MALAYSIAN SUSTAINABLE PALM OIL MSPO OPMC Public Summary Report

□ Initial Assessment

☑ Annual Surveillance Assessment (1_1)

Recertification Assessment (Choose an item.)

□ Extension of Scope

SIME DARBY PLANTATION BERHAD

Client Company (HQ) Address: Level 11, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7, Ara Damansara 47301 Petaling Jaya, Selangor, Malaysia

Certification Unit: Strategic Operating Unit (SOU 18) Diamond Jubilee Palm Oil Mill and Plantations: Diamond Jubilee Estate, Bukit Asahan Estate, and Welch Estate

Date of Final Report: 18/8/2023

Report prepared by: Mohd Nur Amin Bin Mohd Halim (Lead Auditor)

Report Number: 3717755

Assessment Conducted by:

BSI Services Malaysia Sdn Bhd, (DSM Accreditation Number: MSPO 09112018 CB 12) Suite 29.01 Level 29 The Gardens North Tower, Mid Valley City Lingkaran Syed Putra, 59200 Kuala Lumpur, Malaysia Tel +60392129638 Fax +60392129639 www.bsigroup.com

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Section 1: Executive Summary

1.1 Organizational Information and Contact Person						
Company Name	Sime Darby Plantation Berhad	Sime Darby Plantation Berhad				
Mill/Estate	Certification Unit	MPOB Licen	e No.	Expiry Date		
	Diamond Jubilee POM	50028880400)	30/09/2023		
	Diamond Jubilee Estate	52296700200)	31/08/2023		
	Bukit Asahan Estate	527615002000		28/02/2024		
	Welch Estate	52249900200)	31/07/2023		
Address	Head Office: Level 11, Main Ara Damansara, 47301 Petali	•				
Management Representative	Shylaja Devi Vasudevan Nair,	Head - Sustair	ability Co	mpliance Unit, GSD		
Website	www.simedarbyplantation.com E-mail shylajavasudevan@simyplantation.com		avasudevan@simedarb tation.com			
Telephone	603-7848 4000 (Head Office) 606-5291 302 (Mill)	Facsimi	e 603-7	848 4356 (Head Office)		

1.2 Certification Informa	ation			
Certificate Number	Mill: MSPO 682043		Certificate Start Date	10/01/2023
	Estate: MSPO 688335			
Date of First Certification	10/01/2018		Certificate Expiry Date	09/01/2028
Scope of Certification	Mill: Production of	Sustai	nable Palm Oil and Palm Oil I	Products
	⊠ Estate: Production	of Sus	stainable Oil Palm Fruits	
Visit Objectives	Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory, and contractual requirements.			
Standard	□ MSPO MS 2530-2:	2013 -	- General Principles for Indep	endent Smallholders
	☑ MSPO MS 2530-3: Organized Smallhe		- General Principles for Oil Pa	Im Plantations and
	⊠ MSPO MS 2530-4:	2013 ·	- General Principles for Palm	Oil Mills
Recertification Assessment	Visit (RAV) 1	04/07/2022 - 08/07/2022		
Continuous Assessment Vis	it Date (CAV) 1_1	03/07/2023 - 06/07/2023		
Continuous Assessment Visit Date (CAV) 1_2		-		
Continuous Assessment Vis	it Date (CAV) 1_3	-		
Continuous Assessment Vis	it Date (CAV) 1_4	-		

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1.3 Other Certifications							
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date				
RSPO 591224	RSPO Principles & Criteria of Sustainable Palm Oil Production: 2018; Malaysian National Interpretation: 2019.	BSI Services Malaysia Sdn Bhd	04/10/2026				
MSPO 714120	MSPO Supply Chain Certification Standard (MSPO SCCS) 1 October 2018.	BSI Services Malaysia Sdn Bhd	11/07/2024				

1.4 Location of Certification Unit								
Name of the Certification Unit (Palm Oil Mill/ Estate/	Site Address	GPS Reference of the site office						
Smallholder/ Independent Smallholder)	Site Address	Latitude	Longitude					
Diamond Jubilee POM	KM 8, Jasin-Simpang Bekoh Road, District of Jasin, 77100 Jasin, Melaka, Malaysia	2° 19' 28.02" N	102° 28' 56.21" E					
Diamond Jubilee Estate	Ladang Diamond Jubilee, KM 8, Jasin- Simpang Bekoh Road, District of Jasin, 77100 Jasin, Melaka, Malaysia	2° 19' 29.50" N	102° 28' 59.12" E					
Bukit Asahan Estate	Ladang Bukit Asahan, Jalan Asahan, 77100 Jasin, Melaka, Malaysia	2° 24' 25.99" N	102° 33' 47.99" E					
Welch Estate	Jalan Segamat-Jementah, 85200 Segamat, Johor, Malaysia	2° 27' 24.66" N	102° 39' 18.72" E					

1.5 Certified Area

	Total Planted				
Estate	(Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Diamond Jubilee Estate	2,623.24	5.58	187.62	2,816.44*	93.14
Bukit Asahan Estate	2,965.53	1.36	105.29	3,072.18	96.53
Welch Estate	576.20	0.95	870.67	1,447.82	39.80
Total (ha)	6,164.97	7.89	1,163.58	7,336.44	

Notes:

Diamond Jubilee Estate – Land acquisition at Diamond Jubilee by State government at 3.55ha.

1.6 Plantings & Cycle							
Estato	Age (Years)			Mature Transforme			
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Mature	Immature



Diamond Jubilee Estate	189.33	601.35	1,820.08	12.48	-	2,433.91	189.33
Bukit Asahan Estate	560.58	235.92	2,169.03	-	-	2,404.95	560.58
Welch Estate	-	-	543.16	33.04	-	576.20	-
Total (ha)	749.91	837.27	4,532.27	45.52	-	5,415.06	749.91

1.7 Certified Tonnage of FFB

	Tonnage / year						
Estate	Estimated (Aug 22 - July 23)	Actual (Jul 22 - June 23)	Forecast (Jan 24 - Dec 24)				
Diamond Jubilee Estate	35,915.00	29,510.34	44,984.41				
Bukit Asahan Estate	40,000.00	22,255.46	40,600.00				
Welch Estate	12,000.00	7,616.95	12,090.00				
Pertang Estate	-	47.12	-				
Kempas Estate	-	146.53	-				
Serkam Estate	-	86.03	-				
Bukit Pilah Estate	-	28.98	-				
Kok Foh Estate	-	112.14	-				
Sg. Sabaling Estate	-	19.87	-				
St. Helier Estate	-	38.42	-				
Total (mt)	87,915.00	59,861.84	97,674.41				

1.8 Uncertified Tonnage of FFB

	Tonnage / year					
Estate	Estimated (Aug 22 - July 23)	Actual (Jul 22 - June 23)	Forecast (Jan 24 - Dec 24)			
Nil	N/A	N/A	N/A			
Total (mi) N/A	N/A	N/A			

1.9 Certified Tonnage

	Estimated (Aug 22 - July 23)	Actual (Jul 22 - June 23)	Forecast (Jan 24 - Dec 24)
Mill Capacity:	FFB	FFB	FFB
25 MT/hr	87,915.00	59,861.84	97,674.41
	CPO (OER: 22.00%)	CPO (OER: 20.42%)	CPO (OER: 21.50%)
SCC Model: SG	19,341.00	12,222.52	21,000.00
50	PK (KER: 5.25%)	PK (KER: 6.57%)	PK (KER: 5.16%)
	4,396.00	3,937.77	5,042.09

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1.10 Actual Sold Volume (CPO)							
	MEDO Cortified	Other Schen	Other Schemes Certified		Total		
CPO (mt)	MSPO Certified	ISCC	RSPO	Conventional	Total		
12,222.521	-	-	8,264.98	838.04	11,384.48		

1.11 Actual Sold Volume (PK)						
		Other Schen	nes Certified	Convertional	Total	
PK (mt)	(mt) MSPO Certified		RSPO	Conventional	Total	
3,937.77	-	-	2,811.37	-	2,811.37	



Section 2: Assessment Process

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI 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 03/07/2023 - 06/07/2023. The audit programme is included as Section 2.4. The approach to the audit was to treat the Diamond Jubilee POM, Diamond Jubilee Estate, Bukit Asahan Estate and Welch Estate 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 Certification Unit not using MSPO certification marks for any type of on- and off-product communication. The Certification Unit are compliance with the use of the MSPO Logo and related claims.

The estates 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.

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 Section 3.6.

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.

All the previous nonconformities are remains closed. The assessment findings from the reassessment are detailed in Section 4.2.

This report was externally reviewed by MSPO approved Peer Reviewer prior to certification and recertification decision by BSI. For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

Assessment Program						
Name (Mill / Plantation)	Year 1 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)	
Diamond Jubilee POM	~	√	✓	✓	✓	
Diamond Jubilee Estate	-	✓	✓	-	✓	
Bukit Asahan Estate	\checkmark	-	\checkmark	\checkmark	-	
Welch Estate	\checkmark	✓	-	✓	✓	

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

Total No. of Mandays: 11

2.1 BSI Assessment Team

Team Member Name	Role (Team Leader or Team member)	Qualifications (Short description of the team members)
Mohd Nur Amin Bin Mohd Halim (MNA)	Team Leader	Education: Diploma Office Management & Technology, UiTM. Work Experience: He gained his career as sustainability practitioner in Government Link Company related to palm oil plantation for over 6 years and 10 months majorly handling operational excellent, environment, safety, and health at the upstream and downstream operations. He then joining an international certification body over the last 3 years and started his auditing career as qualified lead auditor for MSPO (OPMC and SCCS) scheme; and qualified auditor for ISCC Waste and Residue scheme. Concurrent, he was also a document controller and scheme coordinator for MSPO (OPMC and SCCS) prior to DSM accreditation.
		Training attended: He has completed Exemplar IMS (9001, 14001 & 45001) LA Course (2019), SA 8000 Course (2019), Endorse MSPO SCCS Course (2020), Endorse MSPO LA Course (2020), Endorse ISCC Waste and Residue Course (2020), HCV & HCS Course (2020), Endorse ISCC Basic & PLUS Course (2022), CQI & IRCA ISO 14001:2015 LA Course (2022), Endorse RSPO P&C LA Course (2022), Endorse RSPO SCCS LA Course (2022). Aspect covered in this audit:

PF824

		Transparency & communications, Traceability, social aspect & aspects,
		human rights, employees' welfare, trafficking & child labour, stakeholders' consultation. (Principle 2 and Principle 4).
		Language proficiency:
		Fluent in Bahasa Malaysia and English Language.
Amir Bin Bahari	Team Member	Education:
(AB)		Bachelor Of Science (Hons) Chemistry, from Universiti Sains Malaysia (USM) in 1985 and Diploma in Palm Oil Milling Technology/Management in 1996 from MPOB, a registered Chemist with Institut Kimia Malaysia as AMIC.
		Work Experience:
		34 years' experience in the oil palm industry including in the mill and estates, 350 mandays in RSPO auditing, and 210 mandays in MSPO audit.
		Training attended:
		Attended RSPO Lead Assessor Course (Refresher) on May 2022 and MSPO Lead Auditor course in April 2016, as well as courses related to HCV & GHG, social and environmental related program.
		Aspect covered in this audit:
		Company policy & commitment, internal audit, management review, Continuous Improvement Plan, environmental management & action plan, environmental requirement, biodiversity & HCV, water & waste management, opening burning practices and new development (if any). (Principle 1, Principle 5, and Principle 7).
		Language proficiency:
		Fluent in Bahasa Malaysia and English Language.
Mohd Isa Bin	Team Member	Education:
Hasim (MIH)		MIH graduates' Diploma in Mechanical Engineering UiTM and Diploma in Palm Oil Milling Technology MPOB.
		Work Experience:
		MIH has more than 10 years working in Plantation Industry which is under Palm Oil Mill and 2 years in Petrochemical Plant. Since 2015 starting a part time MSPO Auditor until currently year.
		Training attended:
		MIH has attended the training Lead Auditor MSPO MS 2530 course on 2015 by SIRIM Training.
		MIH has successfully completed Lead Auditor Course ISO 9001:2015 by SIRIM Training and Integrated Management System (IMS).
		MIH also has attended the RSPO P&C and RSPO SCCS from Checkmark Training, Davig Ogg in 2020.
		Aspect covered in this audit:
		Legal requirement, land used rights, safety requirement, safety risk analysis, safety implementation, accident reporting and training, best practices, economy viability, contractor management. (Principle 3, Principle 4, Principle 6).



	Language proficiency:
	Fluent in Bahasa Malaysia and English Language.

2.2 Impartiality and conflict of interest

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

2.3 Accompanying Persons

No.	Name	Role
	N/A	

2.4 Assessment Plan

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

Date	Time	Subjects		AB	МІН
Sunday 02/07/2023	09:00 - 18:00	Audit team travel from Kuala Lumpur to Melaka		✓	~
Monday 03/07/2023	07:30	Travel to Diamond Jubilee POM (for Opening Meeting)		~	~
	08:30 - 09:00	 Opening Meeting Presentation by Sime Darby Plantation Berhad's management Presentation by BSI Lead Auditor – introduction of team member and assessment agenda Confirmation of assessment scope and finalizing audit scope 	~	~	~
	09:00 - 13:00	Diamond Jubilee Palm Oil Mill Site visit, 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.	~	✓	~
	13:00 - 14:00	Lunch break	✓	\checkmark	✓
	14:00 - 16:30	<u>Diamond Jubilee Palm Oil Mill</u> Document review P1 – P6 (MS 2530 Part 4): SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	~	~	~

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Date	Time	Subjects		AB	MIH
	16:30 - 17:00	Interim closing meeting	✓	~	✓
Tuesday 04/07/2023	07:30	Travel to Diamond Jubilee Estate	~	~	~
	08:30 - 13:00	<u>Diamond Jubilee Estate</u> 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, wastes management, workers housing, clinic, landfill, etc.		~	~
	13:00 - 14:00	Lunch break	\checkmark	\checkmark	✓
	14:00 - 17:00	<u>Diamond Jubilee Estate</u> Document review P1 – P7 (MS 2530 Part 3): General documentation e.g., Legal, Manual and Procedures, production and monitoring records, IPM & HCV records, SEIA documents and records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	~	~	¥
Wednesday 05/07/2023	07:30	Travel to Diamond Jubilee Estate	~	✓	~
		Diamond Jubilee Estate	,	/	
	08:30 - 12:00	Continue Document review P1 – P7 (MS 2530 Part 3)	✓	~	✓
	10:00 - 12:00	Stakeholder consultation: Government agencies, village representatives, smallholders, Union Leader, contractors etc.	~	-	-
	12:00 - 12:30	Interim Closing meeting & Lunch	✓	✓	✓
	12:30	Travel to Bukit Asahan Estate	~	~	~
	13:30 - 17:00	Document review P1 – P7 (MS 2530 Part 3): General documentation e.g., Legal, Manual and Procedures, production and monitoring records, IPM & HCV records, SEIA documents and records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.	V	¥	~
Thursday 06/07/2023	07:30	Travel to Bukit Asahan Estate	~	~	~
	08:30 - 10:30	Bukit Asahan Estate 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	~	~	~

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Date	Time	Subjects	MNA	AB	MIH
		mixing area, wastes management, workers housing, clinic, landfill, etc.			
	10:30 - 12:30	Bukit Asahan Estate Continue document review P1 – P7 (MS 2530 Part 3) general documentation.	~	✓	~
	12:30 - 12:50	Interim closing meeting with Bukit Asahan Estate		\checkmark	✓
	12:50 - 13:50	Lunch Break	✓	√	✓
	13:50 - 14:10	Assessment team discussion and preparation	✓	\checkmark	~
	14:10 - 15:00	Closing meeting at Bukit Asahan Estate	✓	\checkmark	~
	15:00	Audit team travel back to Kuala Lumpur	~	\checkmark	~

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. The findings summary of the assessment by criteria are listed in Appendix A.

During the assessment there were Zero (0) Major, Zero (0) Minor non-conformity and Two (2) OFIs raised. The Sime Darby Plantation Berhad - SOU 18 Diamond Jubilee Certification unit.

Non-Conformity Report					
NCR Ref #:	N/A	Issue Date:	N/A		
Due Date:	N/A	Date of Closure:	N/A		
Area/Process:	N/A	Clause & Category: (Major / Minor)	N/A		
Clause:	N/A				
Requirements:	N/A				
Statement of Nonconformity:	N/A				
Objective Evidence:	N/A				
Corrections:	N/A				
Root cause analysis:	N/A				
Corrective Actions:	N/A				
Assessment Conclusion:	N/A				

Opportunity For Improvement						
Ref:	2365405-202306-I1 Clause: MSPO 2530 Part 3: 4.4.5.12					
Area/Process:	Diamond Jubilee Estate and Bukit Asahan Estate					
Objective Evidence:	Gender Committee for Diamond Jubilee Estate and Bukit Asahan Estate may improve the agenda in minutes of meeting as per suggested topics related to women in guideline document.					

Opportunity For Improvement						
Ref:	2365405-202306-I2 Clause: MSPO 2530 Part 4: 4.4.5.12					
Area/Process:	Diamond Jubilee POM					
Objective Evidence:	Gender Committee for Diamond Jubilee POM may improve the agenda in minutes of meeting as per suggested topics related to women in guideline document.					

	Noteworthy Positive Comments			
1.	Document readiness is at satisfactory level during reviewing.			
2.	Good commitment from the management teams on preparation of the audit.			
3.	Good communication from operating unit's management throughout the audit.			
4.	Good arrangement for transportation for the auditor.			
5.	Good awareness among workers on the understanding of RSPO and MSPO certification.			

3.3 Status of Nonconformities Previously Identified and OFI

Non-Conformity Report				
NCR Ref #:	2219455-202207-M1 Issue Date: 08/07/2022			
Due Date:	07/10/2022	Date of Closure:	04/10/2022	
Area/Process:	Bukit Asahan and Welch Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.5.11 Major	
Requirements:	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.			
Statement of Nonconformity:	Compliance with Employee's Minimum Standards of Housing, Accommodations and Amenities Act 1990 and was not effectively demonstrated.			
Objective Evidence:	Bukit Asahan Estate (BAE) Sighted at house No. block B #15 and block A #5, found petrol kept in a storage with fence and locked at the back of the house. Safe handling and storage of petrol was not in lined with Safe Handling and Storage of Petrol at Employees Housing Procedure, UM/HSE/OCP/06, version:0, effective date: 24/3/2021. Welch Estate (WE) Sighted during site visit at line site, parameter drain leading to sedimentation sump and discharge drain found to be clogged. Undergrowth was also found in the parameter drains which blocked the free flow of water.			
Corrections:	BAE: To remove the petrol can from housing area and briefed workers that the storage of petrol nearby housing area is against the SOP. WE: All the perimeter drain has been cleared off from debris/ undergrowth.			

Root cause analysis:	BAE: The employees were not briefed on the SOP for safe storage of petrol since the employer has yet to decide on centralized storage for petrol as mentioned in the SOP.WE: The clogged in the sedimentation sump is due to uncleared debris out of slashing of overgrown near perimeter drain.		
Corrective Actions:	BAE: To do regular briefing to workers on safekeeping of petrol. WE: To brief the workers to properly disposed trashes of overgrown slashing.		
Assessment Conclusion:	 Evidence verified: <u>Bukit Asahan Estate</u> 1) Pictures that show the petrol has been removed from the workers house to a designated safekeeping locked storage located at the operating unit's storage area. 2) Attendance records dated 03/08/2022 and 20/09/2022 that show the workers have been briefed about restriction of keeping petrol at home and safe handling of it. <u>Welch Estate</u> 1) Pictures that show the clogged drainage has been cleared off from debris/ undergrowth. 2) Record that shows the workers have been briefed about how to properly dispose the residue from slashed vegetation. The evidence was found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment. 		
Verification Statement:	Verification evidence of last Major NC. Document review, Diamond Jubilee Estate and Bukit Asahan Estate management continuously conduct Housing Complex / NEST / Community Hall Inspection by EWC committee and PIAO members. Verified the checklist includes 'No Chemical, lubricant or paint container and fertilizer bags' in place. Onsite visit to housing area, Employees Housing Procedure is implemented accordingly. Document review on training records, Diamond Jubilee Estate and Bukit Asahan Estate management conduct briefing on petrol safekeeping to workers. Onsite interview with sampled workers informed they been briefed on prohibited to store petrol container at home due as safety measured on fire exposure if anything happens. There was no recurrence of non-conformity. Thus, the NCR remains closed.		

Non-Conformity Report				
NCR Ref #:	2219455-202207-M2	Issue Date:	08/07/2022	
Due Date:	07/10/2022	Date of Closure:	04/10/2022	
Area/Process:	Diamond Jubilee POM	Clause & Category: (Major / Minor)	MSPO 2530 Part 4: 4.4.5.11 Major	
Clause:	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.			

Requirements:	Compliance with Employee's Minimum Standards of Housing, Accommodations and Amenities Act 1990 and was not effectively demonstrated.		
Statement of Nonconformity:	Diamond Jubilee POM Sighted at house #100, found petrol kept in a container. Safe handling and storage of petrol was not in lined with Safe Handling and Storage of Petrol at Employees Housing Procedure, UM/HSE/OCP/06, version:0, effective date: 24/3/2021.		
Objective Evidence:	To remove the petrol can from housing area and briefed workers that the storage of petrol nearby housing area is against the SOP.		
Corrections:	The employees were not briefed on the SOP for safe storage of petrol since the employer has yet to decide on centralised storage for petrol as mentioned in the SOP.		
Root cause analysis:	To do regular briefing to workers on safekeeping of petrol.		
Corrective Actions:	 Evidence verified: 1) Pictures that show the petrol has been removed from the workers house to a designated safekeeping locked storage located at the mill's storage area. 2) Attendance records dated 16/07/2022 that show the workers have been briefed about restriction of keeping petrol at home and safe handling of it. Training material is also appended. The evidence was found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment. 		
Assessment Conclusion:	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.		
Verification Statement:	 Verification evidence of last Major NC. Document review, Diamond Jubilee POM management continuously conduct Housing Complex / NEST / Community Hall Inspection by EWC committee and PIAO members. Verified the checklist includes 'No Chemical, lubricant or paint container and fertilizer bags' in place. Onsite visit to housing area, Employees Housing Procedure is implemented accordingly. Document review on training records, Diamond Jubilee POM management conduct briefing on petrol safekeeping to workers. Onsite interview with sampled workers informed they been briefed on prohibited to store petrol container at home due as safety measured on fire exposure if anything happens. There was no recurrence of non-conformity. Thus, the NCR remains closed. 		

Non-Conformity Report				
NCR Ref #:	2219455-202207-M3	Issue Date:	08/07/2022	
Due Date:	07/10/2022	Date of Closure:	04/10/2022	
Area/Process:	Bukit Asahan Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.6.1.1 Major	
Requirements:	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.			

