general workers and staff. Observed that the living quarters are habitable and have amenities such as water, electricity etc. Transportation to send children to neighbouring school was provided as well.</p> <p>Line site inspection was carried out on weekly basis as per the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) requirement. VMO will come and visit the estate for clinic visit and other amenities (creche and line site). Any comments will be reported in the logbook and presented to management.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Estate</th> <th>Line site inspection</th> <th>VMO visit</th> </tr> </thead> <tbody> <tr> <td>Gajah Mati</td> <td>2/9/20</td> <td>17/8/20</td> </tr> <tr> <td>MAIDAM</td> <td>8/9/20</td> <td>No clinic</td> </tr> <tr> <td>Pelantoh</td> <td>3/9/20</td> <td>28/8/20</td> </tr> </tbody> </table>	Estate	Line site inspection	VMO visit	Gajah Mati	2/9/20	17/8/20	MAIDAM	8/9/20	No clinic	Pelantoh	3/9/20	28/8/20	Opportunity for Improvement
Estate	Line site inspection	VMO visit													
Gajah Mati	2/9/20	17/8/20													
MAIDAM	8/9/20	No clinic													
Pelantoh	3/9/20	28/8/20													

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		<p>OFI - Compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) has yet to be further improved on :</p> <p>i) Consistent monitoring of weekly line site inspection and</p> <p>ii) VMO task and frequency of visit to be clearly assigned as per section 19(3) of Workers' Minimum Standards Housing and Amenities Act 1990</p> <p>iii) The new Employees Minimum Standards Of Housing, Accommodations And Amenities (Accommodation And Centralized Accommodation) Regulations 2020.</p>	
<b>4.4.5.12</b>	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p><b>- Major compliance -</b></p>	<p>TDM Plantation Sdn Bhd has revised the Gender Policy dated 1/7/2020 where they are responsible to ensure the workplaces are free from any harassment related to sexual, religion, nationality and etc. The policy has been displayed at the notice board in front of office.</p> <p>From the interview with gender committee chair person in Gajah Mati estate they aware regarding to policy and guidelines to prevent all form of sexual harassment. Meeting minute dated 27/7/20 available for review. Based on recorded minute, the was no sexual harassment case and violence reported.</p> <p>At MAIDAM Estate, the latest gender committee meeting was carried out on 12/2/20 and Pelantoh Estate on 10/3/20.</p>	Complied
<b>4.4.5.13</b>	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining.</p>	<p>TDM Plantation Sdn Bhd has newly revised Freedom of Association Policy dated 1/7/20. The workers were able to join or form any association according to the Employment Act without any restriction.</p> <p>Besides, Social Policy revised on 1/7/2020 stated that workers are allowed to join and form association freely. Interview of Staff and</p>	Complied



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	<p>Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p><b>- Major compliance -</b></p>	<p>Workers also confirmed their awareness of freedom of association but there was no worker unions being formed at the moment.</p> <p>At MAIDAM Estate, the latest union meeting conducted on 12 February 2020. Various issues being discussed between the union representatives and also management. The Issue already been taken by management available in Social action plan.</p> <p><u>Pelantoh Estate</u></p> <p>The latest NUPW meeting was carried out on 12/8/20. The meeting was attended by NUPW state representative together with the management and workers representative from Pelantoh estate.</p>	
<b>4.4.5.14</b>	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.</p> <p><b>- Major compliance -</b></p>	<p>TDM Plantation Sdn. Bhd. has newly revised Protection of Children Policy dated 1/7/20. They are committed not to exploit or recruit any individual less than 16 years old in the plantations. Estate maintain an accurate record of all employees under the list of workers.</p> <p>Through document reviewed on the Employee master listing confirmed that the workers recruited are above 18 years old. Evidence that there is no underage worker (below 18 years old) employed at the work locations visited.</p>	Complied
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p><b>- Major compliance -</b></p>	<p>The estates visited conducted training need analysis to identify training required for the employee and documented in Training Matrix FY 2020.</p> <p>The estates visited has established training schedule FY 2020 base on training need analysis conducted. The training program covers Policy, operation and OSH/others.</p>	Complied

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	<p>The program involve the executive, staff/field supervisor, workers and contractors. The identified training was programmed throughout the year.</p> <p>The mill and estate has also conducted assessment to the training attendees to assess the training efficiency.</p> <p>Sighted the training records as follows:</p> <p>Gajah Mati Estate</p> <p>Fire drill with fire department training date 24/8/2020</p> <p>Tractor driver SOP and PPE training dated 21/1/2020</p> <p>Works ethic policy trainings dated 15/4/2020</p> <p>Agrochemical policy and spraying SOP training dated 14/1/2020</p> <p>Agrochemical policy training dated 26/2/2020</p> <p>Harvesting SOP and policy training dated 8/1/2020</p> <p>Bufferzone training dated 15/7/2020</p> <p>Slope protection and river buffer zone policy training dated 10/7/2020</p> <p>HCV and hunting prohibition training dated 14/7/2020</p> <p>Pest and disease applicator and PPE training dated 11/2/2020</p> <p>Accident investigation training dated 14/6/2020</p> <p>Chemical spillage training dated 13/5/2020</p> <p>SOP for IPM training dated 10/3/2020</p> <p>Pesticides calibration and calculation training dated 12/2/2020</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Emergency Response Plan training dated 5/1/2020</p> <p>PPE awareness and spraying SOP training dated 13/1/2020</p> <p>MAIDAM Estate</p> <p>Safety and health policy training dated 5/1/2020</p> <p>SOP for palm supply training dated 21/1/2020</p> <p>Foreign workers policy training dated 16/2/2020</p> <p>SOP for spraying training dated 18/2/2020</p> <p>Biodiversity and environmental policy training dated 23/2/2020</p> <p>Skid tank operator training dated 3/3/2020</p> <p>Palm manuring SOP training dated 11/3/2020</p> <p>Slope protection and river riparian bufferzone training dated 15/3/2020</p> <p>Agrochemical management policy training dated 22/3/2020</p> <p>Human rights policy training dated 5/4/2020</p> <p>Boundary marking SOP training dated 12/4/2020</p> <p>Replanting OP to OP training dated 3/5/2020</p> <p>Soil conservation SOP training dated 31/5/2020</p> <p>Water Management training dated 7/6/2020</p> <p>Palm manuring SOP training dated 14/6/2020</p> <p>Chemical calibration training dated 1/7/2020</p>	

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		Weeding SOP training dated 12/7/2020 Rat baiting SOP training dated 9/8/2020 Chemical handling training dated 10/8/2020  Pelantoh Estate Firefighting training dated 25/8/2020 First aid training dated 15/7/2020 Lining for harvesting path and platform construction training dated 22/6/2020 Housing and facilities disinfection training dated 28/3/2020 COVID 19 briefing dated 18/3/2020 SOP for fertiliser application dated 8/3/2020 Spraying SOP and buffer zone training dated 4/2/2020 Harvesting SOP for new harvester training dated 12/1/2020	
<b>4.4.6.2</b>	Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.  <b>- Major compliance -</b>	The estates visited conducted training need analysis to identify training required for the employee and documented in Training Matrix FY 2020. The mill and estate has also conducted assessment to the training attendees to assess the training efficiency.	Complied
<b>4.4.6.3</b>	A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.	The estates visited has established training schedule FY 2020 base on training need analysis conducted. The training program covers Policy, operation and OSH/others.	Complied

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	- <b>Minor compliance</b> -	The program involve the executive, staff/field supervisor, workers and contractors. The identified training was programmed throughout the year.	
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
<b>4.5.1.1</b>	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.  - <b>Major compliance</b> -	TDM Plantation has established Biodiversity and Environmental Policy dated 1/7/2020 signed by the CEO. In the policy stated the company commitment to:  Complied with all statutory requirement regarding biodiversity and environmental  creating, maintaining and continuous improvement of sustainable plantation management  eliminate potential adverse effects on the environment and biodiversity that may arise from plantation activities  provide an effective work system subject to Environmental Quality Act 1974  Ensure zero burning is always given priority as stipulated in the Environmental Quality (Declared Activities) (Open Burning) Order 2003  The policy was communicated to the employee through displayed at notice board around the mill, training and morning briefing.	Complied
<b>4.5.1.2</b>	The environmental management plan shall cover the following: An environmental policy and objectives; The aspects and impacts analysis of all operations.	The estate conducted aspect and impacts analysis of all operations as per SOP established and documented in Standard Operating Procedure – Environmental Aspects/Impacts Evaluation date 1/11/2017, edition TDMP/01 rev. TDMP – 01/2017.	Complied

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<p><b>- Major compliance -</b></p>	<p>Gajah Mati Estate</p> <p>The analysis was reviewed on annually basis. Latest review was conducted on 21/6/2020. The review was conducted by Environmental Performance Monitoring Committee.</p> <p>MAIDAM Estate</p> <p>The estate has conducted the environmental aspects and impacts analysis and reviewed on annually basis. Latest review was conducted on 3/2/2020.</p> <p>Pelantoh Estate</p> <p>The estate has conducted the environmental aspects and impacts analysis and reviewed on annually basis. Latest review was conducted on 15/2/2020.</p>	
<p><b>4.5.1.3</b> An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>Base on the significant impact activity identified during aspects and impacts analysis the estate has established environmental management plan and documented in the Pollution Prevention Plan and reviewed on annually basis. sighted the implementation of the management plan as follows:</p> <p>Gajah Mati Estate</p> <p>The latest review of the Pollution Prevention Plan was conducted on 16/6/2020. Sighted the implementation of the management plan as follows:</p> <p>The estate has established river buffer zone at Sg. Pasir and Sg. Kersik. Sighted the river buffer zone of Sg. Pasir at P18B2. No evidence of chemical application along the buffer zone</p> <p>The estates has established barn owl box in the estate as IPM initiative.</p>	<p>Complied</p>

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	<p>MAIDAM Estate</p> <p>The estate has established Environmental Management Plan and reviewed on annually basis. Latest review was conducted on 19/2/2020. Sighted the implementation of the management plan as follows:</p> <p>The estate has implemented the IPM in order to reduce the usage of pesticides such as Installation of barn owl box in the estate. Latest barn owl census was conducted on 25/7/2020. The barn owl box ratio was at 1:45 ha with occupancy of 100%</p> <p>Sighted during site visit at P98A-1, beneficial plant such as <i>Cassia cobanensis</i>, and <i>Antigonon leptopus</i>, were planted along the main road.</p> <p>All empty pesticides containers were triple rinse, puncture and stored at designated stored before disposed to licensed contractors. Latest disposal was conducted on 1/9/2020 as per consignment note no. 20200901153PLADK.</p> <p>Pelantoh Estate</p> <p>The estate has established Environmental Management Plan and reviewed on annually basis. Latest review was conducted on 17/3/2020. Sighted the implementation of the management plan as follows:</p> <p>The estate has implemented the IPM in order to reduce the usage of pesticides such as Installation of barn owl box in the estate. Latest barn owl census was conducted in Feb 2020. The barn owl box ratio was at 1:10 ha with occupancy of 56%</p>	

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		The estate has established beneficial plant nursey. The beneficial plant planted in the nursery such as <i>Tunera subulata</i> , <i>Cassia cobanensis</i> , and <i>Antigonon leptopus</i> . Sighted the beneficial plant planted at the estate entrance and field P20.	
<b>4.5.1.4</b>	A programme to promote the positive impacts should be included in the continual improvement plan. <b>- Minor compliance -</b>	Program to promote the positive impacts was documented in the Continuous Improvement Plan/Environmental Management Plan. Sighted the improvement plan as follows:  Rain water harvesting  Integrated Pest management  Changing 2 <sup>nd</sup> generation rat bait to 1 <sup>st</sup> generation rat bait  Environmental awareness signage for local community  Reduce the usage of P&D pesticide by implementation of IPM	Complied
<b>4.5.1.5</b>	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives. <b>- Major compliance -</b>	The estates visited continuously provide training to the workers to create awareness regarding the environmental policy and management plan established. Sighted the training records as stated in criteria 4.4.6.1.	Complied
<b>4.5.1.6</b>	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed. <b>- Major compliance -</b>	The management has established Environmental Performance Monitoring Committee. The committee consist of representative from the employer and employee. The committee conducted meeting on quarterly basis.	Complied
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>			
<b>4.5.2.1</b>	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends	The estates visited has established management plan to assess the usage of the non-renewable energy in the estate and documented in	Complied



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	<p>shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.</p> <p><b>- Major compliance -</b></p>	<p>the Continuous Improvement Plan. Sighted the implementation of the management plan as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Gajah Mati Estate</th> <th>MAIDAM Estate</th> <th>Pelantoh Estate</th> </tr> </thead> <tbody> <tr> <td>Jan 2020</td> <td>6162</td> <td>2788</td> <td>2455</td> </tr> <tr> <td>Feb 2020</td> <td>5623</td> <td>3092</td> <td>2613</td> </tr> <tr> <td>Mar 2020</td> <td>7164</td> <td>3162</td> <td>3085</td> </tr> <tr> <td>Apr 2020</td> <td>6242</td> <td>2218</td> <td>3644</td> </tr> <tr> <td>May 2020</td> <td>6778</td> <td>2106</td> <td>2732</td> </tr> <tr> <td>Jun 2020</td> <td>7007</td> <td>2530</td> <td>3499</td> </tr> <tr> <td>Jul 2020</td> <td>7207</td> <td>2214</td> <td>N/A</td> </tr> <tr> <td>Aug 2020</td> <td>5788</td> <td>2544</td> <td>N/A</td> </tr> </tbody> </table>		Gajah Mati Estate	MAIDAM Estate	Pelantoh Estate	Jan 2020	6162	2788	2455	Feb 2020	5623	3092	2613	Mar 2020	7164	3162	3085	Apr 2020	6242	2218	3644	May 2020	6778	2106	2732	Jun 2020	7007	2530	3499	Jul 2020	7207	2214	N/A	Aug 2020	5788	2544	N/A	
	Gajah Mati Estate	MAIDAM Estate	Pelantoh Estate																																				
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<b>4.5.2.2</b>	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p>	<p>The estates has established baseline for diesel usage base on average previous year diesel consumption trend. The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations</p>	Complied																																				

