

**RSPO PRINCIPLE AND CRITERIA –  
4<sup>th</sup> ANNUAL SURVEILLANCE ASSESSMENT (ASA1\_4)  
Public Summary Report**

<b>Sime Darby Plantation Berhad</b>
Client company Address: Level 3A, Main Block, Plantation Tower No, 2, Jalan PJU 1A/7 47301 Ara Damansara Selangor, Malaysia
Certification Unit: <b>Strategic Operating Unit (SOU 1) Sungai Dingin Palm Oil Mill</b>  Location of Certification Unit: Ladang Bukit Selarong 09400 Padang Serai Kedah, Malaysia

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**Section 1: Scope of the Certification Assessment**

1. Company Details			
<b>RSPO Membership Number</b>	1-0008-04-000-00	<b>Membership Approval Date</b>	06/09/2004
<b>Parent Company Name</b>	Sime Darby Plantation Berhad		
<b>Address</b>	Level 3A, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia		
<b>Subsidiary (Certification Unit Name)</b>	Strategic Operating Unit (SOU 1)		
<b>Address</b>	Sunagi Dingin Palm Oil Mill, Ladang Bukit Selarong 09400 Padang Serai, Kedah, Malaysia		
<b>Contact Name</b>	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mr Subramaniam a/l Govindasamy (Mill Manager)		
<b>Website</b>	<a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a>	<b>E-mail</b>	<a href="mailto:shylaja.vasudevan@simedarbyplantation.com">shylaja.vasudevan@simedarbyplantation.com</a> <a href="mailto:kks.sungai.dingin@simedarbyplantation.com">kks.sungai.dingin@simedarbyplantation.com</a>
<b>Telephone</b>	+603-78484379 (Head Office) +603 5940178 (Mill)	<b>Facsimile</b>	+603 78484363 (Head Office) +603 5940167 (Mill)

2. Certification Information			
<b>Certificate Number</b>	RSPO 550179	<b>Date of First Certification</b>	12/08/2010
		<b>Certificate Start Date</b>	12/08/2015
		<b>Certificate Expiry Date</b>	11/08/2020
<b>Scope of Certification</b>	Palm oil and Palm Kernel Production		
<b>Applicable Standards</b>	RSPO P&C MY-NI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E)		

3. Other Certifications			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
MSPO 705584	MS 2530-4 Malaysia Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	14/02/2023
MSPO 705628	MS 2530-3 Malaysia Sustainable Palm Oil (MSPO) Part 3		

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base)</b>	<b>Location [Map Reference #]</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Sungai Dingin Palm Oil Mill	Karangan, Kedah, Malaysia	5° 23' 38.60" N	100° 42' 36.30" E
Sungai Dingin Estate	Karangan, Kedah, Malaysia	5° 20' 37.70" N	100° 43' 09.10" E
Padang Buluh Estate	Sungai Petani, Kedah, Malaysia	5° 34' 25.00" N	100° 34' 24.00" E
Bukit Selarong Estate	Padang Serai, Kedah, Malaysia	5° 47' 98.80" N	100° 59' 73.90" E
Anak Kulim Estate	Kulim, Kedah, Malaysia	5° 18' 32.00" N	100° 36' 36.00" E
Bukit Hijau Estate	Kuala Ketil, Kedah, Malaysia	5° 33' 04.00" N	100° 45' 25.00" E
Jentayu Estate	Sungai Petani Kedah, Malaysia	5° 46' 01.20" N	100° 35' 49.41" E
Somme Estate	Serdang, Kedah, Malaysia	5° 15' 12.00" N	100° 36' 14.00" E

<b>5. Description of Supply Base</b>					
<b>Estate</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Sg Dingin Estate	2,935.81	3.56	1,312.30	4,251.67	69.05 %
Padang Buluh Estate	3,447.00	14.34	547.13	4,008.47	85.99 %
Bukit Selarong Estate	3,669.04	34.24	222.29	3,925.57	93.47 %
Anak Kulim Estate	388.33	1.72	1,132.44	1,522.49	25.51 %
Bukit Hijau Estate	1,776.90	5.33	942.77	2,725.00	65.21 %
Jentayu Estate	1,191.04	0.71	986.84	2,178.59	54.67 %
Somme Estate	770.72	0	170.84	941.56	81.86 %
<b>Total</b>	<b>14,178.84</b>	<b>59.9</b>	<b>5,314.61</b>	<b>19,553.35</b>	<b>77.99%</b>

*\*Anak Kulim (infrastructure including rubber 983.14)*

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6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Sg Dingin Estate	0	827.23	1,143.74	964.84	0	2,935.81	0
Padang Buluh Estate	586	690	2,087	84	0	2,861	586
Bukit Selarong Estate	342.56	699.27	513.75	2,113.46	0	3,326.48	342.56
Anak Kulim Estate	0	0	388.33	0	0	388.33	0
Bukit Hijau Estate	0	293.47	963.98	519.45	0	1,450.62	0
Jentayu Estate	612.26	145.91	432.87	0	0	578.78	612.26
Somme Estate	0	510.09	0	260.63	0	770.72	0
<b>Total (ha)</b>	<b>1,540.82</b>	<b>3,165.97</b>	<b>5,529.67</b>	<b>3,942.38</b>	<b>0</b>	<b>12,873.60</b>	<b>1,540.82</b>

7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (Aug 2018-July 2019)	Actual (April 2018-March 2019)	Forecast (Aug 2019-July 2020)
Sg Dingin Estate	58,198.68	55,114.94	52,637.98
Padang Buluh Estate	8,2464.00	57,649.25	72,100
Bukit Selarong Estate	67,033.71	66,850.17	71,218.00
Anak Kulim Estate	8,700.00	4,252.67	2,850
Bukit Hijau Estate	21,100.00	26,100.99	25,400
Jentayu Estate	22,310.00	20,856.18	20,003.48
Somme Estate	14,110.00	13,485.31	14,890.88
<b>Total</b>	<b>273,916.39</b>	<b>244,309.51</b>	<b>259,100.34</b>

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (Aug 2018-July 2019)	Actual (April 2018-March 2019)	Forecast (Aug 2019-July 2020)
Tali Ayer	N/A	330.60	N/A
Holyrood		10,615.99	
<b>Total</b>		<b>10,946.59</b>	

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*Diversion crop from other certified management unit (Chersonese SOU2, certificate no. RSPO 590800 valid until 4/10/21)*

<b>9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable</b>			
Independent FFB Supplier	Tonnage / year		
	Estimated (Aug 2018-July 2019)	Actual (April 2018-March 2019)	Forecast (Aug 2019-July 2020)
Supplier ABC	Nil	80,805.56	95,000
<b>Total</b>	<b>Nil</b>	<b>80,805.56</b>	<b>95,000</b>

<b>10. Certified Tonnage</b>			
Mill Capacity: 80 MT/hr  SCC Model: IP/MB	Estimated (Aug 2018-July 2019)	Actual (April 2018-March 2019)	Forecast (Aug 2019-July 2020)
	FFB	FFB	FFB
	273,916.39	255,256.10	259,100.34
	CPO (OER: %)	CPO (OER: 21.52%)	CPO (OER: 22 %)
	61,329.87	54,927.47	57,002.07
	PK (KER: %)	PK (KER: 5.86 %)	PK (KER: 5.38 %)
	14,873.65	14,963.19	13,939.59

<b>11. Actual Sold Volume (CPO)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>CPO (MT)</b>	0	0	0	52,120	52,120

Conventional product = product that is produced using certified FFB but sold without RSPO claim.

<b>12. Actual Sold Volume (PK)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>PK (MT)</b>	0	0	0	14,200	14,200

Conventional product = product that is produced using certified FFB but sold without RSPO claim.

<b>13. Actual Group certification Claims</b>		
	Credit	Physical Volume (MT)
<b>IS-CSPO</b>	-	-
<b>IS-CSPKO</b>	-	-
<b>IS-CSPKE</b>	-	-

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn Bhd,  
(ASI Accreditation Number: ASI-ACC-067)  
Unit 3, Level 10, Tower A  
The Vertical Business Suites, Bangsar South  
No. 8, Jalan Kerinchi  
59200 Kuala Lumpur  
Tel +603 2242 4211 Fax +603 2242 4218  
Nicholas Cheong: [Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com)  
[www.bsigroup.com](http://www.bsigroup.com)

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted from 22-26/04/2019. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, 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. RSPO Principles & Criteria 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2017 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 approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (0.8\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula  $(0.8\sqrt{y}) \times (z)$ ; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

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



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Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

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

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification)</b>	<b>Year 2 (ASA 1_1)</b>	<b>Year 3 (ASA 1_2)</b>	<b>Year 4 (ASA 1_3)</b>	<b>Year 5 (ASA 1_4)</b>
Sungai Dingin Palm Oil Mill	√	√	√	√	√
Sungai Dingin Estate		√		√	
Padang Buluh Estate	√		√		√
Bukit Selarong Estate		√		√	
Anak Kulim Estate		√			√
Bukit Hijau Estate	√			√	
Jentayu Estate			√		√
Somme Estate	√		√		

**Tentative Date of Next Visit:** April 22, 2020 – April 26, 2020

**Total No. of Mandays:** 13.0 mandays including one day SC audit for mill

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**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Mohamed Hidhir Zainal Abidin	Team Leader	He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers & stakeholders consultation.
Mohd Hafiz Mat Hussain	Team Member	He holds Bachelor Degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2014 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since May 2013 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, social issues and workers/stakeholders consultation.
Elzy Ovktafia Chairul	Team Member	She graduated from Universiti Putra Malaysia in Diploma of Agriculture, holding the designatory of LISP from the Incorporated Society of Planters and currently in the midst of completing the AISP level (professional certificate and recognition from the Incorporated Society of Planters). She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO, MSPO and 2nd Party Audit for Social Compliance Programme (URSA, ETI, etc) for 2 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for RSPO P&C, RSPO NEXT, RSPO SCC, MSPO P&C, MSPO SCC, ISO 9001:2015, ISO 14001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for almost 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During this assessment, she assessed on the aspects of legal, social and stakeholder engagement. Able to communicate in Bahasa Malaysia and English.

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#### Accompanying Persons:

No.	Name	Role
	Nil	

### 2.3 Assessment Plan

PRELIMINARY AGENDA					
Date	Time	Subjects	Hidhir	Elzy	Hafiz
Sunday 21/4/19	PM	Audit team travel to Seberang Jaya. Check in at Sunway Hotel, Seberang Jaya	√	√	√
Monday 22/4/2019	0730	Audit Team travelling Sungai Dingin POM.	√	√	√
<b>Sg Dingin Palm Oil Mill</b>	0830	Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation).</li> <li>• Verification on previous audit findings</li> </ul>			
	09.00 – 12.00	<b>Sg Dingin Palm Oil Mill</b> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√	√
	10.00 – 12.00	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	12.00 – 13.00	Lunch	√	√	√
	13.00 – 16.30	<b>Sg Dingin Palm Oil Mill:</b> Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√
	16.30-17.00	Interim Closing briefing and end of day 1	√	√	√
Tuesday 23/4/2019	08.30 – 12.00	<b>Jentayu Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
<b>Jentayu Estate</b>	10.00 – 12.00	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	12.00 – 13.00	Lunch	√	√	√

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<b>PRELIMINARY AGENDA</b>					
<b>Date</b>	<b>Time</b>	<b>Subjects</b>	<b>Hidhir</b>	<b>Elzy</b>	<b>Hafiz</b>
	13.00 – 16.30	<b>Jentayu Estate</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16.30-17.00	Interim Closing Briefing and end of day 2	√	√	√
Wednesday 24/4/2019	8.30 – 13.00	<b>Padang Buloh Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
<b>Padang Buloh Estate</b>	10.00 – 12.00	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	12.00-13.00	Lunch	√	√	√
	13.00 – 16.30	<b>Padang Buloh Estate</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16.30-17.00	Interim Closing Briefing and end of day 3	√	√	√
Thursday 25/4/19	8.30 – 13.00	<b>Anak Kulim Estate</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
<b>Anak Kulim Estate</b>	10.00 – 12.00	<b>Meeting with stakeholders</b> (Government, village rep, smallholders, Union Leader, contractor etc.)	-	√	-
	12.00-13.00	Lunch	√	√	√
	13.00 – 16.30	<b>Anak Kulim Estate</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16.30-17.00	Interim Closing Briefing and end of day 4	√	√	√

PRELIMINARY AGENDA					
Date	Time	Subjects	Hidhir	Elzy	Hafiz
Friday 26/4/2019  <b>Sg Dingin POM</b>	8.30 – 12.00	Supply chain audit for Sg Dingin POM <ul style="list-style-type: none"> <li>• General COC for supply chain</li> <li>• RSPO rules communication and claim</li> <li>• Module E: Mass Balance</li> </ul>	√	-	√
	12.00- 13.00	Closing meeting. Presentation of finding	√	-	√
	13.00	End of audit. Lunch and Friday Prayer	√	-	√
	PM	Audit team travel back to KL	√	-	√

### Section 3: Assessment Findings

#### 3.1 Normative requirement applied for this assessment:

- Sime Darby Plantation Berhad Multiple Management Units / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

#### 3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	The time bound plan includes all SOUs in Malaysia and Indonesia. Malaysia - Effectively 34 SOUs: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down. Indonesia - Effectively 25 SOUs. For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Based on the latest information, the unit will be	Yes

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	surrender to government. The negotiation process is still on going.	
Have all the estates and mills certified within five years after obtaining RSPO membership?	For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Based on the latest information, the unit will be surrender to government. The negotiation process is still on going.	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	<p>In March 2015, Sime Darby Plantation completed the acquisition of New Britain Palm Oil Limited (NBPOL). NBPOL is managed under a separate entity and the reporting of timebound plan will be under NBPOL’s management. NBPOL is considered as a different entity/member under the RSPO and NBPOL is 100% RSPO Certified.</p> <p>*RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in completed. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audit was premature terminated and postponed to a later date in 2019. Based on the latest information, the unit will be surrender to government. The negotiation process is still on going.</p> <p>SDPL (Liberia Operation) has undergone RSPO Main Certification audit scheduled on 19 to 23 March 2018, but the assessment was only completed conducted and put on-hold due to security &amp; safety issue. After due consideration on the current engagement with the House of Representative in Liberia, SDP management decided to postpone the time bound plan of RSPO Certification to 2019 until satisfactory resolution and demonstration of progress towards the 15 recommendations by the Special Legislative Committee of the House of Representative, Liberia in managing the potential risks resulting from the RSPO Certification process. Based on the latest information, the unit will be surrender to government. The negotiation process is still on going.</p>	Yes
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	<p>Sime Darby Plantation’s time bound plan for certification is initially 3 years, starting 2008-2011. SDP has had all its SOUs (Malaysian &amp; Indonesian) and all Malaysian SOUs have been RSPO certified including 2 new mills have been in Jan and Feb 2014.</p> <p>For Indonesian operations, currently, 1 SOU in Indonesia (PT MAS) is pending for RSPO Certification due to social legacy issues.</p>	Yes

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	<p>SDP's is actively working on its certification targets given the span across a large geographical location and over 200 estates and mills in operation.</p> <p>97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes and a new oil mill in Liberia has been commissioned in Feb 2016. SDP's time bound plan has been revised to take into consideration the social challenges encountered in Indonesia for the remaining SOU (PT MAS) yet to be certified.</p> <p>Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter.</p> <p>For Indonesia operation, the reported Case No: DSF 007 between the parties PT Mistra Austral Sejahtera (a subsidiary of Sime Darby Plantation Sdn Bhd) and Kerunang/Entapang community. New status has been updated for dispute tracker for following case, <a href="http://www.rspo.org/members/dispute-settlement-facility/status-of-disputes#007">http://www.rspo.org/members/dispute-settlement-facility/status-of-disputes#007</a></p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised</p>	<p>No lapses.</p>	<p>Yes</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>	<p>No.</p>	<p>Yes</p>
<p>Have there been any stakeholder comments?</p>	<p>Up to date, there is no comment. SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat.</p>	<p>Yes</p>
<p><b>Un-Certified Units or Holdings</b></p>		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	<p>HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p>	<p>Yes</p>
<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>A new mill will be set up in Liberia and planned for commissioning in Feb 2016. Initial audit was carried out in March 2018 but unable to be completed due strike and unstable site condition. Audt was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1<sup>st</sup> quarter of 2019. RSPO NPP process has been completed in 2011.</p>	<p>Yes</p>

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	<p>Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.</p> <p>*Note: RSPO NPP Announcements for SDP can be found at <a href="http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?">http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?</a></p>																																																																				
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>. The progress on the Liabilities shall be verified and reported.</p>	<p>Latest update based on RSPO Case Tracker (19 potential liabilities; 5 LUCA submitted, 1 LUCA is passed, 1 CN submitted, 1 CN approved) on LUCA submission status as per below table:</p> <p style="text-align: center;"><b>SIME DARBY PLANTATION: LUCA SUBMISSION TIMELINE</b></p> <table border="1" data-bbox="727 779 1323 1279"> <thead> <tr> <th>No.</th> <th>PT/ Company</th> <th>Report Submission to RSPO</th> <th>Current Status (14 Aug 2018)</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>PT Lahan Tani Sakti</td> <td>Submitted on 31 May 2017</td> <td>LUCA approved by reviewer</td> </tr> <tr> <td>2.</td> <td>PT Bina Sains Cemerlang</td> <td>Submitted on 29 Sept 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>3.</td> <td>PT Swadaya Andika</td> <td>Submitted on 6 Oct 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>4.</td> <td>PT Langgeng Muara Makmur</td> <td>Submitted on 8 Dec 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>5.</td> <td>PT Laguna Mandiri</td> <td>Submitted on 20 Dec 2017</td> <td>Shapefiles submitted to RSPO</td> </tr> <tr> <td>6.</td> <td>PT Kridatama Lancar</td> <td>Submitted on 22 Sept 2017</td> <td rowspan="10">Shapefiles to be submitted to RSPO by 17 Aug 2018</td> </tr> <tr> <td>7.</td> <td>PT Paripurna Swakarsa</td> <td>Submitted on 29 Sept 2017</td> </tr> <tr> <td>8.</td> <td>PT Sime Indo Agro</td> <td>Submitted on 10 Nov 2017</td> </tr> <tr> <td>9.</td> <td>PT Bhumireksa Nusa Sejati</td> <td>Submitted on 12 Dec 2017</td> </tr> <tr> <td>10.</td> <td>PT Budidaya Agro Lestari</td> <td>Submitted on 15 Dec 2017 <i>*Re-submitted on 29 Dec 2017</i></td> </tr> <tr> <td>11.</td> <td>PT Teguh Sempurna</td> <td>Submitted on 15 Dec 2017 <i>*Re-submitted on 29 Dec 2017</i></td> </tr> <tr> <td>12.</td> <td>PT Bahari Gembira Ria</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>13.</td> <td>PT Guthrie Pecconina Indonesia</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>14.</td> <td>PT Sajang Heulang</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>15.</td> <td>PT Bersama Sejahtera Sakti</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>16.</td> <td>PT Tunggal Mitra Plantation</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>17.</td> <td>PT Ladangrumpun Suburabadi</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>18.</td> <td>PT Aneka Inti Persada</td> <td>Submitted on 29 Dec 2017</td> </tr> <tr> <td>19.</td> <td>PT Mitra Austral Sejahtera</td> <td>Submitted on 29 Dec 2017</td> </tr> </tbody> </table> <p>Note: SDP's LUCA is still in queue for review process pending finalization of the contract between RSPO and the reviewer. Sime Darby Plantation has also submitted its RSPO Compensation Plan (CP) for evaluation by RSPO.</p>	No.	PT/ Company	Report Submission to RSPO	Current Status (14 Aug 2018)	1.	PT Lahan Tani Sakti	Submitted on 31 May 2017	LUCA approved by reviewer	2.	PT Bina Sains Cemerlang	Submitted on 29 Sept 2017	Shapefiles submitted to RSPO	3.	PT Swadaya Andika	Submitted on 6 Oct 2017	Shapefiles submitted to RSPO	4.	PT Langgeng Muara Makmur	Submitted on 8 Dec 2017	Shapefiles submitted to RSPO	5.	PT Laguna Mandiri	Submitted on 20 Dec 2017	Shapefiles submitted to RSPO	6.	PT Kridatama Lancar	Submitted on 22 Sept 2017	Shapefiles to be submitted to RSPO by 17 Aug 2018	7.	PT Paripurna Swakarsa	Submitted on 29 Sept 2017	8.	PT Sime Indo Agro	Submitted on 10 Nov 2017	9.	PT Bhumireksa Nusa Sejati	Submitted on 12 Dec 2017	10.	PT Budidaya Agro Lestari	Submitted on 15 Dec 2017 <i>*Re-submitted on 29 Dec 2017</i>	11.	PT Teguh Sempurna	Submitted on 15 Dec 2017 <i>*Re-submitted on 29 Dec 2017</i>	12.	PT Bahari Gembira Ria	Submitted on 29 Dec 2017	13.	PT Guthrie Pecconina Indonesia	Submitted on 29 Dec 2017	14.	PT Sajang Heulang	Submitted on 29 Dec 2017	15.	PT Bersama Sejahtera Sakti	Submitted on 29 Dec 2017	16.	PT Tunggal Mitra Plantation	Submitted on 29 Dec 2017	17.	PT Ladangrumpun Suburabadi	Submitted on 29 Dec 2017	18.	PT Aneka Inti Persada	Submitted on 29 Dec 2017	19.	PT Mitra Austral Sejahtera	Submitted on 29 Dec 2017	<p>Yes</p>
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<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 6.3.</p>	<p>No stakeholder comments or complaints received.</p>	<p>Yes</p>																																																																			
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>None noted. No stakeholder comments or complaints received.</p>	<p>Yes</p>																																																																			
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>Yes</p>	<p>Yes</p>																																																																			



**3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)**

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?  OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable.	

**3.4 Details of findings**

The nonconformity is listed below. The summary report of the assessment by criteria is listed in Appendix A.

During the 4<sup>th</sup> annual surveillance assessment there were three (3) Minor raised. The Sungai Dingin Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1767947-201904-N1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.1.2 Minor
<b>Date Issued</b>	25/04/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Environmental management plan was not effectively implemented		
<b>Requirement Reference:</b>	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons		
<b>Objective Evidence:</b>	Environmental management plan (EMP) FY 2019 dated 5/1/19 did not include: i) Significant environmental impacts - nuisance (noise pollution) as per Compliance Schedule no. 004543. ii) As to date, no boundary noise monitoring carried out as baseline monitoring. Basis use for the boundary noise is referred to noise mapping report in 2017.		