MSPO Public Summary Report Revision 2 (Nov 2021)

Statement of Nonconformity:	Standard Operating Procedure for sprayers was not effectively demonstrated.
Objective Evidence:	 Sighted during site visit at Bathing Room for Sprayer in Bukit Asahan Estate, all PPEs such as Apron, Face Mask, Safety Boots, Googles, Nitrile Gloves were not found in the cabinet and hang for drying purpose while no spraying activity on the day. Thus, non-compliance to the following SOP: According to Safe Operating Procedure Version 1 (01/11/2021), Pesticides Spraying (After) Bathing, washing and changing cloth before going back home. According to SOP/BAE/03/01-2009 Tatacara Kerja Selamat (Keselamatan Penggunaan Bahan Racun), PPE Required Breathing Mask, Apron, Gloves, Safety Boots and Googles. Para 12 mentioned All Sprayer has to wash all PPEs with soap and keep neatly at the storage cabinet. All apron to be washed and hanged.
Corrections:	To brief sprayers on the function of bathing room and cabinet. To brief on the Safe Working Procedure.
Root cause analysis:	Sprayers were not briefed on the function of bathing room and cabinet. Sprayers were not briefed on safe working procedure on to wash all PPEs with soap and keep neatly at the storage cabinet.
Corrective Actions:	To do regular briefing to the sprayers to wash their PPE and cloths in bathing room and keep in neatly in the cabinet. To make all sprayers logged in their washing activity in Buku Log Mandi provided at Bathing Room.
Assessment Conclusion:	 Evidence verified: 1) Pictures that show the PPE has been kept at the designated places (cloth line and safe cabinet). 2) Attendance records dated 17/08/2022 and 08/09/2022 that show the workers have been briefed about the PPE keeping and recording. 3) Logbook that shows the washing activities are registered. The records have the information about number of sprayers, PIC name, time-in & time-out, and type of PPE. The evidence was found to be adequate to close the NCR. Continuous effective implementation of the corrective actions shall be verified in the next assessment.
Verification Statement:	Verification evidence of last Major NC. During audit, the management has implemented that PPE has been kept at designated place. Verified also the PPE distribution recorded for Sprayer, that they have received Apron, Face Mask, Safety Boots, Safety Googles and Nitrile Gloves. There was no recurrence of non-conformity. Thus, the NCR remains closed.

Non-Conformity Report				
NCR Ref #: 2219455-202207-N1 Issue Date: 08/07/2022				
Due Date:	Next assessment visit	Date of Closure:	06/07/2023	
Area/Process:	Bukit Asahan Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.4.2.2 Minor	

MSPO Public Summary Report Revision 2 (Nov 2021)

Description and an				
Requirements:	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.			
Statement of Nonconformity:	Process to keep parties to a grievance informed of its progress, including against agreed timeframe and the outcome was not effective and communicated to relevant stakeholders.			
Objective Evidence:	 Feedback raised by 2 (two) foreign workers at Bukit Asahan Estate with regards to leave application process. They have not been informed on the status of leave application (approved or denied) so far. Further check on the records for both workers: 1) Bikas - leave application dated 13/5/22, apply for 2 months leave (25/9/22 - 25/11/22), leave approved but deferred to 1-3/2023. 			
	 Marsan - leave application letter was just submitted on 1/7/2022. Status of leave in still on-hold. 			
	No evidence of attendance during meeting with workers (for leave application) in June 2022. No minute of meeting or information on the approval/deferment for the said workers. This is not in line with IOM (CEOUM/036/06/2022) Foreign Workers Management Process Flow, Leave Request Process - 06 Leave request process (Peninsular Malaysia).			
Corrections:	The management has conducted meeting with workers and responded in writte to their leave request via and to give response letter towards leave application and get acknowledged of receipt.			
Root cause analysis: The PIC do not aware of the SOP to response to workers leave re the response is not as per IOM.				
Corrective Actions:	Re-briefing on the SOP to Executive in Charge (EIC).EIC has been assigned to monitor on passport management including leave request.EIC to ensure the progress or update of leave request is communicated to respective workers.			
Assessment Conclusion:	The correction and corrective action are accepted. Evidence of effective implementation shall be verified in the next assessment visit.			
Verification Statement:	 Verification of last Minor NC Diamond Jubilee Estate, Bukit Asahan Estate and Welch Estate conduct briefing on passport handling procedure to staff and executive in-charge. Review on the briefing records, sighted the topics discuss includes as follow. Passport/work permit will be requested by management for renewal before 3 months of expiry. Safe locker provided for each worker to keep their passport. Any movement outside estate premises shall bring with their own passport. Thus, the Minor NC was close on 06/07/2023. 			

Non-Conformity Report				
NCR Ref #: 2219455-202207-N2 Issue Date: 08/07/2022				
Due Date:	Next assessment visit	Date of Closure:	06/07/2023	

MSPO Public Summary Report Revision 2 (Nov 2021)

Area/Process:	Welch Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.5.3.2 Minor	
Requirements:	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:			
	a) Identifying and monit	oring sources of waste and p	collution	
	, , ,	cy of resource utilization and ting them into value-added	, .	
Statement of Nonconformity:	The monitoring of sources of waste and pollution was not effectively implemented.			
Objective Evidence:	During site visit to field 02C1, Welch Estate, it was found two empty chemical containers, one with blue colour (no label was found) and another one green color with a label name "Hextar" that stuck in estate drain.			
Corrections:	To conduct drain desilting at the outlet, drain. To clear the container from the field, drain and to arrange for disposal.			
Root cause analysis:	The containers were washed off from nearby villagers during heavy rainfall.			
Corrective Actions:	To consult with villagers on the waste management including on storage of waste. To do periodic monitoring for wastes in estate and to dispose it accordingly.			
Assessment Conclusion:	The correction and corrective action are accepted. Evidence of effective implementation shall be verified in the next assessment visit.			
Verification Statement:	 Verification of last Minor NC Diamond Jubilee Estate, Bukit Asahan Estate and Welch Estate established environmental management plan for year 2023 which include with was management plan. The plan includes objectives on communication of environment and waste management. Document review on stakeholders' consultation minutes of meeting, sighted to management includes topics on waste handling to external stakeholders. Thus, the Minor NC was close on 06/07/2023. 			

Non-Conformity Report				
NCR Ref #:	2219455-202207-N3	Issue Date:	08/07/2022	
Due Date:	Next assessment visit	Date of Closure:	06/07/2023	
Area/Process:	Bukit Asahan Estate	Clause & Category: (Major / Minor)	MSPO 2530 Part 3: 4.5.5.1 Minor	
Requirements:	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:			
	b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.			
Statement of Nonconformity:	The Water Quality Monitoring SOP was not adequately implemented.			

MSPO Public Summary Report Revision 2 (Nov 2021)

Objective Evidence:	Referred to Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System; SOP for Water Quality Monitoring; Date: 01/06/2016; 5.5 Evaluation of Laboratory Test Results.			
	- Upon receiving the complete results, the Head of Operating Unit shall check whether it exceeds, or no not meet the related requirement. If the results are off limit, an investigation shall be initiated to solve the issue.			
	 Arrangement for a re-sampling and analysis of the parameter of concern shall be done concurrently with the investigation and sent to the laboratory within 1 week of receiving the results. 			
	Bukit Asahan Estate monitors the water quality (River Water) for the stream that flows adjacent to the estate as per the Water Management Plan. Water Analysis Test Report were received with non-conforming results and the implementation there after was not in accordance with the SOP.			
	 The corrective/preventive action report for non-conforming water analysis results were not done for Water Analysis Test Report dated 08/01/2022 (Report Number: PL121/2022) and 06/07/2021 (Report Number:IE738/2021). 			
	Resampling was not done within a week of receiving the off-spec results for Water Analysis Test Report dated 14/03/2022 (Report Number: IE349/2022), 08/01/2022 (Report Number: PL121/2022), 29/11/2021 (report Number: IE1170/2021) and 06/07/2021 (Report Number:IE738/2021).			
Corrections:	 To arrange for investigation for off spec in parameters. To arrange for resampling if required upon investigation within the stipulated time. 			
Root cause analysis:	The PIC did not follow the procedure as per in SOP.			
Corrective Actions:	PIC is briefed on the follow up procedure for water analysis. PIC is responsible to arrange for investigation and resampling.			
Assessment Conclusion:	The correction and corrective action are accepted. Evidence of effective implementation shall be verified in the next assessment visit.			
Verification Statement:	 Verification of last Minor NC Bukit Asahan Estate and Welch Estate established environmental management plan for year 2023 which include with water management plan. The plan includes objectives on monitoring of water usage on daily consumption since the water supply is from the SAMB treated water and water analysis for water ways. For water ways, management has acted by sent the water analysis to third parties registered laboratory on monthly basis. Based on the sample of water analysis result verified meet water standard parameters. Document review, managements conduct briefing on water management plan to staff and executive in-charge. Thus, the Minor NC was close on 06/07/2023. 			

Opportunity For Improvement								
Ref:	Ref: 2219455-202207-I1 Clause: MSPO 2530 Part 3: 4.4.4.2							
Area/Process:	Bukit Asahan Estates and Welch Estates							

PF824

Objective Evidence:	The Hazard Identification Risk Analysis Risk Control (HIRARC) in OSH Risk Assessment Register to be further reviewed and enhanced to provide better details of information for reference of Estates.					
Verification Statement:	The management has established the Hazard Identification Risk Analysis Risk Control (HIRARC) for prevention of risk in a workplace. During audit, sighted the management has been reviewed the (HIRARC) for the year 2023.					
	Diamond Jubilee Estate					
	Document: Hazard Identification Risk Analysis Risk (HIRARC)					
	Date Review: 04/03/2023 – Tractor Driver					
	Date Review: 22/05/2023 – Harvester					
	Bukit Asahan Estate					
	Document: Hazard Identification Risk Analysis Risk (HIRARC)					
	Date Review: 26/06/2023 – Workshop Station					
	Date Review: 26/06/2023 – Manuring Activities					

	Opportunity For Improvement						
Ref:	2219455-202207-I2	Clause:	MSPO 2530 Part 4: 4.4.4.2				
Area/Process:	Diamond Jubilee POM						
Objective Evidence:	The Hazard Identification Risk Analysis Risk Control (HIRARC) in OSH Risk Assessment Register to be further reviewed and enhanced to provide better details of information for reference of mill.						
Verification Statement:		tion of risk in ved the (HIR) tion Risk Anal Kernel Recove Pressing Statio	lysis Risk (HIRARC) ery Station on				

	Opportunity For Improvement						
Ref:	2219455-202207-I3	Clause:	MSPO 2530 Part 3: 4.5.1.5				
Area/Process:	Welch Estate						
Objective Evidence:	Policies SDP Briefing was done on 25/06/2022 and HCV awareness Briefing was done on 27/06/2022 at the muster ground. Verified the notes of the briefing and the attendance list sighted. The attendance list prepared can be further improved by requesting the participants to sign or thumbprint the attendance list.						
Verification Statement:	yearly basis or revised as p program are subjects relate scheduled waste managemer	er the mana ed to environ nt, environme les taken, al	8 Training Program 2023 updated on a gement requirement. Included in this nment includes environmental policy, ental responsibility, HCV & Biodiversity I training related to the process were tes.				

Clause & Category CAR Ref. **Issued Date** Status & Date (Closure) (Major / Minor) 2219455-202207-M1 4.4.5.11 Part 3 - Major 07/07/2022 Closed on 04/10/2022 2219455-202207-M2 4.4.5.11 Part 4 - Major 07/07/2022 Closed on 04/10/2022 2219455-202207-M3 4.6.1.1 Part 3 - Major 07/07/2022 Closed on 04/10/2022 2219455-202207-N1 4.4.2.2 Part 3 - Minor 07/07/2022 Closed on 06/07/2023 2219455-202207-N2 4.5.3.2 Part 3 - Minor 07/07/2022 Closed on 06/07/2023 2219455-202207-N3 Closed on 06/07/2023 4.5.5.1 Part 3 - Minor 07/07/2022

3.4 Summary of the Nonconformities and Status

3.5 Issues Raised by Stakeholders

IS #	Description
1	Issues: Visiting Medical Officer
	VMO interviewed informed he would do visit SOU 18 operating units as agreed based on once at every fortnight requirement to verified estate's medical assistant reports and attend patients during his visits to the estate and mill and housing visit.
	The VMO is satisfied with action taken by SOU 18 management upon the maintenance of healthcare facilities and housing amenities provided to workers. He provided appreciation to management for action taken to maintain hygiene and cleanliness at workers' housing.
	Management Responses:
	No further issue.
	Audit Team Findings:
	No further issue.
2	Issues: SOU 18 Chairman - Gender Committee
	SDPB SOU 18 management established SOU level and operating unit's level of Gender committee representatives with main objectives of the committee to raise awareness, identify and address issues of concerns, opportunities, and areas for improvement for workers especially women. The committee established attention to create a safe community within operations where women can raise issues and concerns at work and in their lives with a focus on zero tolerance to sexual harassment and gender-biased violence.
	Interview with SOU level chairman informed the committee is required to plan 4 times engagement activities annually to achieve with minimum guidelines of TOR Gender committee and Gender Representatives. Among the important activity planned were briefing/training to female workers/employees on understanding the meaning of sexual harassment and domestic violence and method of reporting should it happen. The SOU 18 management has also been very supportive with the programmes in term of financial, facilities and other resources. Since the last audit, there has been no sexual harassment case reported.
	Management Responses:
	No further issue.
	Audit Team Findings:



	No further issue.
3	Issues: Sampled Field Workers (Estates & Mill)
	Field workers (estates and mill) been interviewed informed they are happy with action taken be management. They informed the accommodation provided to the workers are at satisfaction Additionally, workers also provided with welfare, housing facilities, water & electricity supply were alway maintained in good conditions. Workers were also made to understand the mechanism to lodge complain or grievance should there be any. If any maintenance request regarding on housing repair, managemen will take prompt action to replace.
	They do inform, management had taken safety precautions at the workplace as a top priority. Management had taken necessary action to give an awareness adequately with briefing/trainings an free PPE before start work.
	There has been no issue with regards to delivering the terms & conditions stipulated in the employmer contract so far. They are satisfied with the wages received and overtime offered as if there are necessar to take.
	Management Responses:
	No further issue.
	Audit Team Findings:
	No further issue.

3.6 List of Stakeholders Contacted

Government Officer: -	Community/neighbouring village: -
Suppliers/Contractors/Vendors:	Worker's Representative/Gender Committee:
VMO	Estates and mill's workers.
	Gender committee representatives.



Section 4: Assessment Conclusion and Recommendation

Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings Based on the findings during the assessment Sime Darby Plantation Berhad - SOU 18 Diamond Jubilee Certification Unit complies with the MS 2530-3:2013 and MS 2530-4:2013. It is recommended that the certification of Sime Darby Plantation Berhad - SOU 18 Diamond Jubilee Certification Unit is continued. Acknowledgement of Assessment Findings **Report Prepared by** Name: Name: Mohd Nur Amin Bin Mohd Halim Shylaja Devi Vasudevan Nair **Company name: Company name:** Sime Darby Plantation Bhd **BSI Services Malaysia Sdn Bhd** Title: Title: Head, Sustainability Compliance Unit, Group Sustainability Dept. **Client Manager** D Signature: Signature: Date: 18/07/2023 Date: 17/08/2023



Appendix A: Summary of the findings by Principles and Criteria

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

Criterion / Indicator		Assessment Findings	Compliance				
4.1 Prin	4.1 Principle 1: Management commitment & responsibility						
Criterio	n 4.1.1 – Malaysian Sustainable Palm O	il (MSPO) Policy					
4.1.1.1	4.1.1.1 A policy for the implementation of MSPO shall be established. Sime Darby Plantation Berhad (SDPB) maintain the current Group Sustainability & Quality Policy signed by Group Managing Director on 02/12/2019 include the statement on commitment towards MSPO implementation. • Major compliance - The memo describes company commitment to comply on the MSPO standards implementation and towards certified sustainable palm oil products.						
4.1.1.2	The policy shall also emphasize commitment to continual improvement. - Major compliance -	 SDPB maintain the current Group Sustainability & Quality Policy signed by Group Managing Director on 02/12/2019 include the statement on commitment towards MSPO implementation. From the memo describes company commitment on emphasizing to achieved systematic approach on ensuring continuous improvement in the operation, compliance to statutory, legal and other regulatory requirements and establishment of traceability within the supply chain in the above-mentioned memorandum. The policy covers commitment to among others as follow. Promoting good governance and transparency Contributing to a better society Minimizing environmental harm Delivering sustainability quality The policy is guided by three main documents as follow. Responsible Agriculture Charter Human Rights Charter 	Complied				



Criterio	on / Indicator	Assessment Findings			Compliance		
		3. Innovation & Productivity	Charter				
Criterio	Criterion 4.1.2 – Internal Audit						
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement. - Major compliance -	DPB update Internal Audit Procedure with Doc. No.: SDP/GSD/SCU/IAP approved on 0/01/2023. The frequency of the internal audit shall be carried out at least once a year and when is required. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure. Verified that sampled estates have conducted the internal audit on a yearly basis. Records were available for verification as below. The root causes where applicable to the audits for the NCR were clearly identified and the proposed corrective action were satisfactorily provided for all the commentaries given by the puditors. All elements in the MSPO MS2530 Part 3 were covered.				Complied	
4.1.2.2	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. - Major compliance -	10/01/2023. The Internal Audit Report was audit team raised non-conform and the corrections and correc and 12/06/2023 respectively a The nonconformity raised at e	DPB update Internal Audit Procedure with Doc. No.: SDP/GSD/SCU/IAP approved on				Complied
		No.EstateDateNCR MajorNCR MinorOFI1Diamond Jubilee09/05/20232022Bukit Asahan10/05/2023202The auditors had also complied to the documented procedure through issuance of audit plan to the operating units. This audit notification was sighted and verified.					
4.1.2.3	Report shall be made available to the management for their review.	SDPB update Internal Audit Procedure with Doc. No.: SDP/GSD/SCU/IAP approved on 0/01/2023.				Complied	



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	Onsite visit to Diamond Jubilee Estate and Bukit Asahan Estate verified the internal audit report kept, available and discussed during management review meeting. As evidence, all findings from internal audit were responded within the acceptable timeframe.	
		The internal audit report was documented and made available for management review. As evidence, all findings from internal audit were responded by estates management within the acceptable time frame.	
Criterior	1 4.1.3 – Management Review		
4.1.3.1	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. - Major compliance -	SDPB maintain the current SOP for Management Review documented in Standard Operation Manual, Sub-Section 5.6, dated: 25/5/2015. Based on the SOP established, the frequency for management review needs to be carried out at least once a year. The Management Review Meeting conducted as follows. No. Estate Date Attendee 1 Diamond Jubilee 25/05/2022 15 16/05/2023 14 2 Bukit Asahan 10/05/2022 9 11/05/2023 16 The agenda discussed among others as shown below: 1. Internal audit findings 2. Process Performance 3. Customer Feedback 4. Audits Results 5. Changes That Could Affect Management System 6. Complaints and grievance 7. Continual Improvement Plan	Complied



Criterio	Criterion / Indicator Assessment Findings				Compliance
Criterion 4.1.4 – Continual Improvement					
4.1.4.1	The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company. - Major compliance -	Review safety initiate Docum	w on the plans include , and operations impro ed for the field operation	ate Continual Improvement Plan for year 2023 for each estate. e workers welfare, waste management, occupational health & vements. For example, several improvement projects have been n and workers quarters. magement identified aspect and significant impact covered on cial as follow. <u>Action /Initiatives</u> <u>Manual grass cutting</u> Only circle and strip spraying in fields <u>Apply low volume spraying equipment</u> Follow manufacturer dosage <u>Awareness among employees</u> Enhancement of waste segregation. <u>Enhancement of workers quarters</u> <u>Scheduled repair and painting</u> <u>Conducive environment</u> <u>Housing roofing/ ceiling upgrading</u> <u>Expansion of in-field FFB collection- grabber</u> <u>Expand mechanization in manuring</u> Frond stacking for easy access of vehicles	Complied
4.1.4.2	The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology	This is being made upon confirmation of any new projects. Employees were briefed of any new development in basic understanding during the weekly briefings. The management team will be informed of such development during the monthly management meetings. Dissemination of information by the Top Management are transacted during the Managers meetings and emails.		Complied	



Criterio	on / Indicator	Assessment Findings	Compliance
	 (where applicable) that are available and feasible for adoption. - Major compliance - 	SOU 18 Diamond Jubilee established annual training plan based on the training needs analysis.	
4.1.4.3	An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established. - Major compliance -	SOU 18 Diamond Jubilee established annual training plan based on the training needs analysis. Where introduction of new machines and new work method, all level of employees will be trained to handle /implement the new techniques and work changes. Monitoring is made by the Estate Managers and Assistants throughout the on-the-job training and familiarization.	Complied
4.2 Prin	ciple 2: Transparency		
Criterio	n 4.2.1 – Transparency of information a	and documents relevant to MSPO requirements	
4.2.1.1	The management shall communicate the information requested by the relevant stakeholders in the appropriate	SDPB maintained the current Grievance Response Standard Operating Procedure, ver. 2, approved on 18/07/2022 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the estate.	Complied
	languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative	Timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation.	
	environmental or social outcomes. - Major compliance -	Review on the procedure, describes estate manager as person in-charge and responsible to address the communication and requests from internal and external.	
4.2.1.2	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	Management documents related to sustainability available at each operating units visited during the on-site audit upon request including sustainability policies, procedures, social and environmental assessments as well as management action plans etc. Furthermore, global documents accessible via company's website. https://simedarbyplantation.com/sustainability/reports-policies-and-statements/	Complied