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	- <b>Major compliance</b> -	inclusive of fuel use by contractors, including all transport and machinery operations.									
4.5.2.3	The use of renewable energy should be applied where possible. - <b>Minor compliance</b> -	No possibility of renewable energy used in the estates visited.	Complied								
<b>Criterion 4.5.3: Waste management and disposal</b>											
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - <b>Major compliance</b> -	<p>The estates have identified the waste products and source pollution generated in the estates and mill. The waste are categorized as follows:</p> <table border="1"> <thead> <tr> <th>Type</th> <th>Item Description</th> </tr> </thead> <tbody> <tr> <td>Scheduled Waste</td> <td>SW 102 – Waste of lead acid batteries SW 305 – spent lubricant SW 306 – spent hydraulic oil SW 410 – rags, plastics, papers, contaminated filters SW 404 – Clinical waste SW 409 – empty chemical containers</td> </tr> <tr> <td>Domestic waste</td> <td>Rubbish</td> </tr> <tr> <td>Industrial waste</td> <td>Scrap metal EFB</td> </tr> </tbody> </table>	Type	Item Description	Scheduled Waste	SW 102 – Waste of lead acid batteries SW 305 – spent lubricant SW 306 – spent hydraulic oil SW 410 – rags, plastics, papers, contaminated filters SW 404 – Clinical waste SW 409 – empty chemical containers	Domestic waste	Rubbish	Industrial waste	Scrap metal EFB	Complied
Type	Item Description										
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Domestic waste	Rubbish										
Industrial waste	Scrap metal EFB										
4.5.3.2	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:  Identifying and monitoring sources of waste and pollution	The estate has established management Plan base on the identification and source of pollutions and the documented in Waste management Plan FY 2020 and were available for review. In the management plan stated the type of waste, description, source of pollution, action to be taken and person responsible.	Complied								

Criterion / Indicator	Assessment Findings	Compliance
<p>Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products</p> <p><b>- Major compliance -</b></p>	<p>Sighted the implementation of the management plan as follows:</p> <p>Gajah Mati Estate</p> <p>The estate collected the domestic waste 2 times a week and disposed at the designated landfill. Sighted the landfill at field P15C, only domestic waste were disposed in the landfill</p> <p>The estate continuously promote the 3R program. 3R bin were placed at designated area at the housing area</p> <p>MAIDAM Estate</p> <p>The estate has established War on Waste (WOW) program. 9 items/issues were identified and action plan has been established.</p> <p>Empty fertiliser bags were reuse in loose fruit collection and FFB platform.</p> <p>Biomass waste such as cut fronds and chipped trunks were left in the field and disposed through decomposing process.</p>	
<p><b>4.5.3.3</b> The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p><b>- Major compliance -</b></p>	<p>TDM Plantation has established SOP for handling scheduled waste and documented in Standard Operating procedure – Procedure for handling schedule waste dated 1/11/2008, edition TDMP/02 rev. TDMP – 02/2017.</p> <p>The estates visited also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected at both estate visited and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>Observed during workers interview with storekeeper shows the understanding the proper disposal for waste as all used lubricant and</p>	<p>Minor Non-Conformity</p>

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	<p>contaminated spill kit will be collected as Scheduled Waste and stored in designated storage area.</p> <p>All the records were found adequate as per required by EQ (Scheduled Waste) Regulations 2005.</p> <p>Inventory for all scheduled waste generated were recorded and reported to DOE through E-SWISS. Sighted the sampled scheduled waste disposal records:</p> <p>Gajah Mati Estate</p> <p>2/9/2020, SW 305, C/N no. 2020090611BEUQPR</p> <p>2/9/2020, SW 410, C/N no. 20200906115BPICG</p> <p>2/9/2020, SW 409, C/N no. 2020090611JRLNGO</p> <p>2/3/2020, SW 410, C/N no. 20200302101XR559</p> <p>2/3/2020, SW 409, C/N no. 2020030210JIGL48</p> <p>MAIDAM Estate</p> <p>1/9/2020, SW 306, C/N no. 2020090115NR0EM2</p> <p>1/9/2020, SW 305, C/N no. 2020090115CJ0MFO</p> <p>1/9/2020, SW 409, C/N no. 20200901153PLADK</p> <p>1/9/2020, SW 410, C/N no. 20200901159I7B5P</p> <p>Last disposal of SW 404 clinical waste at Gajah Mati Estate was done on 21/1/2020 as per C/N no. 0331922. As per inventory records, first generation of SW 404 after last disposal recorded on 29/1/2020. The evidence shows that the SW were kept for more than 180 days without notification from DOE.</p>	

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		<p>This shows that monitoring of clinical waste generated were not effectively implemented. Thus NC were raised.</p> <p>Pelantoh Estate            27/5/2020, SW 409, C/N no. 20200725814NE0DFA            27/5/2020, SW 409, C/N no. 2020072581476ZMVR            27/5/2020, SW 410, C/N no. 20200725814M8WQS0            27/5/2020, SW 305, C/N no. 20200725814VOJUQB</p>	
<b>4.5.3.4</b>	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p><b>- Major compliance -</b></p>	<p>Empty pesticides container were triple rinse and puncture before being disposed at</p> <p>Sighted the disposal records as follows:</p> <p>Gajah Mati Estate            2/9/2020, SW 409, C/N no. 2020090611JRLNGO            2/3/2020, SW 409, C/N no. 2020030210JIGL48</p> <p>MAIDAM Estate            1/9/2020, SW 409, C/N no. 20200901153PLADK</p> <p>Pelantoh Estate            27/5/2020, SW 409, C/N no. 20200725814NE0DFA            27/5/2020, SW 409, C/N no. 2020072581476ZMVR</p>	Complied
<b>4.5.3.5</b>	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p><b>- Minor compliance -</b></p>	<p>Gajah Mati Estate            The estate collected the domestic waste 2 times a week and disposed at the designated landfill. Sighted the landfill at field P15C, only domestic waste were disposed in the landfill.</p>	Complied

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		<p>MAIDAM Estate</p> <p>The estate has established domestic waste collection schedule at once a week. Sighted the waste collection records dated 4/9/2020, 28/8/2020, 21/8/2020 and 14/8/2020. The domestic waste collected were disposed at designated land fill at P98A1, only domestic waste were disposed in the landfill</p> <p>Pelantoh Estate</p> <p>The estate collected the domestic waste 2 times a week and disposed at the designated landfill. Sighted the landfill at field P92B2, only domestic waste were disposed in the landfill.</p>	
<b>Criterion 4.5.4:</b> Reduction of pollution and emission			
<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	The estate has conducted assessment of all polluting activities in the Environmental Aspect Impact and Environmental Impact Evaluation. A management plan has been established based on the significant aspect identified during the assessment and documented in the Pollution Prevention Plan/ Environmental Management Plan.	Complied
<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. <b>- Major compliance -</b>	A management plan has been established based on the significant aspect identified during the assessment and documented in the Pollution Prevention Plan/Environmental Management Plan.	Complied
<b>Criterion 4.5.5:</b> Natural water resources			
4.5.5.1	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:  Assessment of water usage and sources of supply.	TDM Plantations has established Slope Protection and River Buffer Zone Policy signed by the CEO dated 1/7/2020. In the policy stated that river buffer zone must be maintained at both side of river bank as per schedule below:	Complied

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Criterion / Indicator	Assessment Findings	Compliance																																																										
<p>Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.</p> <p>Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>Where bore well is being use for water supply, the level of the ground water table should be measured at least annually.</p> <p>- Major compliance -</p>	<table border="1" data-bbox="1104 416 1789 715"> <thead> <tr> <th>No</th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>&gt; 40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>&lt; 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>The estates visited monitored the water consumption on monthly basis. sighted the sampled records as follows:</p> <table border="1" data-bbox="1048 831 1868 1294"> <thead> <tr> <th></th> <th>Gajah Estate (L/MT FFB)</th> <th>Mati Estate (L)</th> <th>MAIDAM Estate (L)</th> <th>Pelantoh Estate (L/MT FFB)</th> </tr> </thead> <tbody> <tr> <td>Jan 2020</td> <td>0.52</td> <td>182</td> <td>1.68</td> <td></td> </tr> <tr> <td>Feb 2020</td> <td>4.36</td> <td>162</td> <td>1.57</td> <td></td> </tr> <tr> <td>Mar 2020</td> <td>3.16</td> <td>81</td> <td>1.40</td> <td></td> </tr> <tr> <td>Apr 2020</td> <td>2.84</td> <td>81</td> <td>1.18</td> <td></td> </tr> <tr> <td>May 2020</td> <td>0.47</td> <td>633</td> <td>1.55</td> <td></td> </tr> <tr> <td>Jun 2020</td> <td>2.54</td> <td>107</td> <td>1.14</td> <td></td> </tr> <tr> <td>Jul 2020</td> <td>2.81</td> <td>173</td> <td>1.60</td> <td></td> </tr> </tbody> </table> <p>The estates visited has established Action Plan for Reduction of Water and Contingency Plan during water shortage.</p>	No	River width	Buffer zone	1	> 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters		Gajah Estate (L/MT FFB)	Mati Estate (L)	MAIDAM Estate (L)	Pelantoh Estate (L/MT FFB)	Jan 2020	0.52	182	1.68		Feb 2020	4.36	162	1.57		Mar 2020	3.16	81	1.40		Apr 2020	2.84	81	1.18		May 2020	0.47	633	1.55		Jun 2020	2.54	107	1.14		Jul 2020	2.81	173	1.60		
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	<p>The estate monitor the rainfall on daily basis.</p> <p>Gajah Mati Estate has established river buffer zone at Sg. Pasir and Sg. Kersik. Sighted the river buffer zone of Sg. Pasir at P18B2. No evidence of chemical application along the buffer zone.</p> <p>MAIDAM Estate has established river buffer zone and demarcated with red colour pole as sighted at Sg. Buluh Nipis at P99A and Sg. Angka at P18. The vegetation along the buffer zone is well maintained.</p> <p>Pelantoh Estate has established river buffer zone and demarcated with red colour pole as sighted at Sg. Tebak which flows through field P20 and P93. The vegetation along the buffer zone is well maintained.</p> <p>Noted during interview with workers, the understanding on prohibition of chemical application along the buffer zone is acceptable.</p> <p>TDM Plantation has established Standard Operating Procedure for Taking Water Sample from Streams/Rivers, edition TDMP/01, rev. TDMP-02/2017 dated 1/8/2017. Frequency water sampling to be conducted once a year.</p> <p>Latest sampling for MAIDAM Estate was conducted on 18/8/2020 and the result is yet to be submitted to the estate. Latest report for sampling conducted FY 2019 is verified. Refer report no. ERAKT/TDM/MAJLIS AGAMA ISLAM/19/08-07. The results is conform to NWQSM Class IIA/IIB.</p> <p>Latest sampling for Pelantoh Estate was conducted on 8/8/2020. Refer report no. ERAKT/TDM/PELANTOH/20/08-03. The results is conform to NWQSM Class IIA/IIB.</p>	



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Criterion / Indicator		Assessment Findings	Compliance
<b>4.5.5.2</b>	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.  - <b>Minor compliance</b> -	Sighted during field visit in all estates visited, no construction of bunds, weirs and dams across main rivers or waterways passing through an estate.	Complied
<b>4.5.5.3</b>	Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).  - <b>Minor compliance</b> -	Water management plan includes rain water harvesting, desilting of road side drains and etc.  For housing complex, the rain water harvesting was used for cleaning housing compound and etc.	Complied
<b>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</b>			
<b>4.5.6.1</b>	Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:  Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.  Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species), that could be significantly affected by the grower(s) activities.  - <b>Major compliance</b> -	The estates has conducted Biodiversity Assessment for Kemaman Complex by SRA Consultancy as per report dated November 2011.  HCV Toolkit for Malaysia by WWF – Malaysia was used. There were appropriate consultation processes as per the HCV Toolkit-Malaysia which covers the three main components of identification, management and monitoring.	Complied
<b>4.5.6.2</b>	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include:  Ensuring that any legal requirements relating to the protection of the species are met.	Endangered, rare and threatened species classified by IUCN was recorded in the report findings for the studies undertaken. Among the species recorded are elephant ( <i>Elephas maximus</i> ), Malayan tiger ( <i>Panthera tigris corbetti</i> ), Malayan tapir ( <i>Tapirus indicus</i> ) and wild	Complied

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<p>Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts.</p> <p><b>- Major compliance -</b></p>	<p>boar. Other species captured during the assessment was monkey and birds. It is due to certain estate bordering with the forest reserve.</p> <p>The estates visited continues to create awareness on the RTE through training. Signboard of prohibition of illegal hunting were erected at several strategic places in the estates such as estates entrance, office, housing areas and conservation areas.</p> <p>Noted during site visit in Gajah Mati Estates the field P15C1 was adjacent with Kuala Besul Forest Reserve and prone to elephant encroachment. Latest elephant encroachment were recorded in 'Rekod Kerosakan akibat Serangan Gajah' logbook and reported to Department of Wildlife and National Parks through online forms e-Complaints. Refer latest report no. 13685 dated 11/7/2020</p> <p>In MAIDAM Estate, Latest elephant encroachment were recorded in 'Rekod Kerosakan akibat Serangan Gajah' logbook and reported to Department of Wildlife and National Parks through online forms e-Complaints. Refer latest report no. 14339 dated 7/9/2020.</p> <p>The estates continuously conducting animal sighting to monitor the wildlife species in the estates and recorded in Animal Sighting logbook. Sighted the records dated 1/6/2020, 30/7/2020 and 7/9/2020 in MAIDAM Estate.</p>	
<p><b>4.5.6.3</b> A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.</p> <p><b>- Major compliance -</b></p>	<p>The estates visited has established HCV Management and Monitoring Plan FY 2020. Sighted plan as follows:</p> <p>Established Environmental Policy and communicated to the employee and local community</p> <p>Prohibition of conducting any activity in conservation area</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
		Continuously planting beneficial plant Continuous awareness among workers Awareness signage at strategic places Conservation of area with >25° slope Prohibition of illegal hunting	
<b>Criterion 4.5.7: Zero burning practices</b>			
<b>4.5.7.1</b>	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice.  <b>- Major compliance -</b>	There was no land preparation of existence or new planting in SOU Estates by burning ever since TDM Plantation practiced zero burning as per the policy in:  Under felling/clearing & land preparation Carbon Policy  TDM has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.M	Complied
<b>4.5.7.2</b>	A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop.  <b>- Major compliance -</b>	There is no fire used in preparation of existence or new planting in the estates visited.	Complied

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<b>4.5.7.3</b>	Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws.  - Major compliance -	There is no fire used in preparation of existence or new planting in the estates visited.	Complied
<b>4.5.7.4</b>	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.  - Minor compliance -	In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.M	Complied
<b>4.6 Principle 6: Best Practices</b>			
<b>Criterion 4.6.1: Site Management</b>			
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  - Major compliance -	The standard operation procedure SOP for the estates operations is available which is prepared on Group basis. There are levels of the documentation identified as follows;  Level 1 standard operating procedure Level 2 work instruction Level 3 records.  Amendments are made should there be requirement to suit the local issues/situation.  TDM Plantation has established system to monitor and control of best practice implementation at its estate such as Internal audit by Sustainability Department. Agronomist visit.	Complied

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		Monthly progress report submitted to the headquarters.	
<b>4.6.1.2</b>	Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.  - <b>Major compliance</b> -	TDM Plantations has established Slope Protection and River Buffer Zone Policy signed by the CEO dated 1/7/2020. In the policy stated as follows:  For area with slope more than 25° must be excluded from new planting development and replanting program.  For area with slopes less than 25 degrees, existing crops and plants should be properly maintained.	Complied
<b>4.6.1.3</b>	A visual identification or reference system shall be established for each field.  - <b>Major compliance</b> -	During site verification, seen all fields are marked and identified.  Information like year planting (field no) and the total hectare is shown in all markers.  There are both stencilled at the palm trees and also displayed in signage at the boundary/corners of every fields.	Complied
<b>Criterion 4.6.2: Economic and financial viability plan</b>			
<b>4.6.2.1</b>	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.  - <b>Major compliance</b> -	The estates visited continued to commit to long term economic and financial viability. The annual budgets for 2020 to 2025 were sighted. The budget covers as follows:  Hectare statement FFB, Yeild per ha CPO PKO General Overheads Labour Overheads	Complied