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	<p>iii) Monsoon drain analysis - only 2 parameters tested (BOD and COD) compared to EMP (BOD, SS and COD). Refer to analysis report [ IE1396/2018 dated 27/11/18, IE146/2019 dated 10/2/19 and IE319/2019 dated 19/3/19]</p>
<b>Corrections:</b>	<p>i) Mill will include the noise pollution in the EMP FY 2019 and to monitor accordingly.</p> <p>ii) Mill has request for quotation from another consultant to conduct the Boundary Noise Monitoring where the point of monitoring is at the boundary of mill parameter total of 4 points</p> <p>iii) For next sampling on Jun onwards, mill will notify the R&amp;D Lab to conduct analysis on BOD, COD and SS for monsoon drain analysis.</p>
<b>Root Cause Analysis:</b>	<p>i) Noise pollution was not include in the Environmental Management Plan due to mill during EAI and EIE evaluation the noise impact rating is low. Mill as well has overlook the compliance schedule on noise pollution</p> <p>ii) Boundary Noise monitoring has been conducted by PROCOMA ENVIROMENTAL (M) SDN BHD on 19 May 2017. However there is inaccuracy in selecting the point of monitoring by the consultant as the point of selection was found to be boundary between high noise stations at mill rather than between boundary of the mill parameters and external environment.</p> <p>iii) Mill did not clearly advice the R&amp;D Lab on the analysis to be conducted for the Monsoon Drain sample.</p>
<b>Corrective Actions:</b>	<p>i) The comprehensive EAI &amp; EIE assessment need to be carry out by the Mill and assist by the SQM-NTR. During the assessment, the assessor shall to identify the environmental aspects and impacts for all activities in mill operations, the next step is to identify the significant impacts. If the environmental aspect has a high potential of non-compliance to regulatory requirements, then it automatically has to be addressed under the EMP. The relevant training will be conducted to enhance the understanding.</p> <p>ii) Mill will follow as per DOE guideline in The Planning Guidelines For Environmental Noise Limits and Control by Noise Data Section, Air Division, Department of Environment Malaysia. Under title no.6 (6.1) Monitoring point(s) has stated that "Normally the noise assessment will be at the nearest noise-sensitive premises and the best position for the monitoring point(s) will often be outside the sensitive premises at the real property boundary. This however does not mean that the monitoring point must always be close to the premises. Noise assessment at times may refer only to noise from the source under consideration and not to the total measured value which may include, for example, traffic noise." Therefore for point selection, mill will select 4 points at the mill property boundary which is between mill parameter fencing and outside environment. Mill personnel as well will ensure to verify the location of Noise Monitoring Device is at correct point position.</p> <p>iii) All delivery note for monsoon drain analysis must clearly state the type of analysis to be conducted.</p>
<b>Assessment Conclusion:</b>	<p>The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.</p>

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<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1767947-201904-N2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.1.3 Minor
<b>Date Issued</b>	25/04/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Records of monitoring and any actions taken was not adequately maintained.		
<b>Requirement Reference:</b>	Records of monitoring and any actions taken shall be maintained and available, as appropriate.		
<b>Objective Evidence:</b>	At Padang Buluh Estate, water sample taken from 3 points (upstream, midstream and downstream of Sungai Jerong. Refer to analysis result, IE20/2019 dated 28/12/18. Noted a few parameters were off-limit (BOD, COD, DO and P*). Investigation was not recorded in CAPA and no retest carried out within 1 week after receipt of the report.		
<b>Corrections:</b>	The immediate action has be taken by the estate management. The latest water sampling was conducted and awaiting result from the R&D.		
<b>Root Cause Analysis:</b>	The estate management did not aware on the re-sampling procedure for the off-specification result.		
<b>Corrective Actions:</b>	Estate will closely monitor the final report from R&D. the immediate action will be taken if the result shown the off spec and the investigation will taking place. To enhance the understanding of the water sampling procedure, the specific training will be arrange.		
<b>Assessment Conclusion:</b>	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.		

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1767947-201904-N3	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.6.3 Minor
<b>Date Issued</b>	25/04/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	GHG calculation report was not in place.		
<b>Requirement Reference:</b>	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.		
<b>Objective Evidence:</b>	GHG calculation report for 2018 was not made available for verification.		
<b>Corrections:</b>	To follow up with GSQM on the update of the deployment and to ensure timely reporting on GHG emission using the version available.		

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<b>Root Cause Analysis:</b>	GSQM was waiting for the updates from RSPO on development of new palmghg calculation version 4 to avoid doing double reporting using V3 and V4.
<b>Corrective Actions:</b>	To assign person in charge for monitoring and update the data if necessary.
<b>Assessment Conclusion:</b>	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.

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

<b>Positive Findings</b>	
PF #	Description
PF 1	

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

<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1617725-201804-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.5.2 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20/06/2018
<b>Statement of Nonconformity:</b>	The management plan has not been developed according to the stakeholder consultation with timetabled		
<b>Requirement Reference:</b>	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.		
<b>Objective Evidence:</b>	1. Promoting the positive impacts are not established in the management plan for Sungai Dingin Mill management plan and Sungai Dingin Estate Management plan. 2. Management plan established by Sungai Dingin Mill did not include an expected timeframe to complete the identified action plans. 3. The management plan established by Sungai Dingin Estate did not include all the identified impacts received from stakeholders. Example of identified impacts not included in the management plan. a. Sewage system blockage at the main division housing complex. b. Fixing of the shed at the Indian cemetery. c. Maintenance of the Indian temple. d. Maintenance of street lights and bridge at field 2014D at Mahang division. e. Stray dog at housing complex at Karangan division housing complex.		
<b>Corrective Actions:</b>	To revise all the Social Management Plans and to incorporate all social issue observed or highlighted in all relevant platforms i.e stakeholder meeting, JCC meeting, OSHA meeting etc		
<b>Assessment Conclusion:</b>	ASA1_4 verification: During the audit, it was found that the SIA management plan was having the promotion of positive impacts, timeframe and person in charge on the issues raised. Also, the issues captured are comes from stakeholder’s meeting, gender		

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	<p>committee meeting, worker’s committee meeting and complaint &amp; grievance logbook. There is no reoccurrence issue.</p> <p>Among the issues captured are:</p> <ol style="list-style-type: none"> <li>1. Gender committee meeting: to promote more activities in Mill’s Gender Committee and generate creativity and unity in Mill’s Gender Committee team in weekly basis. Example is: to provide area next to Motorcycle parking as Gender Committee Park where members can perform gardening activities among themselves. Status is done in Q1 in Sg Dingin POM.</li> <li>2. Workers/staff: To ensure no cattle entering the housing linesite. Example is to build gate at field area and look for possibility of cleaning the expended metal deck in front of main entrance. Status is done in Q1 in Sg Dingin POM.</li> <li>3. Stakeholder’s meeting: Puan Maznah dan Mr Ahmad where living as neighbouring in estate land asking for feedback about the squatter issue for company in Jentayu Estate. Status: Follow up but no decision been made. Due date is Dec 2019 at Jentayu Estate.</li> <li>4. Union meeting: Wild dogs issue in linesite area. Status: Follow up with Majlis Perbandaran Sg Petani in Padang Buluh Estate.</li> <li>5. Gender Committee meeting: Blood test for Malaria and Filariasis with KKM Kulim to all workers in Anak Kulim Estate.</li> </ol> <p>Continuous implementation of corrective action was observed with no recurrence of issues noted. The previous major NC is remain closed.</p>
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<b>Non-Conformity</b>			
<b>NCR Ref #</b>	1617725-201804-M2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.5.2 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20/06/2018
<b>Statement of Nonconformity:</b>	The certification holder is not complying Employment Act 1955.		
<b>Requirement Reference:</b>	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.		
<b>Objective Evidence:</b>	According to the Employment Act 1955 clause 34 (1), there is no approval from Director General to allow female workers to work night shift. The following worker sampled to have been worked from 10pm to 5am. <ul style="list-style-type: none"> <li>• ID 59752 – lab female worker</li> <li>• ID 26878 – lab female worker</li> </ul>		
<b>Corrective Actions:</b>	To appoint Regional HR with help from SQM for monitor and update Legal and requirement.		
<b>Assessment Conclusion:</b>	ASA1_4 verification: During the audit, it was found that female workers at Sg Dingin POM has work in night shift and sign the agreement as per JTK permit approval: Pengecualian Daripada Sekatan Kerja Malam bagi pekerja-pekerja wanita dibawah seksyen 34 Akta Kerja 1955 dated 02.08.2018. Ruj: BHG PU/9/135 Jld 14 (18) to Sungai Dingin POM.		

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	Thus, the implementation of the corrective action is deemed effective and no reoccurrence issue.
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Non-Conformity			
<b>NCR Ref #</b>	1617725-201804-M3	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.12.1 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20/06/2018
<b>Statement of Nonconformity:</b>	The legalization of contract workers is not monitored.		
<b>Requirement Reference:</b>	There shall be evidence that no forms of forced or trafficked labour are used.		
<b>Objective Evidence:</b>	<p>It was found that the in the Mill, there are contract workers. The contract agreement between the contract workers and contractors are not available in the mill. Furthermore, the employer and the sector of the contract workers are not clear:</p> <ul style="list-style-type: none"> <li>• For worker Pazhani Thamizhmani the employer in i-kad is Pantai Mewah Enterprise however, the records in the mil, the worker is under Maju Mech.</li> <li>• For worker Sundaravelu Kuzhandaivelu, the employer in i-kad is Ladang Seri Maju Resources however, the records in the mil, the worker is under Maju Mech.</li> </ul>		
<b>Corrective Actions:</b>	Additional criteria have been added into PTW on legal documents which need to submit by contractor with regards to employment of foreign workers for monitoring and compliance purposes.		
<b>Assessment Conclusion:</b>	<p>ASA1_4 verification: During the audit, it was found that there were only 2 contract workers in Sg Dingin POM under Maju Mech and no other contract workers hired. Sampled workers as below are having the valid employment contract and pay slip from Maju Mech:</p> <ol style="list-style-type: none"> <li>1. Passport No: BP0975101 (Sg Dingin POM contract worker)</li> <li>2. Passport No: BL0528964 (Sg Dingin POM contract worker)</li> </ol> <p>Thus, the implementation of the corrective action is deemed effective and no reoccurrence issue.</p>		

Opportunity for Improvement	
OFI#	Description
OFI 1	

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1197656M1	Major	2.1.1	12/06/2015	Closed out on 18/06/2014
1197656N1	Minor	4.1.1	12/06/2015	Closed on 19/05/2016
1197656N2	Minor	4.7.5	12/06/2015	Escalated to Major
1334123M1	Major	4.7.1	19/05/2016	Closed on 27/06/2016

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1334123M2	Major	4.7.5	19/05/2016	Closed on 27/06/2016
1334123M3	Major	6.5.2	19/05/2016	Closed on 27/06/2016
1334123M4	Major	6.12.1	19/05/2016	Closed on 27/06/2016
1334123N1	Minor	5.3.3	19/05/2016	Closed on 02/06/2017
1480886-201705-N1	Minor	6.10.1	02/06/2017	Closed on 27/04/2018
1617725-201804-M1	Major	6.1.3	27/04/2018	Closed on 20/06/2018
1617725-201804-M2	Major	6.5.2	27/04/2018	Closed on 20/06/2018
1617725-201804-M3	Major	6.12.1	27/04/2018	Closed on 20/06/2018
1767947-201904-N1	Minor	5.1.2	25/04/2019	"Open"
1767947-201904-N2	Minor	4.1.3	25/04/2019	"Open"
1767947-201904-N3	Minor	5.6.3	25/04/2019	"Open"

**3.5. Stakeholders Consultation**

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Sungai Dingin Palm Oil Mill Certification Unit’s (SOU 1) environmental and social performance, legal and any known dispute issues.

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

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

<b>List of Stakeholders Contacted</b>	
<p><b>Internal Stakeholders</b></p> <p>Field workers            Mill workers            NUPW representative            Gender committee            General workers</p>	<p><b>Union/Contractors/Local Communities</b></p> <p>Local village (Sg Dingin)            Local village (Jentayu Estate)</p>
<p><b>Government Departments</b></p> <p>School (SJK(T) Scarboro, Padang Buluh Estate &amp; SK Terap)</p>	<p><b>NGO</b></p> <p>Nil</p>


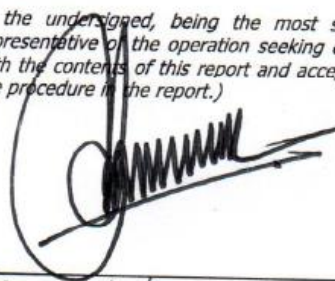
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IS #	Description
1	<p><b>Feedbacks:</b>  <u>NUPW Representative</u>                      The representative was selected through voted in every 3 years. There is no complaint raised from workers. Only suggestion to have worker's sport day and request to levelling the football field.</p> <p><b>Management Responses:</b>                      There issues already raised in the workers committee meeting and management will act accordingly.</p> <p><b>Audit Team Findings:</b>                      Verified the issue in worker's committee minute of meeting. The issue will be verified in the next assessment.</p>
2	<p><b>Feedbacks:</b>  <u>Gender Committee</u>                      The meeting was conducted in quarterly basis. The latest meeting in 2019 was conducted on 07/02/2019 (Sg Dingin POM), 06/03/2019 (Jentayu Estate), 15/03/2019 (Padang Buluh Estate), 15/01/2019 (Anak Kulim Estate). Currently no sexual harassment or domestic violence issue raised from the member. Among the activity conducted was fruits planting at designated area near the office and launched the new 'Buku Aduan Gender'.</p> <p><b>Management Responses:</b>                      Management will continue to support the gender committee.</p> <p><b>Audit Team Findings:</b>                      No further issue.</p>
3	<p><b>Feedbacks:</b>  <u>Villager of Sungai Dingin</u>                      The villager had attended the latest stakeholder consultation in last 2 months. There is no land dispute reported. Management has assist the villagers for clean water supply during emergency and grass cutting in football field.</p> <p><b>Management Responses:</b>                      Management will continue the best practise.</p> <p><b>Audit Team Findings:</b>                      No further issue.</p>
4	<p><b>Feedbacks:</b>  <u>Squatter Villager</u>                      In Jentayu Estate, there is 2.7932 Ha of squatter area been occupied by old-timer since 1960's in Sime Darby's land. So far, there is no payment request or villagers were asked to leave and they lived in harmony. The current status is under discussion with Land Management Department to exclude the area.</p> <p><b>Management Responses:</b>                      Management will continue to follow up with the Land Management Department on the status.</p> <p><b>Audit Team Findings:</b>                      The issue will be verified in the next surveillance assessment visit.</p>
5	<p><b>Feedbacks:</b>  <u>SJK(T) Scarboro, Padang Buluh Estate &amp; SK Terap</u>                      Management has given contribution and services for school. For SJK(T) Sacrboro, currently they have one request which the main road in between school block is required road diversion for safety reason.</p> <p><b>Management Responses:</b>                      Management noted on the request and will discuss the request in the next stakeholder meeting or whenever they receive the request letter. So far, no formal request on this has been submitted.</p> <p><b>Audit Team Findings:</b></p>



The issue will be verified in the next surveillance assessment visit.
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<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Sungai Dingin Palm Oil Mill Certification Unit (SOU 1) has complied with the RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Sungai Dingin Palm Oil Mill Certification Unit (SOU 1) is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> Mohamed Hidir Zainal Abidin	<b>Name:</b> SUBRAMANIAM GOVINDASAMY
<b>Company Name:</b> BSI Services Malaysia Sdn Bhd	<b>Company Name:</b> SIME DARBY PLANTATION BERHAD
<b>Title:</b> Lead Auditor	<b>Title:</b> SENIOR MILL MANAGER
<b>Signature:</b> 	<b>Signature:</b> (I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.) 
<b>Date:</b> 18 <sup>th</sup> June 2019	<b>Date:</b> 19/6/2019

**Appendix A: Summary of Findings**

Criterion / Indicator		Assessment Findings	Compliance
<b>Principle 1: Commitment to Transparency</b>			
<b>Criterion 1.1:</b> Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Sime Darby has published its sustainable policies, annual report and Code of Business Conduct in the Sime Darby Plantation Berhad’s website: 1. <a href="http://www.simedarbyplantation.com/corporate">http://www.simedarbyplantation.com/corporate</a> ; 2. <a href="http://www.simedarbyplantation.com/sustainability/beliefs-progress/governance/sustainability-policies">http://www.simedarbyplantation.com/sustainability/beliefs-progress/governance/sustainability-policies</a>	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	The procedure for handling request for information is stated in Section 3 – Documentation and Communication of the Plantation Quality Management System Manual dated 01/11/2008. For year January 2018-April 2019, there was no request of information at the mill and sampled estates from relevant stakeholders. Only donation request from schools and government authorities visit to sites. Sampled below document: 1. Request for borrowing the canopy for SJKT Ladang Dublin Bahagian 5 Kali ke 33 on 15.03.2018. 2. Request for donation for sport day, SK Ladang Dublin on 14.03.2019. 3. JKK inspection book at Sg Dingin POM 4. Visitors book at Sg Dingin POM 5. General file: Request to use field as exercise for Pasak Bumi Siri 2/2018 by Rejimen Askar Melayu Diraja on 1-8/11/2018. 6. General file: Hari Raya Open House on 29.06.2018. External communication file: Request to borrow canopy, table and chairs for Kenduri on 22.02.2019 at Padang Buluh Estate.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
<b>Criterion 1.2:</b> Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			
1.2.1	Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none"> <li>• Land titles/user rights (Criterion 2.2);</li> <li>• Occupational health and safety plans (Criterion 4.7);</li> <li>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8);</li> <li>• HCV documentation (Criteria 5.2 and 7.3);</li> <li>• Pollution prevention and reduction plans (Criterion 5.6);</li> <li>• Details of complaints and grievances (Criterion 6.3);</li> <li>• Negotiation procedures (Criterion 6.4);</li> <li>• Continual improvement plans (Criterion 8.1);</li> <li>• Public summary of certification assessment report;</li> <li>• Human Rights Policy (Criterion 6.13).</li> </ul> - Major compliance –	Sime Darby has published its sustainable policies, annual report and Code of Business Conduct in the Sime Darby Plantation Berhad’s website: <ol style="list-style-type: none"> <li>1. <a href="http://www.simedarbyplantation.com/corporate">http://www.simedarbyplantation.com/corporate</a>;</li> <li>2. <a href="http://www.simedarbyplantation.com/sustainability/beliefs-progress/governance/sustainability-policies">http://www.simedarbyplantation.com/sustainability/beliefs-progress/governance/sustainability-policies</a></li> </ol>	Complied
<b>Criteria 1.3:</b> Growers and millers commit to ethical conduct in all business operations and transactions.			
1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. -Minor compliance	The Code of Business Conduct (COBC) commitment is written in a form of Handbook 25/08/2011. The COBC message of the provided by Dato’ Mohd Bakke Salleh the previous President & Group Chief Executive. The communication of the Group’s COBC with the workers, stakeholders, and contractors were made through training and awareness. Sample of records verified: <ul style="list-style-type: none"> <li>• Sg Dining POM on 11/02/2019 to 59 workers.</li> <li>• Jentayu Estate on 24/01/2019 to 32 workers.</li> <li>• Padang Buluh Estate on 24-25/01/2019 to 263 workers.</li> <li>• Anak Kulim Estate on 14/01/2019 to 120 workers.</li> </ul>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<b>Principle 2: Compliance with applicable laws and regulations</b>		
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.		

<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available.          - Major compliance -</p>	<p>SOU1 continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and PSQM sustainability team. SOU1 has obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were:</p> <p><u>Sg Dingin Palm Oil Mill</u></p> <p>1) DOE licence no. 004543, reference number, AS(B)31/152/000/010 JLD. 9; licensing period: 1/7/18 – 30/6/19 with processing capacity of 80 mt/hr. Method of discharge: land application (BOD<sub>3</sub> limit @ 30°C is 5,000 mg/l.          2) MPOB license: 530978004000 (validity period 01/07/2018 – 30/06/2019) for 380,000 MT.          3) Energy commission license no: 2018/02863; serial no: 32316 (validity period 19/12/2018 – 18/12/2019) for 4,920 kW installation capacity.          4) Diesel Permit, ref: KPDNKK. KLM(P) 01/2005, serial no. K 018935, quantity: 18,500 litre valid from (23/10/18 – 22/10/18)          5) Electrical Charge man (EC) A4, license no. PJ-T-4-B-0038-2007 valid 21/5/19          6) There are 25 CFs belonged to the mill covering various equipment such as sterilizers, hoist and crane and boilers. Sample of CF checked:          - Boiler (KD PMD 1115, valid until 9/6/20)          - Boiler (KD PMD 80010, valid until 15/3/20)          - Sterilizer (KD PMT 558 valid until 31/12/19)          - Overhead travel crane (KD PMA 335 valid until 31/12/19)</p> <p><u>Jentayu Estate</u></p> <p>1) MPOB license: 523647002000, <i>Menjual dan Mengalih FFB</i>, 2,177.86 Ha, licence holder: Ladang Jentayu (validity period 01/10/2018 – 30/09/2019).          2) Diesel Permit, serial no. P:000014-SGP, ref KPDNKK(SP)006/2016(SK) (validity 12/2/2019 – 11/2/20) Quantity:8,000 litre          3) Certificate of Fitness for Unfired Pressure Vessel (UPV), air compressor KD PMT 4724 (valid until 15/08/2019).</p>	<p>Complied</p>
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		<p>4) Certificate of Fitness for Unfired Pressure Vessel (UPV), air compressor KD PMT 7995 (valid until 15/08/2019).</p> <p><u>Padang Buluh Estate</u></p> <p>1) MPOB license: 529234002000 for 4,039.5 Ha (validity period 1/5/19 - 30/4/20), <i>Menjual dan Mengalih FFB</i>.</p> <p>2) MPOB license: 554595011000 for estate nursery (validity period: 1/11/18-31/10/19)</p> <p>3) Diesel Permit ref: KPDNKK (SP) 013/2016 (SK), serial no. P: 000002-SGP (16/1/2019 – 15/1/2020) Quantity: 8,100 litre (main division)</p> <p>4) Diesel Permit ref: KPDNKK (SP) 007/2017 (SK), serial no.: K017279 (25/7/2018 – 24/7/2019) Quantity: 5,800 litre (Jerai division)</p> <p>5) Certificate of Fitness for Unfired Pressure Vessel (UPV), air compressor KD PMT 5344 (valid till 28/08/2019).</p> <p>6) Certificate of Fitness for Unfired Pressure Vessel (UPV), air compressor KD PMT 5345 (valid till 28/08/2019).</p> <p><u>Anak Kulim Estate</u></p> <p>1) MPOB license: 524669002000 for 1,512.29.5 Ha (validity period 1/11/18-31/10/2019), <i>Menjual dan Mengalih FFB</i>.</p> <p>2) Diesel Permit ref: KPDNHEP.KLM (P) 45/1999, serial no. P:K 000002(KLM) (9/1/2019 –8/1/2020) Quantity: 18,100 litre</p> <p>3) Certificate of Fitness for Unfired Pressure Vessel (UPV), air compressor KD PMT 1801 (valid till 30/10/2019).</p> <p>Sime Darby has the permit obtained from Labour Department of Malaysia as below:</p> <p>1. Permohonan Potongan Upah di bawah Seksyen 24 Akta Kerja 1955 bagi tujuan bayaran bil elektrik dated 06.07.2017. Ruj: BHG.PU/9/129 JLD 3 (53) to Sime Darby Plantation Sdn Bhd.</p>	
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Criterion / Indicator	Assessment Findings	Compliance	
	<ol style="list-style-type: none"> <li>2. Permohonan Had Kerja Lebih Masa (130 jam) di Bawah Seksyen 60A(4)(a) Akta Kerja 1955 dated 27.03.2017. Ruj: BHG.PU/9/134 JLD 9(II) to Sime Darby Plantation Sdn Bhd.</li> <li>3. Potongan Upah di bawah seksyen 24 Akta Kerja 1955 bagi tujuan elektrik, air, yuran kesatuan NUPW &amp; AMESU dated 23.07.2017. Ruj: PMT/10203/2017/0033(3) to Sungai Dingin POM.</li> <li>4. Pengecualian Daripada Sekatan Kerja Malam bagi pekerja-pekerja wanita dibawah seksyen 34 Akta Kerja 1955 dated 02.08.2018. Ruj: BHG PU/9/135 Jld 14 (18) to Sungai Dingin POM.</li> <li>5. Potongan Upah di bawah Seksyen 24 Akta Kerja 1955, Ruj: Bil (2) dlm. PTK/SP/10202/05170 dated 21.01.2012 for Padang Buluh Estate.</li> <li>6. Potongan Upah di bawah Seksyen 24 Akta Kerja 1955, Ruj: PMT/10203/00350(8) dated 29.09.2016 for Anak Kulim Estate.</li> </ol>		
2.1.2	<p>A documented system, which includes written information on legal requirements, shall be maintained.</p> <p>- Minor compliance -</p>	<p>SOU1 continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that are applicable to the CU operation [ref.: Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008]. Each office of the operating unit (mill and estates) has its own LORR and were being evaluated individually annually for compliance and it can be accessed by all levels of staff. For example, latest legal and other requirements register (LORR) dated 11/2/19 was sighted at Sg Dingin POM. The latest update has included Factory and Machinery (Steam Boiler and Unfired Pressure Vessel) Regulation 2017 and the new Minimum Wages Order 2018 in the register.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	All applicable legal and other requirements registered in the LORR. Periodically, SOU1 assigned its personnel to cross check the status of compliance against the LORR through various ways such as internal audit, routine inspections, etc. Whenever there is non-compliance detected, appropriate actions will be taken to address the issue.	Complied
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group's Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Information and implementation date of the new Minimum Wages Order 2018 has been communicated by Group HR on 4 <sup>th</sup> January 2019 to all Sime Darby Plantation Berhad SOUs via email/secular. Effective date of implementation is on 1 <sup>st</sup> January 2019.	Complied
<b>Criterion 2.2:</b> The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.			