Criterion / Indicator		Assessment Findings	Compliance
	outcomes. - Major compliance -		
Criterio	n 4.2.2 – Transparent method of comm	unication and consultation	
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders. - Major compliance -	SDPB maintained the current Grievance Response Standard Operating Procedure, ver. 2, approved on 18/07/2022 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the estates. SOU 18 Diamond Jubilee managements elaborated the requirements for consultation and communication with the relevant stakeholders during stakeholder meeting.	Complied
4.2.2.2	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit. - Minor compliance -	Review on the procedure, describes estate manager as person in-charge and responsible to address the communication and requests from internal and external. However, estates' managers assigned social officer to assist them to handle issues related to social with appointment letter.	Complied
4.2.2.3	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained. - Major compliance -	SOU 18 Diamond Jubilee managements maintained the List of Stakeholders for year 2023 includes categorized as Contractors, Vendors/Suppliers, Local Community and Other Interested Parties (Government Agencies, School, Hospitals, authorities, suppliers etc.) External stakeholders' meeting conducted and attended by representatives from school, contractors, local authorities, local communities, neighbouring estates, vendors and suppliers. For internal stakeholders, management arranged Social Dialogue on weekly basis to discuss on workers issues especially on housing, amenities, and welfare.	Complied
Criterion 4.2.3 – Traceability			
4.2.3.1	The management shall establish, implement and maintain a standard operating procedure to comply with the	SDPB update Standard Operating Procedure for Sustainable Supply Chain and Traceability, Doc. No.: SD/SDP/GSD/SCCS/0522/01; in 2022. The objective of the procedure is to provide	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	requirements for traceability of the relevant product(s). - Major compliance -	guideline for estates to establish and ensure effective implementation on sustainable supply chain and traceability of certified sustainable materials (FFB).	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -		Complied
4.2.3.3	The management should identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -		Complied
4.2.3.4	Records of sales, delivery or transportation of FFB shall be maintained. - Major compliance -		Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
		Product ID: 0001 (FFB A Crop) Nett weight: 3.05 Mt, Delivery date: 20/05/2023 Weighbridge ticket no.: 139685 MSPO certificate no.: 688335 MSPO certificate validity: 10/01/2023 – 09/01/2028	
4.3 Prine	ciple 3: Compliance to legal require	ements	
Criterior	n 4.3.1 – Regulatory requirements		
4.3.1.1	All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. - Major compliance -	 SDPB maintain the current mechanism to ensure compliancy to legal and other requirement and documented in Standard Operation Manual distributed to all operating units. SDPB HQ Group Sustainability Department will update each operating units on changes of applicable laws. SOU 18 Diamond Jubilee management obtained approval licenses and permits from local authorities as follow. <u>Diamond Jubilee Estate</u> i. Lesen MPOB No. 522967002000 valid until 31/08/2023 ii. Perakuan Air compressor No.: PMT-MK/22 35617 valid until 26/07/2023 iii. Perakuan Air compressor No.: PMT-MK/22 35616 valid until 26/07/2023 iv. Permit Kawalan Berjadual No.: M001059 valid until 11/07/2024 v. MSPO Certificate No.: RSPO591224 valid until 11/07/2024 vi. RSPO Certificate No.: 527615002000 valid until 28/02/2024 ii. Lesen MPOB No.: 527615002000 valid until 28/02/2024 	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
		 iii. Perakuan Air Compressor No.: PMT-MK/2344389 valid until 07/09/2024 iv. Perakuan Timbang Sukat No.: B546705270 valid until 07/10/2023 v. RSPO Certificate No.: RSPO591224 valid until 04/10/2026 vi. MSPO Certificate No.: MSPO688335 valid until 09/01/2028 vii. Barangan Kawalan Berjadual No.: PK/2023/B/M-00012 valid until 10/01/2024 viii. Barangan Kawalan Berjadual No.: M001106 valid until 24/01/2025 	
4.3.1.2	The management shall list all laws applicable to their operations in a legal requirements register. - Major compliance -	 Diamond Jubilee Estate and Bukit Asahan Estate adopt SDPB HQ Legal & Other Requirements Register (LORR) with latest updated in January 2023. Review from the register document, sighted applicable requirement listed as follow. 1. Occupational Safety & Health Act 1994. 2. Factories & Machineries Act 1967. 3. Pesticides Act 1974 (Act 149). 4. Poisons Act 1952 (Revised 1989) (Act 366) 5. Petroleum (Safety Measures) Act, 1984. 6. Prevention and Control of Infectious Diseases Act 1988 (Act 342) 7. Uniform Building By-Laws 1984 8. Code of Practice for Safe Working in A Confined Space,2010 9. Environmental Quality Act (Act 127). 10. Water Act 1920 (Act 418). 11. Human resources related. 12. Other requirements. The list prepared by estate assistant managers and approved by estate managers with latest dated on 01/01/2023. 	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. • Major compliance -	 Diamond Jubilee Estate and Bukit Asahan Estate adopt SDPB HQ Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. Review to legal register updated January 2023 with addition to applicable laws since last assessment as follows: Minimum Wages Order 2022 Fire Services Act 1988 (Act 341) Amendment 2020 'Pembangunan Sumber Manusia Berhad' Act 2000 Anti-Sexual Harassment Act 2021 Employees' Social Security (Amendment) Act 2022 Employment Insurance System (EIS) (Amendment) Act 2022 Control of Supplies Act 1961 Employment (Amendment) Act 2022 Diamond Jubilee Estate and Bukit Asahan Estate updated Legal & Other Requirement Register as follow. Diamond Jubilee Estate updated on 01/01/2023. Bukit Asahan Estate updated 01/01/2023. 	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements. - Minor compliance -	SDPB HQ Group Sustainability Department will update each operating units on changes of applicable laws.The assigned person appointed at each operating units are responsible to update the changes into their respective Legal Register document.Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		On the site verification, interviews with office personnel and records verification indicates that the system is appropriate to the operations. Tracking system on any changes in the law is well implemented.	
		Diamond Jubilee Estate and Bukit Asahan Estate assigned person in charge to monitor compliance and to track and update the changes in regulatory requirements as follow.	
		1. Diamond Jubilee Estate assigned PIC with appointment letter date 01/01/2020.	
		2. Bukit Asahan Estate assigned PIC with appointment letter date 02/05/2023.	
Criterio	n 4.3.2 – Lands use rights		
4.3.2.1	The management shall ensure that their oil palm cultivation activities do not	Diamond Jubilee Estate and Bukit Asahan Estate demonstrated with legal ownership or leases with legal documents.	Complied
	diminish the land use rights of other users Major compliance -	Therefore, the estates cultivation activities have not diminished the land use rights of other users. Onsite visit verified there no evidence to show that oil palm cultivation activities had diminished the land use rights of others.	
4.3.2.2	The management shall provide documents showing legal ownership or	Diamond Jubilee Estate and Bukit Asahan Estate demonstrated with legal ownership or leases with legal documents.	Complied
	lease, history of land tenure and the actual use of the land.	Document review on the land titles demonstrated with SDPB name written as evidence of the legal ownership of the lands as sample follow.	
	- Major compliance -	Diamond Jubilee Estate	
		Verified that the management maintained the current total of 32 land titles. Copies of land titles were available as per sample sighted as follow.	
		1. Land title no.: 00020xxx.	
		2. Land title no.: 00020xxx.	
		3. Land title no.: 00030xxx.	
		4. Land title no.: 00020xxx.	



Criterion / Indicator		Assessment Findings	Compliance
		 Land title no.: 00022xxx. <u>Bukit Asahan Estate</u> Verified that the management maintained the current total of 44 land titles. Copies of land titles were available as per sample sighted as follow. Land title no.: 2xx Land title no.: 2xx Land title no.: 3xx Land title no.: 14xxx Land title no.: 14xxx Land title no.: 14xxx 	
4.3.2.3	Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	with legal documents.	Complied


Criterio	on / Indicator	Assessment Findings	Compliance
		No. Field Block Number 1. 00M 2. 01B 3. 02F	
4.3.2.4	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). - Minor compliance -	There was no land dispute at all sampled estates. SDPB has the legal ownership documents as demonstrated by possessing land titles.	Not Applicable
Criterio	n 4.3.3 — Customary rights		
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.	Not applicable since there is no customary rights. Land has been legally owned by the company and has been verified by the land title.	Not applicable
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights land, if any, should made available. - Minor compliance -	Not applicable since there is no customary rights. Land has been legally owned by the company and has been verified by the land title.	Not applicable



Criterion / Indicator		Assessment Findings	Compliance
4.3.3.3	Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available. - Major compliance -	Not applicable since there is no customary rights. Land has been legally owned by the company and has been verified by the land title.	Not applicable
4.4 Princ	ciple 4: Social responsibility, health	n, safety and employment condition	
Criterion	4.4.1: Social Impact Assessment (SIA))	
4.4.1.1	Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Diamond Jubilee Estate and Bukit Asahan Estate maintained the current of Social Impact Assessment for SOU 18 conduct by Group Sustainability Department. The assessment covers Diamond Jubilee POM, Diamond Jubilee Estate and Bukit Asahan Estate. SIA report established on 12/07/2016 – 15/07/2016. The objectives of the assessment are to identify the existing social issues and to develop social management plan. The assessment has involved the participation of stakeholders and attendance list of stakeholders was sighted. The issues raised by the stakeholders were recorded in the SIA report. SIA Management Plan updated for year 2023 for Bukit Asahan Estate and Diamond Jubilee Estate. Both estates have identified the negative and positive impacts during assessment. These impacts have been available in the plan as per verification. The implementation was verified included both operational unit level and individual site level such as issues derived from the worker's complaint, housing complex area and management.	Complied
Criterior	4.4.2: Complaints and grievances		
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	SDPB maintained the current Handling Social Issues Procedure, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008. The objective of the procedure is to ease the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
		SDBP maintained the current Grievance Response Standard Operating Procedure, ver. 2, approved on 18/07/2022. The objective of the procedure is to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the mill and estates. The procedure describes timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation. SDPB maintained the current whistleblowing platform named as 'Suara Kami' for internal and external stakeholders to lodge on any grievance. The grievance mechanism can be access through Human Rights Statement Sime Darby Plantation Berhad. In additional, SDPB maintained the current online platform named as 'Oil Palm Pal' (OPP) and Workers Housing Management Procedure dated 26/11/2021 as guideline to certification unit's management in providing a safe, liveable workers housing condition including the process of handling housing repair. The procedure describes the timeline to investigate/ inspect the housing defect based on the risk category.	
4.4.2.2	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties. - Major compliance -	Diamond Jubilee Estate and Bukit Asahan Estate adopt SDPB HQ Oil Palm Pal (OPP) online	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint. - Minor compliance -		Complied
4.4.2.4	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time. - Minor compliance -	Employees and the surrounding communities were made aware that complaints or suggestions can be made any time through various meetings such as morning muster, training/briefing and stakeholder consultation. Based on interview with the stakeholders, it was noted that they were aware of the complaint's procedure including the platform of 'Suara kami', Whistle Blowing, Workers Helpline, Oil Palm Pal (OPP) and Social Dialogue and they were briefed by the management during stakeholder meeting and morning briefing.	Complied
4.4.2.5	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon request. - Major compliance -	Diamond Jubilee Estate and Bukit Asahan Estate maintained complaints record and resolutions record over the past 24 months were still available as at audit.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
Criterio	n 4.4.3: Commitment to contribute to lo	cal sustainable development	
4.4.3.1	Growers should contribute to local development in consultation with the local communities. - Minor compliance -		Complied
Criterio	n 4.4.4: Employees safety and health		
4.4.4.1	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. - Major compliance -	SDPB maintained the current updated Group Health Safety & Environment (HSE) Policy dated 15/05/2022 and signed by Group Managing Director. In the policy stated the company commitment to the well-being of its employee, providing safe and healthy working environment, pre-emptively preventing our employees and external parties in the operations from injury and ill health as well as operating in an environmentally responsible manner at global operating sites.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		Policy also stated the commitment to comply with statutory requirements, inculcating the culture of safety and health, improving the management of occupational safety, health related and environmental matters eliminating or minimizing any potential adverse effect on the environment arising from or business activities and to educate and encourage stakeholders in maintaining and enhancing the quality of the health, safety and environment. The GSD and RSQM Department is also committed in establishing various working standards	
		through procedures or pictorial method to improve safe working condition.	
		The estates have established Safety and Health Plan and reviewed on annually basis. The plan covers on OSH Legal Compliance, Emergency Response Plan, OSH Management System and Risk Management, HIRADC, training, OSH committee meeting, workplace inspection, medical surveillance and etc.	
		Annual OSH Management Plan for year 2023 updated includes topics of safety & health policy training and attended by workers & staffs. Refer briefing as follow.	
		1. Diamond Jubilee Estate update OSH Management Plan on 11/04/2023 with briefing to workers & staffs dated 06/02/2023.	
		2. Bukit Asahan Estate updated OSH Management Plan on 03/02/2022 with briefing to workers & staffs dated 24/05/2023.	
4.4.4.2	 The occupational safety and health plan shall cover the following: a) A safety and health policy, which is communicated and implemented. b) The risks of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for employees exposed to pesticides: 	 The occupational safety and health plan cover the following: a) SDPB maintained the current updated Group Health Safety & Environment (HSE) Policy dated 15/05/2022 and signed by Group Managing Director. The policy been communicated to workers & staffs at Diamond Jubilee Estate on 06/02/2023 and Bukit Asahan Estate on 24/05/2023. b) The risk of all operation has been assessed and documented in Year 2023. Sighted the evidence: 1. Diamond Jubilee Estate update risk assessment reports as follow. i. HIRADC updated on 04/03/2023 	Complied



Criterion / Indicator	Assessment Findings	Compliance
 a)all employees involved shall be adequately trained on safe working practices b)all precautions attached to products shall be properly observed and applied d) 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). e) 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. f) 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 	 ii. Chemical Register updated on 03/01/2021 iii. CHRA Report valid until 08/07/2025 iv. Noise Risk Assessment updated on 10/08/2020 v. Audio Metric Test updated on 23/03/2023 vi. Housing Inspection updated on 28/06/2023 vii. Workplace Inspection updated on 02/05/2023 2. Bukit Asahan Estate update risk assessment reports as follow. i. HIRADC updated on 26/06/2023 ii. Chemical Register updated on 01/01/2023 iii. CHRA Report valid until 07/07/2025 iv. Noise Risk Assessment updated on 13/08/2020 v. Audio Metric Test updated on 16/05/2023 vii. Workplace Inspection updated on 13/08/2020 v. Audio Metric Test updated on 16/05/2023 vii. Workplace Inspection updated on 19/06/2023 vii. Workplace Inspection updated on 19/06/2023 vii. Workplace Inspection updated on 19/06/2023 vii. Workplace Inspection updated on 05/05/2023 c) Annual training programmed has been established with document title Training Plan dated year 2013 and prepared by Internal Team 1. Diamond Jubilee Estate established Training Schedule FY 2023 includes. i. First Aid on 06/05/2023 ii. OSH on 06/02/2023 iii. OSH on 06/02/2023 	

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Criterion / Indicator	Assessment Findings	Compliance
 national regulations and collective agreements. g) 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. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. i) 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. j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. - Major compliance - 	 First Aid on 12/06/2023 Fire Fighting on 15/06/2023 Fire Fighting on 15/06/2023 OSH on 07/02/2023 HIRADC on 07/02/2023 HIRADC on 07/02/2023 Spraying on 03/04/2023 PPE on 24/05/2023 Hearing on 16/05/2023 SOU 18 Diamond Jubilee managements provided appropriate PPE to workers to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). PPE Issuance record was available for verification. Inspected with sample workers interviewed found all PPE was given accordingly to their task given. PPE Matrix has been established as per HIRARC, SDS, CHRA and NRA. Diamond Jubilee Estate update PPE issuance records for sample workers of sprayer updated in June 2023. The records sighted PPE received includes safety helmet, safety glove, safety boot, apron and safety vest. Bukit Asahan Estate update PPE issuance records for sample workers of driver machinery updated in July 2023. The records sighted PPE received includes safety helmet, safety glove, safety boot and safety vest. SOU 18 Diamond Jubilee managements adopt SDPB Chemical Safety Management with Doc. No.: UM/HSE/OCP/04 dated 19/03/2021. The procedure established as guidelines for handling of chemicals to ensure proper and safe handling and storage in accordance with 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. SOU 18 Diamond Jubilee managements assigned responsible person for workers safety and health. Refer appointment letter and appointed by Manager. Interview with person in	



Criterion / Indicator	Assessment Findings	Compliance
	charge found have good knowledge and access to latest national regulations and collective agreements.	
	1. Diamond Jubilee Estate manager issued appointment letter of PIC for Safety dated 08/10/2019.	
	2. Bukit Asahan Estate manager issued appointment letter of PIC for Safety dated 25/05/2023.	
	g) SOU 18 Diamond Jubilee managements conducted regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. OSH Meeting has been conducted on quarterly basis. Refer OSH minutes of meeting. Records was kept and all the concern of the employees and any remedial actions taken was recorded.	
	1. Diamond Jubilee Estate conduct OSH Meeting on 05/05/2023	
	2. Bukit Asahan Estate conduct OSH Meeting on 09/05/2023.	
	h) SOU 18 Diamond Jubilee managements adopt SDPB Emergency Preparedness & Response Procedures with Doc. No.: UM/HSE/SP/02 dated 17/11/2021. Flowchart for emergency has been placed at strategic location e.g., Office notice board, Line site, store etc. Safety was given upon entrance of sample site visited. Interview with sample workers found they have good understanding on accident and emergency procedures.	
	 First aider has been present at all field visited and works station inspected. Latest training has been conducted on year 2023. Refer training material, attendance, and photos. First aid box was inspected during site visit and found contains with approved contents. Verified that first aid box was available at each worksite. 	
	1. Diamond Jubilee Estate conduct First Aid Training by Medical Assistant on 06/05/2023.	
	2. Bukit Asahan Estate conduct First Aid Training by Persatuan Bulan Sabit Merah (PBSM) Malaysia on 12/06/2023.	
	j) Accident record was verified during the audit. Accident record and investigation was recorded and discussed during quarterly OSH meeting. Refer JKKP 6, 7 and 8 report.	



Criterio	on / Indicator	Assessment Findings	Compliance
Criterio	n 4.4.5: Employment conditions	 Diamond Jubilee Estate submitted JKKP 8 form through online system with ref. No.: JKKP8/122267/2022 on 13/01/2023. Bukit Asahan Estate submitted JKKP 8 form through online system with ref. no.: JKKP8/118992/2022 on 13/01/2023. 	
4.4.5.1	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. - Major compliance -	SDPB established the Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) last revised 2020. Besides, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/03/2020. SDPB respect and safeguard human rights, nation of democracy and its institution. They recognize that Human Rights Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with SDPB. This Policy is applied to all stakeholders affected by the business activities and relationships including directors, employees, counterparties, business partners, workers in their operations and supply chains, and communities surrounding their operations.	Complied
4.4.5.2	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. - Major compliance -	Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They promote diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin,	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		Records of employments and onsite interview conducted with sampled internal workers informed they not discriminated practices implemented in the operations.	
4.4.5.3	 .4.5.3 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. - Major compliance - 	 Based on agreements and pay slips sighted for sample employees as per indicator 4.4.5.6 below, management has ensured that employees' pay, and conditions meet MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement. Review on the sampled of employment contracts verified terms and conditions outlined as per collective agreement and Employment Act 1955 as follow. 1. Diamond Jubilee Estate workers' of √258*0.8 with sample of total 14 workers during this round of audit as follow. 	Complied
		 ID#176483, ID#172816, ID#176464, ID#179137, ID#176473, ID#176457, ID#176479, ID#179132, ID#108661, ID#108662, ID#160724, ID#108520, ID#117013, ID#121492 Bukit Asahan Estate Workers' √201*0.8 with sample of total 12 workers during this round of audit as follow. ID#9953, ID#51037, ID#15373, ID#51027, ID#168445, ID#138884, ID#155048, ID#122779, ID#02496, ID#124017, ID#109471 	
		ID#132778, ID#93486, ID#124917, ID#108471 Document review on workers' payslip verified the information includes piece rated wages, harvesting wages, daily wage rate, vacation leave pays, price bonus, incentives, work on restday paid, Public Holiday paid, special gratuitous payment, MC paid, overtime (Normal day), phone allowance, insurance subsidy, EPF/SOCSO/EIS insurance contribution, electricity deduction and union fee.	
4.4.5.4	Management should ensure employees of contractors are paid based on legal or		Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
	 industry minimum standards according to the employment contract agreed between the contractor and his employee. - Minor compliance - 	employee based on the sample contractors' agreements sighted in Diamond Jubilee Estate and Bukit Asahan Estate. Based on review of the sampled payslip for all contractors' workers verified, is according to the requirement, which is applicable includes minimum wages, EPF and SOCSO contributions. Diamond Jubilee Estate and Bukit Asahan Estate hired contractor for FFB Transportation to the mill and based payslip review sighted with SOCSO and EPF contribution.	
4.4.5.5	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. - Major compliance -	Diamond Jubilee Estate and Bukit Asahan Estate employed local and foreign workers and registered into Employee Master Details Listing in SEMUA system. The records of Employee Master list which is available as a database in computerized Check roll System can provide accurate account of all employees including their particulars of full names, gender, date of birth, date joined company, wages grade and position etc.	Complied
4.4.5.6	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. - Major compliance -	Diamond Jubilee Estate and Bukit Asahan Estate employed local and foreign workers and registered into Employee Master Details Listing in SEMUA system. Review on the listing, verified all workers are employed by SDPB's estates' management. Review on 26 copies of fair contracts that have been signed by both employee and employer were provided to each employee as per records in Diamond Jubilee Estate and Bukit Asahan Estate. Diamond Jubilee Estate and Bukit Asahan Estate hired contractor for FFB Transportation to the mill and based payslip review sighted with SOCSO and EPF contribution.	Complied
4.4.5.7	The management shall establish a time recording system that makes working	Diamond Jubilee Estate and Bukit Asahan Estate registered all their workers into Employee Master Details Listing in SEMUA system. All the daily attendance and overtime work were recorded in Estate Daily Attendance Report.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	hours and overtime transparent for both employees and employer. - Major compliance -	Document review on the attendance (out-turn) and work hours (normal time and overtime) recording system established in both manual and computerized check roll system which makes working hours and overtime transparent for both employees and employer. Onsite interview with sampled workers informed working time and break time is according to employment contract. Overtime offered to workers is voluntarily upon mutually agreement between management and workers.	
4.4.5.8	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. - Major compliance -	registered into Employee Master Details Listing in SEMUA system. Worker's attendance will be	Complied
4.4.5.9	 Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. Major compliance - Diamond Jubilee Estate and Bukit Asahan Estate manage workers' payslip through SAP Daily attendance and total hours of overtime will be recorded into SAP system. Wa overtime were paid according to the Daily Attendance Report and productivity reports Based on records of sample employees sighted in indicator 4.4.5.6 above, the workin found in compliance with employees' terms and conditions of MAPA/NUPW Field an General Employees and Fringe Benefits Agreement, 2019. This also in line with I Employment Act 1955. 		Complied
4.4.5.10	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,		Complied



Criterio	n / Indicator	Assessment Findings	Compliance
	bonus payment, professional development, medical care and health provisions.	workers are provided with free medical facilities. In additional, all the workers are entitled with the phone allowance of RM5 for every month. Free housing facilities were provided to all the workers and their families.	
	- Minor compliance -		
4.4.5.11	provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers'	SDPB revise Workers Housing Management Procedure 2022, Ver.01, updated 30/06/2022 as guidelines to continuously improve of living standards of their employee in estates and mill operations. Its shown company commitment in managing employee's housing repair and maintenance through digital platform named Digital Housing Complaint system or 'OilPalmPal'.	Complied
	Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.	To provide guidance to management in providing a safe, livable workers housing condition in accordance with Workers Minimum Standard of Housing & Amenities (Amendment) 2091 (Act A 1604).	
	- Major compliance -	To integrate all past policies related to workers housing & amenities management in the operating units including.	
		1. Workers minimum standard of housing amenities guidelines on Jan 2015	
		2. IOM for employees housing inspection & welfare in Dec 2020	
		3. IOM for rules & regulations at employee house in June 2021	
		4. IOM for Safe handling & storage of Petrol on Mar 2021	
		5. IOM for Safe Fogging Procedure in June 2021.	
		All workers are provided with free housing facilities that included basic amenities such as electricity and free water up to 35 gallons per employee per day. Only additional use will be charged to workers based on applicable domestic rates.	
		Community hall, sport facilities etc. obtained from the national grid were provided to the workers.	
		The housing condition was in accordance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446).	