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		Other overheads Upkeep cultivations Harvesting and collection EPC, Proportion of General Charges																									
4.6.2.2	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years.  <b>- Major compliance -</b>	The long-range replanting programs (LRRP) until 2025 were sighted on all the Estates. The program is reviewed annually and incorporated into their annual financial budget. The program sighted for the next 5 years in hectares was as follows: <table border="1" data-bbox="1048 751 1868 1078"> <thead> <tr> <th></th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr> <td>Gajah Mati Estate</td> <td>494.31</td> <td>0.00</td> <td>287.70</td> <td>231.35</td> <td>0.00</td> </tr> <tr> <td>MAIDAM Estate</td> <td></td> <td>180.00</td> <td></td> <td>222.80</td> <td></td> </tr> <tr> <td>Pelantoh Estate</td> <td>744.50</td> <td>641.85</td> <td>567.99</td> <td>619.58</td> <td></td> </tr> </tbody> </table>		2020	2021	2022	2023	2024	Gajah Mati Estate	494.31	0.00	287.70	231.35	0.00	MAIDAM Estate		180.00		222.80		Pelantoh Estate	744.50	641.85	567.99	619.58		Complied
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4.6.2.3	The business or management plan may contain: Attention to quality of planting materials and FFB Crop projection: site yield potential, age profile, FFB yield trends Cost of production : cost per tonne of FFB Price forecast	The estates visited continued to commit to long term economic and financial viability. The annual budgets for 2020 to 2025 were sighted. The budget covers as follows:  Hectare statement FFB, Yeild per ha CPO PKO	Complied																								

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	<p>e) Financial indicators : cost benefit, discounted cash flow, return on investment</p> <p><b>- Major compliance -</b></p>	<p>General Overheads</p> <p>Labour Overheads</p> <p>Other overheads</p> <p>Upkeep cultivations</p> <p>Harvesting and collection</p> <p>EPC, Proportion of General Charges</p>	
<b>4.6.2.4</b>	<p>The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.</p> <p><b>- Major compliance -</b></p>	<p>Operating units visited maintained all records of monitoring and available for review. There are several levels of records beginning from the field/mill supervisors to executives and the Managers. The Plantation Controller (PC) is accountable to monitor the estates compliance towards the SOP, Budget and Productivity among others. Estates / Mill performances are reviewed during the monthly meeting with PC/CEO.</p>	Complied
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p><b>- Major compliance -</b></p>	<p>For estates, they always engage the contractor for services such as replanting, cleaning, vehicle maintenance and etc. Pricing for the service has been documented in the contracts for the transportation:</p> <p><u>Gajah Mati Estate</u></p> <p>Replanting contractor, Jid Mat Enterprise, ref: IP 06/20 signed date 21/4/20</p> <p>External FFB transport, Bumi Emas Plant Enterprise, ref: LGM 002/20 signed date 1/1/20.</p> <p><u>Pelantoh Estate</u></p>	Complied

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		<p>Replanting contractor, Nozfa Trading, ref: IP 02/20 signed date 21/4/20</p> <p>Replanting contractor, Rangkaian Mahir Enterprise, ref: IP 03/20 signed date 21/4/20</p> <p>All the terms and conditions were specified in the contract and contractors have acknowledged on each page of the contract.</p>	
<b>4.6.3.2</b>	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p><b>- Major compliance -</b></p>	<p>Sample contract and payment record verification together with interviews of suppliers and contractor found the payments has been made as per contract.</p> <p><u>Gajah Mati Estate</u></p> <p>Replanting contractor, Jid Mat Enterprise</p> <p>Invoice date 9/6/20, ref: JME01/20, Debit Memo: DM HQP 1260/2020 dated 13/7/20.</p> <p>External FFB transport, Bumi Emas Plant Enterprise, ref: LGM 002/20. Invoice date 29/7/20, ref: 090, payment voucher no. PV147/08 dated 9/8/20.</p> <p><u>Pelantoh Estate</u></p> <p>Replanting contractor, Rangkaian Mahir Enterprise</p> <p>Invoice date 5/7/20, ref: 0301, Debit Memo: DM HQP 1407/2020 dated 10/8/20.</p> <p>Replanting contractor, Nozfa Trading, invoice date 2/7/20, ref: 0802, Debit Memo: DM HQP 1408/2020 dated 10/8/20.</p>	Complied



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<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. <b>- Major compliance -</b>	Estates has prepared a standard contract for all the contractors. In the contract, special clause on the MSPO requirements were included to ensure compliance. Under Work Order Agreement, additional terms on the compliance with MSPO and legal requirements provided in the contract acknowledged by the contractor.  Refer to work order agreement; Bumi Emas Plant Enterprise, ref: LGM 002/20 Jid Mat Enterprise, ref: IP 06/20 Nozfa Trading, ref: IP 02/20 Rangkaian Mahir Enterprise, ref: IP 03/20	Complied
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	Estates has prepared a standard contract for all the contractors. The signed copy of the contract available at the estate office. Sample of contract agreement; <u>Gajah Mati Estate</u> Replanting contractor, Jid Mat Enterprise, ref: IP 06/20 signed date 21/4/20 External FFB transport, Bumi Emas Plant Enterprise, ref: LGM 002/20 signed date 1/1/20. <u>Pelantoh Estate</u> Replanting contractor, Nozfa Trading, ref: IP 02/20 signed date 21/4/20	Complied

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		Replanting contractor, Rangkaian Mahir Enterprise, ref: IP 03/20 signed date 21/4/20	
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required.  - <b>Minor compliance</b> -	Estates has no objection to allow BSI auditors to verify the assessment through physical inspection if required.	Complied
<b>4.6.4.4</b>	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted.  - <b>Major compliance</b> -	All works performed at the estates are checked and verified by the estates personnel. Projects where tenders are issued by HQ are checked by representative from TDM HQ.	Complied
<b>4.7 Principle 7: Development of new planting</b>			
<b>Criterion 4.7.1: High biodiversity value</b>			
<b>4.7.1.1</b>	Oil palm shall not be planted on land with high biodiversity value unless it is carried out in compliance with the National and/or State Biodiversity Legislation.  - <b>Major compliance</b> -	No development of new planting in estates visited.	Complied
<b>4.7.1.2</b>	No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as required under Peninsular Malaysia's National Physical Plan (NPP) and the Sabah Forest Management Unit under the Sabah Forest Management License Agreement. For Sabah and Sarawak, new planting or replanting of an area 500ha or more requires an EIA. For areas below 500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required.  - <b>Major compliance</b> -	No development of new planting in estates visited.	Complied

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<b>Criterion 4.7.2: Peat Land</b>			
<b>4.7.2.1</b>	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice.  - <b>Major compliance</b> -	No development of new planting in estates visited.	Complied
<b>Criterion 4.7.3: Social and Environmental Impact Assessment (SEIA)</b>			
<b>4.7.3.1</b>	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations.  - <b>Major compliance</b> -	No development of new planting in estates visited.	Complied
<b>4.7.3.2</b>	SEIAs shall include previous land use or history and involve independent consultation as per national and state regulations, via participatory methodology which includes external stakeholders.  - <b>Major compliance</b> -	No development of new planting in estates visited.	Complied
<b>4.7.3.3</b>	The results of the SEIA shall be incorporated into an appropriate management plan and operational procedures developed, implemented, monitored and reviewed.  - <b>Major compliance</b> -	No development of new planting in estates visited.	Complied
<b>4.7.3.4</b>	Where the development includes smallholder schemes of above 500ha in total or small estates, the impacts and implications of how each scheme or small estate is to be managed should be documented and a plan to manage the impacts developed, implemented, monitored and reviewed.	No development of new planting in estates visited.	Complied

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	- Minor compliance -		
<b>Criterion 4.7.4:</b> Soil and topographic information			
<b>4.7.4.1</b>	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	No development of new planting in estates visited.	Complied
<b>4.7.4.2</b>	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure. - Major compliance -	No development of new planting in estates visited.	Complied
<b>Criterion 4.7.5:</b> Planting on steep terrain, marginal and fragile soils			
<b>4.7.5.1</b>	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	No development of new planting in estates visited.	Complied
<b>4.7.5.2</b>	Where planting on fragile and marginal soils is proposed, plans shall be developed and implemented to protect them and to minimize adverse impacts (e.g. hydrological) or significantly increased risks (e.g. fire risk) in areas outside the plantation. - Major compliance -	No development of new planting in estates visited.	Complied
<b>4.7.5.3</b>	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	No development of new planting in estates visited.	Complied
<b>Criterion 4.7.6:</b> Customary land			

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<b>4.7.6.1</b>	No new plantings are established on recognised customary land without the owners’ free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.  - <b>Major compliance</b> -	No development of new planting in estates visited.	Complied
<b>4.7.6.2</b>	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites.  - <b>Minor compliance</b> -	No development of new planting in estates visited.	Complied
<b>4.7.6.3</b>	Where recognized customary or legally owned lands have been taken-over, the documentary proof of the transfer of rights and of payment or provision of agreed compensation shall be made available.  - <b>Major compliance</b> -	No development of new planting in estates visited.	Complied
<b>4.7.6.4</b>	The owner of recognised customary land shall be compensated for any agreed land acquisitions and relinquishment of rights, subject to their free prior informed consent and negotiated agreement.  - <b>Major compliance</b> -	No development of new planting in estates visited.	Complied
<b>4.7.6.5</b>	Identification and assessment of legal and recognised customary rights shall be documented.  - <b>Major compliance</b> -	No development of new planting in estates visited.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<b>4.7.6.6</b> A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented. <b>- Major compliance -</b>	No development of new planting in estates visited.	Complied
<b>4.7.6.7</b> The process and outcome of any compensation claims shall be documented and made publicly available. <b>- Major compliance -</b>	No development of new planting in estates visited.	Complied
<b>4.7.6.8</b> Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development. <b>- Minor compliance -</b>	No development of new planting in estates visited.	Complied

**MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill**

Criterion / Indicator		Assessment Findings	Compliance
4.1 Principle 1: Management commitment & responsibility			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	Policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	On group level, policy for the implementation of MSPO established as TDM Berhad Sustainability Policy; signed by the new CEO dated 1 <sup>st</sup> July 2020.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. <b>- Major compliance -</b>	The policy emphasized the commitment by management in all its management aspect through: - Commitment and responsible management - Transparency - Compliance towards legal requirements - Responsibility in social, health, safety and employment condition - Environmental, natural resources, biodiversity and ecosystem - Best management practices - Responsible new development  The policy also included on the commitment to implement continual improvement through gainful utilization of resources among human, process and technology to ensure sustainability production of palm products.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.	Internal audit was conducted 27/7/20. Records of internal audit report and findings shown the internal audit able to determine the strong and weak points and potential area for further improvement.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- <b>Major compliance</b> -		
<b>4.1.2.2</b>	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.  - <b>Major compliance</b> -	Internal audit procedure established as TDM Plantation Sdn. Bhd. KPOM MSPO Internal Audit Standard Operating Procedure; Date: 1/8/2017; Edition: TDMP/01; Rev.: TDMP-01/2017. Identified findings recorded in Sustainability Audit Non-Compliance Findings & Recommendations as well as Visual Inspections & Site Visit form as per sighted for the latest audit conducted on 27/7/20. Sighted the Corrective Action Report on Non-compliance Findings on the analysis of nonconformity raised.	Complied
<b>4.1.2.3</b>	Reports shall be made available to the management for their review.  - <b>Major compliance</b> -	The internal audit report has distributed to the POM management and reported to TDM Plantation Sdn Bhd management. Refer to internal audit report dated 27/7/20.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
<b>4.1.3.1</b>	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.  - <b>Major compliance</b> -	The latest management review was carried out on 12/8/20 combined with Monthly Operational Meeting. Review on the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO has been discussed and presented in the meeting.	Complied
<b>Criterion 4.1.4 – Continual Improvement</b>			
<b>4.1.4.1</b>	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.  - <b>Major compliance</b> -	Continuous improvement plan for 2020 was sighted. It covers the welfare and the operation aspect. For example:  i) Provide additional housing blocks – Semi-D (workers quarters) ii) Road to staff quarters – 200 meters x 5 meters x 0.15 meter	Complied



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Criterion / Indicator		Assessment Findings	Compliance
		iii) Mill, plant and machinery – Fibre cyclone upgrade, 300 mt vertical clarifier construction, post heating cooker replacement etc.	
4.1.4.2	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.  - <b>Major compliance</b> -	System to improve practices in line with new information and techniques; and for disseminating the information throughout the workforce is sustainability reporting and updates every quarterly. The latest sustainability report for August 2020 was made available for review.	Complied
4.2 Principle 2: Transparency			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
4.2.1.1	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.  - <b>Major compliance</b> -	TDM Plantation Sdn Bhd has established Flowchart dated 01/06/2016 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders.  The mill management will communicate all information requested by relevant stakeholders. All information relating to external stakeholder will be responded by Mill Management depends on the confidentiality. According to the flow chart, the request shall be responded within 2 weeks from the date of receipt.	Complied
4.2.1.2	The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.  - <b>Major compliance</b> -	There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.  Access to these documents is made available upon request. Information relating to land titles, safety and health plans, pollution prevention plans was made available at all operating units. Procedure for complaints and grievances were available at notice	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<p>boards. The company is in the progress to make available the documents on the company’s website in the future.</p> <p>Among the documents that were made available for viewing are:</p> <ul style="list-style-type: none"> <li>Good Agricultural Practices</li> <li>Social Enhancement</li> <li>Sustainability Management Programmes</li> <li>Complaint and Grievances procedure.</li> <li>Environmental Conservation</li> </ul> <p>These documents highlight current TDM Plantation Sdn Bhd practices and their continual improvement plans. Besides the above document TDM Plantations Sdn Bhd policy on the followings are also available:</p> <ol style="list-style-type: none"> <li>1) Social</li> <li>2) Quality</li> <li>3) Freedom of Association</li> <li>4) Occupational Safety, Health and Environment</li> <li>5) Environment &amp; Biodiversity</li> <li>6) Protection of Children</li> <li>7) Gender</li> </ol> <p>The policies were displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p>	