Criterion / Indicator		Assessment Findings			Compliance																
2.2.1	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	<p>SOU8 estates were able to demonstrate the evidence of legal ownership if its lands through possession of land titles. The estates has a list of all its land titles which have the information about names of lease, hectare, terms &amp; conditions, lease period and grant numbers. Copies of the land titles were available at the estate’s offices while the original were kept at headquarter. Example of land titles checked:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Land title</th> <th>Land use type</th> <th>Tenure</th> </tr> </thead> <tbody> <tr> <td>Jentayu</td> <td>Sample grant checked: i) Grant no. 5963, lot 3273, Mukim Teloi Kiri, district Kuala Muda (title area 119.7 ha) i) Grant no. 5962, lot 3272, Mukim Teloi Kiri, district Kuala Muda (title area 1,004 ha) Total titles: 5 (2,179.92 ha)</td> <td>Agriculture</td> <td>Freehold</td> </tr> <tr> <td>Padang Buluh</td> <td>Sample : Grant no 13376, lot 2387, Mukim Sidam Kiri, district Kuala Muda (title area: 962.1 ha) Total titles: 15 (3332.03 ha) Total of 682.22 ha excluded from area statement.</td> <td>Agriculture</td> <td>Freehold</td> </tr> <tr> <td>Anak Kulim</td> <td>Sample : GRN 46447/GRN34147, lot 955, Mukim: Bandar Kulim, District Kulim (title area: 1,364.70 ha) Total titles: 9 (1,512.27 ha)</td> <td>Agriculture + rubber plantation</td> <td>Freehold</td> </tr> </tbody> </table>			Estate	Land title	Land use type	Tenure	Jentayu	Sample grant checked: i) Grant no. 5963, lot 3273, Mukim Teloi Kiri, district Kuala Muda (title area 119.7 ha) i) Grant no. 5962, lot 3272, Mukim Teloi Kiri, district Kuala Muda (title area 1,004 ha) Total titles: 5 (2,179.92 ha)	Agriculture	Freehold	Padang Buluh	Sample : Grant no 13376, lot 2387, Mukim Sidam Kiri, district Kuala Muda (title area: 962.1 ha) Total titles: 15 (3332.03 ha) Total of 682.22 ha excluded from area statement.	Agriculture	Freehold	Anak Kulim	Sample : GRN 46447/GRN34147, lot 955, Mukim: Bandar Kulim, District Kulim (title area: 1,364.70 ha) Total titles: 9 (1,512.27 ha)	Agriculture + rubber plantation	Freehold	Complied
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Criterion / Indicator		Assessment Findings	Compliance
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	Whenever the land boundaries are adjacent with third party (smallholders, villages, other oil palm companies, etc.) the normal practice of SDPSB to indicate the legal boundaries are through construction of trenches. This was confirmed through the field visit at Jentayu (P01JB – Bedu Division), (Padang Buloh – P10A adjacent with Kg Padang Buluh) and (Anak Kulim – Gunung Bongsu Forest Reserve). Apart from that, erection of pegs painted with red and white along the boundaries was also commonly practiced and clearly visible.	Complied
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	Lands developed under SOU 1 are concession by the State Government. Sime Darby did not acquire any of these lands. The development of this certification unit was developed since 1920s. Considering that there is no new land acquisition for this concession and no new land development, FPIC is not applicable in this certification.  However, the Flowchart and Procedure on Handle Land Disputes (including Squatters) – Appendix 3 of Plantation Quality Management System dated 01/11/2008 has been established. Stakeholders’ consultation confirmed that there is no land conflict.	Complied
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land conflict recorded since the last assessment. This is confirmed through stakeholders’ consultation.	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land conflict recorded since the last assessment. This is confirmed through stakeholders’ consultation.	Complied

Criterion / Indicator		Assessment Findings	Compliance
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	There is no land conflict recorded since the last assessment. This is confirmed through stakeholders' consultation.	Complied
<b>Criterion 2.3:</b> Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.			
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	The estate lands are legally owned and leased by the company. The existing estates are not encumbered by any customary land rights. Interview with the surrounding communities and stakeholders confirmed that the operation has not diminished any legal rights, customary or user right.	Complied

Criterion / Indicator	Assessment Findings	Compliance
2.3.2 Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	The operation has not diminished any legal rights, customary or user right.	Complied
2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	The operation has not diminished any legal rights, customary or user right.	Complied
2.3.4 Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	The operation has not diminished any legal rights, customary or user right.	Complied
<b>Principle 3: Commitment to long-term economic and financial viability</b>		

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 3.1:</b>			
There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains FFB yield, CPO, OER, and KER, OPEX, CAPEX etc. Sg Dingin Palm Oil Mill and supply bases have made progress towards achieving their performance production targets for the current financial year.  Estates: New vehicle/machinery i.e fertiliser machine, grabber, badang engine, rotovator, portable pump engine, construction of bund	Complied
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	SOU1 estates have long range replanting program until 2036. Replanting is planned for tall palm and older than 25 years old.  Replanting programme for the next financial year as follow:  <u>Jentayu Estate</u> 2020 : 138.02 ha (for field 00JC, 02JC) 2021 : 122.54 ha ( for field 00JD, 02JD)  <u>Padang Buluh Estate</u> 2020 : 79.02 ha (for field 97A, 98A) 2021 : 291 ha (for field99A, 99B, 99N, 01S)  <u>Anak Kulim Estate</u> 2020 : 181.61 ha (for field 00A, 00D, 00E)	Complied
<b>Principle 4: Use of appropriate best practices by growers and millers</b>			
<b>Criterion 4.1:</b>			
Operating procedures are appropriately documented, consistently implemented and monitored.			

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Criterion / Indicator		Assessment Findings	Compliance
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	SOP available for the Palm Oil Mill and the Estates. Palm Mill holds two SOPs: sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill.  Estates have a separate SOP (Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual) covers land preparation, planting material, upkeep, harvesting, transport etc.	Complied
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	Quality Assurance, Quality Management Unit (PSQM) inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements.	Complied

<p>4.1.3</p>	<p>Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -</p>	<p>Sime Darby has established a system to monitor the mill and estate operation. The Structured Oil Recovery Assessment (SORA) (for Mill) / Structured Crop Recovery Assessment (SCRA) (for estates) and Planning and Monitoring Unit visited the operating units quarterly. Their reports covers on all aspect of operation. In addition, visit by agronomist was made yearly. The report focusing on rainfall, yield [performing and under-performing], palm nutrition status, field observation agronomic matters and fertilizer recommendation has been included in the report. All the reports of monitoring were available at estate and mill office for references.</p> <p><u>Sg Dingin POM</u> Structured Oil Recovery Assessment (SORA) latest visit to Sg Dingin POM was on 7-10 January 2018. The report covering on process control/safety, process losses, product quality, housekeeping/upkeep/environment and security. No major issue issued from the visit.</p> <p><u>Jentayu Estate</u> Visit from Planning and Monitoring Units (PMU) reports were made available during the visit. Noted reports observed for visit for FY 2019 was carried out on February 2019. The report dated 28/2/2019 covered on Oil Palm mature and immature upkeep, fertiliser application and estate cost of operation. No major issue was raised during the audit.</p> <p><u>Padang Buluh Estate</u> Visit from Planning and Monitoring Units (PMU) reports were made available during the visit. Noted reports observed for visit for FY 2019 was carried out on 23/4/2019. The report covered on Oil Palm immature upkeep, fertiliser application, EVIT, Building &amp; Facilities Management and estate cost of operation. No major issue was raised during the audit.</p> <p><u>Anak Kulim Estate</u></p>	<p>Minor nonconformance</p>
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Criterion / Indicator		Assessment Findings	Compliance
		<p>Visit from Planning and Monitoring Units (PMU) reports were made available during the visit. Noted reports observed for visit for FY 2018 was carried out on 20/11/2018. The report covered on Oil Palm immature upkeep, fertiliser application, EVIT, Building &amp; Facilities Management and estate cost of operation. No major issue was raised during the audit.</p> <p>Records of monitoring and any actions taken was not adequately maintained at visited estate. At Padang Buluh Estate, water sample taken from 3 points (upstream, midstream and downstream of Sungai Jerong. Refer to analysis result, IE20/2019 dated 28/12/18. Noted a few parameters were off-limit (BOD, COD, DO and P*). Investigation was not recorded in CAPA and no retest carried out within 1 week after receipt of the report. Thus, a minor NC was issued.</p>	
4.1.4	<p>The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB).</p> <p>- Major compliance -</p>	<p>The records of origins for all third party sourced were verified through weighbridge ticket by the management accordingly.</p>	Complied
<p><b>Criterion 4.2:</b>            Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
4.2.1	<p>There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible.</p> <p>- Minor compliance -</p>	<p>Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield.</p>	Complied



<p>4.2.2</p>	<p>Records of fertiliser inputs shall be maintained. - Minor compliance -</p>	<p>Fertilizer application program is based on the recommendation by Agronomist and documented in Agronomic and Fertilizer Recommendation Report. Observed the recommendation and implementation record for FY 2019:</p> <p><u>Jentayu Estate</u> Fertilizer recommendation 2019 dated 14/8/2018 for mature and immature fields available. Observed application records as per agronomist recommendation: Month program: March 2019 Field: 2007J Ha program: 33.04 ha Type: RP Rate/palm: 1.75 kg/palm Month applied: 28/3/2019 Ha applied: 33.04 ha</p> <p><u>Padang Buluh Estate</u> Fertilizer recommendation 2019 dated 18-19/7/2018 for mature and immature fields available. Observed application records as per agronomist recommendation: Month program: Feb 2019 Field: 2010C (Block 1) Ha program: 36 Ha Type: RP Rate/palm: 1.5 kg/palm Month applied: 10/4/2019 Ha applied: 36 ha</p> <p><u>Anak Kulim Estate</u> Fertilizer recommendation 2019 (CCM25) dated 30/1/2019 for mature fields available.</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	Observed application records as per agronomist recommendation: Month program: Feb 2019 Field: 2001C Ha program: 43.60 Ha Type: CCM 25 Rate/palm: 1.15 kg/palm Month applied: 25/2/2019 Ha applied: 43.60 ha	

Criterion / Indicator	Assessment Findings	Compliance
<p>4.2.3</p> <p>There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -</p>	<p>Plant Nutrition and Protection Unit (PNU) prepare the annual fertilizer recommendation base leaf analysis result. Leaf analysis show the nutrient level was used as the guidance for the recommendation.</p> <p>As per company SOP, the soil sampling analysis carried at 5 years interval.</p> <p>The leaf analysis and soil analysis report was made available for review. Noted the analysis report for estate visited as follows:</p> <p><u>Jentayu Estate</u> Last soil sampling analysis was carried out on 8/3/2019. Refer report no. S38/2019 dated 5/4/2019.</p> <p>Last leaf sampling analysis was carried out on 8/1/2019. Foliar nutrient report dated 13/2/2019 was sighted</p> <p><u>Padang Buluh Estate</u> Last soil sampling analysis was carried out on 3/3/2015. Refer report no. S38/2015 dated 30/4/2015.</p> <p>Last leaf sampling analysis was carried out on 18-19/7/2018.</p> <p><u>Anak Kulim Estate</u> Last soil sampling analysis was carried out on 21/6/2018. Refer report no. S43/2018 dated 12/7/2018.</p> <p>Last leaf sampling analysis was carried out on 18/3/2019. Foliar nutrient report dated 12/4/2019 was sighted</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.2.4 A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.                      - Minor compliance -</p>	<p>Nutrient recycling strategy is in place and includes use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. EFB applied at selected fields at the estates. Verified sampled EFB application program as both visited estates. Sample of application record checked:</p> <p><u>Jentayu Estate</u>                      EFB was applied for the month of March 19 at 1505 MT</p> <p><u>Padang Buluh Estate</u>                      EFB was applied for the month of March 19 at 2,562.77 MT for field 2013B, 2015B, 2015A and 2010C.</p> <p><u>Anak Kulim Estate</u>                      EFB was applied for the month of March 19 at 2,562.77 MT for field 2013B, 2015B, 2015A and 2010C.</p>	<p>Complied</p>
<p><b>Criterion 4.3:</b>                      Practices minimise and control erosion and degradation of soils.</p>		

Criterion / Indicator	Assessment Findings	Compliance
<p>4.3.1</p> <p>Maps of any fragile soils shall be available.                      - Major compliance -</p>	<p>Soil series map available for both estates visited.</p> <p><u>Jentayu Estate</u>                      No fragile soil categorized in the estate. Most soil in the estate were Gajah Mati, Tebok, Bungor, Malacca, Jitra.</p> <p><u>Padang Buluh Estate</u>                      No fragile soil categorized in the estate. Most soil in the estate were Gajah Mati, Kuah, Rasau, Tebok, Munchong and Chat.</p> <p><u>Anak Kulim Estate</u>                      No fragile soil categorized in the estate. Most soil in the estate was Rengam Series.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.3.2 A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific).            - Minor compliance -</p>	<p><u>Jentayu Estate</u>            Terrain classification: 0-2°:13.452%, 2- 6°: 37.54%, 6-12°: 28.37%, 12-20°: 17.14%, 20-25°: 2.94%, &gt;25°: 0.56%</p> <p><u>Padang Buluh Estate</u>            Terrain classification(Main Div): 0-2°:67.06%, 2- 6°: 32.55%, 6-12°: 0.397%, 12-20°: N/A, 20-25°: N/A, &gt;25°: N/A            Terrain classification(Jerai Div): 0-2°:30.14%, 2- 6°: 57.76%, 6-12°: 11.26%, 12-20°: 0.83%, 20-25°: 0.01%, &gt;25°: N/A</p> <p><u>Anak Kulim Estate</u>            Terrain classification: 0-2°:3.4%, 2- 6°: 20.46%, 6-12°: 36.88%, 12-20°: 31.27%, 20-25°: 6.86%, &gt;25°: 1.13%</p> <p>Planting terraces had been constructed where slope &gt;10°. Fields are established with cover crops such as muccuna and soft grasses and ferns.</p>	<p>Complied</p>
<p>4.3.3 A road maintenance programme shall be in place.            - Minor compliance -</p>	<p><u>Jentayu Estate</u>            Observed during site visit at P00JB noted that the road maintenance programme was completed accordingly, eg: grading and patching potholes.</p> <p><u>Padang Buluh Estate</u>            Observed during site visit at P97A noted that the road was in good condition.</p> <p><u>Anak Kulim Estate</u>            Observed during site visit at P02A noted that the road was in good condition.</p>	<p>Complied</p>
<p>4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.            - Minor compliance -</p>	<p>There is no peat soil or soil categorised as problematic or fragile soil at all estates visited.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at all estates visited.	Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at all estates visited.	Complied
<b>Criterion 4.4:</b> Practices maintain the quality and availability of surface and ground water.			

<p>4.4.1</p>	<p>An implemented water management plan shall be in place. - Minor compliance -</p>	<p>Consistent as per last year assessment, water management plan documented under Sg Dingin Palm Oil Mill Environment Management Programme for Financial Year 2019 which has included the normal water usage mainly for process, cleaning &amp; etc.</p> <p>Water management action plan to reduce fresh water usage identified:</p> <ol style="list-style-type: none"> <li>1. Collection of rain water</li> <li>2. Collection on boiler blow down water and softener back wash water</li> <li>3. Water use for mill cleaning</li> <li>4. Collection at steam condensate from oil storage tank heating coil</li> <li>5. Collection at steam condensate from Kernel Silos heaters</li> <li>6. Collection at steam condensate from Engine room.</li> </ol> <p>For estates, a generic water management plan was reviewed. Sighted an implemented plan established as Identification and Management of Wastewaters for Financial Year 2019 which included the normal water usage mainly for processing stations (mill), boiler, chemical mixing area, sprayers, PPE washing area and workshop. Rain fall data collected by each operating unit to ensure availability and renewability of water for rain water harvesting. For example, action plan to reduce fresh water usage identified rainwater collection using containers and recycle the rainwater for washing office compounds</p> <p>Summary of rainfall data for each estates as per below table:</p> <table border="1" data-bbox="981 1169 1868 1305"> <thead> <tr> <th>Year</th> <th>Jentayu Estate</th> <th>Padang Buloh Estate</th> <th>Anak Kulim Estate</th> </tr> </thead> <tbody> <tr> <td>2019 (todate)</td> <td>204 mm</td> <td>174 mm</td> <td>964 mm</td> </tr> <tr> <td>2018</td> <td>3,189 mm</td> <td>2,890 mm</td> <td>5,238 mm</td> </tr> </tbody> </table> <p>Contingency plan during water shortage identified water storage/dry spell where water bought from SADA (<i>Syarikat Air Darul Aman</i>) for domestic use.</p>	Year	Jentayu Estate	Padang Buloh Estate	Anak Kulim Estate	2019 (todate)	204 mm	174 mm	964 mm	2018	3,189 mm	2,890 mm	5,238 mm	<p>Complied</p>
Year	Jentayu Estate	Padang Buloh Estate	Anak Kulim Estate												
2019 (todate)	204 mm	174 mm	964 mm												
2018	3,189 mm	2,890 mm	5,238 mm												



Criterion / Indicator		Assessment Findings	Compliance												
4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -	<p>Documented as a Guidelines on River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). The widths of the buffer zones are guided by the following measurements:</p> <table border="1"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>&gt; 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>&lt; 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>Monitoring of river water/surface water is based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/riders, version 1, year 2008, issue no. 1, dated 1/6/2016. At Padang Buluh Estate, water sample taken from 3 points (upstream, midstream and downstream of Sungai Jerong. Refer to analysis result, IE20/2019 dated 28/12/18. Noted a few parameters were off-limit (BOD, COD, DO and P*). Refer to indicator 4.1.3 for further details. River/surface water monitoring was carried on quarterly basis at Anak Kulim Estate. Latest analysis report dated 8/2/19, test report no. IE136/2019. All parameters tested comply with NWQS Class IIA/B.</p>	River width	Buffer zone	> 40 meters	50 meters	20 to 40 meters	40 meters	10 to 20 meters	20 meters	5 to 10 meters	10 meters	< 5 meters	5 meters	Complied
River width	Buffer zone														
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Criterion / Indicator		Assessment Findings	Compliance
4.4.3	Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	Effluent Analysis conducted by Sime Darby Research and submitted to DOE every 3 months through OER (Online Environmental Report) and in compliance with mill's compliance schedule for quarterly submission. Total of 11 parameters (pH, TA, VFA, BOD, COD, TS, SS, VSS, TN, AN and O&G) tested. Latest analysis report for December 2018 was checked. Refer to test report# EP130/2019 date issue 11/3/19. BOD for final discharge is 676 mg/l vs limit of 5000 mg/l.  Quarter return report submitted on quarterly basis to DOE. The latest 1 <sup>st</sup> quarter for 2019 report available for review. Report dated 12/4/19 is referred to.	Complied
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	Mill has maintained monitoring of water usage for processing FFB which recorded every month. Water for processing is abstracted from water catchment by using pump. An average of 1.1 to 1.7 m <sup>3</sup> water is used to process per mt of FFB recorded from January 2018 to December 2018.	Complied
<b>Criterion 4.5:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.			