Criterion / Indicator		Assessment Findings	Compliance
		 Weekly inspections by medical assistant were done to ensure cleanliness of the housing. Records were well maintained as per sample latest inspections as following: Diamond Jubilee Estate conduct on 12/04/2023 Bukit Asahan Estate conduct on 16/03/2023. 	
4.4.5.12	The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	 SDPB developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They seek to create a working environment with zero tolerance for sexual harassment and abuse and in which violence is never used to resolve issues or conflict. SDPB issued Inter-Office Mail (Ref. No.: CEOUM/064/10/2022) dated 11/10/2022 with topic 'Non-conformity on Gender Committee Meeting Frequency' from CEO, Upstream Malaysia' has incorporated its policy on violence and sexual harassment in the 'Group Sustainability & Quality Policy Statement' mention in Indicator 4.1.1.2 where the management is committed to prevent sexual harassment and other forms of violence. SDPB established Terms of Reference (TOR) for Gender Representative and Gender Committees as of March 2021. The TOR established as guidelines to raise awareness, identify and address issues of concerns, opportunities and area for improvement for workers particularly the women. 3.4 The GC at SOU's shall be required to conduct the following: a) GC must conduct at least four (4) engagements/activities per year with the community of workers and their dependents. This can be at OU level or SOU level. Suggested topics may include women's health, education for children, mental health awareness, domestic violence/abuse and any other topics that are related to women. 	OFI



Criterio	n / Indicator	Assessment Findings	Compliance
		Document review of minutes of meeting, SOU 18 level gender committee conduct meeting on 25/05/2023, 28/03/2023, 09/03/2023 and 20/01/2023. However, the minutes of meeting verified the discussion only focus for activities only.	
		Opportunity for Improvement (OFI)	
		Gender Committee for Diamond Jubilee Estate and Bukit Asahan Estate may improve the agenda in minutes of meeting as per suggested topics related to women in guideline document.	
4.4.5.13	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	respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They respect the rights of their employees to form and join unions and bargain collectively.	Complied
	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. Employees shall have the	Social Dialogue was carried out by the management of Diamond Jubilee Estate and Bukit Asahan Estate with workers to update the progress of action taken for the issues raised by workers. The initiative will discuss during management review meeting and action taken accordingly. All issues will be uploaded into Social Dialogue Online Tracker System (SDOTS) for monitoring.	
	right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated	Verified the records of monitoring of issues and evidence of actions taken to resolve the issues raised by the workers.	
	against or suffer repercussions. - Major compliance -	The workers that involved in the Social Dialogue were NUPW representatives, Gender Committee representatives and others' nationalities representatives.	
		Diamond Jubilee Estate and Bukit Asahan Estate management allowed their workers to form or join any association such as NUPW. Document reviewed on their payslip found that they are deducted for the NUPW subscription fees of MYR11.00 monthly.	
		Employees were given freedom to associate and bargain collectively with company and to organize among themselves through association meetings as per sample sighted as per sample	



Criterio	n / Indicator	Assessment Findings	Compliance
		latest minutes of meeting between Management and NUPW representatives. Union Meeting sighted in Diamond Jubilee Estate on 16/03/2023 and Bukit Asahan Estate on 17/02/2023.	
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children and young persons is acceptable on family farms, under adult supervision, and when not interfering with their education. They shall not be exposed to hazardous working conditions. - Major compliance -	respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography. They are eradicating child labour in all their supply chain and not employ anyone underage of 18 years.	Complied
Criterion	4.4.6: Training and competency		
4.4.6.1	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. - Major compliance -	developed. The plan established for year 2023 includes with Safety Briefing Plan and have included Gender Specific Training involves all employees. Based on the documents reviewed it was concluded that the training program has been effectively established and is accessible	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
		 2. Bukit Asahan Estate established Training Schedule FY 2023 includes. i. First Aid on 12/06/2023 ii. Fire Fighting on 15/06/2023 iii. OSH on 07/02/2023 iv. HIRARC on 07/02/2023 v. Spraying on 03/04/2023 vi. PPE on 24/05/2023 vii. Hearing on 16/05/2023 	
4.4.6.2	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. - Major compliance -	employee, management, and contractors. The training need analysis was conducted based on	Complied
4.4.6.3	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. - Minor compliance -		Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
		 vi. ERP on 10/06/2023 2. Bukit Asahan Estate established Training Schedule FY 2023 includes. i. First Aid on 12/06/2023 ii. Fire Fighting on 15/06/2023 iii. OSH on 07/02/2023 iv. HIRARC on 07/02/2023 v. Spraying on 03/04/2023 vi. PPE on 24/05/2023 vii. Hearing on 16/05/2023 Trainings were effectively conducted for all work process. The effectiveness of the trainings was then assessed, and evidence of understanding were available and verified. 	
4.5 Prin	ciple 5: Environment, natural resou	irces, biodiversity and ecosystem services	
Criterio	n 4.5.1: Environmental Management Pla	an	
4.5.1.1	An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented. - Major compliance -	 SDPB Group Upstream Malaysia Safety, Health and Environmental Policy Statement had been established via Group Sustainability & Quality Policy Statement dated 05/05/2022 and implemented. The policy was displayed prominently on notice boards in English and local language Bahasa Malaysia. Therein among others has stated that the Company is committed to protecting the environment and conserving biodiversity through minimizing environmental harms: 1. Protecting and enhancing biodiversity and the ecosystem 2. No deforestation and no new development on peat soil 3. Enhancing resilience against climate change impact 4. Adopting responsible consumption and production. 	Complied



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Criterio	on / Indicator		Assessment Fir	ndings		Compliance
Criterio	on / Indicator	commu follows. 1 2 3 4 5 6 7 8 Subject	plicy is prominently displayed in the office al inicated to the employees via training and v	ong with other Compo veekly briefing session Diamond Jubilee 05/01/2023 05/01/2023 16/01/2023 07/01/2023 - 24/06/2023 10/06/2023 - raining program related	Bukit Asahan 24/05/2023 24/05/2023 02/05/2023 10/04/2023 08/04/2023 03/04/2023 22/06/2023 10/04/2023	Compliance
4.5.1.2	 The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations. - Major compliance - 	a) Diar Envii The Impa Pollu b) Base were The 1. 2. 3.	mond Jubilee Estate and Bukit Asahan E ronmental Management Plan 2023 based on Environmental Management Plan was esta act Identification and Environmental Impact E ution Prevention Plan 2023. ed on the samples taken, all environmental r e found to be confirmed accordingly Documer Environment Management Plan has covered to Disposal of waste in accordance with SOP an Towards waste utilization where possible Increase efficiency in consumption of non-re To minimize soil erosion during replanting	Estate established real aspect and impacts a blished based on Env Evaluation conducted a management plan rela- nted information: the objectives among of ad legal requirement	analysis conducted. <i>v</i> ironmental Aspect and documented in ted to the process others includes:	Complied



Criterion / Indicator			Assessment Find	lings	Compliance
		 among others the follow 1. Chemical storage/ 2. Gen-set/ Power get 3. Fertilizer application 4. Diesel storage/ spit 5. Dust and smoke et 6. EFB disposal in the 7. Scheduled Wasters 8. Chemical mixing/ the 	n burning ect impact analysis has bee wing. issuance eneration on illage mission e fields storage/ disposal transportation	n established for operation to include on and Emission Management initiative	
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored. - Major compliance -	The developed environment promote the positive ones Environmental Improvement details of mitigation of the Based on the samples take found to be mitigate the r of the above items were were reviewed annually. The Activities Grass cutting Grass cutting	Complied		



Criterio	on / Indicator		Assessment Fi	ndings	Compliance		
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	 plan. Status, Budget and progress. This is available Improvement planned for issues. Based on the samples tak found to be continuously follows. Diamond Jubilee Esta program. 	d person in charge were as elaborated in indicator or both short and long terr ken, all environmental man or improve for both estates ate and Bukit Asahan Estate te and Bukit Asahan Estate	Landfill external disposal No container leakage/ PPE Schedule maintenance Guidance as SOP Guidance as SOP Tray/ Containment trap PPE/ SOP een included in the continual improvement included in the plan for monitoring the 4.5.1.3 above. ns are detailed along with the identified agement plan related to the process were Among the promote positive impact as e applied EFB in the field as nutrient cycle continuously promoted the reduce, reuse	Complied		
4.5.1.5	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. - Major compliance -	to create awareness rega Training program is avail on a yearly basis or revise	amond Jubilee Estate and Bukit Asahan Estate continuously provide training to the workers create awareness regarding the environmental policy and management plan established. aining program is available in the SOU 18 Diamond Jubilee Training Program 2023 updated a yearly basis or revised as per the management requirement. Based on the samples taken, training related to the process were found to be continuously improve the estates. Details shown in 4.5.6.2.				



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Criterio	on / Indicator		Assessment Findings				Compliance
			ed in this program are subjects related to environme policy, scheduled waste management, environmental p.				
		No	Subjects		Month		
		No.	Subjects	1-4	5-8	9-12	
		1	ESH Legal & Other requirements	/	-	-	
		2	ERP Chemical spill, poisoning, Fire	/	-	/	
		3	Scheduled waste management	/	/	-	
		4	Safe Work Procedure for All Stations.	/	-	/	
		5	Policy Training	/	-	/	
		6	HCV Training for Region	-	/	/	
		7	Safe handling of Electrical Equipment	/	-	/	
		8	MSDS/CSDS	/	-	/	
		9	Triple rinsing	/	/	-	
4.5.1.6	Management shall organize regular	Discussions on environmental issues were discussed at the following forums:					Complied
	meetings with employees where their						
	concerns about environmental quality are	2. ESH meeting on environmental issue if arises.					
	discussed.						
	- Major compliance -	3. Monthly management meeting should there be issues raised.					
		4. Daily briefing during muster.					
		The respective stakeholder meetings for all the estates were held at the respective estates.					
			the discussion focused on the scheduled waste and d	omestic was	ste handlir	ng. Minutes	
			ting was sighted and verified.				
		1. Dia	mond Jubilee Estate				
		No.	Date				
		1.	05/05/2023				
		2.	06/02/2023				
		3.	11/11/2022				

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Criterio	on / Indicator	Assessment Findings	Compliance
		4. 04/08/2022 2. Bukit Asahan Estate No. Date 1. 09/05/2023 2. 07/02/2023 3. 11/11/2022 4. 19/08/2022 Based on the samples taken, the meeting related to the process were found to be discuss their concerns about environmental quality. The agenda among others as shown below. 1. Kawalan Pencemaran Udara/ Air 2. SW Management 3. Estates Waste Management 4. Training The quarterly ESH and the annual management review meeting emphasized on issues on water management plan, electricity use, diesel consumption, waste management, SIA plan, renewable energy, aspect/impact.	
Criterior	1 4.5.2: Efficiency of energy use and us	e of renewable energy	
4.5.2.1	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends 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	 Diamond Jubilee Estate and Bukit Asahan Estate record the following range data and tabulate the ratio against the FFB produced to determine the efficiency of their operations. There has been initiative by the management in reducing the diesel consumption through the follows. Manual grass cutting reducing the tractor running hours. Optimum running hours of tractors. Scheduled maintenance of tractors. Reduce utilization of tractors during low crop seasons. 	Complied



Criterio	on / Indicator				Assess	me	ent Findi	ngs			Compliance
	operations over the base period. - Major compliance -	energy o others a 1. To e	efficiency. s follows. ensure min	The ene	rgy manageme ance FFB ramp	ent o ba	plan to re alance to si	educe and ustain the	el consumption l eliminate was desired FFA at avoid leakages	the mill.	
		-	Regular servicing of gen-sets for a better efficiency.								
			Educate employees on fuel/electricity saving practices.								
		Month	e utilization of fossil fuel in 2022 is being monitored with records shown below.								
		MOLICI	Diesel	FFB	Diesel/FFB	_	Diesel	FFB	Diesel/FFB		
			(L)	(mt)	(L/mt)		(L)	(mt)	(L/mt)		
		Jan	4,068	3,172	1.28	_	4,458	1,980	2.25		
		Feb Mac	4,264 5,047	3,677 4,375	1.16 1.15	-	4,387 6,453	2,690 2,840	1.63 2.28		
		Apr	3,997	3,624	1.10		4,060	2,610	1.56		
		May	3,834	3,712	1.03		4,811	2,633	1.83		
		Jun	4,559	4,494	1.01		4,410	2,451	1.80		
		July	4,486	3,927	1.14	_	4,381	2,124	2.06		
		Aug	3,712	3,479	1.07	_	4,389	1,852	2.37		
		Sep	3,906	2,267	1.72	_	4,150	1,843	2.25		
		Oct Nov	4,260 3,837	2,600 2,158	1.64 1.78	-	4,810 4,510	1,970 1,913	2.44 2.36		
		Dec	5,037	2,156	1.78		5,800	2,620	2.36		
		Total	51,006	40,068	1.95		56,619	27,522	2.05	1	
			Baseline 1.30 Baseline 1.89								
4.5.2.2	The oil palm premises shall estimate the direct usage of non-renewable energy								r operations, in ions inclusive o		Complied

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Criterio	on / Indicator			Assessment Findings	Compliance				
	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. - Major compliance -	estate y	contractors, including all transport and machinery operations was available in the respective estate yearly budgets. Refer details as per indicator 4.5.2.1 above. Figures were extracted from the diesel issuance of estate diesel tank.						
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -		ere was no opportunity to use renewable energy (shell/fibre/EFB) in the estate with the estate technology and facilities within the industry.						
Criterio	n 4.5.3: Waste management and dispos	al							
4.5.3.1	All waste products and sources of pollution shall be identified and documented.	The cor	All waste and pollution are identified and documented in the Waste Management Action Plan. The compilation for 2023 was made at by the SDPB GSD applicable Diamond Jubilee Estate and Bukit Asahan Estate.						
	- Major compliance -			ites visits made waste and energy management were found to ental quality and in compliance to the regulatory requirement.					
		Details	of waste generated fror	n the estates operations among others as shown below.					
		No.	Type of waste	Description					
		1. 2.	Domestic waste Industrial waste	Rubbish at estate complex					
		Ζ.	Industrial waste	Fertilizer bags Scrap metal					
				Disposed construction material					
		3.	Sewage waste	Sewage					
		4.	Scheduled Waste	SW 404 Clinical waste					
				SW rags, plastics, filters					
				Spent lubricant & hydraulic oil					



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Criterio	on / Indicator			Assessm	ent Findings		Compliance
					containers, bags, equip pesticides, SW,	ment contaminated with	
		All was as follo		sources of pollution 2	2023 has been identifie	d and documented. Details	
		No.	Activities	Source	Waste /Pollution	Affected Environment	
		1.	Gen store	Petrol oil, lubricant Chemical	Spillage & contamination	Land, water	
		2.	SW store	Scheduled waste	All type of SW	Environmental	
		3.	Office	Domestic/ office waste	Paper plastic	Land, water	
				Toilet & kitchen	Sewage		
		4.	Workshop	Used oil & grease	Spillage		
				Metal waste	Wastage	Recycled	
				Oil drum/tank			
		5.	Labour line	Domestic waste	Solid waste	Land, water	
				Toilet/kitchen waste	5		
		6.	Field activities	Operation waste	Palm frond, FFB stalk	Land /water	
4.5.3.2	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management	was	ste generated by		stes sources are identifi	their disposal/recycling of ed and monitor. The details	Complied
	plan should include measures for:	No.	Туре	Description	Action t	o be taken	
	a) Identifying and monitoring sources of waste and pollution	1.	Domestic waste		externally Establish col		
	 b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting 				Establish collection sch Create awareness on h Monitoring of line site		



Criterion / Indicator			Assess	ment Findings	Compliance
them into value-added by-products - Major compliance -	2.	Industrial waste	Fertilizer bags	Inventory of bags, reuse for Loose Fruits collection, sell to appointed contractor	
			Scrap metal	Inventory maintained, tender at zone level for sale to licensed contractor.	
			POME	Daily monitoring of application at designated fields a rate of 40mt/ha for mature areas.	
	3.	Sewage waste	Sewage	To monitor during housing inspection and residents' complaints Engagement with licensed contractor for sewage management.	
	4.	Scheduled Waste	Clinical waste	Inventory maintained. Storage in sharp bin in clinic. Disposal via VMO to licensed contractor	
			SW rags, plastics, filters	Inventory maintained. Storage in scheduled waste store. Disposal to approved SW Collector registered with Department of Environment (DOE).	
			Spent lubricant & hydraulic oil	Collection by licensed vendor. Inventory maintained. Disposal to approved SW Collector registered with Department of Environment (DOE).	
			Disposed containers, bags, equipment contaminated	Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by approved SW Collector registered with Jabatan Pertanian and Department of Environment (DOE).	
			with chemicals, pesticides, SW		



Criterion / Indicator			Assess	sment Findings		Compliance
	No.	Activitiy	Source	Waste /Pollution	Affected Environment	
	1.	Gen store	Petrol oil, lubricant Chemical	Spillage & contamination	Land, water	
	2.	SW store	Scheduled waste	All type of SW	Environmental	
	3.	Office	Domestic/ office waste	paper plastic	Land, water	
			Toilet & kitchen	sewage		
	4.	Workshop	Used oil & grease	Spillage		
			Metal waste Oil drum/ tank	Wastage	Recycled	
	5.	Labour line	Domestic waste Toilet/ kitchen wast	Solid waste te sewage	Land, water	
	No.	Activity	Source	Prevention	Action Plan	
	1.	Gen store	lubricant ar		Establish recovery procedure - accidental spillage. Kit available	
	2.	SW store		omply to EQA	Dispose as SW & maintain record.	
	3.	Office	office waste w	vaste	Continuous education on environmental issues and program.	
	4.	Workshop	Used oil & Di grease pr	isplay signboards & rovide litter bins		
				, ,	recycling	
	5.	Labour line		, ,	Provide training on recycling	

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Criterio	on / Indicator				Assess	ment Find	lings				Compliance
		í c	Diamond Jubile observed their v quality and in c lan identified a	e Estate ar vaste and po ompliance t	ollution are o the regula	llage ahan Estate concluded t atory requir	e maintain o o be effectiv ement. All r	event of r documents /e in handlir ecycle wast	ng environme æ included in	l isits ntal	
4.5.3.3	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. - Major compliance -	hall establish Procedure for nicals that are nment Quality Waste) 2005, Act, 1974 to									Complied
		No. 1 2 3	Date 20/06/2023 05/01/2023 17/06/2023	SW 410 0.180 0.082 -	SW 305 0.500 0.400 -	Jubilee Esta SW 404 - - 0.003 ahan Estate	SW 409 - - -	SW 306 0.200 0.030 -	SW 312 - - -		
		No. 1 2 3 4	Date 31/05/2023 13/04/2023 20/09/2022 03/05/2023 12/11/2022	SW 410 0.005 0.205 0.050 - -	Bukit As SW 305 - 0.820 0.200 - -	anan Estate SW 404 - - - 0.026 0.026	SW 409 0.450 - - - -	SW 306 - - - - -	SW 312 0.100 - - - -		

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Criterio	on / Indicator	Assessment Findings	Compliance
4.5.3.4	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. - Major compliance -	SDPBmaintain the currentSOP ofScheduledWastes(HazardousWaste)ManagementSD/SDP/PSQM (ESH)/203-EN1theDisposalPesticidecontainer.Contentincludesthe triplerinsingprocedures and the relevant trainingto be conducted.Under the operational controlprocedureestablished as given in 4.5.3.3 above the guideline and practice for handling emptypesticidescontainers are as follows.1.All class 2 and above containers are tripled rinsed, and holes punctured at the bottom only if the waste generator is to dispose as non-scheduled waste.2.Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process.3.Empty containers were tripled rinsed, punctured, and delivered as SW 409. Others were used recycled for chemical containers for spraying purposes.DiamondJubileeEstate and Bukit Asahan Estate disposed to approved SW Collector registered with Department of Environment (DOE).The records of empty pesticide containers where it will 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.No.ItemsDiamondDateBukit AsahanDate	Complied
		Jubilee Estate Estate 1. 20L Empty Container 48 units 22/06/2023 127 units 24/06/2023 2. 500g Ally Bottle 6 kg 22/06/2023 18 kg 24/06/2023 3. Empty fertilizer bags 680 kg 22/06/2023 1,530 kg 24/06/2023	
4.5.3.5	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses. - Minor compliance -	Domestic waste was disposed according to the waste management plan. Verified that the management has disposed the domestic waste through land fill municipal Majlis Perbandaran Alor Gajah facility available in the landfill of Sungai Udang and Majlis Daerah Segamat with landfill located at Buloh Kasap Segamat respectively for Diamond Jubilee Estate and Bukit Asahan Estate.	Complied



Criterio	n / Indicator			Assessme	nt Findings		Compliance			
		enviror water s All dor registe Asahar propert manag	The risk of contamination has been minimized through this system disposed in an environmentally and socially responsible way, such that there is no risk of contamination of vater sources or to human health. All domestic waste is collected 2 times/3 times weekly via a to approved SW Collector egistered with Department of Environment (DOE) for Diamond Jubilee Estate and Bukit Asahan Estate respectively eliminating the issue of managing own landfill in the estate's property. Collection is made from a centralized point accumulated internally by the estate nanagement from the living quarters and office complex. The risk of contamination has been ninimized through this system.							
		No.	Internal Landfill External							
		1. 2.	Bukit Asahan	-	MP Alor Gajah MD Segamat	Collection 2 times/3 times Collection 2 times/3 times				
Criterio	4.5.4: Reduction of pollution and emis	sion				· · · · · · · · · · · · · · · · · · ·				
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	This in The po Identifi will be Impact With la include chemic Diamon aspects	cluded gas emissions, illuting activities are ic cation. From the EAI, included in the manage Evaluation. st reviewed on 03/01 activities at the ch al store, mixing areas and Jubilee Estate and s/impacts register as	scheduled waste, dentified and docu , it will be evaluat gement plan. The /2023 no major cl emical store, wo s, SW store, catch d Bukit Asahan E sociated with the	solid waste and g umented in the En ted for the impact evaluation is docu hanges to the esta orkshop, store, so ment pond, effluer state continued to ir activities. Enviro	polluting activities in estate. Jeneral waste. vironmental Aspect & Impact . The identified impact if any mented in the Environmental ate's activities. Areas of focus heduled waste, diesel tank, at land application area. Demaintain its environmental conmental aspect and impact as estates and mill activities /	Complied			



Criterio	on / Indicator			Assessment Findings	Compliance		
		the was The ris environ water s the esta	ste products and so sk of contaminat mentally and socia ources or to huma ate's operations as				
		No.	Environment Receptors Air	Source Air emissions – from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). EFB dumping).			
		2.	Water	Water discharges – Cleaning water/ run-off/ process station water / mixing area			
		3.	Land – Scheduled waste, domestic waste and industrial/ process waste. Clinical wastes – generated from clinics.				
		product	s and sources of	and waste management action plan is used to identify the waste pollution – is in place and is being reviewed and implemented tion has been taken by the estates were:			
			eduled wastes – vironment (DOE).	disposed approved SW Collector registered with Department of			
		 Domestic wastes are disposed to MPAG - Sungai Udang landfill twice weekly accumulated at designated area located far from housing complexes and waterways. Full compliance to zero burning practices. 					
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	annuall [,] The ris environ	y. The following is k of contaminatic mentally and socia	Management Plan 2023 was established at estates and reviewed sues and mitigation program among others have been identified. In has been minimized through this system disposed in an ally responsible way, such that there is no risk of contamination of an health. The improvement plan follows.	Complied		



Criterion / Indicator			Assessment Findings	Compliance
	No.	Objectives	Improvement Plan	
	1.	To minimize pollution	Recycling of fertilizer bags	
		from estate activities	Daily checking/ maintenance spraying pumps	
			Preventive maintenance of farm vehicles	
			Spill tray for farm vehicle	
			Sump oil trap at workshop/ premix area	
			No open burning	
			Weekly housing inspection	
	2.	Management of	To ensure all SW being stored and disposed as per legal	
		scheduled waste	requirement	
			Regular inspection for estates vehicles	
			Maintenance PCD to prevent spillage	
	3.	Replanting activities	LCC planting/ BP Planting	
			EFB mulching	
3.	3.01. Tł		perations is identified and recorded in the palm GHG version an for the estates includes reduction of fertilizer usage by EFB application.	
	No.	Issues & Strategies	Action Plan	
	1	Reduce diesel	To monitor diesel usage	
		consumption at estates	To ensure vehicle scheduled maintenance.	
		operations	Optimum gen set usage	
	2	Reduce smoke emission	Implement PMV for all vehicles	
		to the air		
	3	Reduce electricity	5	
		usage	Install capacitor at identified large power consumption	
			motor	
			install LED bulb for the lighting system	



Criterion / Indicato	r			Assessment Find	lings		Compliance
Criterion 4.5.5: Natur	al water resources						
 management and availabilit (surface and management a. Assessment sources of b. Monitoring may have natural way reflects the c. Ways to on usage to read application equipment collection of d. Protection wetlands, restoring a zones at replanting, within the 	of outgoing water which negative impacts into the terways at a frequency that e estate's current activities. ptimize water and nutrient educe wastage (e.g. having systems for re-use, night , maintenance of to reduce leakage, of rainwater, etc.). of water courses and including maintaining and appropriate riparian buffer or before planting or along all natural waterways	Plar reso met the mea The 1. 2. 3.	nond Jubilee Estate and n 2023 which was develo- burces. This is made h thods. The management quality and availability asures are effective. e plan emphasized on the Water source Efficient use of water Renewability of water s Avoidance of surface ar Contin Area/incident Water shortage/ prolonged dry season Severe water pollution/ contamination	oped to maintain the operation of the op	availability water consumption or management plan ar irces (surface and gro mination vater shortage staff/ workers to om SAMB water supply from SAMB staff/ workers to om SAMB	of natural water through various ad has maintained	Complied



Criterion / Indicator			Assessment Findings			Compliance			
a timetable for restoration shall be			Water reduction plan						
established and implemented.	No.	Issues/Areas	Action Steps	PIC	Status				
 f. Where bore well is being use for water supply, the level of the ground water table should be measured at least annually. 	1	Rainwater collection	Large containers are to be placed at strategic locations to collect rainwater The rainwater shall be recycled for	t	On-going				
- Major compliance -			washing heavy machinery						
	Incl	uded therein are the	e following documents which were	sighted and ve	erified.				
	ripa Rev	er courses and wetlands are protected including maintaining and restoring appropriate rian buffer zones. The guidelines are detailed in the Responsible Agriculture Charter ised 2020. The estates adopted the existing SDP policy to maintain the buffer by ricting agrochemical application and left undeveloped during replanting. ite visits buffer zones established for both the estates confirmed the follows.							
	c) Ons	ite visits buffer zone	s established for both the estates	confirmed the	follows.				
	Ν	lo. River width	Buffer Zone						
		1. >40 m	50 m						
		2. 20-40 m	<u>40 m</u>						
		3. <u>10-20 m</u>	20 m						
		4. <u>5-10 m</u>	<u>10 m</u>						
	Diar cato wat Buk	5.<5 m5 mDiamond Jubilee Estate - No river flowing within the estate property however has a catchment pond for the nursery watering requirement at the main division. The closest waterways are Sungai Chohong located three (3) km away.Bukit Asahan Estate - Small area of river flowing Sungai Asahan located at PR 22C within							
	the	estate area.							
			the estates for detection of any portion of any portion of any portion of the intake point are take						


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Criterion / Indicator			Assessment F	indings			Compliance
		sis for detection of fer neters as shown follow		effect to the	water courses.	. Among other	
		Diamond Jubil	ee Estate				
	No.	Parameter	Standard				
	1.	рН	6-9				
	2.	BOD	3				
	3.	COD	25				
	4.	SS	50				
	5.	AN	0.3				
	6.	DO	5-7				
		Bukit Asahar	n Estate				
	No.	Parameter	Standard				
	1.	Aldrin	0.02	ppb			
	2.	Dieldrin	0.02				
	3.	T-DDT	0.10				
	4.	Bhc	2.00				
	5.	Heptachlor	0.05				
	6.	Lindane	2.00				
	7.	Endosulfan	10.00				
	8.	Chlordane	0.08	ppb			
e	Monit	nanagement monitors oring of upstream, and ed the following analys	downstream of wa				
	No.	Estate	Location	Point A	Point B	Point C	
	1	Diamond Jubilee	Water Pond	-	-	-	
	2	Bukit Asahan	Sungai Asahan	PR22C	PR22C	PR22C	



Criterio	on / Indicator	Assessment Findings	Compliance
		 Samples date verified on 10/06/2023, 14/03/2023, 03/01/2023 and 20/10/2022. f) There is bore/tube well available in Bkt Asahan Estate located at P22C and P19A. This was confirmed through the field visits and interview with the employees. The tube well was commissioned in June 2013 is managed and monitored by Cambrain Consult recent. Both units have ceased for estate consumption in Jan 2022 as the entire complex had taken source from SAMB. 	
4.5.5.2	No construction of bunds, weirs and dams across main rivers or waterways passing through an estate. - Minor compliance -	During site verification/ interviews and feedback received from stakeholders/ employees confirmed that there was no construction of bunds, weirs and dams across main rivers or waterways passing through both the estates. This requirement is also audited internally by the SDPB Group Sustainability Department. During the field visit no construction of such was observed.	Complied
4.5.5.3	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). - Minor compliance -	Practices on water harvesting such as roadside drains had been constructed and water has been directed to conservation terraces, pruned fronds were stacked along the palm row. Practices of water harvesting are mainly constructed on flat areas. Roadside pits were also available at every three (3) palm rows, to divert in event of water overflowing and to benefit the nearest palm at the pit end to obtain additional moisture. This is part of the common practices introduced within the SDP Group Agriculture Procedures.	Complied
Criterio	n 4.5.6: Status of rare, threatened, or e	ndangered species and high biodiversity value	
4.5.6.1	 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: a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be 	The audit findings have confirmed that there is no new planting affecting present HCV and primary forest. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented. The HCVs, conservation areas/environmentally sensitive areas had been identified and being monitored.	Complied



Criterion / Indicator				Assessment Findings			Compliance
 significantly affected by the grower(s) activities. b) Conservation status (<i>e.g.</i> 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. - Major compliance - 		Depar There Comm Assess review 1. O 2. D 3. Fi i.	tment has conduct being no revision s non wildlife found of sment for SOU 1 sment is through sit v on available secon verview of HCV ass escription of assess nding and discussion landscape contest	during the assessment were documented in 8 Diamond Jubilee in April 2017. The ce observation, interviews, stakeholders' cor indary data. The assessment among others ressment. sment areas.	Jubilee in A Table 10 i methodolo nsultation a	April 2017. In the HCV gy of the nd desktop	
	b)		nonitoring and man				
		In sum	-	vered within the SOU 18 landholdings 6.94	ha and the	HCV areas	
		No.	Estates	HCV area	Area	Туре	
		1	Bukit Asahan	Water Catchment A Tekah Div	0.69 0.69	HCV 4	
				Water Catchment Main Div	0.67	HCV 4	
		2	Diamond Jubilee	Water catchment area P07H/ P02H	5.58	HCV 4	
		Total			6.94		
		report protec	. Birds, mammals ted and protected	ncluded in the HCV re-assessment for SOU , reptiles, insect (least concern and vu wildlife were identified based on the latest piamond Jubilee Estate. The exercise has ta	Inerable) a HCV repor	and totally t reviewed	



Criterio	on / Indicator	Assessment Findings	Compliance
		all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented. The HCVs, conservation areas/environmentally sensitive areas e.g., bund along the stretches of river/straits which passes bordering through the estates had been identified and being monitored.	
4.5.6.2	 If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include: a. Ensuring that any legal requirements relating to the protection of the species are met. b. Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. - Major compliance - 	 There is no RTE or high biodiversity value complexes except for reported presence of snakes, monkeys and wild boars. The management and monitoring plan for HCV areas was established and reviewed annually. The exercise has taken into consideration all aspects of environmentally sensitive areas such as ponds, streams, wildlife boundaries and was documented. The HCVs, conservation areas/ environmentally sensitive areas had been identified and being monitored. There were displays of signage made at site i.e. No fishing/ no manuring/ no spraying No spraying/ no hunting/ no symming Evidence to continuously prevent and discourage illegal or hunting, fishing, or collecting activities were maintained and implemented. Signage as well as routine patrolling activities were utilized as part of creating awareness among employees and maintain HCV. The estates had established HCV action plan for FY2023 as follow. a) Ensuring all legal requirements to the protection of species/habitat are met. Controlling any illegal /inappropriate hunting, fishing, and developing measures to resolve humanwildlife conflicts. b) Protection of buffers zones for respective rivers as identified in the HCV assessment. Communications are made to all employees, contractors, suppliers, and neighbor informing that encroachment and hunting are not allowed. There were programs held by the estates to all employees in pertaining to the awareness of HCV areas and RTE species. Interview with the employees concluded that training and briefing made during the ad hoc session and morning muster. This is also emphasized 	Complied



Criterio	n / Indicator		Asses	sment Findings		Compliance
Criterio 4.5.6.3	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required.	a 1. 2. 3. Traini No. 1. 2. 3. 4. 5. 6. Diamo Plan b	uring the training held by Group ware of the following measures. An offence to capture, harm, kil Disciplinary measures shall be ta	Sustainability Department s any wildlife. aken if found violating com rom any chemical's applica nent are provided to the er Diamond Jubilee Estate 05/01/2023 05/01/2023 - 10/03/2023 24/06/2023 07/02/2023 an Estate established HCV, report. The exercise has t	pany rules. ation/pollution. mployees as follows. Bukit Asahan Estate 22/03/2023 02/02/2023 22/06/2023 21/06/2023 08/05/2023 27/05/2023 / Biodiversity Management taken into consideration all	Compliance
	- Major compliance -	was c identi Revie 1. D au re 2. D m is	locumented. The HCVs, conservat fied and being monitored. wed and sighted the implementation iamond Jubilee Estate and Bukit A nd RTE to the workers to ensure the cords conducted as shown in 4.5.6 iamond Jubilee Estate and Bukit A onthly basis. The monitoring focu- sues/ conflicts/ Sightings, Pollution we condition of the HCV area was c	ion areas/environmentally on of the management plan sahan Estate continuously he satisfactory understand 5.2. sahan Estate conducted m ising on encroachment/ sin n/ erosion issues and othe	sensitive areas had been n as follows: provided training on HCV ing. Reviewed the training nonitoring on HCV area on ign of trespassing, wildlife	



Criterio	n / Indicator	Assessment Findings	Compliance
Criterio	n / Indicator	 Assessment Findings Diamond Jubilee Estate and Bukit Asahan Estate developed Management Plan for the HCV and conservation area to protect from any encroachment. Among others consists of the follows. 1. To continue educating the workers regarding RTE. Workers interviewed confirmed that they are aware of no hunting is permitted in and within the estate. 2. Regular educating the employees via morning muster briefing about the need to protect the RTE species. 3. Appropriate disciplinary measures will be taken if found violated. Inspection of housing areas and interview of residents confirmed workers were aware of the company policy that prohibits hunting and collecting activities. 4. Information pertaining RTE and relevant SDPB Company policies were displayed at the display boards. 5. Buffer zone establishment to map areas and install buffer zone pegs. 6. Encroachment control in HCV area and monitoring 7. Stabilize the slope at the pump house near the river. Diamond Jubilee Estate and Bukit Asahan Estate established river riparian buffer zone Diamond Jubilee Estate catchment pond adjacent to the nursery Main Division. The riparian buffer zone was demarcated with red and white colour ring at the palm trunks. No evidence of chemical 	Compliance
		application sighted at the area. Signage on prohibition to conducts activities such as swimming, fishing and chemical applications has been erected at the buffer zone area. Noted during interview with the sprayers, the understanding on prohibition of activities in the buffer zone area is satisfactory.	
Criterior	4.5.7: Zero burning practices		
4.5.7.1	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be	units adhered to the policy for any replanting. Onsite interviews with the workers informed no	Complied



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Criterio	on / Indicator	Assessment Findings	Compliance
	avoided except in specific situations, as identified in regional best practice. - Major compliance -	 Diamond Jubilee Estate and Bukit Asahan Estate replanting program spanned over the forthcoming years. In the 2020, 2021 and 2022 replants visited it was evident that all palms were felled, shredded, windrowed and left to decompose. Not sighted any fire been used for waste disposal. SDPB practiced zero burning as per the policy as follow. 1. EMS-SOP-Section B2 - Under felling/clearing & land preparation. 2. Carbon Policy 	
4.5.7.2	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. - Major compliance -		Not Applicable
4.5.7.3	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 -		Not Applicable
4.5.7.4	Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched. - Minor compliance -	This is included in the specification of work orders in event of land preparation during a replanting. It is a standard practice in SDPB. However, there are variations of practices between inland and coastal estates. Trunks are felled and chipped without having to shred and windrowed in certain conditions. Adjustment of work requirement are finalized from the directive of the replanting unit and the Region office.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		Noted based on the records on the land clearing for the replanting at Diamond Jubilee Estate and Bukit Asahan Estate, were felled, shredded, and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate.	
4.6 Prin	ciple 6: Best Practices		
Criterio	n 4.6.1: Site Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -		Complied



Indicator	Assessment Findings	Compliance
	 Prosedur Kerja Selamat established on 01/11/2023. Sime Darby Plantation Agricultural Reference Manual, Issue No:2 dated June 2021. Environment Safety Health Management System (ESHMS) established on 12/12/2019. Sustainability Plantation Management System (SPMS) established on 01/11/2008. 	
ere oil palm is grown within permitted els on sloping land, appropriate soil servation measures shall be plemented to prevent both soil erosion well as siltation of drains and cerways. Measures shall be put in place	SDPB established Group Sustainability & Quality Policy Statement followed by commitment under SDP Responsible Agriculture Charter (RAC) Rev.:02 on year 2020. The revise charter describes company commitment as sighted in section 3.1 of Protect and conserve biodiversity and ecosystems. Which in subsection 3.1.2, SDPB enhanced on their commitment on managing of erosion by protecting of steep slopes and river reserves within their own operations and promoting restoration programs.	Complied
prevent contamination of surface and undwater through runoff of either soil, rients or chemicals. ajor compliance -	The soil conservation measures implemented at the sloping areas are construction of terrace, establishment of cover crop and construction of roadside drain. This is guided by the SOP Steep Slopes Management Doc No. SMP-GPB-10 dated 18/03/2021. The objective was to ensure soil conservation, prevention, control of erosion and safety at steep slopes.	
	Diamond Jubilee Estate and Bukit Asahan Estate managements adopt the procedures from HQ and established relevant management plan as follows.	
	 Environment Management Plan Document: SOP Steep Slope Management 	
isual identification or reference system Il be established for each field. I aior compliance -	Visual identification has been established for each field and divided into division and blocks. Each block is named by visual identification (field marker) erected for reference. Cross checked with the records and the pictorial evidence provided found to be consistent.	Complied
	Onsite visit to fields, observed field numbers and hectare were marked on palms and signboards.	
	els on sloping land, appropriate soil servation measures shall be lemented to prevent both soil erosion well as siltation of drains and erways. Measures shall be put in place prevent contamination of surface and undwater through runoff of either soil, rients or chemicals. ajor compliance -	2.Sime Darby Plantation Agricultural Reference Manual, Issue No:2 dated June 2021. 3.3.Environment Safety Health Management System (ESHMS) established on 12/12/2019. 4.4.Sustainability Plantation Management System (SPMS) established on 01/11/2008.ere oil palm is grown within permitted iss on sloping land, appropriate soil servation measures shall be well as siltation of drains and undwater through runoff of either soil, rients or chemicals.ajor compliance -Sope stablished for each field. ajor compliance -sual identification or reference systemVisual identification has been established for each field. ajor compliance -bil be established for each field. ajor compliance -Visual identification has been established for each field. ajor compliance -compliance -Not sub the records and the pictorial evidence provided found to be consistent. Onsite visit to fields, observed field numbers and hectare were marked on palms and



Criterio	on / Indicator	Assessment Findings	Compliance
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	area, Estimated FFB Price per metric tonnage, Yield Per Hectare, Estimated FFB per metric	Complied
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. - Major compliance -	Diamond Jubilee Estate and Bukit Asahan Estate established a replanting program spanned over a five (5) year's period for forecast.Estates20242025202620272028Diamond Jubilee Estate (Ha)74.9263.88103.3299.350.00Bukit Asahan Estate (Ha)154.78122.68181.95273.01159.59	Complied
4.6.2.3	 The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production: cost per tonne of FFB 	 Diamond Jubilee Estate and Bukit Asahan Estate management established five (5) years business plan as a guidance for daily estate operations. Review on the includes of Total Mature area, Estimated FFB Price per metric tonnage, Yield Per Hectare, Estimated FFB per metric tonnage, Upkeep & Maintenance, Harvesting, General Charges, Income and Profit Loss. Diamond Jubilee Estate and Bukit Asahan Estate management updated their Oil Palm Yield Statistic (Actual & Budget) in June 2023. Includes as follow. 1. FFB Production Actual & Budget 2. Yield Per Hectare Actual & Budget 	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
	 d) Price forecast e) Financial indicators: cost benefit, discounted cash flow, return on investment - Major compliance - 	 Cost Per FFB Actual & Budget Planting material 	
4.6.2.4	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented. - Major compliance -		Complied
Criterio	n 4.6.3: Transparent and fair price deali	ing	
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	 SDPB established pricing mechanism and conducted as per contract agreement with contractors. Review on the contract agreement, sighted pricing of the job task is available. Sampled contract/Letter of Award to contractors as samples follow. <u>Diamond Jubilee Estate</u> 1. Letter of Award to Rxxxx Sxxxx Sdn Bhd dated 01/01/2023. 2. Letter of Award to Sxxxx Yxxxx Enterprise dated 01/02/2023. <u>Bukit Asahan Estate</u> 1. Letter of Award to Mxxxx Enterprise dated 28/10/2022. 2. Letter of Award to Kxxx Sxxxx Sdn Bhd dated 01/04/2023. 	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.6.3.2	All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance -	SDPB established pricing mechanism and conducted as per contract agreement with contractors.Review on the contract agreement, sighted pricing of the job task is available. Payment terms for contract work were stated in the contract agreement.Onsite interview with contractors informed their payments were made as per payment terms stated in the contracts. No delayed of payments recorded.	Complied
Criterio	n 4.6.4: Contractor		
4.6.4.1	Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	 SDPB established contractor agreement with letter of Award & Acceptance (LOA) and Ikrar Integriti Vendor with contractor as follow. <u>Diamond Jubilee Estate</u> 1. Rxxxx Sxxxx Sdn Bhd for FFB transporting contract dated 01/01/2023. 2. Sxxxx Yxxxx Enterprise for Backhoe Rental contract dated 01/02/2023. <u>Bukit Asahan Estate</u> 1. Mxxxx Enterprise for Rubbish Collection contract dated 28/10/2022. 2. Kxxx Sxxxx Sdn Bhd for FFB transporting contract dated 01/04/2023. All contractors engaged by estates were bound to understand and comply to their contractual agreements that includes MSPO requirements through signing of Vendor Integrity Pledge (VIP) which enable accredited CB to audit them. Communication and socialization of the MSPO requirement has been done during the contract agreement signing, stakeholders respond assessment. It has been confirmed through interview with sampled contractors where they can demonstrate their understanding on the MSPO requirement. There is evidence that contractor has been provided required documentation such as employment contract, workers' pay slips, EPF and SOCSO contribution to the management. 	Complied
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor.	Diamond Jubilee Estate and Bukit Asahan Estate engaged contractors for works such as FFB transporting, Backhoe Rental and Rubbish Collection. Sampled of the agreement/ letter of	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	- Major compliance -	 award (LOA)/ contract between company and the contractors as below: <u>Diamond Jubilee Estate</u> 1. Rxxxx Sxxxx Sdn Bhd for FFB transporting contract dated 01/01/2023. 2. Sxxxx Yxxxx Enterprise for Backhoe Rental contract dated 01/02/2023. <u>Bukit Asahan Estate</u> 1. Mxxxx Enterprise for Rubbish Collection contract dated 28/10/2022 2. Kxxx Sxxxx Lxxxx Sdn Bhd for FFB transporting contract dated 01/04/2023. 	
4.6.4.3	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. - Minor compliance -	 SDPB established contractor agreement with letter of Award & Acceptance (LOA) and Ikrar Integriti Vendor with contractors. All contractors engaged by estates were bound to understand and comply to their contractual agreements that includes MSPO requirements through signing of Vendor Integrity Pledge (VIP) which enable accredited CB to audit them. All contracted parties/vendors were required to signed Vendor Integrity Pledge (VIP) and to comply with requirement. In the VCOBC under section 4. Responsibility and Compliance with the Vendor COBC stated as follows: "We have the rights to audit the vendors to verify compliance with this Vendor COBC and/or with the requirements set out in the third-party agreements to permit ongoing assessment of risk". Sampled of contractors as follow. Diamond Jubilee Estate Rxxxx Sxxxx Sdn Bhd for FFB transporting contract dated 01/01/2023. Sxxx Yxxxx Kxxxx Enterprise for Backhoe Rental contract dated 01/02/2023. Bukit Asahan Estate Mxxxx Enterprise for Rubbish Collection contract dated 28/10/2022. 	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		2. Kxxx Sxxxx Lxxxx Sdn Bhd for FFB transporting contract dated 01/04/2023.	
4.6.4.4	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. - Major compliance -	by the contract, checking and signing the assessment of the contractor for each task and season contracted. All works performed of estates are checked and verified by the estate's personnel. Projects	
4.7 Prin	ciple 7: Development of new planti	ng	
Criterio	n 4.7.1: High biodiversity value		
4.7.1.1	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. - Major compliance -	it is this indicator is not applicable.	
4.7.1.2			Not Applicable



Criterio	on / Indicator	Assessment Findings	Compliance
	500ha but above 100ha, a Proposal for Mitigation Measures (PMM) is required. - Major compliance -		
Criterio	n 4.7.2: Peat Land		
4.7.2.1	New planting and replanting may be developed and implemented on peat land as per MPOB guidelines on peat land development or industry best practice. - Major compliance -	There is no development of new planting in all estates within SOU 18 Diamond Jubilee. Hence, this indicator is not applicable.	Not Applicable
Criterio	n 4.7.3: Social and Environmental Impa	ct Assessment (SEIA)	
4.7.3.1	A comprehensive and participatory social and environmental impact assessment shall be conducted prior to establishing new plantings or operations. - Major compliance -	There is no development of new planting in all estates within SOU 18 Diamond Jubilee. Hence, this indicator is not applicable.	Not Applicable
4.7.3.2	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.	There is no development of new planting in all estates within SOU 18 Diamond Jubilee. Hence, this indicator is not applicable.	
	- Major compliance -		
4.7.3.3	The results of the SEIA shall be incorporated into an appropriate	There is no development of new planting in all estates within SOU 18 Diamond Jubilee. Hence, this indicator is not applicable.	Not Applicable



Criterio	n / Indicator	Assessment Findings	Compliance
	management plan and operational procedures developed, implemented, monitored and reviewed.		
	- Major compliance -		
4.7.3.4	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. - Minor compliance -	this indicator is not applicable.	
Criterior	4.7.4 : Soil and topographic informatio	n	
4.7.4.1	Information on soil types shall be adequate to establish the long-term suitability of the land for oil palm cultivation. - Major compliance -	There is no development of new planting in all estates within SOU 18 Diamond Jubilee. Hence, this indicator is not applicable.	Not Applicable
4.7.4.2	Topographic information shall be adequate to guide the planning of planting programmes, drainage and irrigation systems, roads and other infrastructure.	There is no development of new planting in all estates within SOU 18 Diamond Jubilee. Hence, this indicator is not applicable.	Not Applicable
	- Major compliance -		



Criterio	on / Indicator	Assessment Findings	Compliance	
Criterion 4.7.5: Planting on steep terrain, marginal and fragile soils				
4.7.5.1	Extensive planting on steep terrain, marginal and fragile soils shall be avoided unless permitted by local, state and national laws. - Major compliance -	There is no development of new planting in all estates within SOU 18 Diamond Jubilee. Hence, this indicator is not applicable.	Not Applicable	
4.7.5.2	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 -	There is no development of new planting in all estates within SOU 18 Diamond Jubilee. Hence, this indicator is not applicable.	Not Applicable	
4.7.5.3	Marginal and fragile soils, including excessive gradients and peat soils, shall be identified prior to conversion. - Major compliance -	There is no development of new planting in all estates within SOU 18 Diamond Jubilee. Hence, this indicator is not applicable.	Not Applicable	
Criterio	n 4.7.6: Customary land			
4.7.6.1	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	There is no development of new planting in all estates within SOU 18 Diamond Jubilee. Hence, this indicator is not applicable.	Not Applicable	



Criterio	on / Indicator	Assessment Findings	Compliance
	and other stakeholders to express their views through their own representative institutions.		
4.7.6.2	Where new plantings on recognised customary lands are acceptable, management plans and operations should maintain sacred sites. - Minor compliance -	There is no development of new planting in all estates within SOU 18 Diamond Jubilee. Hence, this indicator is not applicable.	Not Applicable
4.7.6.3	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. - Major compliance -	aken-over, the this indicator is not applicable. le transfer of r provision of	
4.7.6.4	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. - Major compliance -	any agreed this indicator is not applicable. uishment of ior informed	
4.7.6.5	Identification and assessment of legal and recognised customary rights shall be documented. - Major compliance -	There is no development of new planting in all estates within SOU 18 Diamond Jubilee. Hence, this indicator is not applicable.	Not Applicable



Criterion / Indicator		Assessment Findings	Compliance
4.7.6.6	A system for identifying people entitled to compensation and for calculating and distributing fair compensation shall be established and implemented.	There is no development of new planting in all estates within SOU 18 Diamond Jubilee. Hence, this indicator is not applicable.	Not Applicable
	- Major compliance -		
4.7.6.7	The process and outcome of any compensation claims shall be documented and made publicly available.	There is no development of new planting in all estates within SOU 18 Diamond Jubilee. Hence, this indicator is not applicable.	
4.7.6.8	Communities that have lost access and rights to land for plantation expansion should be given opportunities to benefit from the plantation development.	this indicator is not applicable.	Not Applicable
	- Minor compliance -		



MS 2530-4: 2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General Principles for Palm Oil Mills

Criterion / Indicator		Assessment Findings	Compliance
4.1 Prin	ciple 1: Management commitment & resp	onsibility	
Criterio	n 4.1.1 – Malaysian Sustainable Palm Oil (MSPC)) Policy	
4.1.1.1	Policy for the implementation of MSPO shall be established. - Major compliance -	Sime Darby Plantation Berhad (SDPB) maintain the current Group Sustainability & Quality Policy signed by Group Managing Director on 02/12/2019 include the statement on commitment towards MSPO implementation. The memo describes company commitment to comply on the MSPO standards implementation and towards certified sustainable palm oil products.	Complied
4.1.1.2	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. - Major compliance -	 SDPB maintain the current Group Sustainability & Quality Policy signed by Group Managing Director on 02/12/2019 include the statement on commitment towards MSPO implementation. From the memo describes company commitment on emphasizing to achieved systematic approach on ensuring continuous improvement in the operation, compliance to statutory, legal and other regulatory requirements and establishment of traceability within the supply chain in the above-mentioned memorandum. The policy covers commitment to among others as follow. Promoting good governance and transparency Contributing to a better society Minimizing environmental harm Delivering sustainability quality The policy is guided by three main documents as follow. Responsible Agriculture Charter Human Rights Charter 	Complied

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Criterio	on / Indicator		Assessment Fi	ndings		Compliance
		3. Innovation & Productivi	ty Charter			
Criterio	Criterion 4.1.2 – Internal Audit					
4.1.2.1	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.	SDPB update Internal Audit 10/01/2023. The frequency and when is required.				Complied
	- Major compliance -	Based on the procedure, th Audit Procedure. Verified th yearly basis. Records were	hat sampled estates h	ave conducted the i		
		MSPO Internal Audit was co Group Sustainability Depa verification.				
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by	10/01/2023.			Complied	
	the identification of strengths and root causes of nonconformities, in order to implement the	The Internal Audit Report internal audit team raised n				
	necessary corrective action. - Major compliance -	MSPO Internal Audit was conducted on 11/05/2023 During the assessment, the internal audit team raised three (3) Major Non-Conformities in regard to MSPO Standard. The root cause was identified, and the corrections and corrective action plans were implemented and closed on 10/06/2023.				
		The nonconformity raised to				
		No. Date	NCR Major	NCR Minor	OFI	
		1 11/05/2023 2 10/05/2022	3	- 3	- 1	
	Image: Complexity of the sector of the se					



Criterio	on / Indicator	Assessment Findings	Compliance
4.1.2.3	Reports shall be made available to the management for their review. - Major compliance -	SDPB update Internal Audit Procedure with Doc. No.: SDP/GSD/SCU/IAP approved on 10/01/2023. Onsite visit to Diamond Jubilee POM verified the internal audit report kept, available and discussed during management review meeting. As evidence, all findings from internal audit were responded within the acceptable timeframe. The internal audit report was documented and made available for management review. As evidence, all findings from internal audit were responded by Mill Management within the acceptable time frame.	Complied
- ·· ·			
Criterio	n 4.1.3 – Management Review		
4.1.3.1	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. - Major compliance -	SDPB maintain the current SOP for Management Review documented in Standard Operation Manual, Sub-Section 5.6, dated: 25/5/2015. Based on the SOP established, the frequency for management review needs to be carried out at least once a year. The Management Review Meeting conducted as follows at the mill. No. Date 1. 15/06/2023 14 2. 17/06/2022 6 The agenda discussed during the meeting among others as follows: 1. Internal audit findings 2. Process Performance 3. Customer Feedback 4. Audits Results 5. Changes That Could Affect Management System 6. Complaints and grievance 7. Continual Improvement Plan	Complied

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Criterio	on / Indicator	Assessment Findings		Compliance
Criterion 4.1.4 – Continual Improvement				
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company. - Major compliance -	 SOU 18 Diamond Jubilee update Continual Improvement Plan for 202 Review on the plans include workers welfare, waste management, or & safety, and operations improvements. For example, several impro- have been initiated for the field operation and workers quarters. The plan includes as follow. 1. To reduce mill breakdown 2. To reduce mill losses 3. To enhance awareness on waste management 4. To initiate frequent CSR program with any local communities 5. To ensure safety in workplace before work commencement 6. In addition, there are projects and management plan to enhance and social improvement to the employees among others as follow No. Project 1 Pipe Water supply for process 2 Fuel conveyor for enhanced throughput 3 High speed separator - enhance oil recovery 4 Staff House 4 units Rehabilitation 5 Canteen building upgrading 	cupational health ovement projects the work process	Complied
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. - Major compliance -	Any new technology and/or innovation equipment is subject to appr Offices and Headquarters. The new information is updated to en morning briefings, memo, meetings, station training. Whenever new technology or system are introduced, awareness brief the employees at all levels prior to the implementation	nployees through	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.2 Prin	ciple 2: Transparency		
Criterio	n 4.2.1 – Transparency of information and doc	uments 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. - Major compliance -	SDPB maintained the current Grievance Response Standard Operating Procedure, ver. 2, approved on 18/07/2022 to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the mill. Timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct feedback and within one week of the completion of the investigation for communication requiring investigation. Review on the procedure, describes estate manager as person in-charge and responsible to address the communicated the information to the relevant stakeholders during external stakeholder meeting. Sampled the latest external stakeholder meeting conducted at Club House, Diamond Jubilee Estate been attended by representative from Diamond Jubilee POM dated on 12/05/2023.	Complied
4.2.1.2	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. - Major compliance -	environmental assessments as well as management action plans etc. Furthermore, global documents accessible via company's website. https://simedarbyplantation.com/sustainability/reports-policies-and-statements/	Complied
Criterion 4.2.2 – Transparent method of communication and consultation			
4.2.2.1	Procedures shall be established for consultation and communication with the relevant stakeholders.		Complied



Compliance **Criterion / Indicator Assessment Findings** (SPMS); Appendix 5 Flowchart and Procedure on Handling Social Issues, dated - Maior compliance -01/11/2008. The sub document to Grievance Response Standard Operating Procedure, ver. 2, approved on 18/07/2022 for estates has elaborated the requirements for consultation and communication with the relevant stakeholders. The management shall nominate management Review on the procedure, describes mill manager as person in-charge and responsible 4.2.2.2 Complied officials at the operating unit responsible for to address the communication and requests from internal and external. issues related to *indicator 1*. Diamond Jubilee POM's management have nominated responsible persons for social issues as per sample in the Mill Manager appointed the PIC for social matters, as stated - Minor compliance in the appointment letter dated 01/01/2023. 4.2.2.3 A list of stakeholders, records of all consultation SOU 18 Diamond Jubilee managements maintained the List of Stakeholders for year Complied and communication and records of action taken in 2023 includes categorized as Contractors, Vendors/Suppliers, Local Community and Other Interested Parties (Government Agencies, School, Hospitals, authorities, suppliers response to input from stakeholders shall be properly maintained. etc.) - Major compliance -External stakeholders' meeting conducted and attended by representatives from school, contractors, local authorities, local communities, neighbouring estates, vendors and suppliers. For internal stakeholders, management arranged Social Dialogue on weekly basis to discuss on workers issues especially on housing, amenities and welfare. List of stakeholders for internal and external parties maintained up to date as of 10/05/2023. The most recent communication with the stakeholders was on 12/05/2023 during the stakeholder meeting. Criterion 4.2.3 – Traceability 4.2.3.1 The management shall commit itself to implement SDPB update Standard Operating Procedure for Sustainable Supply Chain and Complied and maintain the requirements for the traceability Traceability, Doc. No.: SD/SDP/GSD/SCCS/0522/01; on 2022. The objective of the and shall establish a standard operation procedure procedure is to provide guideline for mill to establish and ensure effective

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MSPO Public Summary Report

Revision 2 (Nov 2021)

Criterio	on / Indicator	Assessment Findings	Compliance
	for traceability. - Major compliance -	implementation on sustainable supply chain and traceability of certified sustainable materials (FFB).	
4.2.3.2	The management shall conduct regular inspections on compliance with the established traceability system. - Major compliance -	Diamond Jubilee POM management maintain the current practice with conduct inspection on the compliance of the traceability system on daily basis. The procedure requires validation of certificate of supplying estate and had identified critical control points to prevent contamination of non-certified Fresh Fruit Bunches (FFB), Crude Palm Oil (CPO) and Palm Kernel (PK). The current traceability system is Sime Weigh System. Onsite interview with weighbridge operator informed they key in all the related data into the system and verified by the executive at the end of the day. Review on the weighbridge records and CPO, PK and FFB delivery notes, sighted incoming and outgoing document been signed by operators and executives.	Complied
4.2.3.3	The management shall identify and assign suitable employees to implement and maintain the traceability system. - Minor compliance -	 Diamond Jubilee POM has appointed personnel to be responsible for Supply Chain Certification System as per appointment letter which state the responsible of the PIC as follows. 1. Assisting Assistant on Supply Chain Certification System 2. Other related issues on SCCS The mill has appointed the (designation of PIC) as Person Responsible for SCCS as per Appointment Letter dated 01/09/2022 signed by the Mill Manager. 	Complied
4.2.3.4	Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained. - Major compliance -	SDPB update Standard Operating Procedure for Sustainable Supply Chain and Traceability, Doc. No.: SD/SDP/GSD/SCCS/0522/01; in 2022. The objective of the procedure is to provide guideline for mill to establish and ensure effective implementation on sustainable supply chain and traceability of certified sustainable materials (FFB). The procedure requires validation of certificate of supplying estates.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		The procedure had identified critical control points to prevent contamination of non- certified FFB. The current traceability system is Sime Weigh System. The mill maintains the records of CPO/PK storage and recorded in the Daily Production Summary Report. For CPO and PK dispatch, the mill maintains records in Oil Dispatch Summary form. No MSPO certified products were sold since last audit.	
4.3 Prin	ciple 3: Compliance to legal requirements		
Criterio	n 4.3.1 – Regulatory requirements		
4.3.1.1	All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations. - Major compliance -	 SDPB maintain the current mechanism to ensure compliancy to legal and other requirement and documented in Standard Operation Manual distributed to all operating units. SDPB HQ Group Sustainability Department will update each operating units on changes of applicable laws. Among of the License & expiry date sampled as follow. Lesen Premis MPJ No.: 01017187 valid until 14/12/2023 Lesen Premis DOE No.: 004043 valid until 30/06/2024 Lesen MPOB No.: 500288804000 valid until 30/09/2023 Perakuan Pendaftaran No.: 000767/2022 valid until 16/03/2024 Perakuan BOMBA No.: 332347 valid until 26/06/2023 Lesen Abtraksi Air No.: 01255 valid until 31/10/2023 Cukai Tanah No.: 00020102 valid until 01/05/2023 Among of the competency License & registered date sampled as follow. Jurutera Stim G2 No.: JKKP/2023/JS02/320 dated 08/06/2023 	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
		 Jurutera Stim G2 No.: JKKP/2022/JS02/153 dated 23/08/2022 Chargeman A1 No.: PJ10704032 dated 16/04/2009 Chargeman A4 No.: PJ10500746 dated 13/10/2006 Boilerman G2 No.: MA50/2005 dated 06/10/2005 Boilerman G1 No.: MA52/2005 dated 14/11/2005 Boilerman G1 No.: MA042/2005 dated 26 July 2005 AESP No.: NW-SRO-AE-6488-U dated 05/09/2024 AESP No.: NW-SRO-AE-R-8067-U dated 19/10/2024 FFB Grader No.: 02550 dated 10/04/2017 FFB Grader No.: 03990 dated 27/05/2019. 	
4.3.1.2	The management shall list all relevant laws related to their operations in a legal requirements register. - Major compliance -	 Diamond Jubilee POM adopt SDPB HQ Legal & Other Requirements Register (LORR) with latest updated in January 2023. Review from the register document, sighted applicable requirement listed as follow. 1. Occupational Safety & Health Act 1994. 2. Factories & Machineries Act 1967. 3. Pesticides Act 1974 (Act 149). 4. Poisons Act 1952 (Revised 1989) (Act 366). 5. Petroleum (Safety Measures) Act, 1984. 6. Prevention and Control of Infectious Diseases Act 1988 (Act 342). 7. Uniform Building By-Laws 1984. 8. Code of Practice for Safe Working in A Confined Space, 2010. 9. Environmental Quality Act (Act 127). 10. Water Act 1920 (Act 418). 11. Human resources related. 	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
		12. Other requirements. The list prepared by estate assistant managers and approved by estate managers with latest dated on 01/01/2023.	
4.3.1.3	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force. • Major compliance -	 Diamond Jubilee POM adopt SDPB Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. Review to legal register updated January 2023 with addition to applicable laws since last assessment as follows: Minimum Wages Order 2022 Fire Services Act 1988 (Act 341) Amendment 2020 'Pembangunan Sumber Manusia Berhad' Act 2000 Anti-Sexual Harassment Act 2021 Employees' Social Security (Amendment) Act 2022 Employment Insurance System (EIS) (Amendment) Act 2022 Control of Supplies Act 1961 Employment (Amendment) Act 2022 The list prepared by estate assistant managers and approved by estate managers with latest dated on 01/01/2023. 	Complied
4.3.1.4	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements Minor compliance -	 SDPB Group Sustainability Department will update each operating units on changes of applicable laws. The assigned person appointed at each operating units are responsible to update the changes into their respective Legal Register document. Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office. 	Complied



Criterio	n / Indicator	Assessment Findings	Compliance
		On the site verification, interviews with office personnel and records verification indicates that the system is appropriate to the operations. Tracking system on any changes in the law is well implemented.	
		Diamond Jubilee POM assigned person in charge to monitor compliance and to track and update the changes in regulatory requirements with appointment letter date 01/09/2022.	
Criterior	1 4.3.2 – Lands use rights		
4.3.2.1	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users. - Major compliance -	Diamond Jubilee POM located within Diamond Jubilee Estate land area and demonstrated with legal ownership or leases with legal documents. The mill has ensured the oil palm milling activities do not diminish the land use rights of other users. No issues of land dispute issue occurred in the mill that involved other land user rights.	Complied
4.3.2.2	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land. - Major compliance -	Diamond Jubilee POM located within Diamond Jubilee Estate land area and demonstrated with legal ownership or leases with legal documents. Document review on the land titles demonstrated with SDPB name written as evidence of the legal ownership of the lands as sample follow. Diamond Jubilee Estate_Verified that the management maintained the current total of 32 land titles. Based on the review. One copy of land titles is applicable to Diamond Jubilee POM available with land title no.: 20xxx.	Complied
4.3.2.3	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable. - Major compliance -	Diamond Jubilee POM located within Diamond Jubilee Estate land area and demonstrated with legal ownership or leases with legal documents. Legal perimeter boundary around the mill building complex to separate the management boundary of estate and the mill with monsoon drain and fencing. The housing and other recreational facilities are located within the same vicinity for ease of employees' management.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance	
4.3.2.4	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). - Minor compliance -	There was no land dispute at Diamond Jubilee POM. SDPB has the legal ownership documents as demonstrated by possessing land titles.	Not Applicable	
Criterio	n 4.3.3 — Customary rights			
4.3.3.1	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. - Major compliance -	Not applicable since there is no customary rights. Land has been legally owned by the company and has been verified by the land title.	Not Applicable	
4.3.3.2	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. - Minor compliance -	Not applicable since there is no customary rights. Land has been legally owned by the company and has been verified by the land title.	Not Applicable	
4.3.3.3	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. - Major compliance -	Not applicable since there is no customary rights. Land has been legally owned by the company and has been verified by the land title.	Not Applicable	
4.4 Prin	ciple 4: Social responsibility, health, safet	y and employment condition		
Criterio	Criterion 4.4.1: Social Impact Assessment (SIA)			



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.1.1	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. - Minor compliance -	Diamond Jubilee POM maintained the current of Social Impact Assessment for SOU 18 conduct by Group Sustainability Department. The assessment covers Diamond Jubilee POM, Diamond Jubilee Estate and Bukit Asahan Estate. SIA report established on 12/07/2016 – 15/07/2016. The objectives of the assessment are to identify the existing social issues and to develop social management plan. The assessment has involved the participation of stakeholders and attendance list of stakeholders was sighted. The issues raised by the stakeholders were recorded in the SIA report. Based on the assessment conducted, the mill has established Management Plan on Social Impact Assessment. The plan was updated on annually basis with addition of issues raise during stakeholders meeting, NUPW meetings, stakeholders' complaints and grievances, OPP reports, Social Dialogue, feedbacks from Suara Kami, Whistleblowing and Workers Helpline and others. These impacts have been available in the plan as per verification. The implementation was verified included issues derived from the worker's complaint, housing complex area and management.	Complied
Criterio	n 4.4.2: Complaints and grievances		
4.4.2.1	A system for dealing with complaints and grievances shall be established and documented. - Major compliance -	SDPB maintained the current Handling Social Issues Procedure, Appendix 5, Version 1, and Issue No.1, dated 01/11/2008. The objective of the procedure is to ease the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner. SDBP maintained the current Grievance Response Standard Operating Procedure, ver. 2, approved on 18/07/2022. The objective of the procedure is to put in place a system to effectively communicate with external interested parties on matters pertaining to performance of the mill and estates. The procedure describes timeframe for external communication to provide feedback within two weeks of the date of receipt for communication requiring direct	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
		requiring investigation. SDPB maintained the current whistleblowing platform named as 'Suara Kami' for internal and external stakeholders to lodge on any grievance. The grievance mechanism can be access through Human Rights Statement Sime Darby Plantation Berhad. In additional, SDPB maintained the current online platform named as 'Oil Palm Pal' (OPP) and Workers Housing Management Procedure dated 26/11/2021 as guideline to certification unit's management in providing a safe, liveable workers housing condition including the process of handling housing repair. The procedure describes the timeline to investigate/ inspect the housing defect based on the risk category.	
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. - Major compliance -	Diamond Jubilee POM adopt SDPB HQ Oil Palm Pal (OPP) online platform to record any housing repair from workers. Diamond Jubilee POM established the Complaint Book (Internal), Complaint/Feedback Form (External) and Communication Book Internal & External to record the communication and complaints. Most of complaints made by internal stakeholders and workers were related to the housing repair which were based on the records. The complaints were acted on and resolved immediately by the estate management. For Complaint/Feedback Form by external stakeholders, action taken by the management was acknowledged by the complainant and verified to be resolved within the agreed timeframe.	
		 SDPB has established system to handled issue regarding to social as following; 1. Suara Kami (using social dialogue tool kit) This session is about management and workers engagement between representative of workers, and employer (operating unit management) to resolve workplace and living condition issues through social dialogue. This dialogue frequency will be done every 2 weeks once. The issues that been raised during this dialogue will be recorded under a tracker. This tracker will be captured in the dashboard and available to RGM, RCEO, ILO WG. This system rolled out on 	



Criterio	on / Indicator	Assessment Findings	Compliance
		 31/05/2023 to all operating unit. Oil Palm Pal (OPP) Established and started been used since on 07/12/2021 in SOU 18. This OPP is a digitalized data management, used to capture all complaint/request for repair of workers houses and monitor progress of repair works till completion. Most of the complaints were made by internal stakeholders mainly workers and were related to the housing repair. Based on the records taken, actions were taken and resolved immediately by the estate management. For Complaint/Feedback Form by external stakeholders, action taken by the management was acknowledged by the complainant and verified to be resolved within agreed timeframe.	
4.4.2.3	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. - Minor compliance -	Diamond Jubilee POM made available complaint and feedback forms for the use of stakeholders and workers. Nevertheless, that is not the only platform for workers and stakeholders to address their complaints and grievances as other platforms such as OPP, Suara Kami, Social Dialog among others are also made available. For Complaint/Feedback Form by external stakeholders, action taken by the management was acknowledged by the complainant to be resolved within the agreed timeframe. Sighted a latest complaint received by Diamond Jubilee POM recorded in the OPP Issue Tracking Dated latest on 26/05/2023 been resolved immediately on 27/05/2023.	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. - Minor compliance -	Employees and the surrounding communities were made aware that complaints or suggestions can be made any time through various meetings such as morning muster, training/ briefing and stakeholder consultation. Based on interview with the stakeholders, it was noted that they were aware of the complaint's procedure including the platform of 'Suara kami', Whistle Blowing, Workers Helpline, Oil Palm Pal (OPP) and Social Dialogue and they were briefed by the management during stakeholder meeting and morning briefing.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.4.2.5	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request Major compliance -	Diamond Jubilee POM maintained complaints record and resolutions record over the past 24 months were still available as at audit.	Complied
Criterio	n 4.4.3: Commitment to contribute to local sust	ainable development	
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. - Minor compliance -	 SDPB with join venture with Sime Darby Foundation initiate contributions to local sustainable development on social support initiatives includes promoting educations and offering scholarships to deserving students, promoting the rights and well-being of marginalized communities, improving communities' access to healthcare, assisting communities with disaster relief & prevention, donations to the needy and tree planting etc. SOU 18 managements offer job opportunity to surrounded local communities includes with contributions made by estates as per sample sighted as follow. Diamond Jubilee POM contributions made by estates were based on consultation with stakeholders among local communities as per sample sighted as follow. Programme Kongsi Rezeki Bubur Lambuk Gotong-royong at Tadika Kemas Pintar Stream Chabau Other contributions have been made are such as given 10kg of rice once every 2 months to all the workers. 	Complied
Criterio	n 4.4.4: Employees safety and health		
4.4.4.1	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act	SDPB maintained the current updated Group Health Safety & Environment (HSE) Policy dated 15/05/2022 and signed by Group Managing Director. In the policy stated the company commitment to the well-being of its employee, providing safe and healthy working environment, pre-emptively preventing our	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	1967 (Act 139) shall be documented, effectively communicated and implemented. - Major compliance -	 employees and external parties in the operations from injury and ill health as well as operating in an environmentally responsible manner at global operating sites. Policy also stated the commitment to comply with statutory requirements, inculcating the culture of safety and health, improving the management of occupational safety, health related and environmental matters eliminating or minimizing any potential adverse effect on the environment arising from or business activities and to educate and encourage stakeholders in maintaining and enhancing the quality of the health, safety and environment. The GSD and RSQM Department is also committed in establishing various working standards through procedures or pictorial method to improve safe working condition. Diamond Jubilee POM established Safety and Health Plan and reviewed on annually basis. The plan covers on OSH Legal Compliance, Emergency Response Plan, OSH Management System and Risk Management, HIRADC, training, OSH committee meeting, workplace inspection, medical surveillance and etc. The plan updated 30/06/2023. Annual OSH Management Plan for year 2023 updated includes topics of safety & health policy training and attended by workers & staffs on 26/06/2023 with title Policy Training and attended by workers and staffs. Refer briefing record consist of attendance and photo. 	
4.4.4.2	 The occupational safety and health plan should cover the following: a) A safety and health policy, which is communicated and implemented. b) The risk of all operations shall be assessed and documented. c) An awareness and training programme which includes the following requirements for 	 The occupational safety and health plan cover the following: a) SDPB maintained the current updated Group Health Safety & Environment (HSE) Policy dated 15/05/2022 and signed by Group Managing Director. b) The risk of all operation has been assessed and documented in the year 2023. 1. HIRARC updated on 27/06/2023 2. Chemical Register updated on 08/03/2023 3. CHRA Report Expired on 14/12/2027 	Complied

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MSPO Public Summary Report Revision 2 (Nov 2021)

Criterion / Indicator	Assessment Findings	Compliance
 employees exposed to chemicals used at the palm oil mill: All employees involved are adequately trained on safe working practices; All precautions attached to products should be properly observed and applied; d) 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). e) 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. f) 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. g) The management shall conduct regular twoway communication with their employees where issues that affect their business such as 	 4. Medical Surveillance updated on 23/02/2023 5. Noise Risk Assessment conducted in 4/02/2020 6. Audiometric Test conducted in April 2023 7. LEV Test updated on 02/02/2023 8. Housing Inspection updated on 01/06/2023 9. Workplace Inspection updated on 22/05/2023 c) Annual training programmed has been established with document title Training Schedule dated Year 2023 and prepared by Internal Team. 1. Fire Extinguisher on 21/02/2023 2. First Aid on 26/06/2023 3. Noise Hearing on 09/02/2023 4. 5S Training on 15/06/2023 5. PTW Training on 07/03/2023 6. Drug Policy on 08/03/2023 7. MSPO on 22/04/2023 d) Management has provided appropriate PPE to workers to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC). PPE Issuance record was available for verification. Inspected with sample workers interviewed found all PPE was given accordingly to their task given. PPE Matrix has been established as per HIRARC, SDS, CHRA and NRA. PPE issuance records, dated in June 2023. PPE Received: Safety Helmet, Safety Glove, Safety Boot, Ear Plug, Safety Vest e) SOU 18 Diamond Jubilee managements adopt SDPB Chemical Safety Management with Doc. No.: UM/HSE/OCP/04 dated 19/03/2021. The procedure established as 	



Criterion / Indicator		Assessment Findings	Compliance
 those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded. h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees. i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite. j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals. - Major compliance - 	f) g)	guidelines for handling of chemicals to ensure proper and safe handling and storage in accordance with 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. SOU 18 Diamond Jubilee managements assigned responsible person for workers safety and health. Refer appointment letter and appointed by Manager. Interview with person in charge found have good knowledge and access to latest national regulations and collective agreements. Refer appointment letter to President of OSH Committee dated 01/10/2022 and appointed by Regional Chief Executive Officer (RCEO). Interview with person in charge found have good knowledge and access to latest national regulations and collective agreements. SOU 18 Diamond Jubilee managements conducted regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. OSH Meeting has been conducted on quarterly basis. Refer OSH minutes of meeting dated on 22/05/2023. Records was kept and all the concern of the employees and any remedial actions taken was recorded.	
		SOU 18 Diamond Jubilee managements adopt SDPB Emergency Preparedness & Response Procedures with Doc. No.: UM/HSE/SP/02 dated 17/11/2021. Flowchart for emergency has been placed at strategic location e.g. Office notice board, Line site, store etc. Safety was given upon entrance of sample site visited. Interview with sample workers found they have good understanding on accident and emergency procedures.	
		First aider has been present at all field visited and works station inspected. Latest training has been conducted by Medical Assistant on 26/06/2023. Refer training material, attendance, and photos. First aid box was inspected during site visit and found contains with approved contents. Verified that first aid box was available at each worksite.	



Criterio	on / Indicator	Assessment Findings	Compliance
		 j) Accident record was verified during the audit. Accident record and investigation was recorded and discussed during quarterly OSH meeting. Refer JKKP 6, 7 and 8 report. Diamond Jubilee POM submitted JKKP 8 form through online system with ref. No.: JKKP8/119624/2022 on 07/01/2023. 	
Criterio	n 4.4.5: Employment conditions		
4.4.5.1	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. - Major compliance -	SDPB established the Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no- exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) last revised 2020. Besides, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/03/2020. SDPB respect and safeguard human rights, nation of democracy and its institution. They recognize that Human Rights Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with SDPB. This Policy is applied to all stakeholders affected by the business partners, workers in their operations and supply chains, and communities surrounding their operations.	Complied
4.4.5.2	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. - Major compliance -	SDPB established Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They promote diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity union membership, political affiliation or age. The policy couldbe downloaded from HRC 2020 (simedarbyplantation.com)	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
		Records of employments and onsite interview conducted with sampled internal workers informed they not discriminated practices implemented in the operations.	
4.4.5.3	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. - Major compliance -	 SDPB established employment contract for workers. The employment contract adopts by SOU 18 Diamond Jubilee managements as part as requirement to ensure the workers employment conditions received as accordingly. The original copy kept by management demonstrated in workers' origin language and signed by the worker. Based on agreements and pay slips sighted for sample employees as per indicator 4.4.5.6 below, management has ensured that employees' pay, and conditions meet MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement Review on the sampled of employment contracts verified terms and conditions outlined as per collective agreement and Employment Act 1955. The original copy kept by management demonstrated in workers' origin language and signed by the worker. Diamond Jubilee POM workers' samples: 1. √103 workers*0.8 = eight (8) sample of workers selected as follow. 2. ID#10555, ID#12531, ID#124351, ID#149339, ID#166872, ID#175951, ID#178474, ID#178483 Document review on workers' payslip verified the information includes daily wage rate, vacation leave pay, price bonus, incentives, work on rest day paid, Public Holiday paid, MC paid, overtime (Normal day), phone allowance, insurance subsidy, EPF/SOCSO/EIS insurance contribution and union fee. 	Complied
4.4.5.4	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.	SOU 18 Diamond Jubilee managements ensured employees of contractors are paid based on MWO 2022 according to the employment contract agreed between the contractor and their employee based on the sample contractors' agreements sighted in Diamond Jubilee POM. Based on review of the sampled payslip for all contractors' workers verified, is according	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
	- Minor compliance -	to the requirement, which is applicable includes minimum wages, EPF and SOCSO contributions. Diamond Jubilee POM hired Backhoe Rental to the mill and based payslip review for sample contractor's workers sighted information includes basic wages income, EPF/SOCSO/Employment insurance system deduction and contribution, advance, number of worker days, rest day, public holiday, and net wages SOCSO and EPF.	
4.4.5.5	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. - Major compliance -	Diamond Jubilee POM employed local and foreign workers and registered into Employee Master Details Listing in SEMUA system. The established records of Employee Master list which is available as a database in computerized Checkroll System can provide accurate account of all employees including their particulars of full names, gender, date of birth, date joined company, wages grade and position etc.	Complied
4.4.5.6	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. - Major compliance -	Diamond Jubilee POM employed local and foreign workers and registered into Employee Master Details Listing in SEMUA system. Review on the listing, verified all workers are employed by SDPB's estates' management. Review on eight (8) copies of fair contracts that have been signed by both employee and employer were provided to each employee as per records in Diamond Jubilee POM. Diamond Jubilee POM hired Backhoe Rental to the mill and based payslip review for sample contractor's workers sighted information includes basic wages income, EPF/SOCSO/Employment insurance system deduction and contribution, advance, number of worker days, rest day, public holiday, and net wages SOCSO and EPF.	Complied
4.4.5.7	The management shall establish a time recording system that makes working hours and overtime	Diamond Jubilee POM registered all their workers into Employee Master Details Listing in SEMUA system. All the daily attendance and overtime work were recorded in Mill Daily Attendance Report.	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
	transparent for both the employees and employers. - Major compliance -	Document review on the attendance (out-turn) and work hours (normal time and overtime) recording system established in both manual and computerized check roll system which makes working hours and overtime transparent for both employees and employer. Onsite interview with sampled workers informed working time and break time is according to employment contract. Overtime offered to workers is voluntarily upon mutually agreement between management and workers.	
4.4.5.8	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. - Major compliance -	Diamond Jubilee POM registered all their workers into Employee Master Details Listing in SEMUA system. All the daily attendance and overtime work were recorded in Mill Daily Attendance Report. Based on agreements and pay slips sighted for sample employees as per indicator 4.4.5.6 below, management has ensured that employees' pay, and conditions meet MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement Onsite interview with sampled workers informed working time and break time is according to employment contract. Overtime offered to workers is voluntarily upon mutually agreement between management and workers.	Complied
4.4.5.9	Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements. - Major compliance -	Diamond Jubilee POM registered all their workers into Employee Master Details Listing in SEMUA system. All the daily attendance and overtime work were recorded in Mill Daily Attendance Report. Based on agreements and pay slips sighted for sample employees as per indicator 4.4.5.6 below, management has ensured that employees' pay, and conditions meet MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement	Complied
4.4.5.10	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	SDPB practices to provide with mandatory Employee Provident Fund (EPF) contributions for local employees while both local and foreign employees contributed with Social Security Organization (SOCSO). Diamond Jubilee POM continues to practice by contributed 10 kg of rice once every 2 months for all their workers. Apart from that, all the workers are provided with free	Complied

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Criterio	n / Indicator	Assessment Findings	Compliance
	professional development, medical care provisions and improvement of social surroundings. - Minor compliance -	medical facilities. In additional, all the workers are entitled with the phone allowance of RM5 for every month. Free housing facilities were provided to all the workers and their families.	
4.4.5.11	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities. - Major compliance -	SDPB revise Workers Housing Management Procedure 2022, Ver.01, updated 30/06/2022 as guidelines to continuously improve of living standards of their employee in estates and mill operations. Its shown company commitment in managing employee's housing repair and maintenance through digital platform named Digital Housing Complaint system or 'OilPalmPal'.	Complied
		To provide guidance to management in providing a safe, livable workers housing condition in accordance with Workers Minimum Standard of Housing & Amenities (Amendment) 2091 (Act A 1604).	
		To integrate all past policies related to workers housing & amenities management in the operating units including.	
		 Workers minimum standard of housing amenities guidelines on Jan 2015 IOM for employees housing inspection & welfare in Dec 2020 IOM for rules & regulations at employee house in June 2021 	
		 IOIM for Safe handling & storage of Petrol on Mar 2021 IOM for Safe Fogging Procedure in June 2021. 	
		All workers are provided with free housing facilities that included basic amenities such as clean water (25 gallons/month), community hall, sport facilities, etc. were provided to the workers.	
		Electricity which is obtained from the national grid. The housing condition was in accordance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446).	
		Weekly inspections by medical assistant were done to ensure cleanliness of the housing. Records were well maintained as per sample latest inspections as following:	



Criterio	n / Indicator	Assessment Findings	Compliance
		All workers are provided with free housing facilities that included basic amenities such as clean water (25 gallons/month), community hall, sport facilities, etc. were provided to the workers.	
		Electricity which is obtained from the national grid. The housing condition was in accordance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446).	
		Weekly inspections by EWC and PIOA member were done to ensure cleanliness of the housing. Records were well maintained as per sample latest inspections as follows.	
		1. EWC latest inspection dated 01/06/2023	
		2. PIOA latest inspection dated 26/06/2023	
4.4.5.12	The management shall establish a policy to prevent all forms of sexual harassment and violence at the workplace. - Major compliance -	SDPB developed Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They seek to create a working environment with zero tolerance for sexual harassment and abuse and in which violence is never used to resolve issues or conflict.	OFI
		SDPB issued Inter-Office Mail (Ref. No.: CEOUM/064/10/2022) dated 11/10/2022 with topic 'Non-conformity on Gender Committee Meeting Frequency' from CEO, Upstream Malaysia' has incorporated its policy on violence and sexual harassment in the 'Group Sustainability & Quality Policy Statement' mention in Indicator 4.1.1.2 where the management is committed to prevent sexual harassment and other forms of violence.	
		SDPB established Terms of Reference (TOR) for Gender Representative and Gender Committees as of March 2021. The TOR established as guidelines to raise awareness, identify, and address issues of concerns, opportunities and area for improvement for workers particularly the women.	
		3.4 The GC at SOU's shall be required to conduct the following:	

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Criterio	n / Indicator	Assessment Findings	Compliance
		a) GC must conduct at least four (4) engagements/activities per year with the community of workers and their dependents. This can be at OU level or SOU level.	
		Suggested topics may include women's health, education for children, mental health awareness, domestic violence/abuse and any other topics that are related to women.	
		Onsite interview with gender committee and woman workers representative informed there are no reported lodged as evidence related to sexual harassment or violence.	
		Communications made mainly during gender committee meeting as per sample latest Diamond Jubilee POM Gender committee meeting; Date: 28/03/2023. Review on the minutes, sighted the committee discussed on activities includes cooking competition, sport activities, gotong-royong at Air Terjun Asahan and inform awareness on sexual harassment complaint process.	
		Opportunity for Improvement (OFI) Gender Committee for Diamond Jubilee POM may improve the agenda in minutes of meeting as per suggested topics related to women in guideline document.	
4.4.5.13	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	SDPB established Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They respect the rights of their employees to form and join unions and bargain collectively.	Complied
	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.	Social Dialogue was carried out by the management of Diamond Jubilee POM with workers to update the progress of action taken for the issues raised by workers. The initiative will discuss during management review meeting and action taken accordingly. All issues will be uploaded into Social Dialogue Online Tracker System (SDOTS) for monitoring. Verified the records of monitoring of issues and evidence of actions taken to resolve the	



Criterio	n / Indicator	Assessment Findings	Compliance
	- Major compliance -	 issues raised by the workers. The workers that involved in the Social Dialogue were NUPW representatives, Gender Committee representatives and others' nationalities representatives. Diamond Jubilee POM management allowed their workers to form or join any association such as NUPW. Document reviewed on their payslip found that they are deducted for the NUPW subscription fees of MYR11.00 monthly. Employees were given freedom to associate and bargain collectively with company and to organize among themselves through association meetings as per sample sighted as per sample latest minutes of meeting between Management and NUPW representatives. Union Meeting sighted in Diamond Jubilee POM on 16/03/2023. 	
4.4.5.14	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. - Major compliance -	SDPB established Human Rights Charter last revised 2020 where they have a responsibility to respect, support and uphold fundamental human rights as expressed, amongst others, in the Universal Declaration for Human Rights and the United Nations Guiding Principles on Business and Human Rights. They recognize that protecting the wellbeing of children means safeguarding them from any form of maltreatment or exploitation, including child sex tourism, child trafficking and child pornography. They are eradicating child labour in all their supply chain and not employ anyone underage of 18 years. Based on the interview and sighted records of employees' master lists data, no young person below 18 years old employed within all operating units within SOU 18 Diamond Jubilee.	Complied
Criterion	4.4.6: Training and competency		
4.4.6.1	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.	SOU 18 Diamond Jubilee management maintained documented training programme developed. The plan established for year 2023 includes with Safety Briefing Plan and have included Gender Specific Training involves all employees. Based on the documents reviewed it was concluded that the training program has been effectively established	Complied



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- Major compliance -	and is accessible to all staffs and stakeholders. The program also includes gender specific needs. The trainings were sighted to have included Gender Specific Training and involves staffs and workers.	
	Training records as follow.	
	1. Fire Extinguisher on 21/02/2023	
	2. First Aid on 26/06/2023	
	3. Noise Hearing on 09/02/2023	
	4. 5S on 15/06/2023	
	5. PTW on 07/03/2023	
	6. Drug Policy on 08/03/2023	
	7. MSPO on 22/04/2023	
	8. Offer of employment briefing on 02/06/2023	
	9. Payslip on 31/05/2023	
	10. ILO briefing on 29/05/2023	
	11. Passport safekeeping briefing on 29/05/2023	
	12. Grievance Channel briefing to contractor on 27/05/2023	
	13. Human right charter & human right defender on 06/05/2023	
	14. Sexual harassment awareness on 15 & 17/04/2023	
	15. Sexual harassment & reproductive right on 15/04/2023	
	16. Grievance channel (refresher) on 13/03/2023	
	17. Physical, sexual abuse, isolation and intimidation briefing on 20/02/2023	
	18. Social dialogue refresher session on 06/02/2023	
	19. Medical access briefing on 30/01/2023	
	20. Health screening program (HSP) SOCSO by Perkeso on 23/12/2022	

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environmental laws shall be established,

effectively communicated and implemented.

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Criterio	on / Indicator	Assessment Findings	Compliance
		 21. Non communicable disease (NCD) check-up by Klinik Kesihatan Simpang Bekoh on 17/11/2022 22. Wage on Public Holiday and Restday on 31/10/2022 23. Worker's payslip training on 01/06/2022 	
4.4.6.2	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. - Major compliance -	SOU 18 Diamond Jubilee management visited has conducted training need analysis for all employee, management, and contractors. The training need analysis was conducted based on the job designation and training required by the job type. Based on the documents reviewed it was concluded that the training program has been effectively established and is accessible to all staffs and workers. The training need analysis conducted for Diamond Jubilee POM established training Need Analysis for year 2023 includes workers, staffs, and Executives.	Complied
4.4.6.3	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. - Minor compliance -	A training programme has been developed and available. Refer Annual Training Plan FY 2023. Training has been implemented as per training programme. Sample workers checked has undergo training and have good understanding on their job function and responsibility. The MSPO & SCCS Training Need, Plan & Evaluation with Doc. No.: SDP/DJM/Training Evaluation, dated 22 February 2023 with Competency Level: $1 - 10$. Trainings were effectively conducted for all work process. The effectiveness of the trainings was then assessed, and evidence of understanding were available and verified.	Complied
4.5 Prin	4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services		
Criterio	n 4.5.1: Environmental Management Plan		
4.5.1.1	An environmental policy and management plan shall be in line with the relevant country and state	SDPB Group Upstream Malaysia Safety, Health and Environmental Policy Statement had been established via Group Sustainability & Quality Policy Statement dated 05/05/2022	Complied

and implemented.



Compliance **Criterion / Indicator Assessment Findings** - Maior compliance -The policy was displayed prominently on notice boards in English and local language Bahasa Malaysia. Therein among others has stated that the Company is committed to protecting the environment and conserving biodiversity through minimizing environmental harms. 1. Protecting and enhancing biodiversity and the ecosystem 2. No deforestation and no new development on peat soil 3. Enhancing resilience against climate change impact 4. Adopting responsible consumption and production. This policy is prominently displayed in the office along with other Company's Policies. It is communicated to the employees via training and weekly briefing session among others as follows. No. Subject Date Chemical hazards identification 17/06/2022 Noise hearing conservation 2 09/02/2023 3 HACCP Implementation 21/06/2023 4 08/05/2023 HCV Management 20/06/2022 5 ERP (Spillage / ETP overflow / disaster) 6 Scheduled Waste Management 06/06/2022 Domestic waste management 06/06/2022 Subjects on environmental are included the annual training program related to 'Environmental Responsibility & Biodiversity-Environmental Aspect Impact Assessment'. 4.5.1.2 The environmental management plan shall cover Complied a) Diamond Jubilee POM established environmental management plan 2023 based on the followina: aspect and impacts analysis conducted. a) An environmental policy and objectives; The environmental management plan was established based on Environmental Aspect Impact Identification and Environmental Impact Evaluation conducted and b) The aspects and impacts analysis of all documented in Pollution Prevention Plan 2023. operations

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Criterion / Indicator	Assessment Findings	Compliance
- Major compliance -	 The Environmental Policy has been established as described in 4.5.1.1 above. The objectives of the environmental management plan among others include the follows. Implement and comply all prevailing statutory environmental laws. Plantation development emphasizing zero burning practices. Compliance of DOE - to minimize pollution of land/water/air. Identification of HCV and preserving riparian zones. The environmental aspects and impact evaluation covers the following areas/activities among others. boiler operation / power generation crude palm oil storage leakage & spillage effluent pond ruptured Process operations and workshop activities. The plans and impact assessments relating to environmental impacts based on documents for the mill are elaborated in the following records: Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, (version 1; year 2008 Issue no. 1; dated 1 April 2009; MR-01/EAI) Appendix 5.4.1d - Environmental Impacts Evaluation form (version 1; year 2008 issue no. 1; dated 1 April 2009; MR-01/EAI) Appendix 5.4.1d - Environmental Impacts Evaluation form (version 1; year 2008 issue no. 1; dated 1 April 2009; MR-01/EAI) Appendix 5.4.1d - Environmental Impacts Evaluation form (version 1; year 2008 issue no. 1; dated 1 April 2009; MR-01/EAI) 	



Criterio	on / Indicator	Assessment Findings						
4.5.1.3	An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored. - Major compliance -	SDPB maintained the current Environment Policy dated 05/05/2022. The policy was endorsed by Group Managing Director. The Policy has stated the commitment of th organisation to comply with applicable laws and regulation related to environment. The policy was displayed prominently on notice boards in English and local language Bahasa Malaysia. Therein among others has stated that the Company is committed to protecting the environment and conserving biodiversity through minimizin environmental harms. 1. Protecting and enhancing biodiversity and the ecosystem 2. No deforestation and no new development on peat soil 3. Enhancing resilience against climate change impact 4. Adopting responsible consumption and production. This policy is prominently displayed in the office along with other Company's Policies. is communicated to the employees via training and weekly briefing session amore others as follows. No. Subject Date 1 Chemical hazards identification 17/06/2022 2 Noise hearing conservation 09/02/2023 3 HACCP Implementation 21/06/2023 4 HCV Management 08/05/2023 5 ERP (Spillage / ETP overflow / disaster) 20/06/2022 6 Scheduled Waste Management 06/06/2022	e . o . g					
4.5.1.4	A programme to promote the positive impacts should be included in the continual improvement plan. - Minor compliance -	Diamond Jubilee POM established environmental management plan 2023 based of Environmental Aspect Impact Identification and Environmental Impact Evaluation conducted and documented in Pollution Prevention Plan 2023.						



Criterio	n / Indicator	Assessment Findings	Compliance
		 The Environmental Policy has been established as described in 4.5.1.1 above. The objectives of the environmental management plan among others include the follows. Implement and comply all prevailing statutory environmental laws. Plantation development emphasizing zero burning practices. Compliance of DOE - to minimize pollution of land/water/air. Identification of HCV and preserving riparian zones. The environmental aspects and impact evaluation covers the following areas/activities among others. boiler operation / power generation crude palm oil storage leakage & spillage effluent pond ruptured Process operations and workshop activities. The plans and impact assessments relating to environmental impacts based on documents for the mill are elaborated in the following records: Appendix 5.4.1b - Environmental Aspect and Impact Identification form (version 1; year 2008 Issue no. 1; dated 1 April 2009; MR-01/EAI) Appendix 5.4.1d - Environmental Impacts Evaluation form (version 1; year 2008 Issue no. 1; dated 1 April 2009; MR-01/EAI) Appendix 5.4.1d - Environmental Impacts Evaluation form (version 1; year 2008 Issue no. 1; dated 1 April 2009; MR-02/EIE) The latest register being reviewed dated 01/07/2023 to include bio catalyst at clarification to enhance oil recovery by 0.5 %. SORS by Aug 2023 to enhance oil recovery. 	
4.5.1.5	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and	Diamond Jubilee POM continuously provide training to the workers to create awareness regarding the environmental policy and management plan established.	Complied

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Criterio	on / Indicator		Compliance							
	management plans and are working towards achieving objectives.	The ma Training								
	- Major compliance -	No.	Subjects	Month 5-8 9-12						
		1 2	ESH Legal & Other requirements ER Plan Chemical spill, Fire.	1-4						
		3	Scheduled waste management							
		4 5	Policy Training Effective workplace inspection	-	- /					
		6 7	GAP training/ SW HCV Training for Region	/						
			Based on the samples taken, all training related to the process were found to be continuously improve the mill employee's awareness and compliance.							
			Subject	Date						
		1 2	Chemical hazards identification Noise hearing conservation		17/06/2022 09/02/2023					
		3	HACCP Implementation		21/06/2023					
		4	HCV Management ERP (Spillage / ETP overflow / disaster)		08/05/2023 20/06/2022					
		6	Scheduled Waste Management Domestic waste management		06/06/2022 06/06/2022					
4.5.1.6	The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.	Discuss manage on wate	Discussing environmental issues are the quarterly EPMC meeting, and the annual management review meeting dated 13/12/2022. The latter emphasized more on issues on water management plan, electricity use, diesel consumption, waste management, SIA plan, renewable energy, aspect/impact. EPMC Meeting							
	- Major compliance -	No.	Date 14/06/2023							

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Criterio	on / Indicator			Assessment Finding	S	Compliance		
2 16/12/2022 3 30/09/2022 4 16/06/2022 The Environmental Performance Monitoring Committee is setup to comply with the DOE requirement of Guidance Self-Regulation (GSR). The meeting reviewed the environmental performance within the DJPOM. Among others the agenda discussed as follows. 1. Kawalan Pencemaran Udara CEMS 2. SW Management 3. Mill Waste Management 4. Training								
4.5.2.1	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 - Major compliance -	A plan incorpo docum	for improving the prated into the En ent was reviewed	vironmental Aspect and Impact /updated on Jan 2023. The Env sage among others are detailed Objective To reduce fossil fuel (diesel) consumption from company- owned vehicles and fuel using mobile equipment To reduce fossil fuel (diesel)	Action plan To ensure the vehicle engine is turn off during idle time. To record vehicle activity which consume fuel To record vehicle activity in order to eliminate waste	Complied		

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Criterion / Indicator				Assessment F	indings			Compliance
	3	Electrical s		educe reliance c		Utilization of TNE	B sources	
				for power supply				
		ilization of fo below:	ossil fuel in 2	2022 with total 7,6	579 liters is	s being monitore	d with records	
	Month	1	Diesel	FFB	Diese	I/FFB		
		-	(L)	(Mt)	(L/mť	•		
	Jan		585	5,593	0.10			
	Feb		537	7,011	0.08			
	Mac		670	7,876	0.09			
	Apr		569	7,072	0.08			
	May		596	6,484	0.09			
	Jun		570	7,735	0.07			
	July		724	5,979	0.12			
	Aug		677	5,749	0.12			
	Sep		679	5,312	0.13			
	Oct		506	5,055	0.10			
	Nov		769	4,864	0.16			
	Dec		797	5,757	0.14			
	Total		7,679	74,486	0.10			
				consumption fo				
				d and documente				
				a is compiled fo			rol for future	
	improvement with aim of gradual reduction particularly diesel.							
	The electricity energy monitoring based on FFB processed tabulated as shown below.							
	No.	Energy Mc		2019	2020	2021	2022	
	1	TNB (KwH		1,007,719.0	953,995.		897,035.0	
	2	FFB proces	ssed /mt	116,655.8	99,680.1	90,564.9	74,485.9	

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Criterio	on / Indicator				Assessment	Findings			Compliance		
		mana 1. E	3Kwh / mt FFB8.6389.5709.78812.043Variation of ratio in the analysis were explained and justified. Under the energy management plan 2023 the mill aimed for reduction plan among others.1.1.Educate workers on fuel saving practice2.Avoid leakages during vehicles maintenance.								
4.5.2.2	Palm oil millers shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. - Major compliance -	incluc inclus was a	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 was available in the respective estate yearly budgets. Refer details as per indicator 4.5.2.1 above. Figures were extracted from the diesel issuance of estate diesel tank.								
4.5.2.3	The use of renewable energy should be applied where possible. - Minor compliance -	quant buyer	The fiber and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fiber are delivered to estates for multi purposes or sold to outside buyers. EFB is used in the estates for mulching. Details of renewable energy fiber/shell used in the mill are shown in 4.5.2.1 above.								
Criterio	n 4.5.3: Waste management and disposal										
4.5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Plan. to the	All waste and pollution are identified and documented in the Waste Management Action Plan. The compilation for 2023 was made at by the Sustainability Department applicable to the mill. Details of waste generated from the mill operations among others as shown below.								
		1		Spent lubri	cants/ hydraulio	c oil 🛛 Wo	rkshop activitie	es			



Criterio	on / Indicator			Assessment Find	ings	Compliance			
			Scheduled Waste	Used batteries/ used rags/ empty containers	Workshop activities				
				Hexane/ spent chemicals/ empty containers	Laboratory and boiler station				
		2	Domestic Waste	Rubbish Sewage	Line site/ office & mill complex Line site/ office & mill complex				
		3	Industrial Waste	POME EFB	Effluent Treatment Plant EFB station.				
		The belo			on and improvement are described				
		The mon revie							
		opei	The mill maintained the waste management effectively for an environmentally friendly operation. There being no summons / notices for the Regulatory Agency during the period of review.						
4.5.3.2	A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure		accordingly. T		sal/recycling of waste generated by nd monitor. The details of the waste	Complied			
	for:		Туре	Item	Action/Program				
	a) Identifying and monitoring sources of waste and pollution.		Scheduled	Spent lubricants/ hydraulic oil	SOP titled MQMS Section VII				
	b) Improving the efficiency and recycling potential of mill by-products by converting		waste	Used batteries/ used rags/ empty containers	Compliance to Environmental Quality Regulation 2005.				
	them into value-added products. - Major compliance -			Hexane/ spent chemicals/ empty containers	Establishment & notification of SW				

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Criterio	n / Indicator			Assessment Find	lings	Compliance			
					Labeling & Coding of SW SW Inventory Disposal < 180 days & approved quantity/volume.				
			omestic Vaste	Rubbish	Disposed together with the estate to the respective local municipal landfill				
				Sewage	Disposal by local authority				
			ndustrial Vaste	POME	Monitoring of application & through operation of land application				
				EFB	Monitoring of application in the field.				
		operation period of	on. There of review.	being no summons / notices for	ively for an environmentally friendly the Regulatory Agency during the				
		anc con	d pollution mpliance to	are concluded to be effective in ha	d onsite visits observed their waste andling environmental quality and in recycle waste included in the plan ster morning briefing.				
4.5.3.3	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, storage and	1. Det Har SD/	 The SOP on Scheduled Waste disposal is established and implemented. Details as provided in SDP MQMS Standard Operating Procedure Section VII- Handling of scheduled waste (Hazardous Waste) Management ref no. SD/SDP/PSQM (ESH) /203-EN1 dated 26/02/2015. The inventory of the waste generated is recorded using the "E-SWISS" inventory 						



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Criterie	on / Indicator		Compliance								
	disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005 - Major compliance -	3. All Env san <u>No.</u> 1 2	tem. Methodolo SW are dispos vironment (DOE npled as shown Date 27/04/2023 14/02/2023 01/09/2022	ed to app) and lice below. SW 409 - 0.164	roved SW	Collector 06056 val SW 322 - 0.180	registered id until 30	with Dep)/04/2023. SW 410 - 0.389	artment of Details as SW 305 0.281 0.098		
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. - Minor compliance -	SD/SDF triple r operation practice 1. All bot 2. Cor hol 3. Em we The mil is colle collection from a	No.DateSW 409SW 306SW 322SW 418SW 410SW 305127/04/2023-0.8220.281214/02/20230.164-0.1800.0710.3890.098301/09/20220.150-0.198-0.3250.126SDPB maintain the current SOP of Scheduled Wastes (Hazardous Waste) ManagementSD/SDP/PSQM (ESH)/203-EN1 the Disposal Pesticide container. Content includes the triple rinsing procedures and the relevant training to be conducted. Under the operational control procedure established as given in 4.5.3.3 above the guideline and practice for handling empty pesticides containers are as follows.1.All class 2 and above containers are tripled rinsed, and holes punctured at the bottom only if the waste generator is to dispose as non-scheduled waste.2.Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process.								

Criterion 4.5.4: Reduction of pollution and emission including greenhouse gas



Criterio	on / Indicator		Compliance							
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. - Major compliance -	estate was la end 2 includ boiler The p Impac	The environmental aspect and impact have been identified the polluting activities in estate. This included gas emissions, scheduled waste, solid waste and general waste. It was last reviewed on 03/01/2023 to include the clarification station newly installed in end 2022 a high-speed separator - enhance oil recovery oil separation Areas of focus include activities at the chemical store, workshop, store, scheduled waste, diesel tank, boiler house, effluent pond, WTP. The polluting activities are identified and documented in the Environmental Aspect & Impact Identification. From the EAI, it will be evaluated for the impact. The identified impact if any will be included in the management plan. The evaluation is documented in the Environmental Impact Evaluation.							
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. - Major compliance -	11/01 additi of the	The pollution prevention plan and plan to reduce GHG emission 2023 updated 11/01/2023, with the mitigation plan, actions and time frame has been identified. In addition, the Environmental Management Plan for FY2023 is available. The monitoring of the plan is available. The following tabled the management action plan to reduce GHG emission from the mill activities.							
			Issues & Strategies Reduce diesel consumption at mill operation Reduce smoke emission to the air Reduce electricity usage	Action PlanTo monitor diesel usageTo ensure vehicle scheduled maintenance.Optimum gen set usageTo effectively implement the CEMSEliminate use of wet shell as fuelMonitor usage vs baseline.Install capacitor at identified large powerconsumption motor.Install LED bulb for the lighting system						
		4	To promote awareness on HCV	Annual training on HCV						



Criterio	on / Indicator			Assessi	ment Finding	S		Compliance		
		to com environ compila Jubilee. 1. Plan	All efforts and action plan for the identified pollutants and emission above is adequate to comply with the requirement. All identified issues have significant impacts to the environment. The mill also monitored and maintained records on Palm GHG. This compilation is made at Head Office level and made for the entire SOU 18 Diamond Dubilee. Inclusive in the report as follow. 1. Plantation/field emission with data from field emission and sinks (CO2/FFB) 2. Mill emission with data from mill emission and credits (CO2/FFB).							
4.5.4.3	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. - Major compliance -	include limit in 30/06/2	alm oil mill effluent generated was treated accordingly through ponding system which accude aerobic and anaerobic process. The limit of palm oil mill effluent following the mit in the `Syarat Lesen' with License No.: 004043 effective from 01/07/2023 - 0/06/2024 atest submission for to DOE on as follows. Among others the indicators were: <u>No. Parameters STD 09/01/2023 09/02/2023 22/03/2023</u> 1 pH - 7.54 7.56 7.43 2 BOD mg/l 5,000 1,345 2,250 2,995 3 COD mg/l - 20,196 57,699 35,130 4 Total Solids - 39,879 99,778 31,687 5 S Solids - 31,800 61,000 22,700 6 Oil & Grease - 16 10 8 7 A Nitrogen - 336 377 319							
Criterio	n 4.5.5: Natural water resources							·		
4.5.5.1	The management shall establish water management plans to maintain the quality and	The Wa 03/01/2	ter Management Pla 2023.	n for the mi	ill has been esta	blished. It was l	ast reviewed on	Complied		



Criterion / Indicator		Assessment Findings					
ground water). The water management plan may	complex. The	The mill processing water are obtained from the water catchment adjacent to the mill complex. The water usage monitoring is made monthly with the latest recording detailed sampled water usage m3 per mt of fresh fruit bunches (FFB) 2022 below.					
b) Monitoring of outgoing water which may have	i ionen	(Mt)	(L)	racio			
negative impacts into the natural waterways at a frequency that reflects the mill's current	Jan Feb	5,593 7,011	7,931 8,986	1.42 1.28			
activities.	Mac	7,876	10,139	1.29			
c) Ways to optimize water and nutrient usage	April	7,072	9,105	1.29			
and reduce wastage (<i>e.g.</i> having in place	May	6,484	8,682	1.34			
systems for re-use, night application,	June	7,735	9,866	1.28			
maintenance of equipment to reduce leakage,	July	5,979	9,367	1.57			
collection of rainwater, etc.).	Aug	5,749	8,695	1.51			
- Major compliance -	Sept	5,312	7,719	1.45			
	Oct	5,055	7,168	1.42			
	Nov	4,864	7,024	1.44			
	Dec	5,757	8,746	1.52			
	Total	74,486	103,428	1.39			
	volume of FFB	being proces	sed. There we	ere variations of p	e proportionate erformance. Prot charging for main	bable factors	
	The Water Management Plan for the mill had included among others the following details.						
				eduction plan			
		ssues/ Area	Actio	n Steps	PIC	Status	



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Criterion / Indicator			ŀ	ssessment	Findings				Compliance
	1	Rainwater collection	at str rainwa The r	containers are ategic location ater ainwater shall ashing heavy m	ns to collect be recycled		ineer	On-going	
	2	Re-streaming		stream from nsate pit for di		Mill Engi	ineer	On-going	
		-		ency plan durin		age			
	No.	Area/inc			ction steps			PIC	
	2	Water shorta prolonged dr Severe pollution/ contaminatio	y season water	conserve wat To seek assis - to obtain tre neighbouring To obtain wat To train/edu conserve wat To seek assis	cate staff/wc er. tance from LA ated water sup <u>mill's WTP</u> ter from LAP cate staff/wc	P pply from orkers to P	Mill E Staff	Executive/	
		1	Identificati	on & managen	nent of wastew	vater			
	No.	Location	Wastewa	ter produced	Treatmen containme	t/ l nt di	•	recycle method	
		stations		on condensate condensate cyclone te	Oil recovery/ ETP		cover i stem	nto	

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Criterion / Indicator			Assessment	Findings		Compliance
			Mill floor cleaning water			
	2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain	
	3	Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain	
	4	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain	
	5	Lab	Cleaning water	Process drain	Monsoon drain	
	6	Washroom	Toilet water, cleaning water	Septic tank	Supernatant to drains, sludge collected by licensed contractor.	
	appro	priate riparian	wetlands are protecte buffer zones. Responsib hed are as follows.			
	Rive	er width (Meter	s) Buffer Zone (Meter	s)		
		>40 20-40	50			
		10-20	20			
		5-10	10			
		<5	5			
			urse is Sungai Chohong x hence no sampling was			

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Criterio	on / Indicator	Assessment Findings	Compliance
		The management internal monitors the water quality through water sampling at 4x /year frequency at the identified 3 points within the mill perimeter.	
4.5.5.2	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. - Major compliance -	POME is discharged through land application via farrows at Diamond Jubilee Estate field no P 01H / P011A / P05H / P02H /P15B from the Final Discharge Holding Pond as stated in the DOE Compliance Schedule. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. Effluent Analysis conducted by accredited laboratory and submitted to DOE every three (3) months through OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly. The application field was visited and verified with no sign of overflowing observed.	Complied
4.6 Prin	ciple 6: Best Practices		
Criterio	n 4.6.1: Mill Management		
4.6.1.1	Standard operating procedures shall be appropriately documented and consistently implemented and monitored. - Major compliance -	 SDPB established Standard Operating procedures (SOPs) described details from the reception, sterilisation, threshing, pressing, clarification, nut polishing station, effluent, laboratory, workshop and dispatches. SOU 18 Diamond Jubilee continued to use the documents established by the SDPB among others as follows: Mill Quality Management System (MQMS) Standard Operating Manual & Procedures (SOP) Sustainable Plantation Management System (SPMS) RSPO Supply Chain Manual ESH Management System Manual Occupational Safety and Health Manual Pictorial Safety Standards 	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance
		 8. Laboratory Process Control Manual 9. Security Guidelines. In addition, technical guidelines as listed in the Agricultural Reference Manual were also used. In general, the documents included operation activities in the estates and the mills from: Seedlings in nursery to planting of young palms. Plantation upkeep to mill FFB receipt, grading, processing. Quality analysis and dispatch of CPO and PK. Security in the SOU 18 Diamond Jubilee. Contents of the Manual were disseminated to the workers through. Morning muster Mill weekly briefings. Training as ad hoc and programmed basis. The Manuals are also kept in the administration office to facilitate reference by any interested parties. Site inspection and interview with workers confirmed that the SOP had been implemented and the employees understood the requirements of the SOP. In addition, there are also manuals available within the industry and MPOB that are used 	
4.6.1.2	All palm oil mills shall implement best practices. - Major compliance -	 as guidelines. A mechanism on checking the consistency of mill implementation of their procedures were in place. Among the mechanism such as Performance Monitoring Visit, SORA visit, monthly production and Internal Audit. Sample of records verified as follow: Structured Oil Recovery Assessment dated on 09-13/01/2023. Internal Audit Report conduct on 11/05/2023. Month Production Report dated on 30/06/2023. 	Complied

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Criterio	on / Indicator	Assessment Findings	Compliance	
Criterion 4.6.2: Economic and financial viability plan				
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. - Major compliance -	 Diamond Jubilee POM continued its commitment to long term sustainability and improvements through a capital expenditure program. The management has forecasted for five (5) years business plan from FY2023 – FY2027 as guidance for future planning. Review the plan include items as follows. 1. Annual Actual FFB Received volume 2. Annual Actual Production of CPO volume 3. Annual Actual Production of PK volume 4. Annual Actual Total Palm Oil Extraction (OER) 5. Annual Actual Total Palm Kernel Extraction (KER) 6. Annual Actual Mill Processing Cost. 7. Annual Actual Total Mill Cost. 	Complied	
Criterio	n 4.6.3: Transparent and fair price dealing			
4.6.3.1	Pricing mechanisms for the products and other services shall be documented and effectively implemented. - Major compliance -	 SDPB established pricing mechanism and conducted as per contract agreement with contractors. Pricing mechanism is available in the contract under Transportation Agreement. All tender and pricing exercises are handled by the HQ management. Projects are tendered from the approved vendors registered with HQ. Payments are processed and made by HQ through system by MEX. This is made upon job verification by the operating units' personnel and representatives from HQ for major projects. Review on the contract agreement, sighted pricing of the job task is available. Sampled contract/Letter of Award to Contractors as sample as follow. 1. Letter of Award to Mxxxx Axxxx Sdn Bhd dated 22/08/2022. 2. Letter of Award to Uxxxx Rxxxx Sdn Bhd dated 18/02/2023. 	Complied	



Criterio	on / Indicator	Assessment Findings	Compliance
4.6.3.2	 All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner. - Major compliance - 		
Criterio	n 4.6.4: Contractor		
4.6.4.1	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information. - Major compliance -	 SDPB established contractor agreement with letter of Award & Acceptance (LOA) and Ikrar Integriti Vendor with contractor as follow. 1. Letter of Award to Mxxxx Axxxx Sdn Bhd for CPO/PK Transporting contract dated 06/06/2022. 2. Letter of Award to Uxxxx Rxxxx Sdn Bhd for supplying equipment's order dated 18/04/2023. All contractors engaged by estates were bound to understand and comply to their contractual agreements that includes MSPO requirements through signing of Vendor Integrity Pledge (VIP) which enable accredited CB to audit them. Communication and socialization of the MSPO requirement has been done during the contract agreement signing, stakeholders respond assessment. It has been confirmed through interview with sampled contractors where they can demonstrate their understanding on the MSPO requirement. There is evidence that contractor has been provided required documentation such as employment contract, workers' pay slips, EPF and SOCSO contribution to the management. 	Complied



Criterio	on / Indicator	Assessment Findings	Compliance
4.6.4.2	The management shall provide evidence of agreed contracts with the contractor. - Major compliance -	 Diamond Jubilee POM engaged contractors for works such as CPO & PK transporting and Supplying equipment. Sampled of the agreement/ letter of award (LOA)/ contract between company and the contractors as below: 1. Letter of Award to Mxxxx Axxxx Sdn Bhd for CPO/PK Transporting contract dated 06/06/2022. 2. Letter of Award to Uxxxx Rxxxx Sdn Bhd for supplying equipment's order dated 18/04/2023. 	Complied
		Contract agreements between the mill and its contractors were made available. Generally, the elements of sustainability such as obligations to legal compliance, workers' welfare, safety and environmental issues.	
4.6.4.3	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required. - Minor compliance -	 SDPB established contractor agreement with letter of Award & Acceptance (LOA) and Ikrar Integriti Vendor with contractors. All contractors engaged by estates were bound to understand and comply to their contractual agreements that includes MSPO requirements through signing of Vendor Integrity Pledge (VIP) which enable accredited CB to audit them. All contracted parties/vendors were required to signed Vendor Integrity Pledge (VIP) and to comply with requirement. In the VCOBC under section 4. Responsibility and Compliance with the Vendor COBC stated as follows: "We have the rights to audit the vendors to verify compliance with this Vendor COBC and/or with the requirements set out in the third-party agreements to permit ongoing assessment of risk". Sampled of contractors as follow. Letter of Award to Mxxxx Axxxx Sdn Bhd for CPO/PK Transporting contract dated 06/06/2022. 	Complied



Criter	ion / Indicator	Assessment Findings	Compliance
		2. Letter of Award to Uxxxx Rxxxx Sdn Bhd for supplying equipment's order dated 18/04/2023.	



Appendix B: Smallholder Member Details

	Smallhold		Location of	GPS Coo	ordinates	Certified	Planted
No.	Name	MPOB License Number	Planted Area (District)	Latitude	Longitude		Area (ha)
	N/A						

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Appendix C: Location and Field Map

Diamond Jubilee Palm Oil Mill



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Diamond Jubilee Estate



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<u>Diamond Jubilee Estate</u>



bsi.

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Appendix D: List of Abbreviations

BOD	Biochemical Oxygen Demand
СВ	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
РКО	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
SDPB	Sime Darby Plantation Berhad
SOU	Strategic Operating Units