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Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication with the relevant stakeholders. <b>- Major compliance -</b>	TDM Plantation Sdn Bhd has developed a Communication Procedure with POM/ Estates and Flowchart to Handle Social Issue. Maximum 28 working days shall be taken to resolve the issues. All internal and external stakeholders were briefed on this procedure.	Complied
<b>4.2.2.2</b>	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . <b>- Minor compliance -</b>	The Mill Manager was appointed as the management officials as per Letter from Group Senior Human Resource Manager; ref. # TDMP/HR/PSN-GEN/RSPO; dated 2/9/2014.	Complied
<b>4.2.2.3</b>	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. <b>- Major compliance -</b>	Kemaman POM has developed the stakeholder list FY2020 which included all relevant stakeholders such as local communities, government authorities, contractors and suppliers and etc.  Stakeholder meeting was conducted on 23/8/20 for whole Kemaman Complex with stakeholders such as local communities, managers from other estates, workers’ representatives, school representatives and etc. Issues raised during the stakeholders was explained in the meeting and unresolved issue has incorporated into the Social Action Plan to continuously monitor the progress.	Complied
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. <b>- Major compliance -</b>	Procedures are controlled documents and controlled and updated by Kemaman POM (MSPO Traceability SOP, TDM/STPOM/01 dated 1/8/2017). These procedures are current and include all elements of the traceability for controlling the receipt, sale and dispatch of palm products.	Complied
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system.	Daily production report and sales & stock movement (MT) are available for the past 12 months. In the report, incoming and outgoing of FFB and palm product (CPO and PK) as well as the	Complied

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	- <b>Major compliance</b> -	despatch record is available. Verified the record (latest) dated 5/9/20 contains all the required information.  Latest inspections was conducted on 27/7/20 by appointed person in-charge on compliance with traceability system as per records of Kemaman POM Supply Chain & Traceability Audit Report dated on 27/7/20.	
<b>4.2.3.3</b>	The management shall identified and assign suitable employees to implement and maintain traceability system.  - <b>Minor compliance</b> -	The Mill Compliance Executive, Mr. Wan Ahmad Amilin Wan Ngah was appointed as the person in-charge to implement and maintain traceability system. Interview with the Mill Manager confirmed his knowledge of the MSPO traceability requirements	Complied
<b>4.2.3.4</b>	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.  - <b>Major compliance</b> -	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel reported under daily production summary report. As at 5 <sup>th</sup> September 2020, CPO stock recorded at 1,414.66 mt and PK: 164 mt.  Latest despatch report, 1/9/20;  - Product: CSPK; Weighbridge docket no. S0109170, Date: 1/9/20 Lorry no.: JHM 9353, weight: 42,410 kg  - Product: CSPO; Weighbridge docket no. S01109172, Date: 1/9/20 Lorry no.: CDD1229, weight: 40,560 kg	Complied
<b>4.3 Principle 3: Compliance to legal requirements</b>			
<b>Criterion 4.3.1 – Regulatory requirements</b>			
<b>4.3.1.1</b>	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.  - <b>Major compliance</b> -	Compliance to each applicable law and regulation is monitored by the operating units. Sighted the sampled evidence of compliancy to the regulation as follows:  MPOB License no. 600041904000 valid till 31/3/2021	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>DOE Contradiction License no. 004055 with Compliance schedule no. AS(B)T:31/152/000/001 valid till 5/6/2021</p> <p>DOE Contradiction License no. 004082 with Compliance schedule no. JPLP(UB)/2020/004082 valid till 5/6/2021</p> <p>Fire Certificate no. JPBM:TR/7/049/2019 valid till 5/7/2021</p> <p>Private Installation license, no. 2019/03524 valid till 21/11/2020</p> <p>Weighbridge permit for equipment no. B849884850 with security sticker no. 2.1KQ.018332 dated 15/3/2020</p> <p>Unfired pressured vessel permit no.:</p> <p>TG PMT 85 valid till 7/4/2021</p> <p>TG PMT 86 valid till 7/4/2021</p> <p>PMT 107391 TG valid till 7/4/2021</p> <p>AESP for Confined Space</p> <p>NW-NCT-AE-R-2285-R valid till 20/4/2021</p> <p>NW-NCT-AE-R-2384-R valid till 27/4/2021</p> <p>AGTES permit no.:</p> <p>HQ/19/AGTES/01/04181 valid till 13/10/2022</p> <p>CePSWaM certificate no. CePSWaM/209338 valid till 22/12/2020</p>	
<b>4.3.1.2</b>	<p>The management shall list all relevant laws related to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>List of applicable legal and other requirements was made available during the assessment and compiled in the Legal Register 2018. Documented procedure has been established and implemented;</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>refer to SOP: Kemaman Palm Oil Mill: Procedure for Legal and Other Requirements dated November 2012.</p> <p>All operating units have Legal &amp; Other Requirements Register (LORR) covering all the necessary regulatory requirements. Refer to legal register for 2020.</p>	
<b>4.3.1.3</b>	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p><b>- Major compliance -</b></p>	<p>The latest legal register for 2020 was sighted. Among the applicable legal laws registered are EQA, OSHA, Factory &amp; Machinery Act, Employment Act, Workers’ Minimum Standard of Housing and Amenities Act Regulation 2020, Minimum Wages order 2020 to name a few. Other related legal for COVID19 pandemic under Prevention and Control of Infectious Diseases (Measure Within The Infected Local Areas) Regulation 2020 was also has been identified.</p>	Complied
<b>4.3.1.4</b>	<p>The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.</p> <p><b>- Minor compliance -</b></p>	<p>Documented procedure has been established and implemented; refer to SOP: Kemaman Palm Oil Mill: Procedure for Legal and Other Requirements dated November 2012.</p> <p>The mill management will identify all legal and other requirements that are applicable to the Mill operations. The Group Legal Department, Plantation Coordinator and Plantation Advisor will advise of any new regulatory requirements. All the requirements will be evaluated once a year.</p> <p>Person-in charge for legal is Mr Wan Ahmad Amilin as Compliance executive effective from 1/1/18.</p>	Complied
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	<p>The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.</p> <p><b>- Major compliance -</b></p>	<p>There was no evidence to show that oil palm milling activities had diminished the land use rights of others. Verified documents to show legal ownership of its land.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
<b>4.3.2.2</b>	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. <b>- Major compliance -</b>	The mill located in Lot no. 28 in Pelantoh Estate. The copy of land title are available at the estate for review.	Complied
<b>4.3.2.3</b>	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. <b>- Major compliance -</b>	The mill parameter were demarcated with fences.	Complied
<b>4.3.2.4</b>	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior informed consent (FPIC). <b>- Minor compliance -</b>	There is no land dispute in TDM Kemaman complex at the time of audit. The land belongs to TDM and land ownership documents verified	Complied
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. <b>- Major compliance -</b>	No any lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Complied
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. <b>- Minor compliance -</b>	No any lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that any customary rights are understood and not being threatened or reduced.	Complied
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. <b>- Major compliance -</b>	No any lands encumbered by customary rights within TDM Kemaman complex. However, company able to demonstrate that	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		any customary rights are understood and not being threatened or reduced.	
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	<p>Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones.</p> <p><b>- Minor compliance -</b></p>	<p>Implementation was as per TDM Plantation Sdn. Bhd. Social Impact Assessment (SIA) Kompleks Kemaman; A report prepared by SRA Consultancy, Senawang, Negeri Sembilan for TDM dated November 2011 was made available during audit. Based on the assessment, action plan was established on annual basis as per sighted Management Plan &amp; Progress on Social Impact.</p> <p>Assessment Review date: February 2020</p> <p>Issues reviewed as per the following;</p> <p>Social responsibility – Delayed payment for contractor, road repair and maintenance</p> <p>Safety and Health – Covid19 sanitation programme</p> <p>Labour matters – lack of workers</p> <p>Related action plan has been identified with timeline of completion. The report is updated on quarterly basis and the latest progress report documented for August 2020.</p>	Complied
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	<p>A system for dealing with complaints and grievances shall be established and documented.</p> <p><b>- Major compliance -</b></p>	<p>TDM Plantation Sdn Bhd has established a flowchart on handling social issue. Two-way communication was the method been utilized by the management. Any issue raised by stakeholders will be</p>	Complied



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Criterion / Indicator		Assessment Findings	Compliance
		discuss within 2 weeks for the first meeting and issues to be resolved within 28 working days.	
4.4.2.2	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. <b>- Major compliance -</b>	Grievances procedure flowchart also displayed on the office signboard and security post. Checked the complainants file noted that acknowledgement was evident in the complaint form.  Interviewed with the workers' representatives confirmed that the management has addressed the issues raised by them.	Complied
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. <b>- Minor compliance -</b>	The complaint form is available in KPOM latest record is available under title house maintenance record and no record complaint from other stakeholder. Grievances procedure flowchart and complaint form displayed on the office signboard	Complied
4.4.2.4	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. <b>- Minor compliance -</b>	Interview with internal and external stakeholders during stakeholder consultation found that they were aware of the complaint procedure and they were briefed by the management during stakeholder meeting.	Complied
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request. <b>- Major compliance -</b>	Flowchart indicate records of complaints and resolution for the last 24 months are available in the Complaint and Grievances file. Up to date there is no complaint documented in exception of housing maintenance request.	Complied
<b>Criterion 4.4.3: Commitment to contribute to local sustainable development</b>			
4.4.3.1	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.	Kemaman POM has made contributions to the local communities and stakeholders such as below:  i) Request for "Ibadah Korban" during RMCO period (21/7/20)	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- <b>Minor compliance</b> -	ii) Request to assist for cabling, electrical socket and fan for religious talk for MPKK Padang Kubu. (20/2/20)  iii) Request to use van for sport event (football match at Bukit Kuang) (12/3/20)  The record is available under file communication with Stakeholder.	
<b>Criterion 4.4.4: Employees safety and health</b>			
<b>4.4.4.1</b>	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.  - <b>Major compliance</b> -	TDM Plantation has established Safety and Health Policy dated 1/7/2020 signed by the CEO. In the policy stated the company commitment to:  Provide continuous training and development in order to increase awareness among the employees  Instilling a culture of safety and health among employees  Complied with safety and health legal requirements, guidelines and best practices  Made safety and health factors as main element to develop and run the company operations  Improve the safety and health management base on Occupational Safety and Health Act 1994 and Factory and Machinery Act 1967.  The mill has established the H&S plan documented in OSH Plan 2020. The plan cover on OSH legal compliance, emergency response plan, OSH management system, risk management and safety committee. Sighted the implementation as follows:  KPOM	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>The mill conducted CHRA every 5 years. Latest CHRA was conducted on 12/7/2020 by registered assessor with reg. no. HQ/08/ASS/00/259. Refer report no. HQ/08/ASS/00/259-2020/009.</p> <p>LEV test was conducted on annually basis. Latest review was conducted on 21/4/2020 by registered hygiene technician with reg. no. HQ/08/JHII/00/76. Recommendation in the report has been addressed by the mill.</p> <p>Medical surveillance was conducted on annually basis as recommended in CHRA. Latest medical surveillance was conducted on 22-23/7/2020. 11 employee who exposed with chemical were sent for surveillance and found fit to work as chemical handler.</p> <p>Latest audiometric test was conducted on 1-2/3/2020 by OHD with reg. no. HQ/08/DOC/00/272. 124 employee were sent test. A total of 47 employee were found to have hearing impairment and 28 of them having temporary STS. Repeat test was conducted in 11/8/2020. The result has yet to be received by the mill.</p>	
<b>4.4.4.2</b>	<p>The occupational safety and health plan should cover the following:            A safety and health policy, which is communicated and implemented.            The risk of all operations shall be assessed and documented.            An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:            All employees involved are adequately trained on safe working practices;</p>	<p>a. TDM Plantation has established Safety and Health Policy dated 1/7/2020 signed by the CEO.</p> <p>b. TDM Plantations has established the SOP for risk assessment to identify H&amp;S issue documented in the Standard Operating Procedure (HIRARC) edition TDMP/01, rev. no. TDMP-02/2018 dated 22/10/2018.</p> <p>The risk assessment process has been describe in the SOP accordingly. As per SOP, HIRARC review to be conducted as follows:</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>All precautions attached to products should be properly observed and applied;</p> <p>The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</p> <p>The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</p> <p>The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept and the concerns of employees and any remedial actions taken shall be recorded.</p> <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p>	<p>At least once a year</p> <p>Immediately whenever there is an accident, near miss or dangerous occurrence</p> <p>When there is changes in the work method</p> <p>When new machines and technology are introduced</p> <p>When there is new activity, process or operations</p> <p>The mill has established HIRARC Team lead by the Mill Manager. The team reviewed the HIRARC as per SOP established. FY 2020, the annual HIRARC review was conducted in February 2020 with no changes in the HIRARC register. Latest HIRARC review was conducted on 10/6/2020 due to accident occur on 7/6/2020 at boiler station.</p> <p>c. The chemical handlers have been given training regarding the usage safety and health issue and proper way for chemical application. Sighted the training records for the pesticides operators as stated in criteria 4.4.6.1.</p> <p>d. The management provide appropriate PPE to the employee's base on the job type. The PPE given as per HIRARC and Standard Operating Procedure. PPE issuance was recorded in 'Borang Penyerahan Peralatan kerja dan Pengambilan Barang' PPE by individual basis.</p> <p>Noted during interview with workshop foreman and fitter, the employee was provided appropriate PPE as per SOP established</p>	

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<p>Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>such as welding shield, leather gloves, N95 mask and safety boots for foreman and fitter.</p> <p>Sighted the sample PPE issuance records for workers with employment ID no. as follows;</p> <p>Workshop and Labratory</p> <p>KM14002xx</p> <p>KM000xx</p> <p>KM09001xx</p> <p>e. TDM Plantation has established the Agrochemical Management Policy dated 1/7/2020 signed by the CEO.</p> <p>f. The mill manager has been appointed as person responsible for safety and health cum chairman for safety and health committee in the CU.</p> <p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee.</p> <p>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 matters arising, OSH objective and program, compliance to legal and requirement, Accident statistic and report, external and internal compliant, training and competency, workplace inspection report and other matters.</p>	

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Criterion / Indicator	Assessment Findings	Compliance
	<p>g. Sighted the minutes meeting dated 10/6/2020, 19/12/2019, 17/9/2019, 18/6/2019 and 19/3/2019.</p> <p>h. TDM Plantations has established the SOP for Accident and emergency procedures documented in the Standard Operating Procedure – Emergency Preparedness and Response edition TDM/01, rev. no. TDMP-02/2018 dated 1/1/2018. In the SOP, the emergency plan and ERT to be activated according to the emergency situations as follows:</p> <p>Fig. 4.0 – Event of environmental and OSH emergencies including accident/incident</p> <p>Fig. 4.4a – Event of fire</p> <p>Fig. 4.4b – Event of Explosion</p> <p>Fig. 4.4c – Event of Oil Spillage</p> <p>Fig. 4.4d – Event of Effluent Spillage (mills).</p> <p>The Emergency Response Plan Flow Chart has been displayed at strategic places in the mill and estates.</p> <p>The mill and estates visited has established Emergency response team. Training has been conducted regularly to ensure the awareness on the ERP. Sighted the training records of the ERP as stated in criteria 4.4.6.1.</p>	