Criterion / Indicator		Assessment Findings	Compliance
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	<p>IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators. The estates are continue to plant beneficial plants such as <i>Turnera subulata</i>.</p> <p><u>Jentayu Estate</u>            Barn owl box: Occupancy rate average at 29% (Feb 2019) together with BOB maintenance and replacement/new box.            Beneficial Plant: 1.7 DM/Ha</p> <p><u>Padang Buluh Estate</u>            Barn owl box: Occupancy rate average at 70% (March 2019).            Beneficial Plant: 1.2 DM/Ha</p> <p><u>Anak Kulim Estate</u>            Barn owl box: Occupancy rate average at 70% (March 2019).            Beneficial Plant: 1.2 DM/Ha</p>	Complied
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>IPM training is given by the plantation executives with qualification in agriculture. Interview with the workers confirm their understanding of the Sime Darby SOP in Agricultural Reference Manual v.1 Section 15 on census.</p> <p>#cross refer with indicator 4.8.2</p>	Complied
<p><b>Criterion 4.6:</b>            Pesticides are used in ways that do not endanger health or the environment</p>			

Criterion / Indicator		Assessment Findings	Compliance																				
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 1/7/2011. Selected products are specific to the target pest, weed and disease.	Complied																				
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate.</p> <table border="1"> <thead> <tr> <th>Chemical Name</th> <th>Active Ingredient (a.i)</th> </tr> </thead> <tbody> <tr> <td>Ally</td> <td>20</td> </tr> <tr> <td>Glyphosate</td> <td>41</td> </tr> <tr> <td>Kenlon</td> <td>32.10</td> </tr> <tr> <td>Cypermethrin</td> <td>5.5</td> </tr> <tr> <td>Basta</td> <td>3.5</td> </tr> </tbody> </table> <p>The record of pesticides used was sighted.</p> <table border="1"> <thead> <tr> <th></th> <th>a.i/ha</th> </tr> </thead> <tbody> <tr> <td>Jentayu Estate</td> <td>0.292 % (Jan19)</td> </tr> <tr> <td>Padang Buluh Estate</td> <td>1.65 % (Mar19)</td> </tr> <tr> <td>Anak Kulim Estate</td> <td>0.84 % (Mar19)</td> </tr> </tbody> </table>	Chemical Name	Active Ingredient (a.i)	Ally	20	Glyphosate	41	Kenlon	32.10	Cypermethrin	5.5	Basta	3.5		a.i/ha	Jentayu Estate	0.292 % (Jan19)	Padang Buluh Estate	1.65 % (Mar19)	Anak Kulim Estate	0.84 % (Mar19)	Complied
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Criterion / Indicator		Assessment Findings	Compliance
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5	Complied
4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -	Paraquat was eliminated. At the time of assessment there was no class 1a or 1b pesticide. Alternatives such as Glyphosate were used with the elimination of Paraquat.	Complied
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers.  #cross refer with indicator 4.8.2	Complied
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5.	Complied
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No aerial spraying at all estates.	Complied
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	There is no associated smallholder at Sg Dingin POM Certification Unit. Employees handling pesticide given knowledge and skill required to cover safe handling practices and standard operating procedures.  #cross refer with indicator 4.8.2	Complied
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	Disposal method of all identified waste was already included in the pollution prevention plan/environmental management plan where the site visit confirmed that the practice of reduce, reuse and recycle of materials has been implemented throughout the company within mill and estates. Interviewed the workers in workshop, line site and store and they aware of the proper waste handling method as per established SOP.	Complied

Criterion / Indicator	Assessment Findings	Compliance																											
4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	<p>Annual medical surveillance for sprayers and pesticide operators were demonstrated.</p> <p>Medical examination programme established for sprayers which conducted by Kelinik Gopi (HQ/10/DOC/00/165) for Jentayu Estate, Poliklinik Dr Azhar dan Rakan-rakan (HQ/08/DOC/00/534) for Padang Buluh Estate and Poloklinik Sakthi Sheila (HQ/12/DOC/00/262) for Anak Kulim Estate.</p> <table border="1" data-bbox="981 624 1552 991"> <thead> <tr> <th>ID No</th> <th>Date of Medical check up</th> <th>Result</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>116742</td> <td rowspan="3">14/3/2019</td> <td>Fit</td> <td rowspan="3">JE</td> </tr> <tr> <td>116746</td> <td>Fit</td> </tr> <tr> <td>129541</td> <td>Fit</td> </tr> <tr> <td>109383</td> <td rowspan="2">11/2/2019</td> <td>Fit</td> <td rowspan="2">PBE</td> </tr> <tr> <td>107219</td> <td>Fit</td> </tr> <tr> <td>129268</td> <td rowspan="3">14/3/2019</td> <td>Fit</td> <td rowspan="3">AKE</td> </tr> <tr> <td>25178</td> <td>Fit</td> </tr> <tr> <td>129508 *</td> <td></td> <td></td> </tr> </tbody> </table> <p>*Transfer work to general work, eg: painting, housekeeping, pulling creepers. Retest need to be done on 4/7/2019.</p>	ID No	Date of Medical check up	Result	Estate	116742	14/3/2019	Fit	JE	116746	Fit	129541	Fit	109383	11/2/2019	Fit	PBE	107219	Fit	129268	14/3/2019	Fit	AKE	25178	Fit	129508 *			<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	There were no female pesticide operators at all Estate only. However, based on interview with female workers confirmed knowledge of the policy of transfer to alternative duties if they wished to continue working when pregnancy was confirmed or breast-feeding.	Complied
<b>Criterion 4.7:</b> An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			



<p>4.7.1</p>	<p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.          - Major compliance -</p>	<p>SOU1 has maintained an approved Health and Safety Policy dated January 2015 that is displayed prominently on notice boards in English. Health and safety plan was established for FY18/19.</p> <p><u>Chemical Health Risk Assessment (CHRA)</u></p> <p><b>Sg Dingin POM</b> - CHRA was conducted on 10-12/2/2015 by registered assessor JKKP HIE 127/171-2(358). Based on the CHRA, a total of 38 findings/recommendations reported.</p> <p><b>Jentayun Estate</b> – CHRA was conducted on 23/12/15 and Additional CHRA was conducted on 18/4/2017 by registered assessor JKKP HIE 127/171-2(124). Based on the CHRA, a total of 40 findings/recommendations reported.</p> <p><b>Padang Buluh Estate</b> – CHRA was conducted on 23/12/15 and Additional CHRA was conducted on 18/4/2017 by registered assessor JKKP HIE 127/171-2(124). Based on the CHRA, a total of 53 findings/recommendations reported.</p> <p><u>Baseline &amp; Annual Audiometric Testing</u></p> <p>Flemington POM – Baseline &amp; Annual Audiometric testing completed on 26/2/2018 by Specialist Mobile Safety Supplies Sdn Bhd. Total of 45 workers were sent for the annual testing. Sighted report dated 21/5/2018. Results from testing: 8 workers with hearing impairment (including 2 workers with standard threshold shift (STS)). The repeat test for the workers identified with STS was conducted accordingly on 10/7/2018. JKKP 7 was submitted to DOSH on January 2019 (refer to notice of improvement by DOSH dated 24/1/2019).</p> <p><u>Medical Surveillance</u></p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>Medical surveillance was conducted was done by Poliklinik Sakthi &amp; Sheila Sdn Bhd, on 6,7 and 9/3/18, OHD registration HQ/12/DOC/00/262 for total of 17 workers from workshop, store and laboratory. From the report, found that the test result for all operators were stated fit.</p> <p><u>Periodic Chemical Exposure Monitoring</u> Sg Dingin POM - The periodic chemical exposure monitoring was conducted on 3/4/2018 by JKKP IH/127/171-2(124) for the laboratory operators and workshop operators was observed. The exposure results of personal monitoring at Laboratory for n-Hexane and workshop for manganese were compliance with the permissible exposure limit as specified under OSH (USECHH) Regulation 2000.</p> <p><u>LEV inspection and testing</u> Sg Dingin POM - LEV inspection and testing was conducted on 13/4/2018 by registered hygiene tech II assessor (JKKP HIE 127/171-3/2(190). Sighted the report dated 18/5/2018. From the assessment, the assessor conclude that the LEV system at laboratory was found to be working at satisfactory condition.</p>	

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.</p> <p>- Major compliance -</p>	<p>SOU1 had identified and reviewed significant hazards and risks and determined appropriate risk control measures.</p> <p>The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. Appropriate control measure has been determined and revised in the HIRARC register.</p> <p><b>Sg Dingin POM</b> - The mill has conducted assessment for risk on all the operations and documented in Hazard Identification, Risk Assessment, and Risk Control (HIRARC). The assessment cover all main operations and support operations such as security, office, store, weighbridge, fruit handling, threshing and etc. The assessment also covers working type, job step, hazard, effect, existing control, type, probability, etc. HIRARC Review was conducted on annually basis and when necessary due to accident occur. Latest review was conducted on 4/1/2019 for accident at oil recovery station in December 2018.</p> <p><b>Jentayu Estate</b> - HIRARC was reviewed on 22/10/2018 and approved by the Manager. Revision done for collection activity after accident happened on 17/10/2018.</p> <p><b>Padang Buluh Estate</b> - HIRARC was reviewed on 19/12/2018 and approved by the Sr. Manager. Revision done for pruning and sanitation activity after accident happened on 23 and 28 November 2018.</p> <p><b>Anak Kulim Estate</b> - The estate has established HIRARC review team. The HIRARC was reviewed at minimum once a year and when necessary as per accident happen. Latest review was conducted 22/2/2018 due to accident happen on 4/2/2018 and 1/1/2019 for annual review.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.3</p>	<p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>- Minor compliance -</p> <p>Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE. #cross refer to indicator 4.8.2.</p> <p>Suitable PPE has been provided to the workers based on the information in the MSDS and CHRA assessor’s recommendation.</p> <p>List of Personal Protective Equipment (PPE) Provided – identifies the type of PPE for the respective activities.</p> <ul style="list-style-type: none"> <li>i. Press/workshop operator – Safety Helmet, Safety Shoes, Safety Vest and Ear plug/muff</li> <li>ii. Field workers (sprayer, manure &amp; harvester) – N95 respirator, anti-mist goggles, wellington boots, apron and sickle cover.</li> </ul> <p>During the site visit, it was noted that the PPE will be replaced by the workers when damaged or lost.</p> <p>The chemical store was found to be adequately organized, properly labelled, secured and person in charge understands the OSH procedures. CSDS was placed at the chemical stores and is available. The person in charge understands the information written in CSDS.</p>	<p>Complied</p>

<p>4.7.4</p>	<p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>SOU1 OSH policy is well briefed to all workers. Interview with workers reveal that they understand the policy and the importance of safety at work.</p> <p><u>Sg Dingin POM</u> OSH meeting conducted on quarterly basis and last meeting conducted on 30/1/2019. The work place inspection conducted in January 2019 and review of accident record was discussed during the OSH meeting. No any unresolved safety and health issues noted. OSH/EHS meeting: Sighted the minutes meeting for OSH committee dated 2/1/2019 for accident occur on 31/12/2019 and for quarterly OSH committee meeting dated 30/1/2019, 29/10/2018, 30/7/2018 and 6/4/2018.</p> <p><u>Jentayu Estate</u> OSH meeting conducted on quarterly basis and last meeting conducted on 15/2/2019. The work place inspection and review of accident record was discussed during the OSH meeting. No any unresolved safety and health issues noted. OSH/EHS meeting: 15/2/2019, 16/11/2018, 18/8/2018 and 25/5/2018.</p> <p><u>Padang Buluh Estate</u> OSH meeting conducted on quarterly basis and last meeting conducted on 4/4/2019. The work place inspection and review of accident record was discussed during the OSH meeting. No any unresolved safety and health issues noted. OSH/EHS meeting: 4/4/2019, 9/1/2019, 9/10/2018 and 10/7/2018.</p> <p><u>Anak Kulim Estate</u> OSH meeting conducted on quarterly basis and last meeting conducted on 18/1/2019. The work place inspection and review of accident record was discussed during the OSH meeting. No any unresolved safety and health issues noted.</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	OSH/EHS meeting: 18/1/2019, 19/10/2018, 26/7/2018 and 25/4/2018.	

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.5</p>	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>- Minor compliance -</p> <p>Accident of emergency procedure is presented in Mill Quality Management System Standard Operation manual (MQMS SOM) dated November 1st, 2008. Flowchart of emergency handling was presented in Appendix 5.5.3.3. Sighted during site visit, the workstation also equipped with fire extinguisher and first aid kit. Noted during interview with employee shows the understanding regarding emergency procedures.</p> <p>The mill has established Emergency Response Team lead by the Mill Manager. Sighted during site visit, the ERT chart and Fire Hydrant and Fire Extinguisher Map was displayed at several notice board in the mill. Latest ERP training was conducted on 22/9/2018</p> <p>First aider present at various work station at the mill and estate. The first aider responsible for first aid box at each workstation. During the interview with the sterilizer operator, press operator, harvester shows the awareness regarding the emergency procedure if accident occur, person responsible of every first aid box and the location of the nearest first aid box. Sighted the latest training records for first aider dated 4/1/2019,18/1/2018 and 14/4/2018 (AKE).</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance												
4.7.6	All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -	<p>Medical care was provided to all the employees. Reviewed on workers profile records found that all workers are covered by the accident insurances.</p> <p>Malaysian workers were covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Refer to form 8A, "Jadual Caruman" for Dec 2018, Jan 2019 and February 2019.</p> <p>Foreign workers were covered by Foreign Workers Compensation Scheme Certificate of Insurance and/or SOCSO.</p> <table border="1"> <thead> <tr> <th>Insurance</th> <th>Period</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>RHB Insurance (MW293480)</td> <td>8/2/19-7/2/20</td> <td>SDPOM</td> </tr> <tr> <td>RHB Insurance (MW256047)</td> <td>2/9/18-1/9/19</td> <td>JE</td> </tr> <tr> <td>RHB Insurance (MW261890)</td> <td>17/10/18 – 16/10/19)</td> <td>PBE</td> </tr> </tbody> </table>	Insurance	Period	Remark	RHB Insurance (MW293480)	8/2/19-7/2/20	SDPOM	RHB Insurance (MW256047)	2/9/18-1/9/19	JE	RHB Insurance (MW261890)	17/10/18 – 16/10/19)	PBE	Complied
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RHB Insurance (MW261890)	17/10/18 – 16/10/19)	PBE													
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>Accident records are found to be updated. All records on Lost Time Accident (LTA) metrics are maintained. Samples of accident statistic as shown below :</p> <table border="1"> <thead> <tr> <th>Year</th> <th>SDPOM</th> <th>JE</th> <th>PBE</th> <th>AKE</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>2 (LTA 2)</td> <td>0 (LTA 0)</td> <td>5 (LTA 30)</td> <td>2 (LTA 29)</td> </tr> </tbody> </table> <p>*LTA is equivalent to lost man days</p>	Year	SDPOM	JE	PBE	AKE	2018	2 (LTA 2)	0 (LTA 0)	5 (LTA 30)	2 (LTA 29)	Complied		
Year	SDPOM	JE	PBE	AKE											
2018	2 (LTA 2)	0 (LTA 0)	5 (LTA 30)	2 (LTA 29)											
<p><b>Criterion 4.8:</b> All staff, workers, smallholders and contract workers are appropriately trained.</p>															



Criterion / Indicator		Assessment Findings	Compliance
4.8.1	<p>A formal training programme shall be in place that covers all aspects of the RSP0 Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme.</p> <p>- Major compliance -</p>	<p>A formal training programme on all aspects of RSP0 Principles and Criteria has been established and implemented. Refer to training programme FY 2019 of SOU 1 POM and respective estate. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs had been reviewed and found to be in compliance.</p>	<p>Complied</p>

<p>4.8.2</p>	<p>Records of training for each employee shall be maintained. - Minor compliance -</p>	<p>Records of training for employees available and maintained. Records verified on a sampling basis at the Mill and estates visited covers all aspect of training and RSPO P&amp;C. Training need and plan for FY2018 and FY2019 was verified.</p> <p>Training records checked:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Remark</th> </tr> </thead> <tbody> <tr><td>16/4/2019</td><td>Production</td><td rowspan="8">SDPOM</td></tr> <tr><td>1/4/2019</td><td>Safety Townhall</td></tr> <tr><td>10/4/2019</td><td>SCCS</td></tr> <tr><td>21/3/2019</td><td>Shovel handling</td></tr> <tr><td>4/1/2019</td><td>First aid training</td></tr> <tr><td>22/9/2018</td><td>Fire drill</td></tr> <tr><td>10/8/2018</td><td>Scheduled waste</td></tr> <tr><td>4/1/2019</td><td>First aid</td><td rowspan="6">JE</td></tr> <tr><td>23/10/2018</td><td>Tractor driving</td></tr> <tr><td>29/1/2019</td><td>HCV</td></tr> <tr><td>29/1/2019</td><td>Bagworm</td></tr> <tr><td>18/2/2019</td><td>Spraying</td></tr> <tr><td>5/3/2019</td><td>Chemical handling</td></tr> <tr><td>30/3/2019</td><td>IPM Training</td><td rowspan="7">PBE</td></tr> <tr><td>26/3/2019</td><td>Prunning</td></tr> <tr><td>24/1/2019</td><td>Harvesting</td></tr> <tr><td>24/1/2019</td><td>HCV</td></tr> <tr><td>19/1/2019</td><td>CDA spray</td></tr> <tr><td>31/12/2018</td><td>First aid kit</td></tr> <tr><td>7/12/2018</td><td>Rat bait</td></tr> <tr><td>5/7/2018</td><td>HCV</td><td rowspan="3">AKE</td></tr> <tr><td>17/4/2019</td><td>IPM</td></tr> <tr><td>15/1/2019</td><td>Spraying</td></tr> </tbody> </table>	Date	Training Topic	Remark	16/4/2019	Production	SDPOM	1/4/2019	Safety Townhall	10/4/2019	SCCS	21/3/2019	Shovel handling	4/1/2019	First aid training	22/9/2018	Fire drill	10/8/2018	Scheduled waste	4/1/2019	First aid	JE	23/10/2018	Tractor driving	29/1/2019	HCV	29/1/2019	Bagworm	18/2/2019	Spraying	5/3/2019	Chemical handling	30/3/2019	IPM Training	PBE	26/3/2019	Prunning	24/1/2019	Harvesting	24/1/2019	HCV	19/1/2019	CDA spray	31/12/2018	First aid kit	7/12/2018	Rat bait	5/7/2018	HCV	AKE	17/4/2019	IPM	15/1/2019	Spraying	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance
		12/4/2019	Townhall 7.0			
		2/3/2019	Pruning			
		22/2/2019	Manuring			
		12/2/2019	Rat Baiting			
		19/10/2018	Harvesting activity			
		15/8/2018	Recycle			
<b>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</b>						
<b>Criterion 5.1:</b>						
Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.						
5.1.1	An environmental impact assessment (EIA) shall be documented. - Major compliance -	Plans and impact assessments relating to environmental impacts based on documents as following: i) Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register. ii) Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI. iii) Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE. POM and Estates carried out the annual review of environmental impacts documented in Registration of Environmental Aspects and Impacts. Example of aspect and impact reviewed: i) Construction of boiler – found establishment, piling, frame construction, main part and chimney installation. Date of review: 4/1/19 ii) Replanting – felling & clearing, road and path construction, fixing bridges and culverts, drains and pits construction etc. dated on review 12/9/17.				Complied

Criterion / Indicator	Assessment Findings	Compliance
5.1.2	<p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.</p> <p>- Minor compliance -</p> <p>The mill and estates has continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan. Managers and assistant managers of mill and estates were identified as person-in-charge of the programs which were established upon review of the aspect and impact register. It was observed that the reviewing and updating on the registers were done annually if there's no any new activity within respective sites. Significant environment impact and management plan is documented under Environmental management plan (EMP) FY 2019 dated 5/1/19 however did not include:</p> <ul style="list-style-type: none"> <li>i) Significant environmental impacts - nuisance (noise pollution) as per Compliance Schedule no. 004543.</li> <li>ii) As to date, no boundary noise monitoring carried out as baseline monitoring. Basis use for the boundary noise is referred to noise mapping report in 2017.</li> <li>iii) Monsoon drain analysis - only 2 parameters tested (BOD and COD) compared to EMP (BOD, SS and COD). Refer to analysis report [ IE1396/2018 dated 27/11/18, IE146/2019 dated 10/2/19 and IE319/2019 dated 19/3/19]</li> </ul> <p>Thus, a minor NC was issued</p>	<p>Minor nonconformance</p>

Criterion / Indicator		Assessment Findings	Compliance
5.1.3	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>- Minor compliance -</p>	<p>An Environmental Management Plan 2019 made available for POM and estate. Listed environmental issue/Improvement plan/Location /PIC time bound. This environmental improvement plan is implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. The new directive towards DOE's Guided Self-Regulation (GSR) is being implemented in accordance to the 7 mainstreaming tools. Environmental Performance Monitoring Committee (EPMC) carried every quarter as part of GSR towards compliance. Environmental performance discussed i.e EFB stock, effluent analysis, ETP safety, stack emission and scheduled waste. Refer to the latest EPMC meeting minutes dated 30/1/19 and 30/7/18.</p>	Complied
<p><b>Criterion 5.2:</b>            The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and and operations managed to best ensure that they are maintained and/or enhanced.</p>			
5.2.1	<p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>- Major compliance -</p>	<p>Re-assessment of HCV was conducted by Sustainability Department (Social &amp; Environment Projects Unit) on April 2015. The assessment incorporating 7 (seven) SOU1 estates namely (Sg Dingin, Bkt Selarong, Padang Buluh, Bukit Hijau, Anak Kulim, Jentayu and Somme Estate). In summary, the areas covered within these SOU landholdings in this report are 19,553.35 hectare and the HCV area presence is 59.9 ha (HCV 4)</p> <p>The assessment concluded with recommendations that incorporated basic conservation planning principles for consideration into management regimes of preserving the HCV and conservation areas. The proposed management and monitoring for HCVA possible threats also recorded.</p> <p>For the sample estates (Jentayu, Padang Buluh, Anak Kulim, only HCV 4 (water catchment) identified within the estates.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance						
5.2.2 Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	<p>No RTE was identified within the planted or surrounding village area based on the HCV assessment report dated March 2017.</p> <p>Regular patrols within the operating unit estates were carried out and findings recorded by the respective Estate executives to monitor the Conservation / buffer zone areas. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented.</p> <p>Signage that prohibit hunting, fishing and water polluting activities were verified on-site at the estates visited (P00JB – Jentayu Estate, Padang Buluh Estate – P00C, P06A, P02A, P98A, P10B &amp; P08A) and Anak Kulim estate – P02A and 18B) found to have been satisfactorily maintained.</p>	<p>Complied</p>						
5.2.3 There shall b a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	<p>Although there is no RTE species identified at SOU1, there is evidence to continuously prevent and discourage illegal or hunting, fishing or collecting activities. Signage as well as routine patrolling activities were carried out as part of the efforts to create awareness among employees about biodiversity. Summary of training conducted at visited estates as per the following:</p> <table border="1" data-bbox="981 979 1859 1099"> <thead> <tr> <th data-bbox="981 979 1429 1015">Training</th> <th data-bbox="1429 979 1859 1015">Date of training</th> </tr> </thead> <tbody> <tr> <td data-bbox="981 1015 1429 1066">HCV and biodiversity training</td> <td data-bbox="1429 1015 1859 1066">29/1/19 (Jentayu Estate)</td> </tr> <tr> <td data-bbox="981 1066 1429 1099">HCV/riparian buffer zone training</td> <td data-bbox="1429 1066 1859 1099">24/1/19 (Padang Buluh Estate)</td> </tr> </tbody> </table>	Training	Date of training	HCV and biodiversity training	29/1/19 (Jentayu Estate)	HCV/riparian buffer zone training	24/1/19 (Padang Buluh Estate)	<p>Complied</p>
Training	Date of training							
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HCV/riparian buffer zone training	24/1/19 (Padang Buluh Estate)							