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		<p>Noted during interview with workers, the workers were aware regarding the location of firefighting equipment, first aid box and the competent first aider in the estate.</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 2019 as reported to DOSH as follows:</p> <table border="1"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>KPOM</td> <td>2</td> <td>52</td> </tr> </tbody> </table>	Operating units	Accident Cases	LTA	KPOM	2	52	
Operating units	Accident Cases	LTA							
KPOM	2	52							
<b>Criterion 4.4.5: Employment conditions</b>									
<b>4.4.5.1</b>	<p>The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>TDM Plantation Sdn Bhd has newly revised the Human Rights Policy dated 1/7/2020 and Social Policy dated 1/7/20 which signed by the new CEO. The management is committed to support the principle of Universal Declaration of Human Rights and ILO Core Convention on Labour Standards. They evaluated and managed the human rights activities parallel to the policy such as workers, contractors and suppliers, local communities and etc. The policy was displayed at the notice board in front of office and canteen area. Briefing on the policies were provided to the workers on 25/2/20</p>	Complied						
<b>4.4.5.2</b>	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p>	<p>TDM Plantation Sdn Bhd has newly revised the Human Rights Policy dated 1/7/2020 and Social Policy dated 1/7/20 which signed by the new CEO. TDM Plantation Sdn Bhd is committed to treat all the workers equally during the recruitment and promotion process</p>	Complied						

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	- <b>Major compliance</b> -	without discrimination based on nationality, race, ethnic, religion, sexual orientation, age and etc. There were no evidences of any form of discrimination based on race, national origin, religion, gender, union and political affiliation and is covered in the policy as well.	
4.4.5.3	<p>Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p>- <b>Major compliance</b> -</p>	<p>The payroll and pay slip records of employees showed that all employees are paid with the monthly salary are compliance with the local minimum wages requirements. Payslip of month February 2020, May 2020 and July 2020 for workers have been sampled as below:</p> <ul style="list-style-type: none"> <li>i) Employee no. KM00046</li> <li>ii) Employee no. KM0900140</li> <li>iii) Employee no. KM1800215</li> <li>iv) Employee no. KM1800213</li> <li>v) Employee no. KM00027</li> </ul> <p>Review the pay slip of mill employees pay statements has been carried out and confirm that their basic salary wages are comply with Minimum Wage Order 2020 of RM 1200/ month or RM 46.15/ day.</p>	Complied
4.4.5.4	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p>- <b>Minor compliance</b> -</p>	<p>Contract workers checked under workshop;</p> <p>All 5 sample workers basic salary wages are comply with Minimum Wage Order 2020 of RM 1200/ month or RM 46.15/ day.</p>	Complied



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<p><b>4.4.5.5</b> The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p><b>- Major compliance -</b></p>	<p>The mill maintain an accurate record of all employees under the following documents :</p> <ol style="list-style-type: none"> <li>1) Workers paid on monthly basics</li> <li>2) Working paid on daily/hourly workers</li> </ol> <p>Both above records (e.g. records updated as of year 2020 to date) verified during the audit were found contains the following details of information for every employees.</p> <ul style="list-style-type: none"> <li>• Employee Name</li> <li>• New IC/Passport</li> <li>• Position</li> <li>• Date of Birth</li> <li>• EPF No</li> <li>• SOCSO No</li> <li>• Tax No</li> <li>• Marital Status</li> <li>• No of children</li> <li>• Nationality</li> <li>• Race</li> <li>• Remuneration</li> <li>• OT Rate and EIS</li> </ul>	<p>Complied</p>

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<p><b>4.4.5.6</b> All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>There is a contract and agreement for staff and workers, pay and conditions are documented and are above the industry minimum standard and followed as per MAPA NUPW. Inspection of a sample of employee contracts confirmed that terms and conditions are clearly outlined and have been signed by the worker.</p> <p>Copies of Employment Contract for each local workers indicated in the employment records are available. Sample of employment contract available for the local workers:</p> <ul style="list-style-type: none"> <li>i) Employee no. KM000xx</li> <li>ii) Employee no. KM09001xx</li> <li>iii) Employee no. KM18002xx</li> <li>iv) Employee no. KM18002xx</li> <li>v) Employee no. KM000xx</li> </ul>	<p>Complied</p>
<p><b>4.4.5.7</b> The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p><b>- Major compliance -</b></p>	<p>Kemaman POM established a time recording system using Check Roll Book for all employees at different station. The working hours for all employees has been clearly documented in the Check Roll Book as well as their pay slip under OT section to ensure transparent for both employees and employer. Time recording system has been carried out manually on daily basis. The documented working hours available in the daily check roll records</p>	<p>Complied</p>
<p><b>4.4.5.8</b> The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p><b>- Major compliance -</b></p>	<p>Working hours is 8 hours. From Monday to Saturday. Total monthly working hours is 208 hours. The overtime maximum is 104 hours according to the Employment Act 1955. As at current status, there was none has crossed 100 hours of overtime.</p> <p>The management has applied for extension of overtime hours to maximum of 130 hours to cater for any future overproduction.</p>	<p>Complied</p>

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		<p>Refer to letter ref: BHG. PU/9/134 Jld 17 (38) dated 2<sup>nd</sup> January 2019.</p> <p>Verified the pay slips, the payment and calculation of overt time well distributed. The overtime rate after 8 hours daily rated is as following:</p> <p>a) Sun - Thu – daily rated / 8 hours x 1.5</p> <p>b) Friday - daily rated / 8 hours x 2.0</p> <p>c) Public holiday – daily rated / 8 hours x 3.0</p>	
<b>4.4.5.9</b>	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p><b>- Major compliance -</b></p>	<p>Pay slips of all employees are available as evidence of salary payment. The pay slip contains the following information:</p> <p>i) Basic Wages (Normal day, Rest day work)</p> <p>ii) Overtime (Week days, Rest days and Holiday)</p> <p>iii) Allowance</p> <p>iv) Advance</p> <p>v) Deduction (Tabung Haji, Union MAPA/NUPW)</p> <p>vi) SOCSO, EPF, Others.</p> <p>Wages and overtime payment documented found consistent with legal regulations and collective agreements as per sample sighted in indicator 4.4.5.3 above.</p>	Complied
<b>4.4.5.10</b>	<p>Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional</p>	<p>Other forms of social benefits for workers including the insurance as following:</p>	Complied

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	development, medical care provisions and improvement of social surroundings. <b>- Minor compliance -</b>	- Local workers & staff: Social Security Organization (SOCSCO) Monthly Contribution sighted as per sample latest Form 8A; for the monthly contribution for the month of July 2020 - Foreign workers: SOCSCO	
<b>4.4.5.11</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. <b>- Major compliance -</b>	On-site living quarters are provided to general workers and staff. Observed that the living quarters are habitable and have amenities such as water, electricity etc. New housing is in progress to build for comply with min housing and amenities regulation. Transportation to send children to neighbouring school was provided as well.	Complied
<b>4.4.5.12</b>	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. <b>- Major compliance -</b>	TDM Plantation Sdn Bhd has revised Gender Policy dated 1/7/20 where they are responsible to ensure the workplaces are free from any harassment related to sexual, religion, nationality and etc. The policy has been displayed at the notice board in front of office. Up to date, there is no case reported in the estate. In respective estate will organise gender committee meeting quarterly. Latest gender committee meeting was carried out on 6/9/20.	Complied
<b>4.4.5.13</b>	The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions. <b>- Major compliance -</b>	TDM Plantation Sdn Bhd has implemented and revised Freedom of Association Policy dated 1/7/20. The workers were able to join or form any association according to the Employment Act without any restriction. Besides, they also implemented Social Policy dated 1/7/20 where they workers are allowed to join and form association freely. Sighted the latest union meeting was carried out on 20/8/20.	Complied

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<p><b>4.4.5.14</b> Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.</p> <p>- Major compliance -</p>	<p>TDM Plantation Sdn. Bhd. has developed Protection of Children Policy dated 1/7/20. They are committed not to exploit or recruit any individual less than 16 years old in the plantations. Mill maintain an accurate record of all employees under the list of workers. Through document reviewed on the Employee Listing confirmed that the workers recruited are above 18 years old. Evidence that there is no underage worker (below 18 years old) employed at the work locations visited.</p>	<p>Complied</p>
<p><b>Criterion 4.4.6: Training and competency</b></p>		
<p><b>4.4.6.1</b> All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.</p> <p>- Major compliance -</p>	<p>The mill has established training schedule FY 2020 base on training need analysis conducted. The training program covers Policy, operation and OSH/others.</p> <p>The program involve the executive, staff/field supervisor, workers and contractors. The identified training was programmed throughout the year.</p> <p>The mill maintain the training records for all employees. Sighted the training records as follows:</p> <p>SOP for receiving and issuing item from store training dated 4/2/2020</p> <p>SOP for office training dated 23/1/2020</p> <p>Audiometric test result briefing dated 11/8/2020</p> <p>Chemical handling for water treatment plan training dated 9/8/2020</p> <p>LEV inspection result briefing dated 27/7/2020</p> <p>First aid training dated 20/7/2020</p>	<p>Complied</p>

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		<p>Fire drill and ERP training with Kuala Terengganu Fire Department dated 29/6/2020</p> <p>RSPO and MSPO supply chain standard training dated 13/8/2020</p>	
<b>4.4.6.2</b>	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p><b>- Major compliance -</b></p>	<p>MFM</p> <p>The mill conducted training need analysis to identify training required for the employee and documented in Training Matrix FY 2020.</p> <p>The mill has established training schedule FY 2020 base on training need analysis conducted. The training program covers Policy, operation and OSH/others.</p> <p>The program involve the executive, staff/field supervisor, workers and contractors. The identified training was programmed throughout the year.</p> <p>The mill and estate has also conducted assessment to the training attendees to assess the training efficiency.</p>	Complied
<b>4.4.6.3</b>	<p>A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.</p> <p><b>- Minor compliance -</b></p>	<p>The estates visited has established training schedule FY 2020 base on training need analysis conducted. The training program covers Policy, operation and OSH/others.</p> <p>The program involve the executive, staff/field supervisor, workers and contractors. The identified training was programmed throughout the year.</p>	Complied
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			

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<p><b>4.5.1.1</b> An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>TDM Plantation has established Biodiversity and Environmental Policy dated 1/7/2020 signed by the CEO. In the policy stated the company commitment to:</p> <p>Complied with all statutory requirement regarding biodiversity and environmental</p> <p>creating, maintaining and continuous improvement of sustainable plantation management</p> <p>eliminate potential adverse effects on the environment and biodiversity that may arise from plantation activities</p> <p>provide an effective work system subject to Environmental Quality Act 1974</p> <p>Ensure zero burning is always given priority as stipulated in the Environmental Quality (Declared Activities) (Open Burning) Order 2003</p> <p>The policy was communicated to the employee through displayed at notice board around the mill, training and morning briefing.</p>	<p>Complied</p>
<p><b>4.5.1.2</b> The environmental management plan shall cover the following:            An environmental policy and objectives;            The aspects and impacts analysis of all operations</p> <p><b>- Major compliance -</b></p>	<p>The mill conducted aspect and impacts analysis of all operations as per SOP established and documented in Standard Operating Procedure – Environmental Aspects/Impacts Evaluation date 1/11/2017, edition TDMP/01 rev. TDMP – 01/2017.</p> <p>The analysis was reviewed on annually basis. Latest review was conducted on 1/2/2020. The review was conducted by Environmental Performance Monitoring Committee.</p>	<p>Complied</p>

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<b>4.5.1.3</b>	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.  - <b>Major compliance</b> -	Environmental Management Plan has been established base on the activity with significant impact identified during the aspect impact assessment. Sighted the implementation of the management plan as follows:  The mill is in progress to construct the Electrostatic Precipitators (ESP) in order to comply with DOE regulation. The project targeted to be completed by 2021.  The mill is in progress to build Biogas Plant to capture Methane gas in order to reduce the GHG emission. The project targeted to be completed by 2022.	Complied
<b>4.5.1.4</b>	A programme to promote the positive impacts should be included in the continual improvement plan.  - <b>Minor compliance</b> -	Program to promote the positive impacts was documented in the Continuous Improvement Plan. Sighted the improvement plan as follows:  1. To install ESP and hire competent person 2. To build bio-gas plant and hire competent person	Complied
<b>4.5.1.5</b>	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards achieving objectives.  - <b>Major compliance</b> -	The mill continuously provided training to the employee to ensure the understanding on the environmental policy, objectives and management plans. Noted during interview, the understanding on the environmental issue were acceptable.  The sampled of training conducted as per criteria 4.4.6.1.	Complied
<b>4.5.1.6</b>	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.  - <b>Major compliance</b> -	The management has established Environmental Performance Monitoring Committee. The committee consist of representative from the employer and employee. The committee conducted meeting on twice a year. Sighted the minutes meeting dated 15/6/2020, 11/12/2019 and 12/6/2019.	Complied



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Criterion / Indicator	Assessment Findings	Compliance																			
<b>Criterion 4.5.2:</b> Efficiency of energy use and use of renewable energy																					
<b>4.5.2.1</b>	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period</p> <p><b>- Major compliance -</b></p>	<p>The monitoring of non-renewable energy usage was conducted on monthly basis. Sighted the records as follows:</p> <table border="1" data-bbox="1088 539 1594 1066"> <thead> <tr> <th>Month</th> <th>Consumption/FFB</th> </tr> </thead> <tbody> <tr> <td>Jan 2020</td> <td>1.78</td> </tr> <tr> <td>Feb 2020</td> <td>1.41</td> </tr> <tr> <td>Mar 2020</td> <td>1.06</td> </tr> <tr> <td>Apr 2020</td> <td>1.03</td> </tr> <tr> <td>May 2020</td> <td>1.95</td> </tr> <tr> <td>Jun 2020</td> <td>1.38</td> </tr> <tr> <td>Jul 2020</td> <td>1.00</td> </tr> <tr> <td>Aug 2020</td> <td>1.10</td> </tr> </tbody> </table> <p>The mill has established the management plan to optimize the usage of diesel and documented in the Diesel Reduction Strategy FY 2020. Latest review was done February 2020. the plan focusing on:</p> <ul style="list-style-type: none"> <li>Optimize steam generation from boiler</li> <li>Construction/installation new TNB substation</li> <li>Monitor prime mover operation</li> </ul>	Month	Consumption/FFB	Jan 2020	1.78	Feb 2020	1.41	Mar 2020	1.06	Apr 2020	1.03	May 2020	1.95	Jun 2020	1.38	Jul 2020	1.00	Aug 2020	1.10	<p>Complied</p>
Month	Consumption/FFB																				
Jan 2020	1.78																				
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<b>4.5.2.2</b>	The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.  - <b>Major compliance</b> -	The mill has established baseline for diesel usage base on 3 years diesel consumption trend. The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations.	Complied						
<b>4.5.2.3</b>	The use of renewable energy should be applied where possible.  - <b>Minor compliance</b> -	Renewable energy used is from biofuel (shell and fiber) for boiler start-up. Sighted the records for usage of renewable energy FY 2020 as follows: <table border="1" data-bbox="1086 751 1783 901"> <thead> <tr> <th>Month</th> <th>Shell (MT)</th> <th>Fiber (MT)</th> </tr> </thead> <tbody> <tr> <td>Todate as at Jul 2020</td> <td>0.06</td> <td>0.14</td> </tr> </tbody> </table>	Month	Shell (MT)	Fiber (MT)	Todate as at Jul 2020	0.06	0.14	Complied
Month	Shell (MT)	Fiber (MT)							
Todate as at Jul 2020	0.06	0.14							
<b>Criterion 4.5.3: Waste management and disposal</b>									
<b>4.5.3.1</b>	All waste products and sources of pollution shall be identified and documented.  - <b>Major compliance</b> -	The mill have identified the waste products and source pollution generated in the estates and mill. The waste are categorized as follows: <table border="1" data-bbox="1086 1114 1816 1359"> <thead> <tr> <th>Type</th> <th>Item Description</th> </tr> </thead> <tbody> <tr> <td>Scheduled Waste</td> <td>SW 102 – Waste of lead acid batteries SW 110 – Fluorescent tube/lamp SW 305 – spent lubricant SW 410 – rags, plastics, papers, contaminated filters SW 322 – Waste of non-halogenated</td> </tr> </tbody> </table>	Type	Item Description	Scheduled Waste	SW 102 – Waste of lead acid batteries SW 110 – Fluorescent tube/lamp SW 305 – spent lubricant SW 410 – rags, plastics, papers, contaminated filters SW 322 – Waste of non-halogenated	Complied		
Type	Item Description								
Scheduled Waste	SW 102 – Waste of lead acid batteries SW 110 – Fluorescent tube/lamp SW 305 – spent lubricant SW 410 – rags, plastics, papers, contaminated filters SW 322 – Waste of non-halogenated								

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			organic SW 409 – empty chemical containers Domestic waste      Rubbish Industrial waste      Scrap metal EFB POME Fiber Ash                              Boiler Shell	
<b>4.5.3.2</b>	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>Identifying and monitoring sources of waste and pollution.</p> <p>Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p><b>- Major compliance -</b></p>	<p>The mill has established management Plan base on the identification and source of pollutions and the documented in Waste management Plan FY 2020 and were available for review. In the management plan stated the type of waste, description, source of pollution, action to be taken and person responsible.</p> <p>Sighted the implementation of the management plan as follows:</p> <p>The mill has established bio-compost plant. 20 -22% EFB were sent to the plant to be processed as bio-compost fertiliser.</p> <p>EFB were sent to the sister estate as nutrient cycle initiative and applied through mulching.</p> <p>Fibre and shell were used as fuel for boiler.</p>	Complied	
<b>4.5.3.3</b>	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling,</p>	<p>TDM Plantation has established SOP for handling scheduled waste and documented in Standard Operating procedure – Procedure for handling schedule waste dated 1/11/2008, edition TDMP/02 rev. TDMP – 02/2017.</p>	Complied	

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	<p>storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p><b>- Major compliance -</b></p>	<p>The mill also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Stores for scheduled waste were inspected at both estate visited and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment.</p> <p>Observed during workers interview with storekeeper shows the understanding the proper disposal for waste as all used lubricant and contaminated spill kit will be collected as Scheduled Waste and stored in designated storage area.</p> <p>All the records were found adequate as per required by EQ (Scheduled Waste) Regulations 2005.</p> <p>Inventory for all scheduled waste generated were recorded and reported to DOE through E-SWISS. Sighted the sampled scheduled waste disposal records:</p> <p>24/8/2020, SW 305, C/N no. 2020082416IJAK20</p> <p>24/8/2020, SW 410, C/N no. 2020082416A0IFG</p> <p>24/8/2020, SW 322, C/N no. 2020082416QWM2X6</p> <p>24/8/2020, SW 409, C/N no. 2020082416RBU93N</p>	
<b>4.5.3.4</b>	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse.</p> <p><b>- Minor compliance -</b></p>	<p>Domestic waste were collected by the mill and disposed at the designated landfill at sister estate.</p>	Complied
<b>Criterion 4.5.4:</b> Reduction of pollution and emission			

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<p><b>4.5.4.1</b> An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent.</p> <p><b>- Major compliance -</b></p>	<p>The mill has conducted assessment of all polluting activities in the Environmental Aspect Impact and Environmental Impact Evaluation. A management plan has been established based on the significant aspect and DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling.</p>	<p>Complied</p>
<p><b>4.5.4.2</b> An action plan to reduce identified significant pollutants and emissions shall be established and implemented.</p> <p><b>- Major compliance -</b></p>	<p>The mill has conducted assessment of all polluting activities in the Environmental Aspect Impact and Environmental Impact Evaluation. A management plan has been established based on the significant aspect and DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling. The plan was reviewed on annual basis.</p> <p>Sighted the sampled if stack sampling conducted as follows:</p> <ul style="list-style-type: none"> <li>• 1<sup>st</sup> sampling FY 2020</li> </ul> <p>Report no.: L-GB-TC2007CTP-0387</p> <p>Date sampled: 20/7/2020</p> <p>Result: 147.7 mg/m<sup>3</sup> @ 12.0% CO<sub>2</sub> lower than the allowable emission of 150 mg/m<sup>3</sup></p> <ul style="list-style-type: none"> <li>• 1<sup>st</sup> sampling FY 2019</li> </ul> <p>Report no.: L-GB-TC1905CTP-0444</p> <p>Date sampled: 23/5/2019</p> <p>Result: 283.50 mg/m<sup>3</sup> @ 12.0% CO<sub>2</sub> lower than the allowable emission of 400 mg/m<sup>3</sup></p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance																								
		<ul style="list-style-type: none"> <li>2<sup>nd</sup> sampling FY 2019</li> </ul> Report no.: L-GB-TC1912CTP-0239 Date sampled: 12/12/2019 Result: 150.70 mg/m <sup>3</sup> @ 12.0% CO <sub>2</sub> lower than the allowable emission of 400 mg/m <sup>3</sup>																									
<b>4.5.4.3</b>	Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.  <b>- Major compliance -</b>	Treated POME discharge was regularly monitored as prescribed under Compliance Schedule License no. 003180. Limit of Biochemical Oxygen Demand (BOD) discharge is 100 mg/l for land application. Regular monitoring was done on monthly basis and every quarterly via Quarterly return form to DOE for compliance. Sighted the quarterly return form as follows:  1 <sup>st</sup> quarter (report date: 9/4/2020) <table border="1"> <thead> <tr> <th></th> <th>Jan</th> <th>Feb</th> <th>Mar</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>8.49</td> <td>8.78</td> <td>8.82</td> </tr> <tr> <td>BOD</td> <td>25</td> <td>25</td> <td>27</td> </tr> </tbody> </table> 2 <sup>nd</sup> quarter (report date: 9/7/2020) <table border="1"> <thead> <tr> <th></th> <th>Apr</th> <th>May</th> <th>Jun</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>8.85</td> <td>8.89</td> <td>8.57</td> </tr> <tr> <td>BOD</td> <td>24</td> <td>25</td> <td>29</td> </tr> </tbody> </table> The effluent analysis confirm with condition prescribed under Compliance Schedule.		Jan	Feb	Mar	pH	8.49	8.78	8.82	BOD	25	25	27		Apr	May	Jun	pH	8.85	8.89	8.57	BOD	24	25	29	Complied
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<b>Criterion 4.5.5: Natural water resources</b>																											

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Criterion / Indicator		Assessment Findings	Compliance																				
4.5.5.1	<p>The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <p>Assessment of water usage and sources.</p> <p>Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</p> <p>Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p><b>- Major compliance -</b></p>	<p>The mill has established water management Plan and documented in Action Plan to reduce fresh water usage. In the plan stated the, areas of concern, action plan, person responsible and time frame. Sighted the implementation of the management plan as follows:</p> <p>i. The mill continue to monitor the water consumption. Sighted the records of water consumption as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>L/FFB</th> </tr> </thead> <tbody> <tr> <td>Todate 2019</td> <td>2.13</td> </tr> <tr> <td>As at June 2020</td> <td>2.16</td> </tr> </tbody> </table>	Month	L/FFB	Todate 2019	2.13	As at June 2020	2.16	Complied														
Month	L/FFB																						
Todate 2019	2.13																						
As at June 2020	2.16																						
4.5.5.2	<p>Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.</p> <p><b>- Major compliance -</b></p>	<p>Treated POME discharge was regularly monitored as prescribed under Compliance Schedule License no. 003180. Limit of Biochemical Oxygen Demand (BOD) discharge is 100 mg/l for land application. Regular monitoring was done on monthly basis and every quarterly via Quarterly return form to DOE for compliance. Sighted the quarterly return form as follows:</p> <p>1<sup>st</sup> quarter (report date: 9/4/2020)</p> <table border="1"> <thead> <tr> <th></th> <th>Jan</th> <th>Feb</th> <th>Mar</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>8.49</td> <td>8.78</td> <td>8.82</td> </tr> <tr> <td>BOD</td> <td>25</td> <td>25</td> <td>27</td> </tr> </tbody> </table> <p>2<sup>nd</sup> quarter (report date: 9/7/2020)</p> <table border="1"> <thead> <tr> <th></th> <th>Apr</th> <th>May</th> <th>Jun</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		Jan	Feb	Mar	pH	8.49	8.78	8.82	BOD	25	25	27		Apr	May	Jun					Complied
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		pH	8.85	8.89	8.57	
		BOD	24	25	29	
The effluent analysis confirm with condition prescribed under Compliance Schedule.						
<b>4.6 Principle 6: Best Practices</b>						
<b>Criterion 4.6.1: Mill Management</b>						
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  - <b>Major compliance</b> -	At Kemaman POM, the Standard Operating Procedure & Operation Manual updated on November 2012 (TDM/KPOM/01 dated 1 May 2011) is available as a guidance document to operate the mill. There were total of 25 SOPs been established and documented.  For SCCS implementation, RSPO Supply Chain Standard Operating Procedure – Identity Preserved and Mass Balance Module, TDM/MILLS/02 rev:01/2018 dated 1/7/18 is referred to.				Complied
<b>4.6.1.2</b>	All palm oil mills shall implement best practices.  - <b>Major compliance</b> -	The following reports are established to monitor the mill operations:  Daily production report Progress report FFB quality / Extraction Ratios Qualities issues/complaints MPD analysis Manpower Process control Mill throughput /downtime				Complied



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Criterion / Indicator		Assessment Findings	Compliance
		<p>Water consumption</p> <p>Processing cost /CAPEX.</p> <p>Annual Sustainability Department Internal Audit</p> <p>The Mill Advisor visits.</p> <p>The Mill Manager then develop action plans from the Mill Advisor visit report and internal audit report for improvement of mill operations. Review of reports, action plans and site inspections confirmed consistent records of implementation of SOPs. This to ensure that performance is on track and best practices being consistently implemented.</p>	
<b>Criterion 4.6.2: Economic and financial viability plan</b>			
<b>4.6.2.1</b>	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p><b>- Major compliance -</b></p>	<p>The mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains;</p> <p>FFB Processing &amp; CPO/CPK production forecast</p> <p>Extraction Ratios – OER / KER,</p> <p>Cost of production</p> <ul style="list-style-type: none"> <li>- administration / labour overhead</li> <li>- processing cost labour, maintenance, consumables</li> <li>- depreciation and head office charges-</li> <li>- EVIT running accounts</li> <li>- CAPEX - capital expenditure.</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings						Compliance	
		Year	2020	2021	2022	2023	2024	2025	
		FFB processed	x	x	x	x	x	x	
		OER	x	x	x	x	x	x	
		KER	x	x	x	x	x	x	
		Administration	x	x	x	x	x	x	
		Processing cost	x	x	x	x	x	x	
		Depreciation	x	x	x	x	x	x	
		H Q charges	x	x	x	x	x	x	
		RM/mt FFB	x	x	x	x	x	x	
		RM/mt CPO	x	x	x	x	x	x	
<b>Criterion 4.6.3: Transparent and fair price dealing</b>									
<b>4.6.3.1</b>	Pricing mechanisms for the products and other services shall be documented and effectively implemented. <b>- Major compliance -</b>	Kemaman POM received only own FFB crops from its certified estates. However, the pricing of FFB available and was displayed at the weighbridge area. Other pricing mainly for maintenance services were clearly stipulated in the tender document.						Complied	
<b>4.6.3.2</b>	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.	Contracts are fair, legal and transparent as per sampled agreement between TDM Plantation – Kemaman POM dated 01/07/2020 and Chong Trading valid from 01/07/2020 – 9/7/2020 "membekalkan						Complied	

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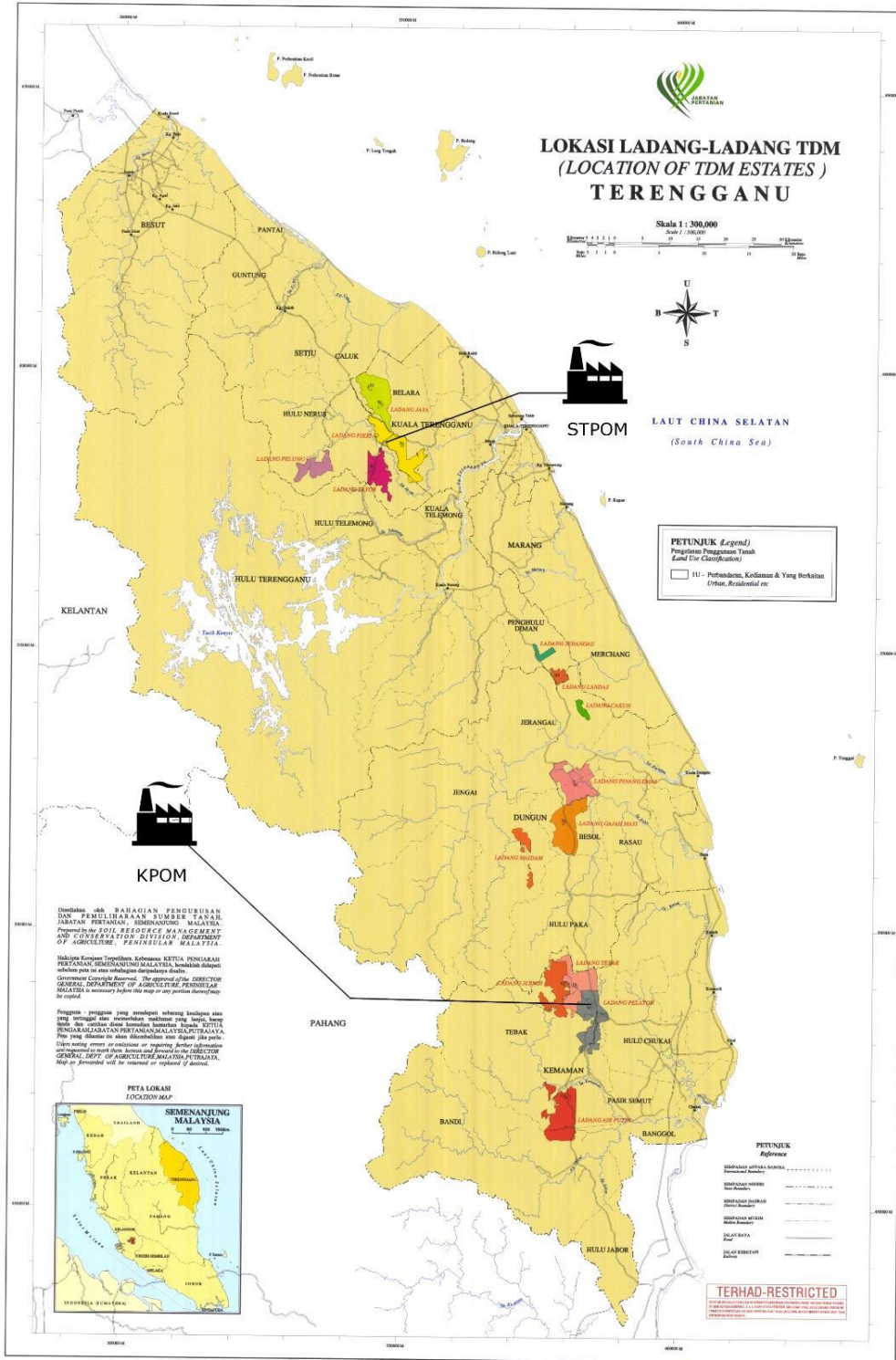
Criterion / Indicator		Assessment Findings	Compliance
	- <b>Major compliance</b> -	<i>excavator bagi kerja-kerja mencuci pasir di empangan air mentah KPOM serta kolam sludge pit no.1 RM 650 x 9 hari". Refer to Work Order Agreement no. P/CO5/175/2020.</i>	
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.  - <b>Major compliance</b> -	Kemaman POM provided MSPO information and documentation for engaged contractors via work agreement signed by the contractors prior to delivery of work items and/or services. Briefing to contractors together done by mill management to contractors during signing of Perjanjian Pesanan Kerja (Work Order Agreement @ WOA) which included the provision for contractors to comply with legal requirements, MSPO requirements and authorization by the mill to audit the contractors from time to time on their compliance against all relevant requirements.	Complied
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor.  - <b>Major compliance</b> -	Evidence of agreed contract with contractor provided by the mill as per following sample: -  Work Order Agreement # P/CO5/175/2020.; Date: 1/7/2020; Contractor: Chong Trading	Complied
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.  - <b>Minor compliance</b> -	TDM Plantation Sdn Bhd has agreed for BSI auditors to verify the assessment through a physical inspection if required.	Complied