<p>5.2.4</p>	<p>Where a management plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> <li>• The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>• Outcomes of monitoring shall be fed back into the management plan.</li> </ul> <p>- Minor compliance -</p>	<p>The HCV management plan is developed based on recommendation given by the assessor. The plan includes monitoring of buffer zone area and conservation area in the estate and surrounding area. Monitoring of action plan was carried out at appropriate frequency as a mechanism to ensure effectiveness of implementation. Report of the monitoring was adequately recorded by the person in-charge on monthly basis. Based on the report, no RTE sighted and no evidence of encroachment/trespasses at the identified HCV and conservation area. Among established management sighted:</p> <table border="1" data-bbox="981 651 1868 1374"> <thead> <tr> <th data-bbox="981 651 1151 691">Estate</th> <th data-bbox="1151 651 1509 691">Management Plan</th> <th data-bbox="1509 651 1868 691">Monitoring records</th> </tr> </thead> <tbody> <tr> <td data-bbox="981 691 1151 954">Jentayu Estate</td> <td data-bbox="1151 691 1509 954">Monitoring of water catchment area (patrolling and sighting) Availability of signage Prohibition of agrochemical activities Prohibition of any activities (fishing/swimming)</td> <td data-bbox="1509 691 1868 954">Monitoring HCV and conservation area report dated 10/4/19, 24/3/19 and 6/2/19. No encroachment, wildlife sighting and pollution/erosion issues reported.</td> </tr> <tr> <td data-bbox="981 954 1151 1217">Padang Buluh Estate</td> <td data-bbox="1151 954 1509 1217">Monitoring of water catchment area (patrolling and sighting) Availability of signage Prohibition of agrochemical activities Prohibition of any activities (fishing/swimming)</td> <td data-bbox="1509 954 1868 1217">Monitoring HCV and conservation area report dated 1/4/19, 29/3/19 and 30/2/19. No encroachment, wildlife sighting and pollution/erosion issues reported.</td> </tr> <tr> <td data-bbox="981 1217 1151 1374">Anak Kulim Estate</td> <td data-bbox="1151 1217 1509 1374">Monitoring of water catchment area (patrolling and sighting) Availability of signage</td> <td data-bbox="1509 1217 1868 1374">Monitoring HCV and conservation area report dated 9/4/19, 11/3/19 and 11/2/19. No encroachment, wildlife sighting and</td> </tr> </tbody> </table>	Estate	Management Plan	Monitoring records	Jentayu Estate	Monitoring of water catchment area (patrolling and sighting) Availability of signage Prohibition of agrochemical activities Prohibition of any activities (fishing/swimming)	Monitoring HCV and conservation area report dated 10/4/19, 24/3/19 and 6/2/19. No encroachment, wildlife sighting and pollution/erosion issues reported.	Padang Buluh Estate	Monitoring of water catchment area (patrolling and sighting) Availability of signage Prohibition of agrochemical activities Prohibition of any activities (fishing/swimming)	Monitoring HCV and conservation area report dated 1/4/19, 29/3/19 and 30/2/19. No encroachment, wildlife sighting and pollution/erosion issues reported.	Anak Kulim Estate	Monitoring of water catchment area (patrolling and sighting) Availability of signage	Monitoring HCV and conservation area report dated 9/4/19, 11/3/19 and 11/2/19. No encroachment, wildlife sighting and	<p>Complied</p>
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Criterion / Indicator		Assessment Findings		Compliance
		Prohibition of agrochemical activities Prohibition of any activities (fishing/swimming)	pollution/erosion issues reported.	
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	No HCV set asides with existing rights of local communities have been identified.		Complied
<b>Criterion 5.3:</b> Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.				



Criterion / Indicator	Assessment Findings	Compliance
<p>5.3.1 All waste products and sources of pollution shall be identified and documented.                      - Major compliance -</p>	<p>As per Sustainable Plantation Management System Appendix 9 Procedure for Handling of Domestic Waste version 1, year 2008, issue no. 1, dated 1 October 2008. Other operational control procedure related to waste management are referred to:</p> <p>i) Landfill Management in Estate, SD/SDP/PSQM(ESH)/203-EN7 dated 13/3/1</p> <p>Palm oil mill - Type of waste generated:</p> <p>a. Scheduled waste (SW305, SW322, SW409 and SW410) domestic waste and recyclable waste. These categories include: effluent, fibre/shell, EFB, boiler clinker, wash water, scrap metal, scheduled waste, boiler blowdown, hydro-cyclone/claybath wash water, methane gas.</p> <p>Estate - Type of waste</p> <p>a. Scheduled waste – SW102, SW109, SW305, SW306, SW322, SW409, SW410, SW404 – workshop, clinic, SW store, store;</p> <p>b. Domestic waste – rubbish &amp; sewage – line-site, office, workshop, store, shop &amp;</p> <p>c. Recycle waste – empty container, waste oil</p> <p>d. Industrial waste – Scrap iron</p> <p>Records on the usage and disposal were well recorded and documented. Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be maintained accordingly</p>	<p>Complied</p>

<p>5.3.2</p>	<p>All chemicals and their containers shall be disposed of responsibly. - Major compliance -</p>	<p>The disposal of used chemicals and containers were done in accordance with their schedule on waste management as planned. Stores for scheduled waste were inspected at audited sites i.e. Mill and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. The mill and estates also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor. Latest disposal records checked:</p> <table border="1" data-bbox="981 587 1859 1142"> <thead> <tr> <th>Operating Unit</th> <th>Contractor</th> <th>Disposal records</th> </tr> </thead> <tbody> <tr> <td>Sg Dingin POM</td> <td>Famous Phase Sdn Bhd</td> <td>5/12/18: CN# 2018120516F0S5DY for SW 410 22/11/18: CN# 2018112213Q8T9S2 for SW 409 3/11/18: CN# 20181103128ZJDNL for SW322</td> </tr> <tr> <td>Anak Kulim Estate</td> <td>Scheduled waste (SW410,SW305, SW409) Contractor: Dhakshinamoorthy Manufacturing Sdn Bhd</td> <td>Consignment notes no.: i) 2018102609ND5I6P dated 24/10/18 for SW410, quantity: 0.54 mt</td> </tr> </tbody> </table> <p>For estates, there are 2 options available for disposal. The empty chemical containers are categorised as non-scheduled wastes after the process of triple rinsing is undergone. The practice was based on the triple rinse procedure and in-line with national programme on recycling of used HDPE pesticide containers. Refer to approval letter issued by DOA, refer to JP KRP 207/12/471 JLD VI dated 7/12/15.</p>	Operating Unit	Contractor	Disposal records	Sg Dingin POM	Famous Phase Sdn Bhd	5/12/18: CN# 2018120516F0S5DY for SW 410 22/11/18: CN# 2018112213Q8T9S2 for SW 409 3/11/18: CN# 20181103128ZJDNL for SW322	Anak Kulim Estate	Scheduled waste (SW410,SW305, SW409) Contractor: Dhakshinamoorthy Manufacturing Sdn Bhd	Consignment notes no.: i) 2018102609ND5I6P dated 24/10/18 for SW410, quantity: 0.54 mt	<p>Complied</p>
Operating Unit	Contractor	Disposal records										
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Criterion / Indicator		Assessment Findings	Compliance						
		Whereas for used oil (SW305), was taken by Sime Darby Industries (SDI) whom was the company hired to carry out machinery & vehicles maintenance job, back to their premise. Refer to approval letter, reference no. AS(BB) 91/110/619/161 Jilid 14 (69) dated 6/9/11. In some cases, DOE's license contractor appointed for disposal of SW305 and SW410 when there is no SDI appointed for service and maintenance of tractors.							
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	Action plan to manage the disposal of wastes is documented in the Waste Management Action Plan for 2019. Among the method of disposal are through SW Reg. 2005, landfill, application of industrial waste at the estates (e.g. EFB & POME) and creating awareness among the employees through 3R activities. Verified during field visit at estate's landfill, no evidence of hazardous waste disposal sighted.	Complied						
<b>Criterion 5.4:</b>									
Efficiency of fossil fuel use and the use of renewable energy is optimised.									
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Apart from use of grid supply (TNB) for electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler.</p> <p>The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through steam turbine where Palm fibre and PK shells were used as renewable energy/fuel on a 70:30 ratio basis respectively. Summary of renewable energy per palm product (CPO) as per below:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>kWh/CPO</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>0.94</td> </tr> <tr> <td>2019 to date</td> <td>1.01</td> </tr> </tbody> </table>	Year	kWh/CPO	2018	0.94	2019 to date	1.01	Complied
Year	kWh/CPO								
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Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 5.5:</b>			
Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.			
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -	The Group policy of "Zero open burning" is enforced since July 2008. The operating units adhere to the policy of "Zero open burning" for any replanting, if any, in the estates. Field inspections made in Jentayu Estate, Padang Buluh Estate and Anak Kulim Estate field showed no evidence of open burning.	Complied
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -	Fire was not used for preparing land for replanting at all visited estates. For example at Padang Buluh Estate, stipulated in the contract under Appendix 2, dated 1/3/18 between Sime Darby Plantation Berhad and YIH Construction Sdn Bhd. Only mechanized operation is allowed for the land preparation (felling, shredding, pulverizing and deboling). No phyto-sanitary disposal using fire allowed for pest outbreak.	Complied
<b>Criterion 5.6:</b>			
Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			

<p>5.6.1</p>	<p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).          - Major compliance -</p>	<p>Assessment of all polluting activities was conducted under Environmental Aspect Impact for identifying activities that contributes significant impact to environment</p> <p>As prescribed under "<i>Jadual Pematuhan</i>", license# 004543, air emission from boiler stack have to be monitored twice per year. Stack sampling results for 2018 :</p> <table border="1" data-bbox="981 619 1870 1157"> <thead> <tr> <th data-bbox="981 619 1279 667">Date of monitoring</th> <th data-bbox="1279 619 1576 667">Stack no.3</th> <th data-bbox="1576 619 1870 667">Stack no.4</th> </tr> </thead> <tbody> <tr> <td data-bbox="981 667 1279 895">                     Report ref: L-PG-KC1802CSD-0494 dated 28/2/18                 </td> <td data-bbox="1279 667 1576 895">                     Solid particle (dust) – 0.3597 g/m<sup>3</sup>, dry@ 12%CO<sub>2</sub>.                      CO – 136 mg/m<sup>3</sup>                      Opacity – not exceeding Ringellman 1                 </td> <td data-bbox="1576 667 1870 895">                     Not in operation.                 </td> </tr> <tr> <td data-bbox="981 895 1279 1157">                     Report ref: L-PG-KC1808 dated 14/8/18 (stack no.3)                       Report ref: L-PG-KC1808CSD-0380 dated 30/8/18 (stack no.3)                 </td> <td data-bbox="1279 895 1576 1157">                     Solid particle (dust) – 0.3857 g/m<sup>3</sup>, dry@ 12%CO<sub>2</sub>.                      CO – 395 mg/m<sup>3</sup>                      Opacity – not exceeding Ringellman 1                 </td> <td data-bbox="1576 895 1870 1157">                     Solid particle (dust) – 0.1417 g/m<sup>3</sup>, dry@12%CO<sub>2</sub>.                      CO – 274.8 mg/m<sup>3</sup>                      Opacity – not exceeding Ringellman 1                 </td> </tr> </tbody> </table> <p>The emissions of all parameters tested were complied with their respective limits as stipulated in the EQ (Clean Air) Regulations 1978.</p> <p>Smoke emission was monitored using online system (CEMS-DIS) to DOE based on the transmitted data from boiler smoke density indicator and recorder. Emission result was found in compliance with the regulatory limit.</p>	Date of monitoring	Stack no.3	Stack no.4	Report ref: L-PG-KC1802CSD-0494 dated 28/2/18	Solid particle (dust) – 0.3597 g/m <sup>3</sup> , dry@ 12%CO <sub>2</sub> . CO – 136 mg/m <sup>3</sup> Opacity – not exceeding Ringellman 1	Not in operation.	Report ref: L-PG-KC1808 dated 14/8/18 (stack no.3)  Report ref: L-PG-KC1808CSD-0380 dated 30/8/18 (stack no.3)	Solid particle (dust) – 0.3857 g/m <sup>3</sup> , dry@ 12%CO <sub>2</sub> . CO – 395 mg/m <sup>3</sup> Opacity – not exceeding Ringellman 1	Solid particle (dust) – 0.1417 g/m <sup>3</sup> , dry@12%CO <sub>2</sub> . CO – 274.8 mg/m <sup>3</sup> Opacity – not exceeding Ringellman 1	<p>Complied</p>
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Criterion / Indicator		Assessment Findings	Compliance
		For effluent discharge, regular monitoring was conducted as per requirement. Monthly and quarterly report was submitted to DOE. Refer to Indicator 4.4.3 for details.	
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	For the estate, GHG emissions identified including COx, SOx and NOx from various sources including fossil fuel, chemical, peat oxidation, sinks, crop sequestration, fertilizer consumptions and sequestration in conservation area.  For mill, GHG emission identified from POME, fuel consumption and grid electricity utilization. 5 years plan for GHG reduction (phase I, 20 mills (Malaysia) was sighted. Programme such as feed in tariff (FIT), flaring, CNG, CaP, Co-gen was included in the plan.  The Carbon Emission Reduction Strategy is the overall implementation plan that cuts across SDP's value chain- upstream, downstream and other related business. The group target is to reduce emission by 40% at 2021	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -	Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.  Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 however, at the point of audit there was no GHG calculation provided for verification. Thus, a minor NC was raised.	Minor nonconformance
<p><b>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</b></p>			

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 6.1:</b> Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	The Social Impact Assessment for SOU 1 was conducted in year 2015. The assessment was conducted internally by PSQM Department. The assessment will be re-conducted in 2020. There are no new activities in the mill and estates which requires new social impact assessment.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	The SIA report has recorded the list of stakeholder engaged. The list of stakeholder engaged includes local communities, contractors/suppliers, schools and other interested parties (e.g. police). There is continuous stakeholder engagement by Sime Darby SOU 1 operation. For mill, the last engagement with the related stakeholders was last conducted on 24 January 2019 (Sg Dingin POM), 16/04/2019 (Jentayu Estate), 29/01/2019 (Padang Buluh Estate) and 28/01/2019 (Anak Kulim Estate).	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>6.1.3</p> <p>Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.</p> <p>- Major compliance -</p>	<p>The latest available management plan for mill is updated as 15 April 2019 where the management plan had been developed through inputs from stakeholders' engagement (Sg. Dingin POM: 24/01/2019, Jentayu Estate: 16/04/2019, Padang Buluh Estate 29/01/2019 and Anak Kulim Estate: 28/01/2019), NUPW meeting (Sg. Dingin POM: 12/04/2019, Jentayu Estate: 24/01/2019, Padang Buluh Estate: 9/1/19 and Anak Kulim Estate: 15/01/2019) and gender committee meeting (Sg. Dingin POM: 17/02/2019, Jentayu Estate: 6/03/2019, Padang Buluh Estate: 15/3/2019 and Anak Kulim Estate: 15/01/2019).</p> <p>Among the issues captured are:</p> <ol style="list-style-type: none"> <li>1. Gender committee meeting: to promote more activities in Mill's Gender Committee and generate creativity and unity in Mill's Gender Committee team in weekly basis. Example is: to provide area next to Motorcycle parking as Gender Committee Park where members can perform gardening activities among themselves. Status is done in Q1 in Sg Dingin POM.</li> <li>2. Workers/staff: To ensure no cattle entering the housing linesite. Example is to build gate at field area and look for possibility of cleaning the expended metal deck in front of main entrance. Status is done in Q1 in Sg Dingin POM.</li> <li>3. Stakeholder's meeting: Puan Maznah dan Mr Ahmad where living as neighbouring in estate land asking for feedback about the squatter issue from company in Jentayu Estate. Status: Follow up but no decision been made. Due date is Dec 2019 at Jentayu Estate.</li> <li>4. Union meeting: Wild dogs issue in linesite area. Status: Follow up with Majlis Perbandaran Sg Petani in Padang Buluh Estate.</li> <li>5. Gender Committee meeting: Blood test for Malaria and Filariasis with KKM Kulim to all workers in Anak Kulim Estate.</li> </ol>	<p>Complied</p>



Criterion / Indicator		Assessment Findings	Compliance
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -	The management plan is reviewed once a year. The last review was conducted on 15/04/2019 (Sg Dingin POM), 18/04/2019 (Jentayu Estate), 11/04/2019 (Padang Buluh Estate) and 08/02/2019 (Anak Kulim Estate). The review of the carried out plans are being reviewed by the management to the affected stakeholders in the next meeting.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	There is no smallholder scheme involved in this certification. This certification only purchase FFB from smallholders while the smallholders are not managed by SOU 1.	Not applicable
<b>Criterion 6.2:</b> There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			

Criterion / Indicator	Assessment Findings	Compliance
<p>6.2.1 Consultation and communication procedures shall be documented.                      - Major compliance -</p>	<p>The procedure for handling consultation and communication that was established and documented includes:</p> <ul style="list-style-type: none"> <li>• Section 3.2 Availability of Information and Communication of the Plantation Quality Management System dated 01/11/2008.</li> <li>• Appendix 5 Flowchart and Procedure on Handling Social Issues of the Plantation Quality Management System dated 01/11/2008.</li> <li>• Sub-section 5.5 Procedure for External Communication of the Estate Quality Management System dated 01/11/2008.</li> </ul> <p>During the stakeholders’ engagement, it was confirmed that the communication between the certification holder and the stakeholders are effective.</p> <p>SOU 1 performs periodic stakeholders’ engagement to demonstrate continuously communication and consultation. Sample of stakeholder engagement meeting minutes reviewed:</p> <ul style="list-style-type: none"> <li>• For Sg Dingin POM, the last engagement with the related stakeholders was conducted on 24 January 2019 attended by 25 people.</li> </ul> <p>For Jentayu Estate, the last engagement with the related stakeholders was conducted on 16 April 2019 attended by 18 people.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	The responsible personnel to handle communication and social issue matters is the Assistant Mill Manager. Samples of appointment verified: <ul style="list-style-type: none"> <li>• Appointment of Assistant Mill Manager as the responsible person on social related matters was on 02.01.2019. The appointment was by the Senior Manager.</li> <li>• Appointment of Assistant Manager as the responsible person on social related matters was on 02.04.2019. The appointment was by the Estate Manager at Jentayu Estate.</li> <li>• Appointment of Senior Manager as the responsible person on social related matters was on 02.01.2019. The appointment was by the Regional CEO at Padang Buluh Estate.</li> <li>• Appointment of Estate Manager as the responsible person on social related matters was on 02.01.2019. The appointment was by the Regional CEO at Anak Kulim Estate.</li> </ul>	Complied
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	The list of local stakeholders affected by the operations of this certification unit is available at the operating units. The list is reviewed on annual basis. Sample of stakeholder list verified. <ul style="list-style-type: none"> <li>• Stakeholder list for Sungai Dingin Mill reviewed in April 2019.</li> <li>• Stakeholder list for Jentayu Estate reviewed in January 2019.</li> <li>• Stakeholder list for Padang Buluh Estate reviewed in January 2019.</li> <li>• Stakeholder list for Anak Kulim Estate reviewed in April 2019.</li> </ul> <p>Communication records with stakeholders are retained in the operating units. Sample of communication verified:</p> <ul style="list-style-type: none"> <li>• Stakeholder’s meeting on 24 January 2019 attended by 25 people.</li> <li>• Stakeholder’s meeting on 16 April 2019 attended by 18 people.</li> <li>• Stakeholder’s meeting on 29 January 2019 attended by 28 people.</li> <li>• Stakeholder’s meeting on 28 January 2019 attended by 15 people.</li> </ul>	Complied
<b>Criterion 6.3:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			

Criterion / Indicator	Assessment Findings	Compliance
6.3.1	<p>The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.</p> <p>- Major compliance -</p> <p>In handling grievances and complaints, the following procedures has been established:</p> <ul style="list-style-type: none"> <li>• For external - Sub-section 5.5 Procedure for External Communication of the Estate Quality Management System dated 01/11/2008.</li> <li>• For Internal - Section 3.2 Availability of Information and Communication of the Plantation Quality Management System dated 01/11/2008.</li> </ul> <p>The procedures include flowchart for resolution and the accessibility of the complaints and grievances.</p> <p>Sime Darby has established a whistle blower channel. This whistle blowing channel information is available in the Sime Darby website. The complaint can be made through <a href="http://www.simedarby.com/contact_us.aspx">http://www.simedarby.com/contact_us.aspx</a> or email to <a href="mailto:whistlelower@simedarby.com">whistlelower@simedarby.com</a>. Other than the online channel, direct toll free number and hotline is available.</p> <p>The details of this whistle blower is made available in the operating unit vicinity. Briefing on the whistle blowing has been carried out. Sample of records verified:</p> <ul style="list-style-type: none"> <li>• Sungai Dingin POM on 11/02/2019 to 59 people.</li> <li>• Jentayu Estate on 24/01/2019 to 32 people.</li> <li>• Padang Buluh Estate on 24-25/01/2019 to 263 people.</li> <li>• Anak Kulim Estate on 14/01/2019 to 120 people.</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	<p>Sample of grievance verified:</p> <ul style="list-style-type: none"> <li>• There is no external complaints or grievance recorded for this assessment period. Interview with local communities confirmed that there are no grievances on the operation and they understood the channel of complaint is to the estate manager.</li> <li>• The internal complaints are mainly request for housing maintenance. The request of housing maintenance care completed on an appropriate timeframe. It is confirmed through worker’s interview.</li> </ul> <p>Sample of grievance recorded and resolved has been verified to be accordance to the procedures.</p>	Complied
<p><b>Criterion 6.4:</b>            Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	<p>Through interview with Sg Dingin POM’s affected communities, there is no legal and customary land and it was confirmed that this plantation has been developed since 1920s and there was no new land development. However, the Flowchart and Procedure on Handle Land Disputes (including Squatters) – Appendix 3 of Plantation Quality Management System dated 01/11/2008 has been established to identify legal, customary or user rights. In the Social Policy dated January 2015, Sime Darby has also committed that in any negotiations concerning compensation for loss or customary rights are dealt with through a documented system that enables indigenous people, local communities and other stakeholders to express their views through their own representative institutions.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
6.4.2	<p>A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land.</p> <p>- Minor compliance -</p>	Complied
6.4.3	<p>The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available.</p> <p>- Major compliance -</p> <p>There were no records of issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders at Sg. Dingin POM. This is confirmed through stakeholder interview. In Jentayu Estate, there is squatter area of 2.7932 Ha where the old timer people built house in 1960's on Sime Darby's land but no conflict.</p> <p>Confirmed through stakeholder consultation that there is no payment been made and they are not asked to leave the land. Sime Darby's management has treated them well and the land status is still under top management decision.</p>	Complied
<p><b>Criterion 6.5:</b> Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.</p>		