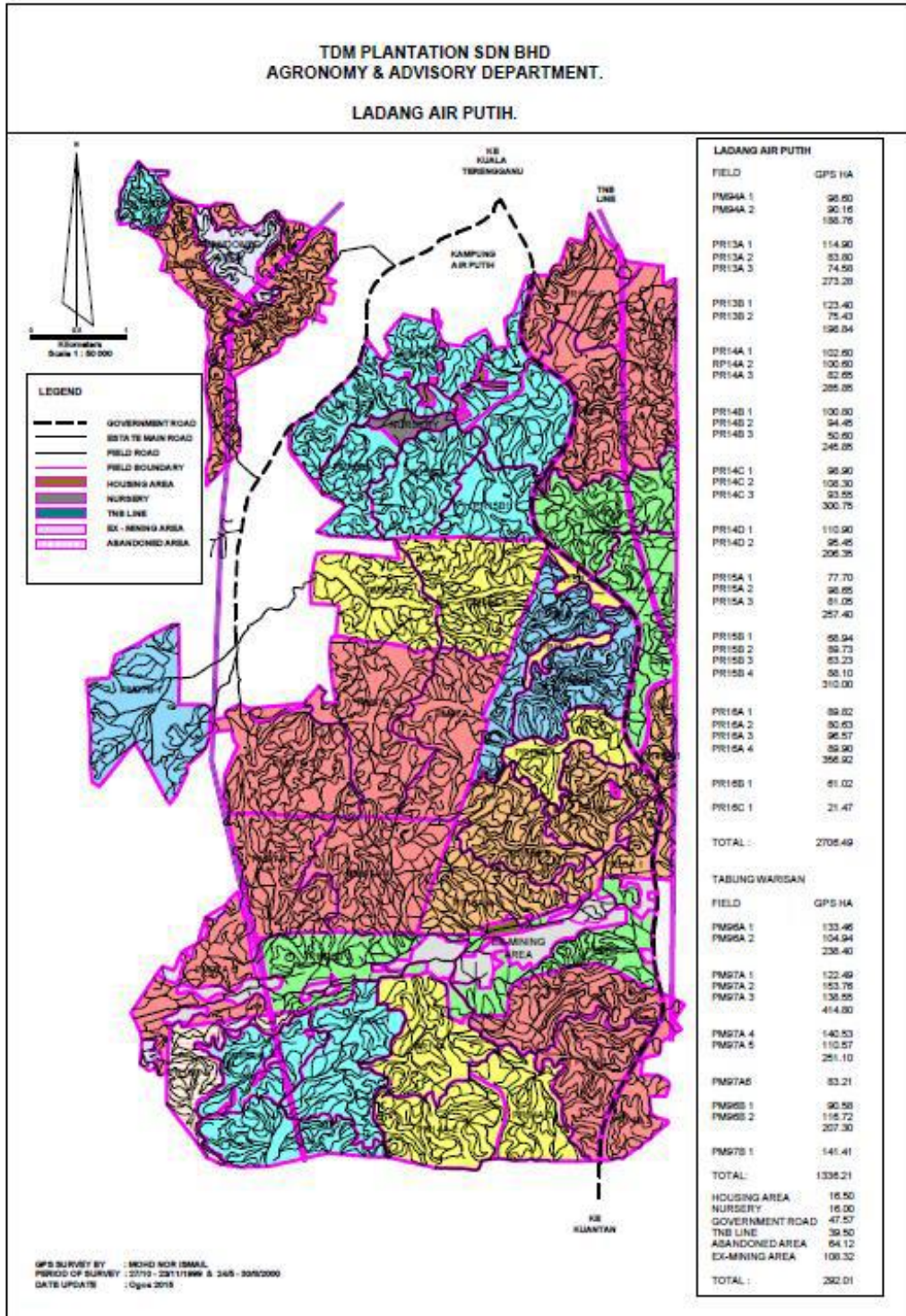
**Appendix B: List of Stakeholders Contacted**

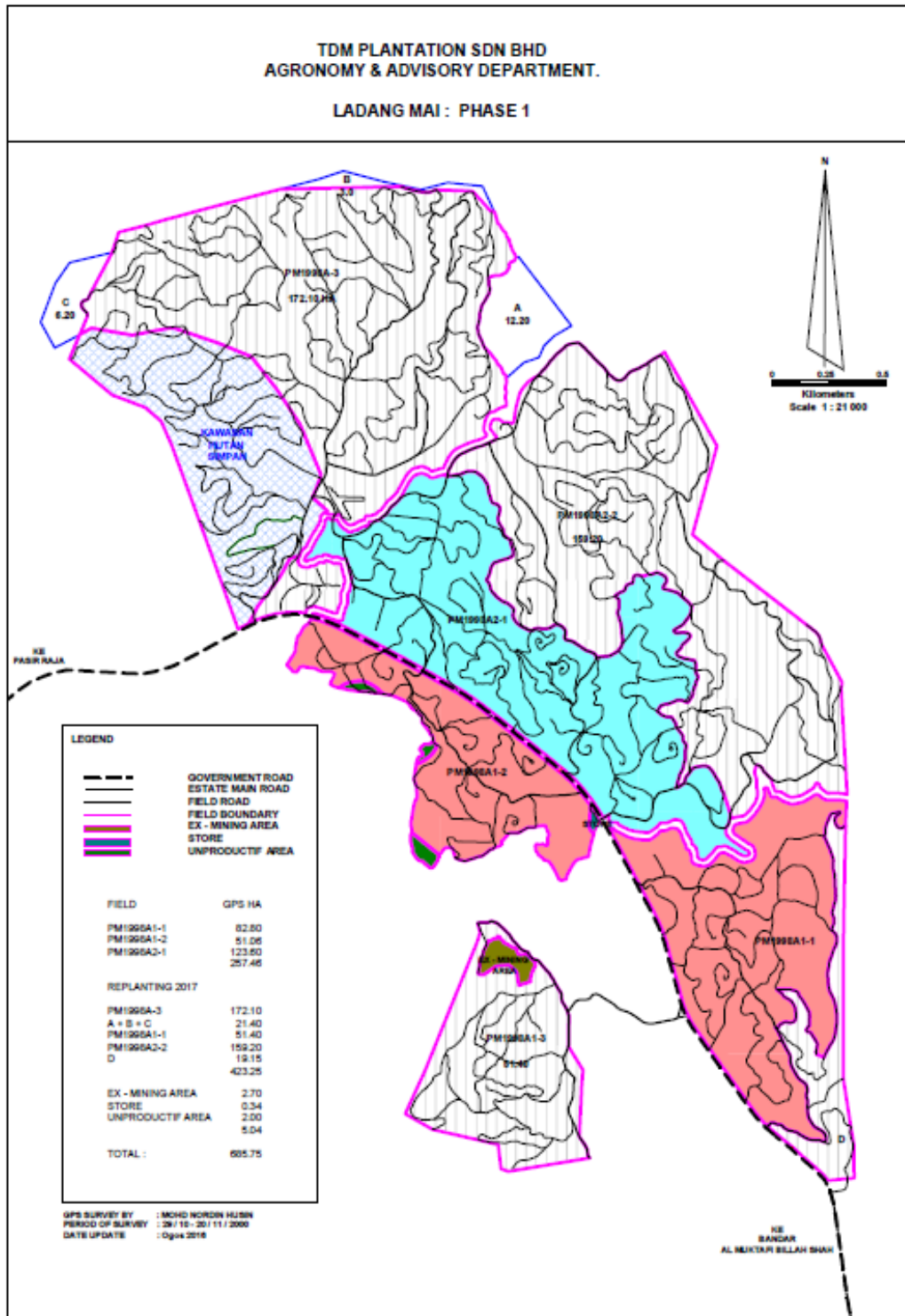
<p><b>Government Officer:</b> SK. Padang Kubu</p>	<p><b>Community/neighbouring village:</b> MPKK Padang Kubu</p>
<p><b>Suppliers/Contractors/Vendors:</b> Concord Biotech Chong Trading Rangkaian Mahir Nozfa Trading CK Tanjung MMA Enterprise Arsar Tyre</p>	<p><b>Worker’s Representative/Gender Committee:</b> Gender Committee Representatives NUPW Representatives Foreign &amp; local workers</p>