Criterion / Indicator	Assessment Findings	Compliance	
6.5.1	<p>Documentation of pay and conditions shall be available.</p> <p>- Major compliance -</p>	<p>The following sample of pay slip was verified to confirmed the pay conditions and deduction are as per the worker’s contract agreement:</p> <ol style="list-style-type: none"> <li>1. Worker ID: 97507 (Sg Dingin POM)</li> <li>2. Worker ID: 93050 (Sg Dingin POM)</li> <li>3. Worker ID: 30167 (Sg Dingin POM)</li> <li>4. Worker ID: 87434 (Sg Dingin POM)</li> <li>5. Passport No: BP0975101 (Sg Dingin POM contract worker)</li> <li>6. Passport No: BL0528964 (Sg Dingin POM contract worker)</li> <li>7. Worker ID: 91618 (Jentayu Estate)</li> <li>8. Worker ID: 48673 (Jentayu Estate)</li> <li>9. Worker ID: 108162 (Jentayu Estate)</li> <li>10. Worker ID: 114782 (Jentayu Estate)</li> <li>11. Worker ID: 26374 (Jentayu Estate)</li> <li>12. Worker ID: 131950 (Jentayu Estate)</li> <li>13. Worker ID: 94066 (Padang Buluh Estate)</li> <li>14. Worker ID: 141497 (Padang Buluh Estate)</li> <li>15. Worker ID: 131234 (Padang Buluh Estate)</li> <li>16. Worker ID: 134135 (Padang Buluh Estate)</li> <li>17. Worker ID: 25112 (Anak Kulim Estate)</li> <li>18. Worker ID: 103773 (Anak Kulim Estate)</li> <li>19. Worker ID: 107672 (Anak Kulim Estate)</li> <li>20. Worker ID: 131888 (Anak Kulim Estate)</li> <li>21. Worker ID: 141610 (Anak Kulim Estate)</li> </ol>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.2</p> <p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p>	<p>The employment contract agreement between Sime Darby and their direct employed workers and contract with their workers are available. The content of the agreement was made understood to the workers during the induction session at Sime Darby's Induction Centre at Sua Betong for permanent worker. The sample reviewed:</p> <ol style="list-style-type: none"> <li>1. Worker ID: 97507 (Sg Dingin POM)</li> <li>2. Worker ID: 93050 (Sg Dingin POM)</li> <li>3. Worker ID: 30167 (Sg Dingin POM)</li> <li>4. Worker ID: 87434 (Sg Dingin POM)</li> <li>5. Passport No: BP0975101 (Sg Dingin POM contract worker)</li> <li>6. Passport No: BL0528964 (Sg Dingin POM contract worker)</li> <li>7. Worker ID: 91618 (Jentayu Estate)</li> <li>8. Worker ID: 48673 (Jentayu Estate)</li> <li>9. Worker ID: 108162 (Jentayu Estate)</li> <li>10. Worker ID: 114782 (Jentayu Estate)</li> <li>11. Worker ID: 26374 (Jentayu Estate)</li> <li>12. Worker ID: 131950 (Jentayu Estate)</li> <li>13. Worker ID: 94066 (Padang Buluh Estate)</li> <li>14. Worker ID: 141497 (Padang Buluh Estate)</li> <li>15. Worker ID: 131234 (Padang Buluh Estate)</li> <li>16. Worker ID: 134135 (Padang Buluh Estate)</li> <li>17. Worker ID: 25112 (Anak Kulim Estate)</li> <li>18. Worker ID: 103773 (Anak Kulim Estate)</li> <li>19. Worker ID: 107672 (Anak Kulim Estate)</li> <li>20. Worker ID: 131888 (Anak Kulim Estate)</li> <li>21. Worker ID: 141610 (Anak Kulim Estate)</li> </ol>	<p>Complied</p>



Criterion / Indicator		Assessment Findings	Compliance
6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –	At all operating units, housing facility, medical and other welfare amenities is provided. The housing facilities are as per the Minimum Housing Act. Sample of housing facilities assessed: <ul style="list-style-type: none"> <li>• Field assessment has been conducted at the housing facilities. The house is provided with adequate water (government treated water by SADA-Syarikat Air Darul Aman and subsidized electricity.</li> <li>• The housing facilities are well kept and clean. The sanitation of the housing area is kept clean. Waste are collected by the estate contractor in 3x weekly (Azizah Enterprise in Sg Dingin POM &amp; Estate) or own tractor driver. The weekly housing inspection is conducted and records are maintained by the Hospital Assistant.</li> </ul>	Complied
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food. - Minor compliance –	The assessment team had visited the grocery stores and could confirm that the pricing of the food sold in the estates are within the acceptable range. The price is slightly higher due to transportation cost. There is no complaint received from the interviewed workers regarding over price of the grocery items.	Complied
<b>Criterion 6.6:</b> The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			

Criterion / Indicator	Assessment Findings	Compliance
6.6.1 A published statement in local languages recognising freedom of association shall be available. - Major compliance -	The commitment of Sime Darby to allow its employee to freely join a trade union/association is stated in the Social Policy dated January 2015 undersigned by Datuk Franki Anthony Dass. The policy is available in Bahasa Malaysia and the policy is published on notice board within the vicinity of the operating units. The policy is being continuously briefed to workers during morning and during the induction for newly join employees. Sample of training records verified: <ul style="list-style-type: none"> <li>• Sg Dingin POM on 11/02/2019 for 59 people.</li> <li>• Jentayu Estate on 24/01/2019 to 32 people.</li> <li>• Padang Buluh Estate on 24-25/01/2019 to 263 people.</li> <li>• Anak Kulim Estate on 14/01/2019 to 120 people.</li> </ul> Interview with the local NUPW and workers representative confirms that there was no restriction imposed by Sime Darby for its employee to join trade union.	Complied
6.6.2 Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Minutes of meeting with NUPW was reviewed. Sample of meeting minutes verified: <ul style="list-style-type: none"> <li>• Meeting minutes for Sg Dingin POMI dated 12/04/2019.</li> <li>• Meeting minutes for Jentayu Estate dated 16/04/2019.</li> <li>• Meeting minutes for Padang Buluh Estate dated 9/01/2019.</li> <li>• Meeting minutes for Anak Kulim Estate dated 15/01/2019.</li> </ul> The meeting with NUPW is conducted once a year or when necessary.	Complied
<b>Criterion 6.7:</b> Children are not employed or exploited.		

Criterion / Indicator		Assessment Findings	Compliance
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Sime Darby has committed to safeguard employing of child labour in its' Social & Humanity Management Policy dated January 2015 endorsed by Managing Director Datuk Franki Antony Dass. The workers list from the mill and estates were verified to confirm that there is no worker below the minimum age. Field observation and workers interview did not detect any sign of workers below minimum age.	Complied
<b>Criterion 6.8:</b> Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	The commitment of Sime Darby to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, physique, sexual orientation, union membership, political view, religion and/or race is stated in the Social Policy dated January 2015 undersigned by Datuk Franki Anthony Dass. The policies are available in both English and Bahasa Malaysia. The policies are published on notice board within the vicinity of the operating units. Continuous briefing on the policy has been conducted. Sample of briefing records verified: <ul style="list-style-type: none"> <li>• Sg Dingin POM on 11/02/2019 for 59 people.</li> <li>• Jentayu Estate on 24/01/2019 to 32 people.</li> <li>• Padang Buluh Estate on 24-25/01/2019 to 263 people.</li> <li>• Anak Kulim Estate on 14/01/2019 to 120 people.</li> </ul> The commitment of Sime Darby towards Equal opportunity and non-discrimination on temporary or migrant workers is stated in the Social Policy dated January 2015 undersigned by Datuk Franki Antony Dass. There is no form of discrimination found during interview with the foreign workers. It was informed by the foreign workers that especially the Over Time.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>6.8.2</p> <p>Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against.</p> <p>- Major compliance -</p>	<p>Interview with the female workers at the mill confirmed that there is no discrimination on gender. No grievances were highlighted to the audit team by internal and external stakeholders.</p> <p>Mill and estate operating units, there is no foreign female workers. In comparing the female workers and male workers, no discrimination elements were found. The main agreement is referenced to the MAPA/NUPW collective bargaining agreement.</p> <p>The foreign worker’s employment contract does not demonstrate any element of discrimination.</p> <p>Sample of demonstration of equality:</p> <ul style="list-style-type: none"> <li>• Overtime offering is offered to all employees regardless of race or nationality. This is confirmed with interview with workers.</li> <li>• Interview with female workers confirmed that OT is offered fairly to all workers.</li> <li>• The assessment team had checked the salary slip of the workers. The comparison shows that the income of male and female are relatively balance.</li> </ul> <p>During the induction programs, all policies are being briefed to workers.</p> <p>Sample of briefing records verified:</p> <ul style="list-style-type: none"> <li>• Sg Dingin POM on 11/02/2019 for 59 people.</li> <li>• Jentayu Estate on 24/01/2019 to 32 people.</li> <li>• Padang Buluh Estate on 24-25/01/2019 to 263 people.</li> <li>• Anak Kulim Estate on 14/01/2019 to 120 people.</li> </ul>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>6.8.3 It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.                      - Minor compliance -</p>	<p>Equal opportunity regardless of gender has been practiced by Sime Darby Group. Sample of actions:</p> <ul style="list-style-type: none"> <li>• Promotion of Mr. Mohd Daud bin Ahmad from Chargehand (NCS Grade 3) to Chargehand (NCS Grade 2) on 01/07/2018.</li> <li>• Promotion of Munusamy A/L Nadasan from Workhop Mechanic ((NCS Grade 2) to Workhop Mechanic (NCS Grade 1) on 01/07/2018.</li> <li>• Promotion of daily-rated or general workers to weighbridge operator (non-clerical staff-grade 3) on 01.08.2018.</li> </ul> <p>Medical records on employee fitness are kept at the operating units. Sample of medical records verified.</p> <ul style="list-style-type: none"> <li>• Sg Dingin POM: Worker Code 1: W66M052051</li> <li>• Sg Dingin POM: Worker Code 2: W6ES429022</li> <li>• Sg Dingin POM: Worker Code 3: W7EY064508</li> <li>• Padang Buluh Estate: Worker Code: W7EH122341</li> <li>• Padang Buluh Estate: Worker Code: W1ES463748</li> <li>• Padang Buluh Estate: Worker Code: W6ES350893</li> <li>• Anak Kulim Estate: Worker Code: W3ES86323</li> <li>• Anak Kulim Estate: Worker Code: W4EB103048</li> <li>• Anak Kulim Estate: Worker Code: W4EG049736</li> </ul>	<p>Complied</p>
<p><b>Criterion 6.9:</b>                      There is no harassment or abuse in the work place, and reproductive rights are protected.</p>		

Criterion / Indicator		Assessment Findings	Compliance
6.9.1	<p>Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce.</p> <p>- Major compliance -</p>	<p>The commitment of Sime Darby to prevent sexual and other form of harassment and violence is stated in the Gender Policy dated January 2015 and Social &amp; Humanity Management Policy dated January 2015 both undersigned by Datuk Franki Anthony Dass.</p> <p>Sample of implementation of the policy:</p> <ul style="list-style-type: none"> <li>• The Polices are published at notice board of the operating unit vicinity.</li> <li>• Sime Darby has introduced the Gender Committee Handbook. The Handbook is provided to the Operating Units Gender Leader to be implemented and disseminated to the relevant stakeholders at their operating units.</li> <li>• In operating unit, Sg Dingin POM has launched the 'Buku Aduan Gender' to records all the gender issue.</li> <li>• Interview with female workers in Sungai Dingin Estate, Jentayu Estate confirmed that there was no sexual harassment reported.</li> </ul> <p>The minutes meeting of the Gender Committee for Sungai Dingin POM dated 17/02/2019, Jentayu Estate dated 06/03/2019, Padang Buluh Estate dated 15/03/2019 and Anak Kulim Estate dated 15/01/2019 did not report any sexual harassment of domestic violence.</p>	Complied
6.9.2	<p>A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.</p> <p>- Major compliance -</p>	<p>The commitment of Sime Darby on reproductive rights is stated in the Social &amp; Humanity Management Policy dated January 2015 undersigned by Datuk Franki Anthony Dass.</p> <p>Sample of implementation of the policy:</p> <ul style="list-style-type: none"> <li>• The polices are published at notice board of the operating unit's vicinity.</li> <li>• Interview has been conducted with female workers that they understood the policy and the rights of reproductive.</li> <li>• Interview with the Hospital Assistant and gender committees confirmed that there is no report of restriction.</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	The specific grievance procedure for matter related to gender is established and documented in the Manual on Implementation of the Gender Policy. A flowchart to handle Sexual Harassment Grievance is included in the manual. The content of the Manual has been summarized in the Gender Committee Handbook. The Handbook has been distributed to Operating Unit Gender Committee. Specific channel of reporting grievance (e.g. direct telephone number) related to gender is provided in the Gender Committee Handbook.	Complied
<b>Criterion 6.10:</b> Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	The FFB price is made publically at the mill's weighbridge. The pricing is accordance the MPOB daily pricing.	Complied
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	The FFB pricing Mechanism has been briefed to the estates in the Responsible Sourcing Guideline engagement to Outside Crop (OCP). The latest training was conducted on 10/01/2019 together for both Sg Dingin POM and Elphil POM.	Complied
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	The FFB purchase agreement between Sime Darby and Boustead Estates Agency Sdn Bhd has been verified. The agreement effective from 01/01/2019 to 31/12/2019. The contract determines the acceptable limit of the FFB and its penalty.	Complied
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	The assessment team had verified samples of the payment. The payments are made on monthly basis. Due to confidentiality, no sample is stated in this report.	Complied
<b>Criterion 6.11:</b> Growers and millers contribute to local sustainable development where appropriate.			

Criterion / Indicator		Assessment Findings	Compliance
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	The contribution to local development are identified during stakeholder meetings and on ad-hoc request basis from the community. There is no long term development requested. The stakeholder meetings and interview with the local communities confirmed that there is no long term request. Sample of local community contribution request: <ul style="list-style-type: none"> <li>• Sports day contribution 2019 at SK Ladang Dublin on 14.03.2019: RM 200.</li> <li>• Request to borrow canopy for SJK(T) Ladang Dublin on 01.04.2018</li> <li>• Majlis kesyukuran &amp; bacaan yasin on 11.04.2019</li> <li>• Contribution for flower plants for school landscape on 12.03.2018.</li> <li>• Worker’s request to borrow canopy, table and chair for Kenduri on 22.02.2019 at Padang Buluh Estate.</li> <li>• Permission to use water tank and gate opening at gate 19 and 20 on 31.07.2018 for Hindu prayer at Padang Buluh Estate.</li> <li>• Borrow estate equipment (road grader) for gotong-royong at Hindu Temple on 06.01.2019 at Anak Kulim Estate.</li> </ul>	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	Scheme smallholders is not part of this certification.	Not applicable
<b>Criterion 6.12:</b>			
No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	It was found that the in the Mill, there are contract workers. The contract agreement between the contract workers and contractors are available in the mill.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	So far there is no contract substitution occurred as all the employee received the employment contract and signed by both employer and employee.	Complied



Criterion / Indicator	Assessment Findings	Compliance
<p>6.12.3 Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented.                      - Major compliance -</p>	<p>SDPSB has implemented Sime Darby’s Human Rights Charter on 13/1/2017, version 3.0 where they committed as below:</p> <ul style="list-style-type: none"> <li>a. Providing equal opportunity</li> <li>b. Respecting freedom of association</li> <li>c. Eradicating any form of exploitation</li> <li>d. Ensuring favorable working conditions</li> <li>e. Enhancing Safety and Health</li> </ul> <p>They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights on 11.02.2019 attended by 59 workers for Sungai Dingin POM (SDP Policy Training), 24.01.2019 attended by 30 workers for Jentayu Estate, 24-25.01.2019 (Padang Buluh Estate) attended by 263 workers.                      Example: All the workers have provided with induction training in Sua Betong Estate during their arrival to Malaysia.</p>	<p>Complied</p>
<p><b>Criterion 6.13:</b>                      Growers and millers respect human rights.</p>		
<p>6.13.1 A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1).                      - Major compliance -</p>	<p>The commitment of Sime Darby towards human rights is stated in the Social &amp; Humanity Management Policy dated January 2015 undersigned by Datuk Franki Antony Dass.                      The policy has been published at the notice boards of the operating units. Training on the policy has been provided to the workers during morning briefing on 11.02.2019 (Sg Dingin POM), 24.01.2019 (Jentayu Estate), 24-25.01.2019 (Padang Buluh Estate) and 14.01.2019 (Anak Kulim Estate) and during induction.                      Interview with workers confirmed that they aware on this policy.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Not applicable as this certification unit is in Peninsular Malaysia.	Not applicable
<b>Principle 7: Responsible development of new plantings</b>			
Sungai Dingin Palm Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this surveillance assessment. The immature areas are replanted area.			
<b>Principle 8: Commitment to continual improvement in key areas of activity</b>			
<b>Criterion 8.1:</b> Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			

Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> <li>• Reduction in use of pesticides(Criterion 4.6);</li> <li>• Environmental impacts (Criteria 4.3, 5.1 and 5.2);</li> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);               <ul style="list-style-type: none"> <li>• Optimising the yield of the supply base.</li> </ul> </li> </ul> <p>- Major compliance -</p>	<p>Sg Dingin POM and supply bases had established continuous improvement plan, for example:</p> <ol style="list-style-type: none"> <li>1. To recover palm kernel after empty bunch press</li> <li>2. To reduce kernel loss/FFB</li> <li>3. To improve productivity for pruning</li> <li>4. To improve coverage for circle spray</li> <li>5. To reduce debris in LF quality</li> <li>6. To improve productivity of circle sanitation</li> </ol>	<p>Complied</p>

**RSPO Public Summary Report**  
**Revision 8 (Mar /2019)**

**Appendix B: Approved Time Bound Plan**

**SDP- RSPO Certification Status for Malaysia Operations**

SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '10	11-Aug-20	RSPO 550179	N.A
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	N.A
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	N.A
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	N.A
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	N.A
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	N.A
5a	Sg Samak		3 Mar '11	NA	NA	Mill was closed down.
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	N.A
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	N.A
8	East	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543543	N.A
9	West	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543594	N.A
9a	Sepang	Sepang, Selangor	19 May '10	NA	NA	Mill was closed down.
10	Bukit Puteri	Raub, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020, MUTU – RSPO/091	N.A
11	Kerdau	Temerloh, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019, MUTU-RSPO/094	N.A
12	Jabor	Kuantan, Pahang	7 Jul '11	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049, MUTU-RSPO/092	N.A
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-21	CU-RSPO-855480	N.A
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-20	RSPO 541905	

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SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-19	SGS-RSPOPM-MY14/01364, 824 502 16032	Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill with Certificate No: CU- RSPO-819165, certification date: 30 Dec 2011.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '11	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051, MUTU-RSPO/093	N.A
17	Kempas	Jasin, Melaka	19 May '10	18-May-20	RSPO 005	N.A
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	N.A
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-19	RSPO 600305	Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	RSPO 550182	Mill was closed down.
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-20	RSPO 548299	N.A
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	N.A
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	N.A
23	Ulu Remis	Layang-layang, Johor	11 Apr '11	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042, BV-RSPO-20170705-01	N.A
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	SGS-RSPO/PM-00715, 824 502 16040, BV-RSPO-20170623-01	N.A
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	RSPO 547123	Mill was closed down.
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-18	RSPO 537872	N.A
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	N.A
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-20	RSPO 001	N.A
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-20	RSPO 002	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-20	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	Mill was closed down.
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	Mill was closed down.
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	N.A

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SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
32	Rajawali	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819167, RSPO 0020	N.A
33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	N.A
34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-815150, MUTU-RSPO/054	N.A

Legends

Certification Withdrawal

NA - NOT APPLICABLE

Note: There are 2 certificate numbers for some SOUs due to transfer of CB.

**SDP- RSPO Certification Status for Indonesia Operations**

NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	PT LAHAN TANI SAKTI	ALUR DUMAI	Bagan Sinembah/Tanh Putih, Pujud, Rokan Hilir, Riau	16-Jan-12	15-Jan-22	SGS-RSPO/PC17-00005	N.A
2	PT SAJANG HEULANG	ANGSANA MINI	Sebamban, Indonesia	6-Jul-11	6-Jul-16	MUTU-RSPO/006b	Mill closed down
3	PT SAJANG HEULANG	MUSTIKA	Sebamban, Indonesia	3-Jul-13	3-Jul-18	MUTU-RSPO/027	N.A
4	PT LADANGRUMPUN SUBURUBADI	ANGSANA	Sebamban, Indonesia	9-Nov-16	8-Nov-21	MUTU-RSPO/006a	N.A
5	PT LANGGENG MUARAMAKMUR	BEBUNGA	Pamukan Utara, Tanah Grogot, Kotabaru/Pasir, Kalimantan Selatan/Kalimantan Timur	16-Mar-12	3-Aug-22	MUTU-RSPO/014	N.A
6	PT KRIDATAMA LANCAR	SUKAMANDANG	Seruyan Tengah, Sampit, Seruyan, Kalimantan Tengah	2-Sep-16	1-Sep-21	MUTU-RSPO/003	N.A
7	PT BAHARI GEMBIRA RIA	LADANG PANJANG	Kumpeh Ulu, Jambi, Muaro Jambi, Jambi	9-Jul-12	28-Nov-22	MUTU-RSPO/019	N.A
8	PT TUNGGAL MITRA PLANTATIONS	MANGGALA	Riau, Indonesia	25-Nov-10	24-Nov-20	MUTU-RSPO/002	N.A
9	PT PARIPURNA SWAKARSA	PONDOK LABU	Pamukan Selatan, Tanah Grogot, Kotabaru, Kalimantan Selatan	16-Mar-12	19-Jul-22	MUTU-RSPO/016	N.A
10	PT BERSAMA SEJAHTERA SAKTI	GUNUNG ARU	Sebamban, Indonesia	21-Oct-16	20-Oct-21	MUTU-RSPO/005	N.A

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NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
11	PT GUTHRIE PECCONINA	RANTAU PANJANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	16-Mar-12	19-Nov-22	MUTU-RSPO/017	N.A
12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11	30-Dec-16	MUTU-RSPO/009	N.A
13		BETUNG		1-April-14	1-April-19	MUTU-RSPO/035	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	MUTU-RSPO/001	N.A
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	15-Mar-17	MUTU-RSPO/015	Cert. discontinued – supply bases extended to Rantau POM
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	28-Nov-22	MUTU-RSPO/020	N.A
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU-RSPO/004	N.A
18	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16	30-Nov-21	MUTU-RSPO/008	N.A
19		MANDAH		1 April 2014	1 April 2019	MUTU-RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU-RSPO/007	N.A
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	28-Dec-22	MUTU-RSPO/018	N.A
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	N.A
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	3-May-18	MUTU-RSPO/026	N.A
24	PT SANDIKA NATAPALMA/PT BUDIDAYA AGRO LESTARI	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-19	MUTU-RSPO/044	N.A
25	PT MITRAL AUSTRAL SEJAHTERA	MAS Mill	Desa Rahayu Kec. Parindu Kab. Sanggau, Kalimantan Barat	NA	NA	NA	N.A

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Legends

Pending Certification by RSPO EB	Mill down	closed
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NA - NOT APPLICABLE



**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2018** for **Sg Dingin POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2018** for **Sg Dingin POM** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.41
PKO	1.41

Extraction	%
OER	21.61
KER	5.48

Production	t/yr
FFB Process	318,184.3
CPO Produced	68,765.86
PKO Produced	-

Land Use	Ha
OP Planted Area	15,217.91
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
<b>Total</b>	<b>15,217.91</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	127,489.2	0.53	7,217.33	0.51	0	0	19,966.53	1.04
CO <sub>2</sub> Emission from fertilizer	13,979.85	0.06	713.64	0.05	0	0	14,693.49	0.11
NO <sub>2</sub> Emmision	11,096.64	0.05	468.57	0.03	0	0	11,565.21	0.08
Fuel Consumption	1,609.3	0.01	67.32	0	0	0	1,676.62	0.01
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-120,842.83	-0.5	-6,841.07	-0.49	0	0	-127,683.9	0.99
Conservation Sequestration	0	0	0	0	0	0	0	0

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<b>Total</b>	<b>33,332.16</b>	<b>0.14</b>	<b>1,625.79</b>	<b>2.22</b>	<b>8,731.57</b>	<b>0</b>	<b>43,689.52</b>	<b>0.36</b>
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\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	76,223.47	0.24
Fuel Consumption	229.77	0
Grid Electricity Utilisation	1,038.15	0
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>77,491.39</b>	<b>0.24</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	24,518.54
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

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

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

**Appendix D: General Chain of Custody Requirements for the Supply Chain**

<b>5.1 Applicability of the general chain of custody requirements for the supply chain</b>			
	<b>Requirement</b>	<b>Evidence</b> For any N/A raised, justification is required.	<b>Compliance</b> (Yes / No or N/A)
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Sime Darby Plantation headquarter has the physically handle the RSPO Certified Sustainable oil palm products. All trading, contract and sales are managed by Global Trade Marketing department at Sime Darby Plantation, HQ and held the palmTrace registration number for respective mill (Sg Dingin Palm Oil Mill: RSPO_PO1000000104	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Sg Dingin POM is not a trading company. Therefore, this requirement is not applicable.	N/A
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	Sime darby Plantation Bhd held RSPO membership number: 2 10008-04-000-00 since 06 September 2004. Company has registered in palmTrace system as follows: Members ID – East Palm Oil Mill: RSPO_PO1000000104. Licensee valid until 11/08/2019 Member category : Oil Mill	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	Processing aids are not used in the milling process.	N/A
<b>5.2 Supply chain model</b>			

5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	The FFB suppliers are of RSPO certified estates which consists of Sg Dingin POM certification unit and outside supplier declassification of the CPO or PK was done in accordance to the correct order.	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Sg Dingin POM only produced MB certified palm product and the sales of product were MB or conventional.	Yes
<b>5.3. Documented Procedures</b>			
5.3.1	<p>The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> </ul>	<p>Procedure for supply chain has been established entitled "Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability" [appendix 15 of the Sustainable Plantation Management System (SPMS)], version 4, dated September 2018.</p> <p>Among the subjects covered in the procedure are</p> <ul style="list-style-type: none"> <li>• Responsibilities</li> <li>• control of documents &amp; records</li> <li>• delivery of FFB from the estate</li> <li>• receiving FFB at the mill</li> <li>• process monitoring</li> <li>• CPO and PK dispatch</li> <li>• Non-conforming products and/or documents</li> <li>• Product claims</li> <li>• Outsourced contractor</li> <li>• Training</li> <li>• Reclassification of mill's supply chain model</li> <li>• Production volume</li> <li>• Conversion factors</li> <li>• Internal audit</li> <li>• Complaints</li> <li>• Management review</li> </ul>	Yes

	<ul style="list-style-type: none"> <li>Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>	<p>Among the records included in the procedures are:</p> <ul style="list-style-type: none"> <li>Weighbridge tickets</li> <li>Dispatch of CPO/PK – weighbridge ticket, delivery order, shipping document</li> <li>Daily production report</li> <li>Record and balance</li> <li>All the records were found to be up-to-date.</li> </ul>	
	<ul style="list-style-type: none"> <li>Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization’s procedures for the implementation of this standard.</li> </ul>	<p>Addressed in the SOP for Sustainable Supply Chain and Traceability, clause 4.0. The assigned persons are the Head of Operating Unit where in this case the Mill Manager. Based on interview, the person in-charge was able to demonstrate the implementation of their procedures in accordance to the standard requirements.</p>	Yes
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<p>Addressed in the SOP for Sustainable Supply Chain and Traceability, clause 17.0. Based on the procedure, the internal audit is to be conducted annually in accordance to Internal Audit Procedure (SD/SDP/PSQM/IAP). CAP process is documented under internal audit procedure, SD/SDP/PSQM/IAP rev:2 dated 1/11/17. The timeline for CAP submission and closure is within 14 days from closing meeting and closure within 60 days for evidence verification by lead auditor.</p>	Yes
	<p>ii) effectively implements and maintains the standard requirements within its organization</p>	<p>Combined internal audit for supply chain was last conducted on 7-11/1/2019 by 4 internal auditor sourced from other department (PSQM). There were 4 major raised (RSPO SCC) as the results of the audit.</p>	Yes
<b>5.4. Purchasing and goods in</b>			

<p>5.4.1</p>	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g. of information available in the DO is as follows:</p> <ul style="list-style-type: none"> <li>• Consignment note no. (203069)</li> <li>• Estate’s names (Padang Buluh Estate – E273)</li> <li>• Date &amp; time of delivery ( 31/1/2019)</li> <li>• Field No. (2000E, 2002A)</li> <li>• No. of bunches (1075 bunches)</li> <li>• Vehicle no. (KDX8677)</li> <li>• Seal no. (054900)</li> <li>• Net weight (19.92 mt)</li> </ul> <p>E.g. of information available in the mill’s weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> <li>• Weighbridge ticket no.:201956</li> <li>• Name of estates (Jentayu – E303)</li> <li>• Field No. (01JA)</li> <li>• Vehicle no. (KDE2826)</li> <li>• Date (17/1/2019)</li> <li>• Total bunches (1328 bunches)</li> <li>• Seal no. (047387, 047388, 047389)</li> <li>• Net weight (23.17 mt)</li> </ul> <p>E.g. of information available in the mill’s weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> <li>• Weighbridge ticket no.:200452</li> <li>• Name of estates (Anak Kulim – E155)</li> <li>• Field No. (2000A, 2001A)</li> <li>• Vehicle no. (JSW8677)</li> <li>• Date (29/12/2018)</li> </ul>	<p>Yes</p>
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		<ul style="list-style-type: none"> <li>• Total bunches (788 bunches)</li> <li>• Seal no. (014400)</li> <li>• Net weight (13.03 mt)</li> </ul> <p>E.g. of information available in the mill's weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> <li>• Weighbridge ticket no.:200548</li> <li>• C/N no: (14864,14866)</li> <li>• Name of estates (Holyrood – E140)</li> <li>• Field No. (2010A, 2010A1, 2010B, 97M)</li> <li>• Vehicle no. (AV900)</li> <li>• Date (31/12/2018)</li> <li>• Total bunches (411 bunches)</li> <li>• Net weight (11.86 mt)</li> </ul> <p>E.g. of information available in the mill's weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> <li>• Weighbridge ticket no.:206264</li> <li>• Name of estates (Tali Ayer – E010)</li> <li>• Field No. (02K2, 2012E)</li> <li>• Vehicle no. (WRK1079)</li> <li>• Date (18/3/2019)</li> <li>• Total bunches (1204 bunches)</li> <li>• Net weight (6.57 mt)</li> </ul>	
	<ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	<p>The information was available in various documents such as delivery order and weighbridge tickets.</p>	
	<ul style="list-style-type: none"> <li>• The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required</li> </ul>	<p>The mill has a list of certified FFB suppliers which has the information about certificate number and validity period. This is</p>	

	to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.	applied to both second and third party FFB suppliers [ref.: clause 7.2 of SOP for Sustainable Supply Chain and Traceability]	
	<ul style="list-style-type: none"> <li>A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (<a href="http://www.rspo.org">www.rspo.org</a>) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.</li> </ul>	A check of the validity of supply chain certification of supplier is done via the list of RSPO Supply Chain Certified sites on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ). Physical RSPO certificate for all diverted crops sent to East Mill, e.g. from SOU2 (Chersonese) was verified. Validity check was done prior to each FFB delivery. Chersonese Oil Mill RSPO 590800 valid until 4/10/2019.	
	<ul style="list-style-type: none"> <li>The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements.</li> </ul>	NA – this part is applicable for supply chain actor after refinery.	
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	<p>Addressed in the SOP clause 10.0 Non-conforming Products and/or Documents. Based on the procedure, where there is contamination of RSPO certified material during receiving, processing, storage and dispatch, the mill shall downgrade the materials in such order: IP to MB to conventional.</p> <p>Material received with insufficient information shall be treated as non-conforming documents. The documents shall be investigated, verified and corrected in order to allow processing of material. Authorization for release shall be by the mill manager.</p>	
<b>5.5. Outsourcing activities</b>			
5.5.1	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with	No bulking facilities outsourced by the mill. Transporter for CPO was assigned by GTM and PK was assigned by buyer.	Yes



	<p>the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>		
5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>	Not applicable. No outsourcing activity.	N/A
	<p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	Not applicable. No outsourcing activity.	N/A
	<p>c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	Not applicable. No outsourcing activity.	N/A
	<p>d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</p>	Not applicable. No outsourcing activity.	N/A
5.5.3	<p>The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.</p>	Not applicable. No outsourcing activity.	N/A

5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	Not applicable. No outsourcing activity.	
<b>5.6. Sales and goods out</b>			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/ delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>Sg Dingin POM ensured the required information is available in document form.</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/ delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); Crude Palm Oil (CPO) RSPO IP</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number;</li> <li>• Available in a few forms e.g. DN no., seal no.</li> </ul> <p>However, no sales of RSPO certified product within the period Apr 18 – Mar 19.</p>	
	<ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	Information is complete and available in various documents such as sales contract, mill weighbridge ticket, delivery note, transporter collection order. However, no sales of RSPO certified product within the period Apr 18 – Mar 19.	
	<ul style="list-style-type: none"> <li>• For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements</li> </ul>	No sales of RSPO certified product within the period Apr 18 – Mar 19.	

	/ Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.		
<b>5.7. Registration of transactions</b>			
5.7.1	Supply chain actors who: <ul style="list-style-type: none"> <li>are mills, traders, crushers and refineries and;</li> <li>take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	The registration of Palm Trace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the Palm Trace.	Yes
5.7.2	The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> <li>Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</li> </ul>	No sales of RSPO certified product within the period Apr 18 – Mar 19.	Yes
	<ul style="list-style-type: none"> <li>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</li> </ul>	Not applicable. Products are not sold beyond refinery.	N/A
	<ul style="list-style-type: none"> <li>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> </ul>	No sales of RSPO certified product within the period Apr 18 – Mar 19.	Yes

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	<ul style="list-style-type: none"> <li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>	No sales of RSPO certified product within the period Apr 18 – Mar 19.	
<b>5.8. Training</b>			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Training plan for 2019 were available which training for RSPO Supply Chain has been included. Training need analysis is done prior to development of training plan.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	<p>Relevant personnel to supply chain implementation as defined by the CU are the personnel that involve in supply chain implementation such as Assistant Managers, staff and weighbridge operators.</p> <p>The latest RSPO training was carried out on 10/4/2019 attended by operating units representative. The refresher training was given by PSQM personnel from HQ.</p>	Yes
<b>5.9. Record Keeping</b>			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date and accessible.	Yes
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	As spelt out in its supply chain procedure, Clause 5.4, records are to be maintained minimum of two years.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	Not applicable. The product of the facility is containing 100% palm oil.	N/A
<b>5.10. Conversion factors</b>			

5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.	Conversion factor of CPO and PK production is depending on the actual OER and KER.	Yes
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Yes
<b>5.11. Claims</b>			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims	Yes
<b>General corporate communications</b>			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Sg Dingin POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc). Thus, this indicator is not applicable	N/A
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address ( <a href="http://www.rspo.org">www.rspo.org</a> ) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO.	Not applicable as no off-product claim made by Sg Dingin POM as to date.	N/A

	e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by Sg Dingin POM as to date.	N/A
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as no off-product claim made by Sg Dingin POM as to date.	N/A
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Sg Dingin POM and verified through document and site review (notice board, business card, shipping documentation, procurement/purchasing document and promotional material etc). Thus, this indicator is not applicable	N/A
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	<b>Yes</b>
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	No sales of RSPO certified product within the period Apr 18 – Mar 19. As per interview with weighbridge operator, she said that the weighbridge ticket will be stated the info i.e: product/commodity with SCC model (Crude Palm Oil RSPO MB) and RSPO certificate number.	<b>Yes</b>
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:	Sg Dingin POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	N/A

	<p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>Sg Dingin POM is producing crude palm product and does not involved in any labelling of end product and the presence of certified palm oil contained within a product. This requirement is for the next supply chain actor and not applicable for POM.</p>	N/A
<b>Business to consumer communication</b>			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.</p>	<p>No business to consumer communication on product specific claim made Sg Dingin POM and only producing crude and unfinished product. This is not applicable for POM.</p>	N/A
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	<p>No business to consumer communication on product specific claim made Sg Dingin POM and only producing crude and unfinished product. This is not applicable for POM.</p>	N/A

6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made Sg Dingin POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made Sg Dingin POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made Sg Dingin POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made Sg Dingin POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made Sg Dingin POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules	No business to consumer communication on product specific claim made Sg Dingin POM and only producing crude and unfinished product. This is not applicable for POM.	N/A



	applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a> .		
<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Sg Dingin POM is producing RSPO MB certified product. Thus, this indicator is not applicable.	N/A
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Sg Dingin POM is producing RSPO MB certified product. Thus, this indicator is not applicable.	N/A
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Sg Dingin POM is producing RSPO MB certified product. Thus, this indicator is not applicable.	N/A
<b>Labelling and trademark (IP)</b>			
	Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.	Sg Dingin POM is producing RSPO MB certified product. Thus, this indicator is not applicable.	N/A
<b>Messaging (IP)</b>			

	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>	<p>Sg Dingin POM is producing RSPO MB certified product. Thus, this indicator is not applicable.</p>	<p>N/A</p>
<p><b>MODULE B – MASS BALANCE SPECIFIC RULES</b></p>			
<p><b>Minimum Mass Balance content (MB)</b></p>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>Sg Dingin POM is producing RSPO MB product and no MB claim made within review of April 2018 to March 2019</p>	<p><b>Yes</b></p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>Sg Dingin POM is producing RSPO MB product and no MB claim made within review of April 2018 to March 2019</p>	<p><b>Yes</b></p>
<p><b>Labelling and trademark (MB)</b></p>			

	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>• The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</li> <li>• The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>• Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</li> <li>• In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications &amp; Claims document.</li> </ul>	<p>Sg Dingin POM is producing RSPO MB product and no MB claim made within review of April 2018 to March 2019</p>	<p><b>Yes</b></p>
<p><b>Messaging (MB)</b></p>			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>• [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain.</li> <li>• The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</li> </ul>	<p>Sg Dingin POM is producing RSPO MB product and no MB claim made within review of April 2018 to March 2019</p>	<p><b>Yes</b></p>

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	<ul style="list-style-type: none"> <li>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</li> </ul>		
	<p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <p>Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</p>	Sg Dingin POM is producing RSPO MB product and no MB claim made within review of April 2018 to March 2019	<b>Yes</b>
<b>MODULE C – PARTIAL PRODUCT CLAIMS</b>			
	<p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p> <ul style="list-style-type: none"> <li>The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO.</li> <li>At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB.</li> <li>The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume.</li> <li>The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'.</li> <li>The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim.</li> </ul>	Sg Dingin POM is producing RSPO MB product and no MB claim made within review of April 2018 to March 2019	<b>Yes</b>
<b>MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES</b>			
	<p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p>	Sg Dingin POM is producing only RSPO MB product with mixture of FFB supplied inputs. Within review period of April 2018 to March 2019, no RSPO MB or partial claim made.	<b>Yes</b>

	75% IP + 20% SG => 95% SG claim is made 65% SG + 30% MB => 95% MB claim is made 55% MB + 40% B&C => 95% partial product claim can be made 45% SG + 55% B&C < 50% B&C claim can be made		
	Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made:  95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made	Sg Dingin POM is producing only RSPO MB product with mixture of FFB supplied inputs. Within review period of April 2018 to March 2019, no RSPO MB or partial claim made..	<b>Yes</b>
<b>5.12. Complaints</b>			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Addressed in Section 18 of the supply chain SOP. Should there be any complaints from stakeholders pertaining supply chain issues, it will be handled through Procedure for External Communication in PQMS SOM Sub-Section 5.5 Appendix 5.5.3.2. There has been no complaint from any third party with regards to supply chain so far. There were feedback from buyer (refinery) and only related to quality of product (high FFA, exceeded PORAM specification)	<b>Yes</b>
<b>5.13. Management Review</b>			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	RSPO SCC management review was last conducted on 12/4/2019. It was chaired by Mill Sr. Manager and attended by mill staff which include AMs, office clerk, store keeper, lab supervisor, quality supervisor and mill supervisor.	<b>Yes</b>
5.13.2	The input to management review shall include information on: <ul style="list-style-type: none"> <li>Results of internal audits covering RSPO Supply Chain Certification Standard.</li> </ul>	Based on the minutes of meeting, the following agendas were adequately recorded: <ul style="list-style-type: none"> <li>Results of internal audits covering RSPO Supply Chain Certification Standard.</li> </ul>	<b>Yes</b>

	<ul style="list-style-type: none"> <li>Customer feedback.</li> <li>Status of preventive and corrective actions.</li> <li>Follow-up actions from management reviews.</li> <li>Changes that could affect the management system.</li> <li>Recommendations for improvement.</li> </ul>	<ul style="list-style-type: none"> <li>Customer feedback.</li> <li>Status of preventive and corrective actions.</li> <li>Follow-up actions from management reviews.</li> <li>Changes that could affect the management system.</li> <li>Recommendations for improvement.</li> </ul>	
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>Improvement of the effectiveness of the management system and its processes.</li> <li>Resource needs.</li> </ul>	<p>Discussion about the improvement of the effectiveness of the management system and its processes, and any resource needs were found to be included in the meeting minute.</p>	<b>Yes</b>

**Appendix E : CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: Mass Balance)**

<b>E.1 Definition</b>			
	<b>Requirement</b>	<b>Evidence</b> For any N/A raised, justification is required.	<b>Compliance</b> (Yes / No or N/A)
E.1.1	<p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Sg Dingin POM received certified FFB and uncertified FFB. Therefore qualifies for the Mass Balance supply chain system and module. During the P&amp;C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p>	Yes
<b>E.2 Explanation</b>			
E.2.1	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&amp;C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>	Yes

	IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.		
E.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	The registration of PalmTrace will be carried out by the Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Company has registered their mill in the PalmTrace:- Members ID – Sg Dingin Oil Mill: RSPO_PO1000000104	Yes
<b>E.3 Documented procedures</b>			
E.3.1	The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a. Complete and up to date procedures covering the implementation of all the elements in these requirements;	SOP for Sustainable Supply Chain and Traceability, Issue No:3, Dated Feb 2018 which covered control of documents and records, delivery of FFB from the estate, receiving FFB at the mill, process monitoring, CPO and PK despatch, non-conforming material/product, product claims, production volume, conversion factor, internal audit, outsourced contractor, training, reclassification of mill's supply chain model, complaints and management review.	Yes
	b. The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.	SOP for Sustainable Supply Chain and Traceability, Issue No:3, Dated February 2018 has identified every responsible personal who involved in the implementation RSPO Supply Chain Certification.  The mill manager and assistant manager have awareness of the supply chain system. During interview with mill assistant manager, he had explained that he has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.	Yes

E.3.2	The site shall have documented procedures for receiving and processing certifies an non-certified FFBS.	SOP for Sustainable Supply Chain and Traceability, Issue No:3, Dated Feb 2018 which covered control of documents and records, delivery of FFB from the estate, receiving FFB at the mill, process monitoring, CPO and PK despatch, non-conforming material/product, outsourced contractor, training, reclassification of mill's supply chain model and production volume.	Yes
<b>E.4 Purchasing and goods in</b>			
E.4.1	The site shall verify and document the volumes of certified and non-certified FFBS received.	<p>The daily records are prepared at the entry point at the weighbridge.</p> <p>When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill. Daily summary and monthly summary documented for all the certified FFB.</p> <p>E.g. of information available in the DO is as follows:</p> <ul style="list-style-type: none"> <li>• Consignment note no. (203069)</li> <li>• Estate's names (Padang Buluh Estate – E273)</li> <li>• Date &amp; time of delivery ( 31/1/2019)</li> <li>• Field No. (2000E, 2002A)</li> <li>• No. of bunches (1075 bunches)</li> <li>• Vehicle no. (KDX8677)</li> <li>• Seal no. (054900)</li> <li>• Net weight (19.92 mt)</li> </ul>	Yes



		<p>E.g. of information available in the mill’s weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> <li>• Weighbridge ticket no.:201956</li> <li>• Name of estates (Jentayu – E303)</li> <li>• Field No. (01JA)</li> <li>• Vehicle no. (KDE2826)</li> <li>• Date (17/1/2019)</li> <li>• Total bunches (1328 bunches)</li> <li>• Seal no. (047387, 047388, 047389)</li> <li>• Net weight (23.17 mt)</li> </ul> <p>E.g. of information available in the mill’s weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> <li>• Weighbridge ticket no.:200452</li> <li>• Name of estates (Anak Kulim – E155)</li> <li>• Field No. (2000A, 2001A)</li> <li>• Vehicle no. (JSW8677)</li> <li>• Date (29/12/2018)</li> <li>• Total bunches (788 bunches)</li> <li>• Seal no. (014400)</li> <li>• Net weight (13.03 mt)</li> </ul> <p>E.g. of information available in the mill’s weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> <li>• Weighbridge ticket no.:200548</li> <li>• C/N no: (14864,14866)</li> <li>• Name of estates (Holyrood – E140)</li> <li>• Field No. (2010A, 2010A1, 2010B, 97M)</li> <li>• Vehicle no. (AV900)</li> <li>• Date (31/12/2018)</li> </ul>	
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		<ul style="list-style-type: none"> <li>Total bunches (411 bunches)</li> <li>Net weight (11.86 mt)</li> </ul> <p>E.g. of information available in the mill’s weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> <li>Weighbridge ticket no.:206264</li> <li>Name of estates (Tali Ayer – E010)</li> <li>Field No. (02K2, 2012E)</li> <li>Vehicle no. (WRK1079)</li> <li>Date (18/3/2019)</li> <li>Total bunches (1204 bunches)</li> <li>Net weight (6.57 mt)</li> </ul>	
E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The management has inform CB on overproduction of certified tonnage. They aware on the overproduction as per stated in the procedure.	Yes
<b>E.5 Record keeping</b>			
E.5.1	a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis by RSPO.	<p>Sg Dingin Palm Oil Mill has established SOP for Sustainable Supply Chain and Traceability, Issue No:3, Dated February 2018.</p> <p>Sg Dingin POM ensured the required information is available in document form.</p> <ul style="list-style-type: none"> <li>The name and address of the buyer;</li> <li>The name and address of the seller;</li> <li>The loading or shipment/ delivery date;</li> <li>The date on which the documents were issued;</li> <li>A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> </ul>	Yes

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		<p>Crude Palm Oil (CPO) RSPO IP</p> <ul style="list-style-type: none"> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number;</li> <li>• Available in a few forms e.g. DN no., seal no.</li> </ul> <p>However, no sales of RSPO certified product within the period Apr 18 – Mar 19.</p>	
	b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated	Computerized system in place with the delivery deducted accordingly.	Yes
	c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.) For further details refer to Module C.	The Mill aware that only positive stock can be delivered. No short selling.	Yes
E.5.2	In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement	No outsourcing activities.	N/A



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**Supply Chain Declaration** *(Applicable For Appendix E)*

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit (April 2018 to March 2019)</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	Apr 18	17,901.29	6,120.66	24,021.95
2	May 18	17,789.12	5,265.64	23,054.76
3	June 18	18,409.74	4,501.38	22,911.12
4	July 18	18,907.92	5,800.45	24,708.37
5	Aug 18	21,083.79	6,468.12	27,551.91
6	Sept 18	22,953.25	7,103.06	30,056.31
7	Oct 18	23,587.60	6,132.49	29,720.09
8	Nov 18	23,745.00	6,701.28	30,446.28
9	Dec 18	25,800.45	6,465.65	32,266.1
10	Jan 19	25,362.58	8,918.40	34,280.98
11	Feb 19	20,766.44	8,880.96	29,647.4
12	Mar 19	19,248.92	8,447.47	27,696.39
	Total	255,556.1	80,805.56	336,361.66

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	Apr 18	3,857.25	967.93
2	May 18	3,812.68	977.99
3	June 18	4,070.97	962.82
4	July 18	4,077.94	1,011.96
5	Aug 18	4,650.69	1,172.21
6	Sept 18	4,996.31	1,293.64
7	Oct 18	5,000.52	1,291.33
8	Nov 18	5,122.09	1,288.21
9	Dec 18	5,496.59	1,405.29
10	Jan 19	5,397.35	1,525.23
11	Feb 19	4,376.35	1,288.65
12	Mar 19	4,068.73	1,177.93
	Total	54,927.47	14,363.19

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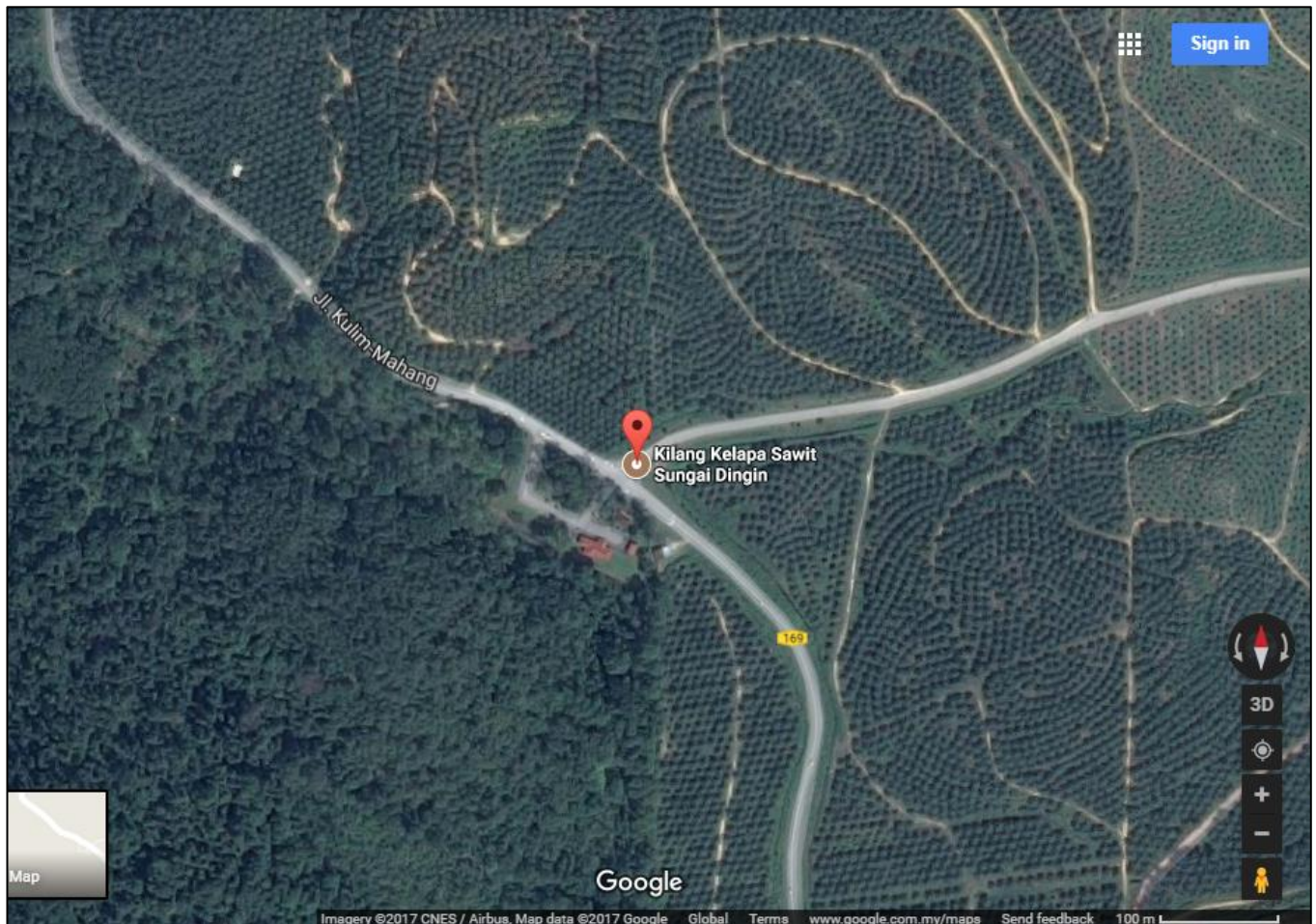
<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
Nil				

<b>D. Records of CPO &amp; PK Sold under other schemes to Buyers since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
Nil				

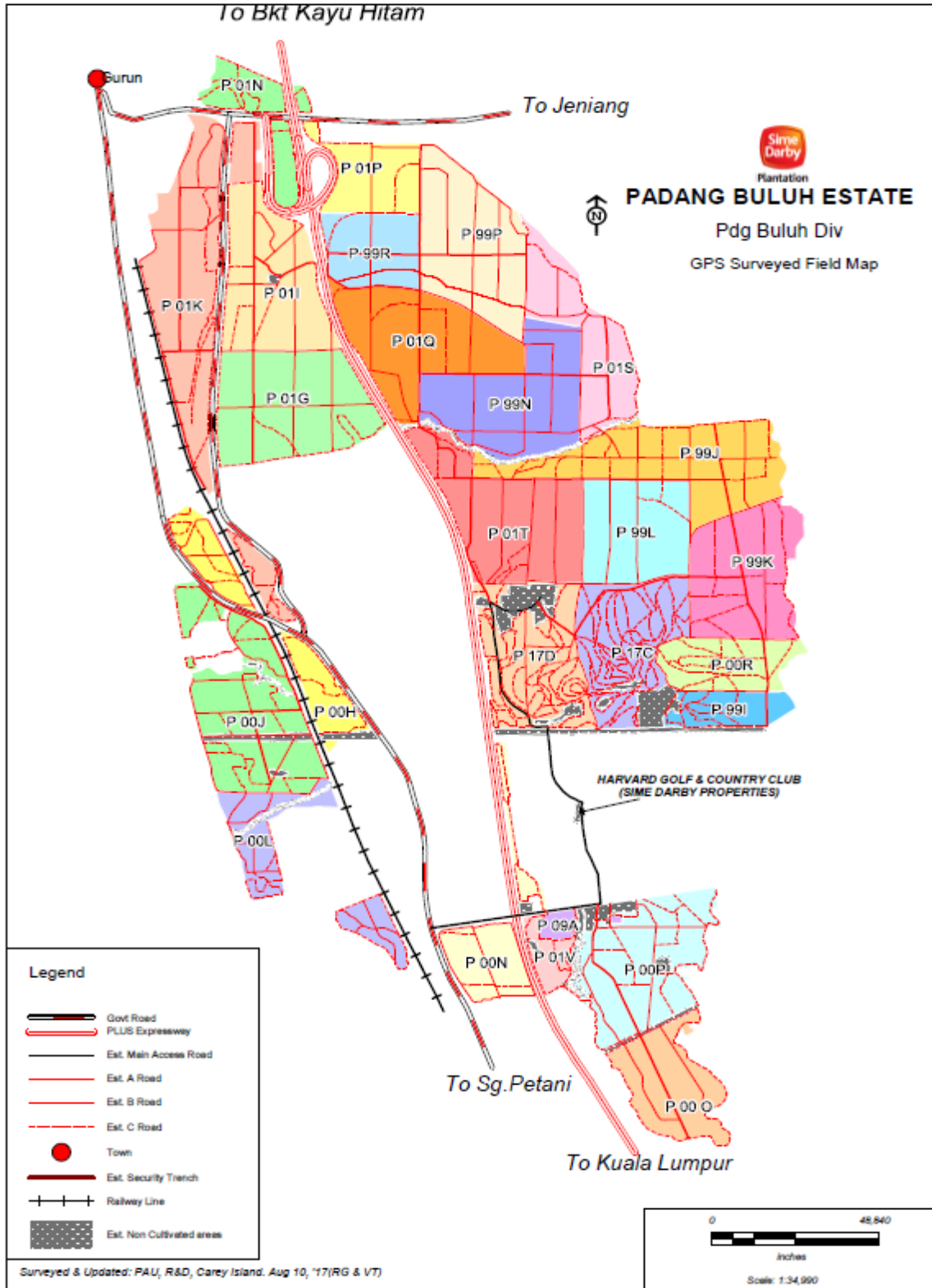
<b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (if any)</b>				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	A	1,192.38	0	
2	B	719.62	0	
3	C	3,644.22	0	
4	D	639.40	0	
5	E	2,687.53	0	
6	F	39,947.44	0	
7	G	4,289.41	0	
8	H	0	1,530.12	
9	I	0	5,892.30	
10	J	0	199.8	
11	K	0	1,449.72	
12	L	0	5,128.06	
	Total	53,120	14,200	

<b>F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)</b>			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
Nil			

**Appendix F: Location Map of Sungai Dingin Palm Oil Mill and Supply bases**

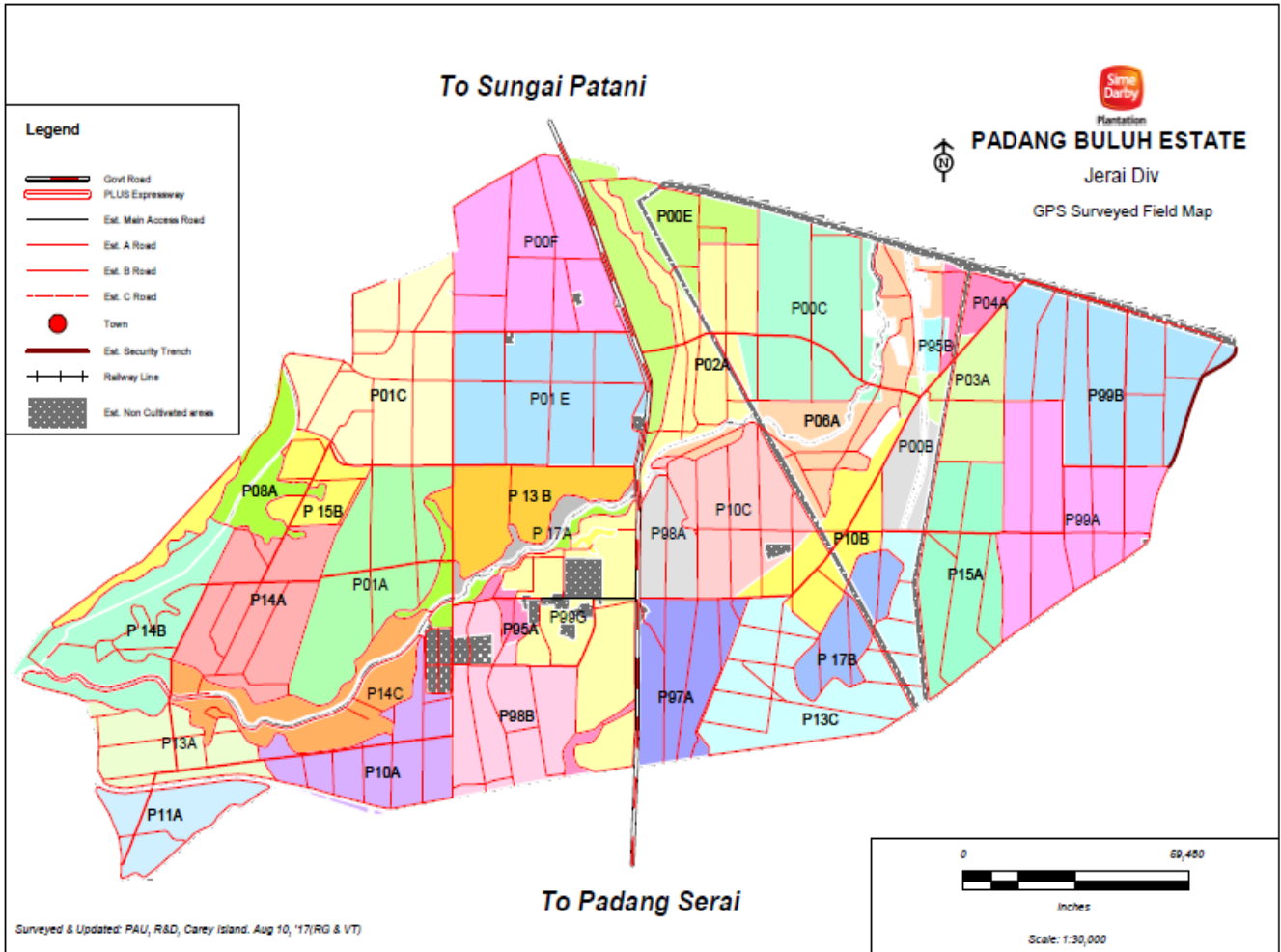


**Appendix G: Padang Buloh Estate Field Map (main division)**

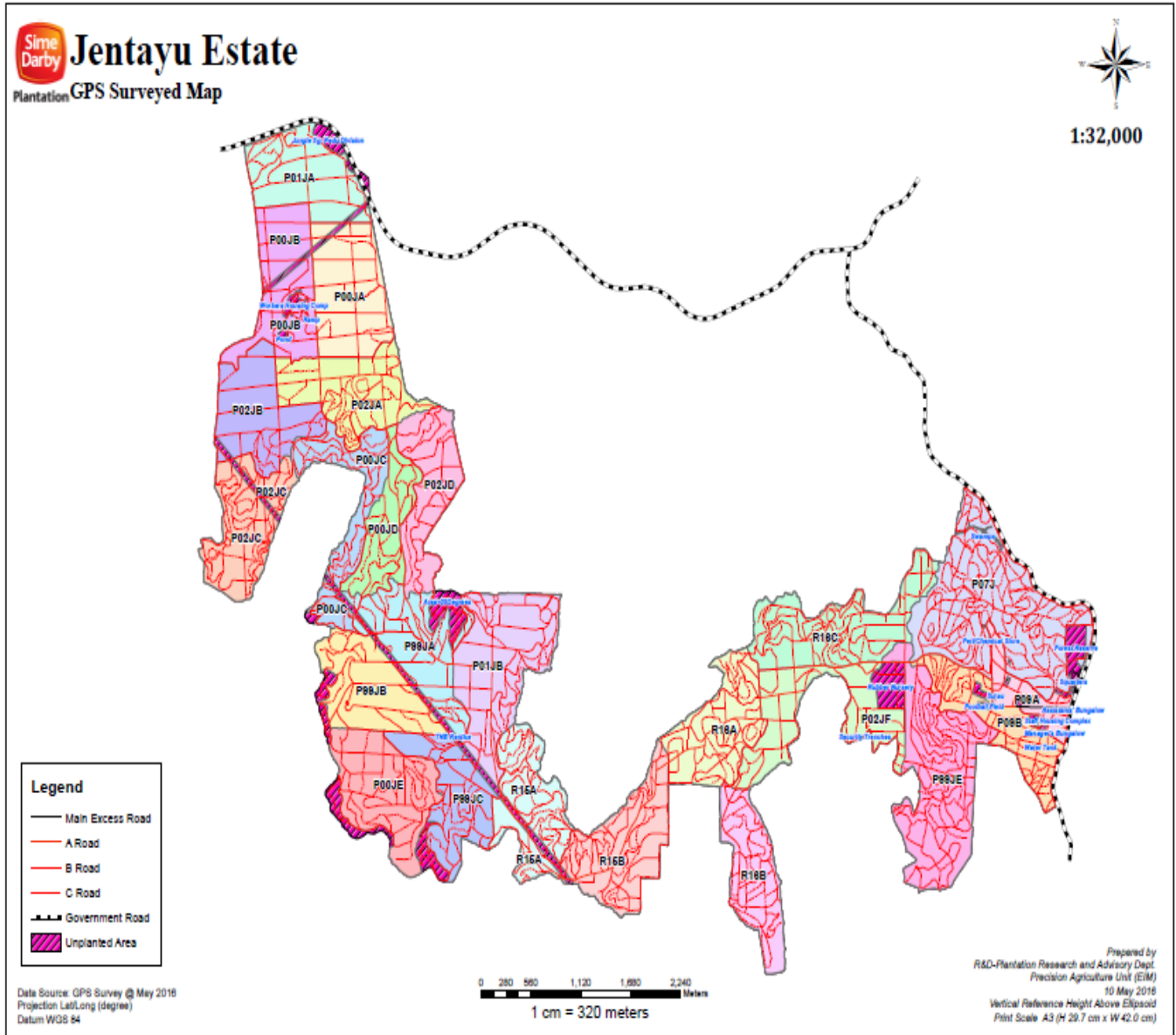




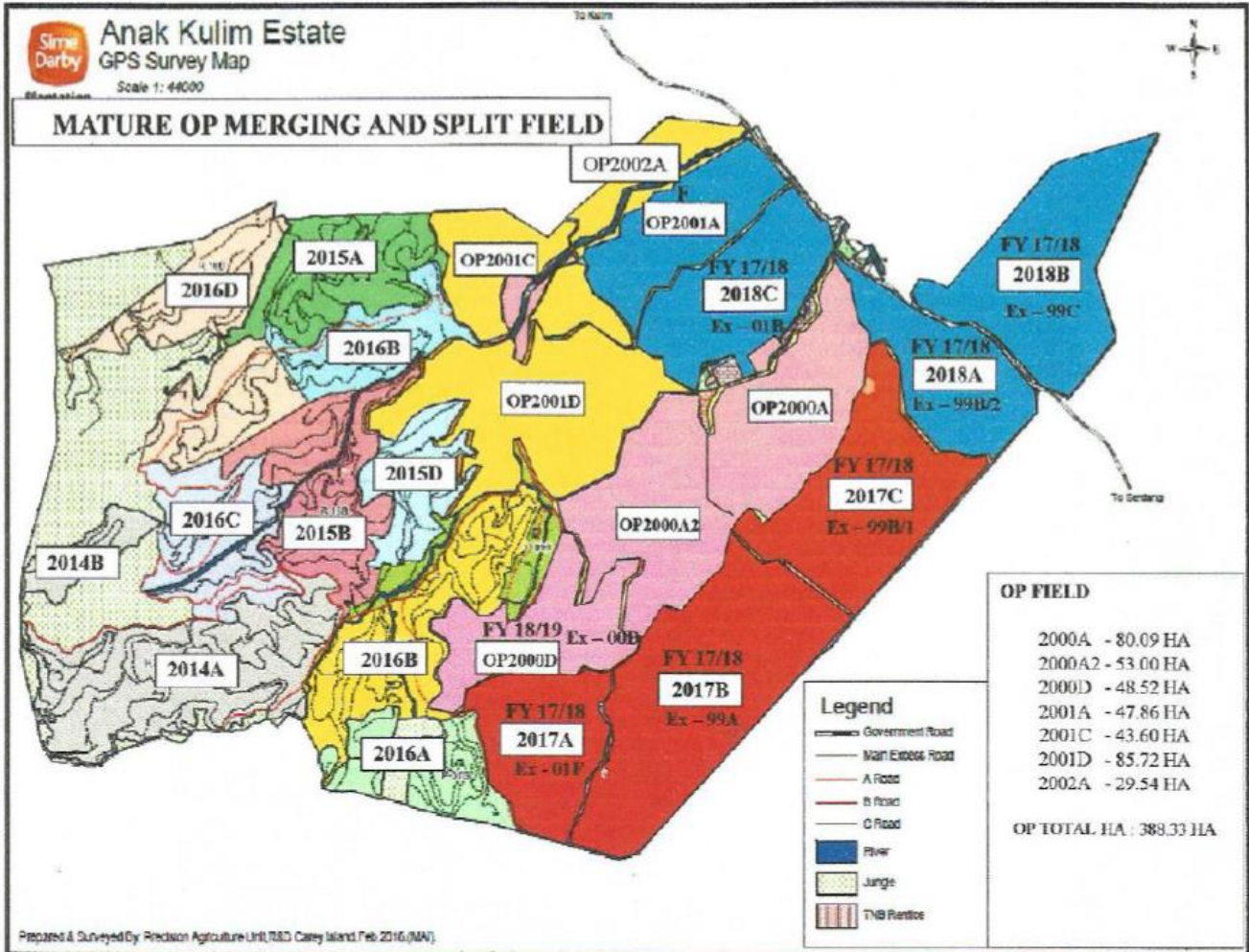
**Jerai Division**



**Appendix H: Jentayu Estate Field Map**



**Appendix I: Anak Kulim Estate Field Map**



**Appendix J: List of Smallholder Sampled** *(If applicable – scheme/associated/group certification)*

## Appendix K: List of Abbreviations

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