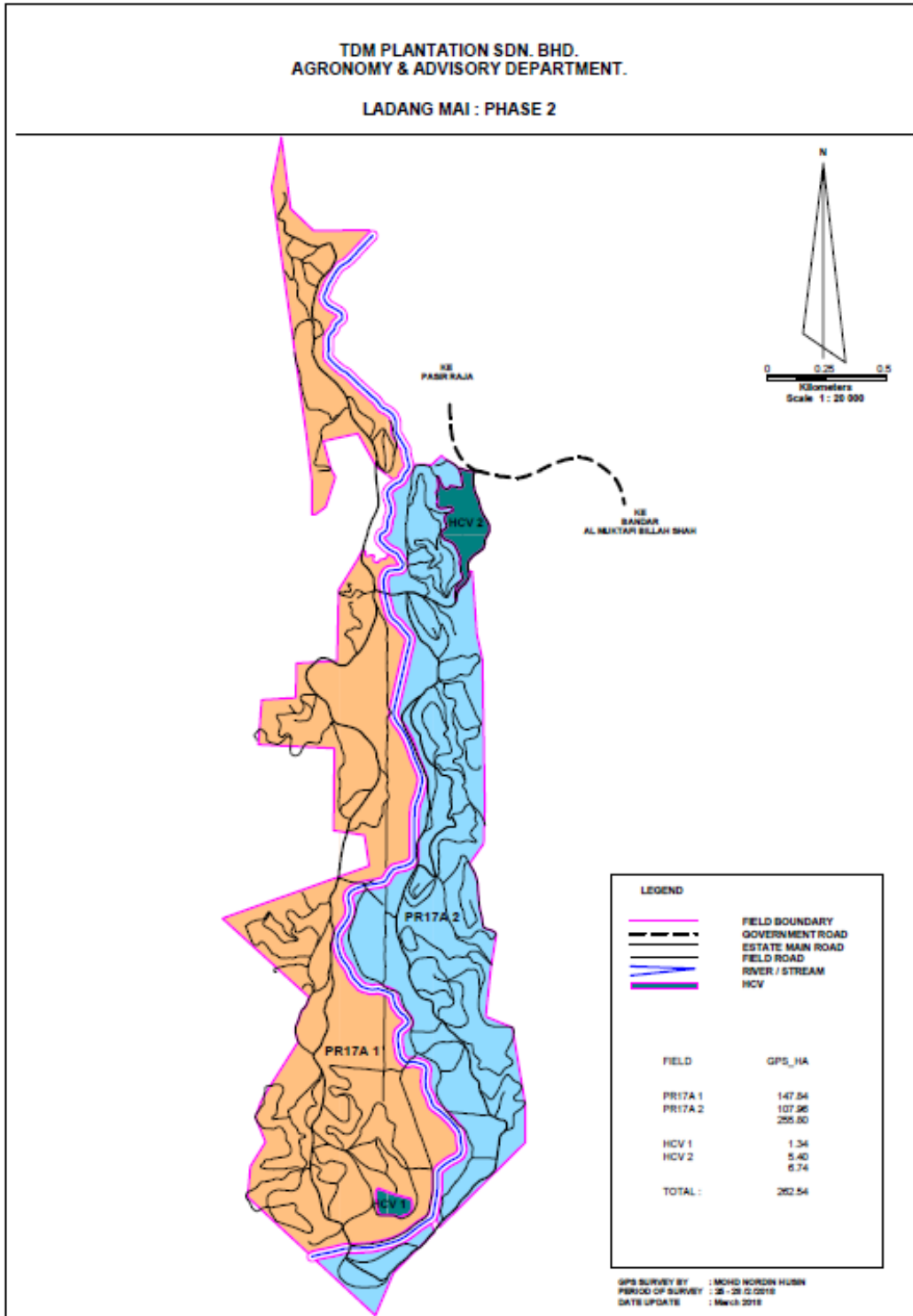
**Appendix D: Location and Field Map**



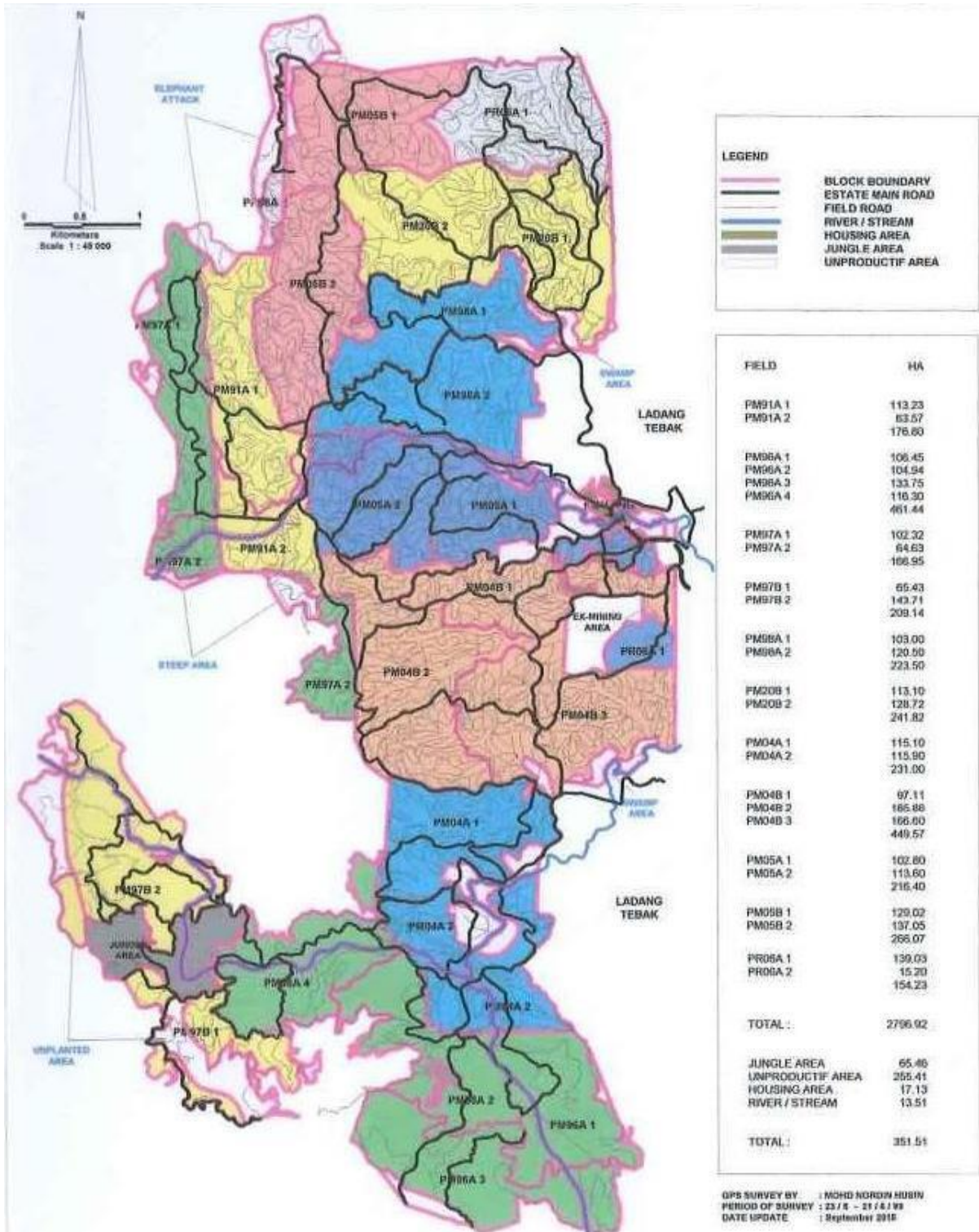


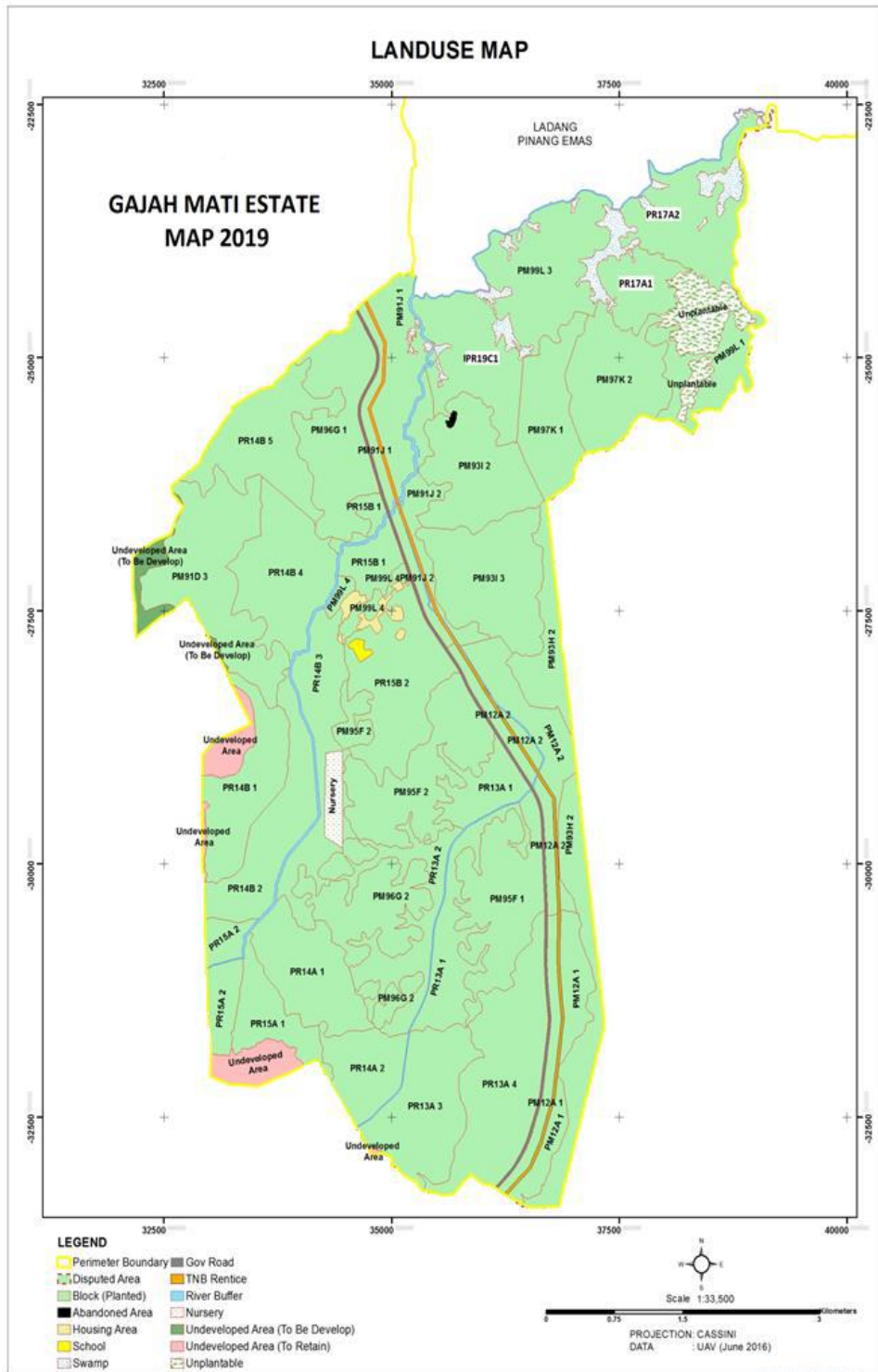






**MSP0 Public Summary Report**  
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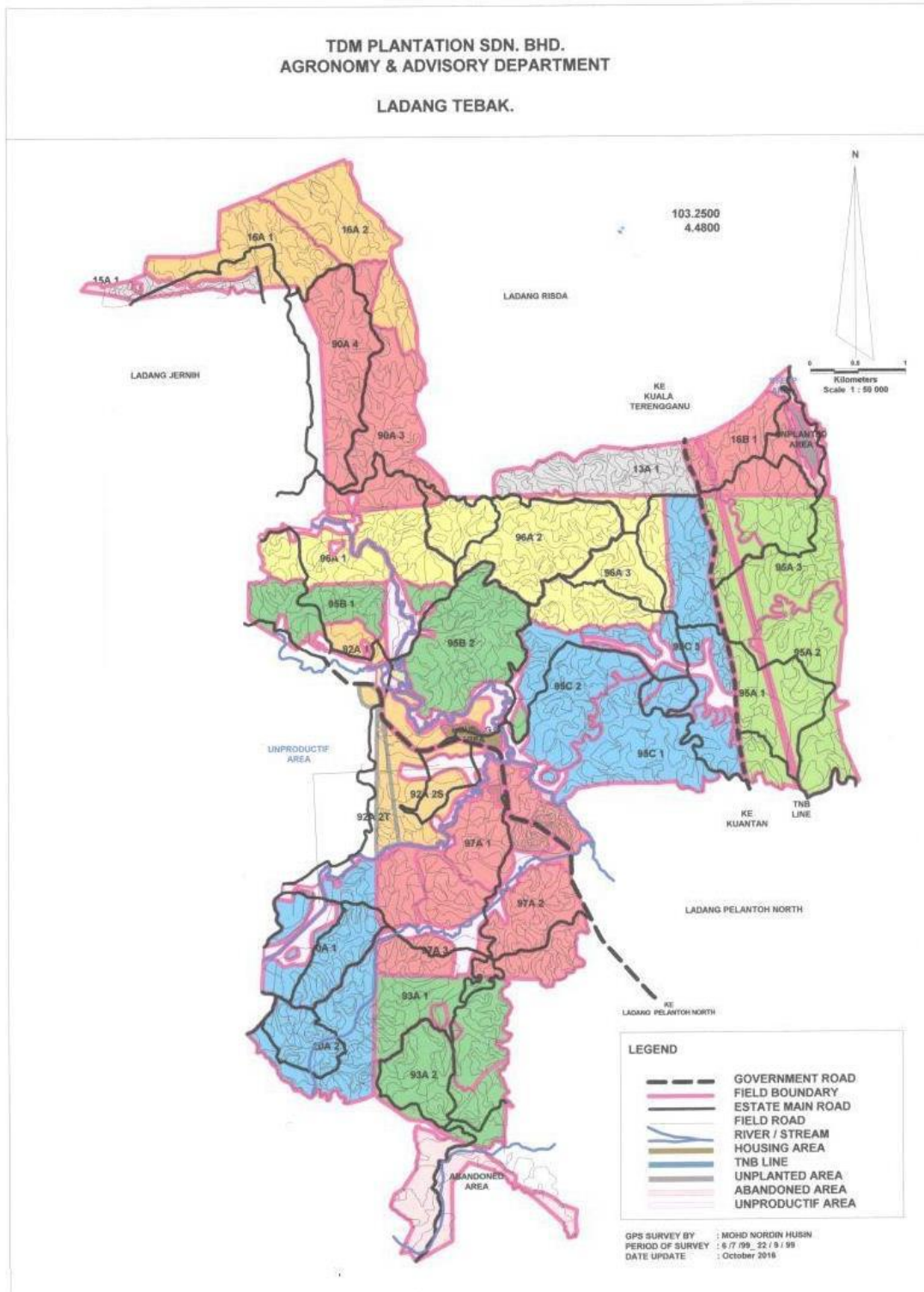


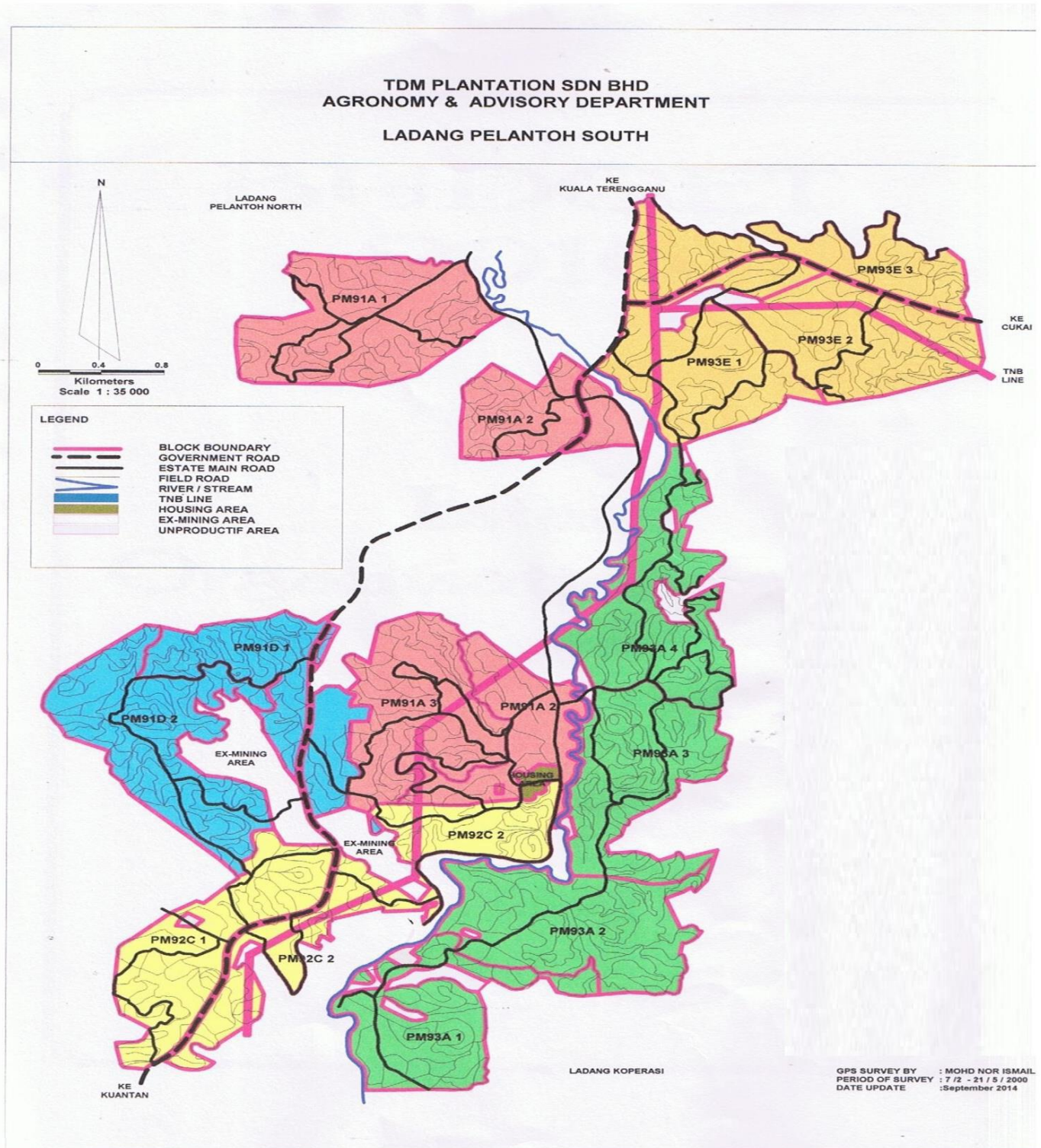


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Figure 3.1 : Landuse Map of Ladang Gajah Mati

AEROMAP SDN BHD





**Appendix E: List of Abbreviations**

BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm 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
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MSPO	Malaysian Sustainable Palm Oil
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
RTE	Rare, Threatened or Endangered species
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure