

**RSPO PRINCIPLE AND CRITERIA –
3rd ANNUAL SURVEILLANCE ASSESSMENT (ASA1_3)
Public Summary Report**

Sime Darby Plantation Berhad
Head Office: Level 3A, Main Block, Plantation Tower No. 2, Jalan PJU 1A/7 47301 Ara Damansara Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 3) Elphil Palm Oil Mill Location of Certification Unit: Batu 6, Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput Perak, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	06/09/2004
Parent Company Name	Sime Darby Plantation Berhad		
Address	Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia		
Subsidiary (Certification Unit Name)	Strategic Operating Unit (SOU 3) - Elphil Palm Oil Mill		
Address	Batu 6, Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput, Perak, Malaysia		
Contact Name	Mdm. Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mr. Muhammad Irsan Azmi (Mill Manager)		
Website	www.simedarbyplantation.com	E-mail	Kks.elphil@simedarbyplantation.com
Telephone	+603-78484379 (Head Office) +605-5940178 (Mill)	Facsimile	+603-78484356 (Head Office) +605 5940167 (Mill)

2. Certification Information			
Certificate Number	RSPO 550180	Date of First Certification	18/06/2011
		Certificate Start Date	18/06/2016
		Certificate Expiry Date	17/06/2021
Scope of Certification	Palm Oil and Palm Kernel Production		
Applicable Standards	RSPO P&C MY-NI 2014; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E – Mass Balance)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 705885	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3	BSI Services Malaysia Sdn. Bhd.	23/03/2023
MSPO 705883	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4		23/03/2023

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4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Longitude	Latitude
Elphil Palm Oil Mill	Elphil Palm Oil Mill, Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput, Perak, Malaysia	101° 5' 37" E	4° 53' 24" N
Elphil Estate	Elphil Palm Oil Mill, Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput, Perak	101° 5' 37" E	4° 53' 24" N
Kamuning Estate	Ladang Elphil, Jalan Lintang 31100 Sungai Siput, Perak	101° 3' 35" E	4° 50' 41" N
Kinta Kellas Estate	Ladang Kamuning/Changkat Salak 31100 Sungai Siput, Perak	101° 4' 59" E	4° 28' 00" N

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Elphil Estate	1661.98	26.42	208.50	1896.90	88.00
Kamuning Estate	2643.00	84.59	350.84	3078.43	85.87
Kinta Kellas Estate	962.76	*3.69	95.48	1061.93	90.66
Total	5267.74	114.70	**654.82	6037.26	87.21

* Based on the HCV report version Feb 2019- the HCV area at Kinta Kellas is 3.69 HA which is 2.83HA (river reserve 'Sg Raya') and water catchment area is 0.86HA)

**Rubber areas are excluded

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Elphil Estate	402.71	234.86	706.78	259.77	57.86	1259.27	402.71
Kamuning Estate	441.00	558.00	1564.00	80.00	0.00	2202.00	441.00
Kinta Kellas Estate	107.37	281.07	545.62	28.70	0.00	855.39	107.37
Total (ha)	950.08	1073.93	2816.4	368.47	57.86	4316.66	951.08

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7. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (June 2018-May 2019)	Actual (March 2018-Jan 2019)	Forecast (June 2019-May 2019)
Elphil Estate	31,435.00	26,670.73	31,400
Kamuning Estate	44,100.00	27,307.84	45,600
Kinta Kellas Estate	16,550.00	16,403.39	20,500
Total	92,085.00	70,381.96	97,500

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (June 2018-May 2019)	Actual (March 2018-January 2019)	Forecast (June 2019-May 2019)
N/A			
Total			

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Estate	Tonnage / year		
	Estimated (June 2018-May 2019)	Actual (March 2018-January 2019)	Forecast (June 2019-May 2019)
XXXXX		130,935.34	
Total		130,935.34	

10. Certified Tonnage			
	Estimated (June 2018-May 2019)	Actual (Mar 2018-Jan 2019)	Forecast (June 2019-May 2019)
	Mill Capacity: 45 MT/hr	FFB	FFB
	92,085.00	70,381.96	97,500
SCC Model:	CPO (OER: 21.00%)	CPO (OER: 20.26%)	CPO (OER: 21.54%)
MB	19,337.85	14,262.56	21,002
	PK (KER: 5.50%)	PK (KER: 5.53%)	PK (KER: 5.26%)
	5,064.67	3,893.28	5,128.50

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11. Actual Sold Volume (CPO) <i>June 18- Jan 19</i>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	440	-	-	10,250.91	10,690.61

12. Actual Sold Volume (PK) <i>June 18- Jan 19</i>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	-	-	-	2,720.54	2,720.54

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	n/a	n/a
IS-CSPKO	n/a	n/a
IS-CSPKE	n/a	n/a

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
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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 annual surveillance assessment was conducted from 19-22/02/2019. 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 Major NC close out on-site assessment was conducted on 07/05/2019. The audit programmes are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. 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.

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Elphil Palm Oil Mill	✓	✓	✓	✓	✓
Elphil Estate		✓	✓	✓	✓
Kamuning Estate	✓		✓	✓	✓
Kinta Kellas Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: March 13, 2020 - 16 March 2020

Total No. of Mandays: 13 mandays (including 1 day for mill - SC audit)

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Mohd Hafiz Mat Hussain (HH)	Team Leader	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, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2016. He had been involved in RSPO auditing since May 2013 within Malaysia, Papua New Guinea, Solomon Islands, Gabon and Liberia. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation.
Hu Ning Shing (HNS)	Team Member	She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social, legal and workers & stakeholders consultation. She is fluent in Bahasa Malaysia and English languages.
Amir Bahari (AB)	Team Member	He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, workers consultation and occupational safety & health. He is fluent in both verbal/written in Bahasa Malaysia and English.
Mohamed Hidhir Zainal Abidin (MH)	Team Member	He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of supply chain.

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Accompanying Persons:

No.	Name	Role
	N/A	

2.3 Assessment Plan

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

Date	Time	Subjects	HH	AB	HNS	MH
Tuesday, 19/2/2019	09:00-09:30	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). Verification on previous audit findings 	√	√	√	-
	09:30-12:30	Elphil POM 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.	√	√	√	-
	10:00–12:30	Meeting with stakeholders (Government, village rep,smallholders, Union Leader, contractor etc.)	-	-	√	-
	12:30–13:30	LUNCH				
	13:30–16:30	Elphil POM: Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√	-
	16:30–17:00	Interim Closing Briefing	√	√	√	-
Wednesday, 20/2/2019 Kamuning Estate	09:00-12:30	Kamuning Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√	-
	10:00–12:30	Meeting with stakeholders for Kamuning Estate (Government, village rep,smallholders, Union Leader, contractor etc.)	-	-	√	-
	12:30–13:30	LUNCH				

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Date	Time	Subjects	HH	AB	HNS	MH
	13:30–15:30	Kamuning Estate 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	√	√	√	-
Thursday, 21/2/2019	09:00-12:30	Elphil Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√	-
	10:00–12:30	Meeting with stakeholders for Elphil Estate (Government, village rep,smallholders, Union Leader, contractor etc.)	-	-	√	-
	12:30–13:30	LUNCH				
	13:30–15:30	Elphil Estate 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	√	√	√	-
Friday, 22/2/2019	09:00–12:30	Kinta Kelas Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√	-
	10:00–12:00	Meeting with stakeholders for Kinta Kelas Estate (Government, village rep,smallholders, Union Leader, contractor etc.)	-	-	√	-
	12:00–14:00	LUNCH/FRIDAY PRAYER				
	14:00–15:30	Kinta Kelas Estate 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).	√	√	√	-
	15:30-16:00	Verify any outstanding issues & Preparation for closing meeting	√	√	√	-
	16:00-17:00	Closing Meeting	√	√	√	-
Thursday, 21/2/2019	09:00–12:30	RSPO Supply Chain for Elphil POM General Chain of custody: Element 5.1 – 5.13	-	-	-	√
	12:30–13:30	LUNCH				

Date	Time	Subjects	HH	AB	HNS	MH
Elphil POM	13:30-16:30	RSPO Supply Chain for Elphil POM CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: <i>Mass Balance</i>	-	-	-	√
	16:30-17:00	Interim Closing Briefing	-	-	-	√

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. Sime Darby has decided to surrender the area to the government. The negotiation process is still ongoing.	Yes
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. Sime Darby has decided to re-audit on 1 st quarter of 2019.	Yes

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<p>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>	<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. Audt was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1st quarter of 2019.</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 & 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.</p>	<p>Yes</p>
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Sime Darby Plantation's time bound plan for certification is initially 3 years, starting 2008-2011. SDP has had all its SOUs (Malaysian & Indonesian) completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2011, all Malaysian SOUs have been RSPO certified (with the exception of 2 new oil mills commissioned to replace the current oil mills after the initial timebound plan targets). The 2 new mills have been RSPO Certified 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> <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.</p>	<p>Yes</p>

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	<p>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, http://www.rspo.org/members/dispute-settlement-facility/status-of-disputes#007</p>	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No lapses.	Yes
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No.	Yes
Have there been any stakeholder comments?	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.	Yes
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	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).	Yes
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	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. Audit was premature terminated and postponed to a later date in 2019. Sime Darby has decided to re-audit on 1 st quarter of 2019. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress. *Note: RSPO NPP Announcements for SDP can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?	Yes

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<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&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 https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. 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;">SIME DARBY PLANTATION: LUCA SUBMISSION TIMELINE</p> <table border="1" data-bbox="727 568 1321 1070"> <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></td></tr> <tr><td>7.</td><td>PT Paripurna Swakarsa</td><td>Submitted on 29 Sept 2017</td><td></td></tr> <tr><td>8.</td><td>PT Sime Indo Agro</td><td>Submitted on 10 Nov 2017</td><td></td></tr> <tr><td>9.</td><td>PT Bhumireksa Nusa Sejati</td><td>Submitted on 12 Dec 2017</td><td></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><td></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><td></td></tr> <tr><td>12.</td><td>PT Bahari Gembira Ria</td><td>Submitted on 29 Dec 2017</td><td rowspan="8">Shapefiles to be submitted to RSPO by 17 Aug 2018</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		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	Shapefiles to be submitted to RSPO by 17 Aug 2018	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&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&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?	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 3rd Annual Surveillance Assessment there were two (2) Major nonconformities raised. The Elphil 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																
NCR Ref #	1744213-201902-M1	Clause & Category (Major / Minor)	Indicator 2.1.1 Major													
Date Issued	22/02/2019	Due Date	22/05/2019													
Closed (Yes / No)	Yes	Date of nonconformity Closure	07/05/2019													
Statement of Nonconformity:	Evidence of compliance with the relevant legal requirements was insufficient.															
Requirement Reference:	Evidence of compliance with relevant legal requirements shall be available.															
Objective Evidence:	<p>Elphil POM:</p> <p>The 1st stack sampling for new boiler chimney was not conducted for 2018.</p> <p>Document reviewed on the OT Request/ Approval Form for July 2018 and January 2019 in the POM found that workers have worked exceeded 130 hours of overtime for that particular month. The management also admitted that the workers have worked more than the allowable limit due to workers' shortage.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Employee number</th> <th>Total hours of overtime</th> </tr> </thead> <tbody> <tr> <td rowspan="2">July 2018</td> <td>132890</td> <td>177 hours</td> </tr> <tr> <td>141387</td> <td>181.5 hours</td> </tr> <tr> <td rowspan="2">Jan 2019</td> <td>120219</td> <td>222 hours</td> </tr> <tr> <td>133146</td> <td>144.5 hours</td> </tr> </tbody> </table>			Month	Employee number	Total hours of overtime	July 2018	132890	177 hours	141387	181.5 hours	Jan 2019	120219	222 hours	133146	144.5 hours
Month	Employee number	Total hours of overtime														
July 2018	132890	177 hours														
	141387	181.5 hours														
Jan 2019	120219	222 hours														
	133146	144.5 hours														
Corrections:	<p>Stack sampling issue</p> <p>1). To get quotation and arrange for sampling in March 2019</p> <p>2) Alternate scheduled between boiler no.1 and no.2 (quarterly) 3). Scheduled for boiler no.2 (Jan-March, July-Sept) Scheduled for boiler no.1 (April-Jun, Oct-Dec), provided the boiler running.</p> <p>Overtime issue</p> <p>1) To get more man power.</p> <p>2) To train additional workers top learn more than 1 station.</p>															

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	Briefing to respective contractor of the Minimum Wages Order 2016 and contractor to get mutual understanding letter between SDP and the contractor.
Root Cause Analysis:	<ul style="list-style-type: none"> i) Miscommunication on the legal requirement for both of boiler as the boiler running on alternate basis. ii) Shortage of manpower for during high crop season. iii) The contractor unaware to the Minimum Wages Order 2016.
Corrective Actions:	<p>Stack sampling issue.</p> <ul style="list-style-type: none"> 1). Quotation already obtained for stack monitoring from Environmental Science Sdn.Bhd for boiler no.2 stack monitoring. 2). Scheduled for boiler no.2 (Jan-March, July-Sept) Scheduled for boiler no.1 (April-Jun, Oct-Dec), provided the boiler running. <p>OT issue</p> <ul style="list-style-type: none"> 1). Interview conducted to employ new workers by march 2019. 2). Shuffle workers in six month period for them to learn new station and available to cover workers who may be on leave. <p>The agreement between SDP and the contractor with new rate will be effective from Jan 2019</p> <p>Major NC close out verification: The following evidence verified:</p> <ul style="list-style-type: none"> - Stack sampling for boiler no.2, PK PMD 80023 was carried out on 13/3/19. Refer to report ref: L-PG-AC1903CSD-0270. - Based on overtime summary report/mill attendance summary report, CKRRD005 from March 2019 to April 2019, the maximum overtime is 130 hours. No recurrence of issue noted. - 6 new employees were hired from March to April 2019 to cater shortage of manpower for operation. Based on employee master listing report, ZCKKLM04 total of 79 as at 7/5/19. - New agreement with the new rate was sighted for 2 contract workers, date signed 7/5/19. - Briefing to relevant contractors on the implementation of minimum wages (amendment 2018) and employment act was done on 12/3/19
Assessment Conclusion:	Based on the above evidence, the major NC is closed effectively on 7/5/19. Continuous implementation will be further verified in the next assessment.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1744213-201902-M2	Clause & Category (Major / Minor)	Indicator 6.5.2 Major
Date Issued	22/02/2019	Due Date	22/05/2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	07/05/2019
Statement of Nonconformity:	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.) were not implement effectively.		
Requirement Reference:	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.		
Objective Evidence:	<p>Elphil POM: The POM has also engaged contractor to supply skill workers to work in the workshop. Seen the employment contract signed between the contractor and the workers. However, the terms and conditions as below were not properly stated in the contract:</p> <p>a. Notice of Period b. Termination of service by the employee c. Clause 7: Overtime on Rest Day or Public Holiday: Salary x 2.0</p> <p>Elphil Estate: The employment contracts for the contractor’s workers sighted where Clause 4.1 stated daily rate of pay is RM 38.40 per day which is not accordance to Minimum Wage Order 2016.</p>		
Corrections:	<p>1). To liaise with Majumech for a new contract agreement with the mentioned details between them and the workers. 2). Briefing to respective contractor of the Minimum Wages Order 2016</p>		
Root Cause Analysis:	The contractor unaware on the detail of the Employment Contract Act 1955 and few requirement is not stated inside workers employment contract.		
Corrective Actions:	<p>1).To contact Majumerch for a improved contract agreement with the mentioned details 2).The contractor will payback of the short pay to the workers by March 2019.</p> <p>Major NC close out verification: The following evidences checked: - The new employment contract was verified for Majumech and Sri As Puspah and has included all required terms and conditions. - Short payment summary was noted for 18 workers and paid accordingly. - Briefing to relevant contractors on the implementation of minimum wages (amendment 2018) and employment act was done on 12/3/19</p>		
Assessment Conclusion:	Based on the above evidence, the major NC is closed effectively on 7/5/19. Continuous implementation will be further verified in the next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	The estates in the midst of introducing mechanized spraying to improve coverage with reduced manning
PF 2	A container namely palm card introduced to keep harvesting knife while in transportation for safety enhancement
PF 3	A non conductor material pole for the harvester to eliminate the risk of electricity contact
PF 4	A mechanised harvesting cutter "Palm King" being introduced to enhance harvesting operation with reduces force.

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity			
NCR Ref #	1606941-201802-M1	Clause & Category (Major / Minor)	SCCS E.5.1 Major
Closed (Yes / No)	Yes	Date of nonconformity Closure	14/05/2018
Statement of Nonconformity:	The delivery/dispatch of RSPO certified PK from the mill was more than the available stock.		
Requirement Reference:	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.		
Objective Evidence:	Based on the quarterly record and balance (RSPO records for oil mills) for year 2017, the following were found: First quarter – delivery/dispatch of RSPO certified PK was 16% more than stock Third quarter – delivery/dispatch of RSPO certified PK was 2% more than stock		
Corrective Actions:	To ensure consistent implementation of mass new balance sheet, monthly check on SCC requirement will conducted by onsite PSQM representative. The SCC component will be incorporated in the monthly PSQM-ESH report to HQ.		
Assessment Conclusion:	ASA1_3 verification: The new mass balance template was used to monitor RSPO certified FFB and deliveries of RSPO certified CPO and PK on three monthly basis. Based on balance sheet closing stock 31 st January 2019, positive stock recorded for CPO and PK. Based on the evidence sighted including plan established, the CAP confirmed to be effective and no recurrence of issue found. Hence, the major NC remained close.		

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Non-Conformity			
NCR Ref #	1606941-201802-N1	Clause & Category (Major / Minor)	Indicator 6.8.3 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	22/02/2019
Statement of Nonconformity:	The process of recruitment in origin country by the agents was not clear to ensure it complies with Sime Darby Plantations Berhad’s procedure.		
Requirement Reference:	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.		
Objective Evidence:	It is stated in the employment contract that all the transportation cost, permit, levy and passport fee will be beared by the company. Cross-checking with the management have confirmed that they have paid all the cost and verified in the New Workers Allocation Cost summary, where agent fee, air fare cost and etc were beared by the company. However during interviews with some of the workers in Elphil Estate (Employee No.: 132419, 138361, 137762 and 132414) from India and Indonesia, it is found that they paid an amount of money (RM 1000 – 4000) to the agents for passport, permit, transportation cost and etc. Thus, the process of recruitment in origin country by the agent was not clear to ensure they follow to the Workforce Management Unit Liaison & Recruitment (LR) Procedure where the worker do not require to pay any cost for the recruitment as it paid by the company.		
Corrective Actions:	To include the information on the above during the recruitment of workers at source country by Workers’ Management Unit (WMU)		
Assessment Conclusion:	<p>ASA1_3 verification:</p> <p>Workers’ Management Unit (WMU) developed a Recruitment presentation slides that briefed the workers on the recruitment fees, benefits and culture of Malaysia during induction and distributed to the operating unit. Elphil Estate’s management has conducted induction training with the new presentation slides and seen the last batch of induction training was conducted on 1/12/2018. Attendance list and training slides were sighted. Besides, the employment contract has stated the costs that will bear by the company was also briefed to the workers during induction training. In additional, for the existing workers, the management has briefed on 16/2/2019 regarding the recruitment process and fees bear by the company during morning muster. The company has also signed on the Demand Letter with the agents in the source of country which has detail the cost that they are allow to collect from the workers. Interviewed with new workers confirmed that they were briefed on the new presentation slides.</p> <p>The implementation of the corrective action was found effective and the minor non-conformity was closed on 21/2/2019.</p>		

Non-Conformity			
NCR Ref #	1606941-201802-N2	Clause & Category (Major / Minor)	Indicator 5.1.2 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	22/02/2019
Statement of Nonconformity:	A comprehensive management plan with timetable for change was not developed and effectively implemented.		
Requirement Reference:	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.		
Objective Evidence:	Environmental management plan @ pollution preventive plan for 2018 did not include significant environmental impact mitigation for: Noise pollution – noise boundary monitoring plan POME solid waste disposal – geo-tube and conventional method of disposal Air emission – Compliance toward Clean Air Regulation 2014. Fire incident – fire incident caused by stakeholder.		
Corrective Actions:	To train periodically and evaluate the competency of trainee.		
Assessment Conclusion:	<p>ASA1_3 verification:</p> <p>Elphil POM has established the Environmental Management Plan and was review annually by the Environmental Performance Monitoring Committee. Sighted the minutes of EPMC meeting no 01/2019 dated 4/1/2019 and 06/2018 dated 25/9/2018. The management plan stated the issue of concern, mitigating measures, person responsible and monitoring period.</p> <p><u>Kamuning Estate</u> The Environmental Management plan was reviewed annually. Latest review was conducted on 2/1/2019.</p> <p><u>Elphil Estate</u> Environmental Management Plan was reviewed annually. Latest review was conducted on 22/1/2019.</p> <p>Thus, the minor NC raised during previous assessment was closed on 21/2/2019.</p>		

Non-Conformity			
NCR Ref #	1606941-201802-N3	Clause & Category (Major / Minor)	Indicator 5.6.1 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	22/02/2019
Statement of Nonconformity:	Monitoring system with reporting on progress for these significant pollutants and emissions from estate and mill operations was not regularly updated.		
Requirement Reference:	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.		
Objective Evidence:	Elphil POM Management Unit Palm GHG for 2017 was not made available for verification during audit.		
Corrective Actions:	To ensure the timeline of PalmGHG submission is according to external audit date		
Assessment Conclusion:	ASA1_3 verification:		

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	<p>The management had summarize the GHG for 2018 using PalmGHG Calculation. The detail as per Appendix C. The data were verified accordingly during the audit.</p> <p>Thus, the minor NC raised during previous assessment was closed on 21/2/2019.</p>
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Opportunity for Improvement	
OFI#	Description
OFI 1	N/A
OFI 2	
OFI 3	

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1306204M1 – 5.2.2	Major	5.2.2	24/3/2016	Closed out on 7/6/2016
1306204M2 – 6.5.2	Major	6.5.2	24/3/2016	Closed out on 19/5/2016
1306204N1 – 4.3.2	Minor	4.3.2	24/3/2016	Closed out on 23/03/2017
1306204N2 – 4.4.1	Minor	4.4.1	24/3/2016	Closed out on 23/03/2017
1306204N3 – 4.7.5	Minor	4.7.5	24/3/2016	Closed out on 23/03/2017
1306204N4 – 6.6.2	Minor	6.6.2	24/3/2016	Closed out on 23/03/2017
1453612-201703-M1	Major	4.7.1	23/03/2017	Closed out on 09/05/2017
1453612-201703-M2	Major	4.7.2	23/03/2017	Closed out on 09/05/2017
1453612-201703-M3	Major	4.7.5	23/03/2017	Closed out on 09/05/2017
1453612-201703-M4	Major	4.4.2	23/03/2017	Closed out on 09/05/2017
1453612-201703-M5	Major	5.1.1	23/03/2017	Closed out on 09/05/2017
1453612-201703-M6	Major	5.3.2	23/03/2017	Closed out on 09/05/2017
1453612-201703-M7	Major	6.3.1	23/03/2017	Closed out on 09/05/2017
1453612-201703-M8	Major	6.5.2	23/03/2017	Closed out on 09/05/2017
1453612-201703-M9	Major	2.1.1	23/03/2017	Closed out on 09/05/2017
1453612-201703-N1	Minor	4.7.3	23/03/2017	Closed out on 13/03/2018
1453612-201703-N2	Minor	4.7.6	23/03/2017	Closed out on 13/03/2018
1453612-201703-N3	Minor	5.3.3	23/03/2017	Closed out on 13/03/2018
1453612-201703-N4	Minor	6.9.3	23/03/2017	Closed out on 13/03/2018
1453612-201703-N5	Minor	6.10.3	23/03/2017	Closed out on 13/03/2018
1606941-201802-M1	Major	SCCS E.5.1	15/03/2018	Closed out on 14/5/2018
1606941-201802-N1	Minor	6.8.3	15/03/2018	Closed out on 22/02/2019
1606941-201802-N2	Minor	5.1.2	15/03/2018	Closed out on 22/02/2019
1606941-201802-N3	Minor	5.6.1	15/03/2018	Closed out on 22/02/2019
1744213-201902-M1	Major	2.1.1	22/02/2019	Closed out on 07/05/2019
1744213-201902-M2	Major	6.5.2	22/02/2019	Closed out on 07/05/2019

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 Elphil Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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


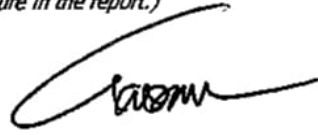
Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their 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.

List of Stakeholders Contacted	
Internal Stakeholders Managers and Assistants Mill & Estate Male Mill Staff/Workers Female Mill Staff/Workers Foreign Worker Male and Female Estate workers Workers Representatives	Union/Contractors/Local Communities Sundry Shop Owner Contractor
Government Departments -Nil-	NGO -Nil-

IS #	Description
1	Feedbacks: Contractors – They have good relationship with the management. Agreement was signed and payments were made promptly. Management Responses: Noted and management will ensure payment will make promptly. Audit Team Findings: No other issue.
2	Feedbacks: Workers (NUPW Representatives, Different Nationalities Representatives) – They informed that the management was treated them equally. Pay and conditions was accordance to the legal requirements. They are allowing to join Union freely without any restriction. They are aware of the complaint procedure. Workers in Elphil Estate has requested the management to carry out pest control (especially ants) at the workers’ housing area. Management Responses: The management noted and will continue to treat all the workers fairly. Elphil Estate’s management has intention to carry out and waiting for the quotation from the contractor. Audit Team Findings: This will be further verified during next assessment in Elphil Estate.

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<p>3</p>	<p>Feedbacks: Female Workers – They informed that they were treated equally without any discrimination. They are aware of the Gender Committee and informed that no case of sexual harassment and violence reported.</p> <p>Management Responses: The management will monitor to ensure no case of sexual harassment and violence happen.</p> <p>Audit Team Findings: No further issue.</p>
<p>4</p>	<p>Feedbacks: Sundry Shop Owner – She informed that the management did not entertain her complaints such as case of broken in, old building of shop and termites attacked at the doors. She reported verbally many times to the management but no action has been taken. Therefore, she covered the wall with zinc films to prevent broken in again.</p> <p>Management Responses: The management informed that they have informed the owner to formally write in request letter but yet to receive yet.</p> <p>Audit Team Findings: The management has immediately conducted meeting with the owner on 20/2/2019 and explained the process of how to lodge complaint and has initiate action for the said issues above. This will be further verified by the auditor during next assessment.</p>

Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Elphil Palm Oil Mill Certification Unit 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 Elphil Palm Oil Mill Certification Unit is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mohd Hafiz Mat Hussain	Name: Jayaganesh Dharmeseelan
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: Sime Darby Plantation Berhad
Title: Lead auditor	Title: SOU Chairman
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 14/05/2019	Date: 28/5/2019

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Commitment to Transparency			
Criterion 1.1: 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 -	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Publicly available documents such as land title, OSH plan, HCV documents, negotiation procedure, complaint records, RSPO public summary reports, EIA, Management Plans & Continuous Improvement Plans and company policies are available.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance -	Mill management has maintained request and response records and sampled one of the request email from DOSH to request for SOP. The Mill Assistant has responded the email with the SOP requested. Request and response letter and email was sighted in Kamuning Estate. For eg: <i>Jabatan Perangkaan</i> has requested the management to provide survey of manpower and salary for every quarter. The management has responded to the request accordingly.	Complied
Criterion 1.2: 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.			

Criterion / Indicator		Assessment Findings	Compliance
1.2.1	Publicly available documents shall include, but are not necessary limited to: <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). - Major compliance -	<p>There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. Sime Darby Plantations Sdn Bhd continued to use the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans was made available at all operating units. Procedure for complaints and grievances were available through Sime Darby Plantations Sdn Bhd website and http://www.simedarbyplantation.com.</p> <p>Besides all the policies were available at the website as well as displayed at the notice board in the office area and muster ground notice boards for stakeholders to be viewed.</p>	Complied
Criteria 1.3: 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 -	Sime Darby Plantation Berhad has implemented Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The policy was developed in Bahasa Malaysia and English. The policy has been briefed to all the workers on 28/1/2019 in Elphil POM, 15/2/2019 in Kamuning Estate and 19/1/2019 in Kinta Kellas Estate.	Complied
Principle 2: Compliance with applicable laws and regulations			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			

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<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>SOU3 had 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. SOU3 had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were:</p> <p>Elphil POM</p> <ol style="list-style-type: none"> 1. Certificate of Fitness for Water Tube Boiler (PK PMD 745) Air receiver tank (PK PMT 3875), Steriliser (PK PMT 3875), Steriliser (PK PMT 3879), Deaerator Storage Tank (PK PMT 4100)Deaerator Header (PK PMT 4102) valid until 22/2/2019. The inspection for new boiler was done on 3/12/2018. The certificate of fitness yet to be received. The payment was done accordingly to DOSH on 13/2/2019. 2. MPOB license: 540132004000 (validity until 31/05/2019) 3. DOE License: 001845 (validity until 30/6/2019) 4. Energy commission license: 012050/2018 dated 19/12/2018 (validity 1 year) 5. CePSWaM cert no: CePSWaM/183345 valid until 21/2/2019 6. CePPOME cert no: CePPOME/194064 valid until 18/4/2019 7. Electrical Chargeman: PJ-T-4-B-2259-1996 8. Engine driver: PK56/2001 and PK64/2002 Grade 1 9. Steam Engineer: 050/2013, Grade 1 <p>Kamuning Estate</p> <ol style="list-style-type: none"> 1. Certificate of Fitness for air receiver (PK PMT 5556 and PK PMT 5555) valid until 7/6/2019. 2. MPOB license: 524393002000 (validity until 31/10/2019) 2435ha 3. MPOB license: 524034002000 (validity until 30/9/2019) 2018ha 4. MPOB license (nursery): 55418011000 (validity until 29/2/2020) 5. Diesel permit: P(A000006-KKS) and P(A000005-KKS), validity until 18/2/2020 	<p>Major nonconformance</p>
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		<p>Elphil Estate</p> <ol style="list-style-type: none"> 1. Certificate of Fitness for air receiver (PK PMT 5693, PK PMT 5694 and PK PMT 6619) valid until 23/12/2019 2. MPOB license: 529849002000 (validity until 31/05/2019) 1896.91ha 3. Diesel permit: A031158, A031159 and A031160 (validity until 21/11/2019) <p>Kinta Kellas Estate</p> <ol style="list-style-type: none"> 1. Certificate of Fitness for air receiver (PK PMT 951) valid until 28/4/2019 2. MPOB license: 528648002000 (validity until 31/3/2019) 1061.93ha 3. Diesel permit: A036286 (validity until 17/7/2019) <p>Sime Darby Plantation Sdn Bhd has obtained approval from <i>Jabatan Tenaga Kerja Semenanjung Malaysia</i> as below:</p> <ol style="list-style-type: none"> a. Ref. No.: BHG.PU/9/134 JLD 9(11) dated 27/3/2017 for overtime 130 hours per month. b. Ref. No.: BHG.PU/9/129 JLD 33(53) dated 6/7/2017 for deduction of salary for electricity. <p>Elphil POM: However, document reviewed on the OT Request/ Approval Form for July 2018 and January 2019 in the POM found that workers have worked exceeded 130 hours of overtime for that particular month. The management also admitted that the workers have worked more than the allowable limit due to workers' shortage.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Employee No.</th> <th>Total Hours of Overtime</th> </tr> </thead> <tbody> <tr> <td rowspan="2">July 2018</td> <td>132890</td> <td>177 hours</td> </tr> <tr> <td>141387</td> <td>181.5 hours</td> </tr> <tr> <td rowspan="2">January 2019</td> <td>120219</td> <td>222 hours</td> </tr> <tr> <td>133146</td> <td>144.5 hours</td> </tr> </tbody> </table> <p>Elphil Estate:</p>	Month	Employee No.	Total Hours of Overtime	July 2018	132890	177 hours	141387	181.5 hours	January 2019	120219	222 hours	133146	144.5 hours	
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January 2019	120219	222 hours														
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Criterion / Indicator	Assessment Findings	Compliance
	<p>In Elphil Estate, there was one contractor that supplied workers for EFB mulching at mature field and spraying, EFB mulching P&D and removing creepers in immature field (Sri XXXX Enterprise). Sampled the payslip from November 2018 to January 2019 found that the daily rate of the pay was not accordance to Minimum Wage Order 2016 and Minimum Wage Order 2018. The workers were paid RM 38.40 before January 2019 and RM 40.00 on January 2019. Supposed the workers to get RM 38.46/ day before January 2019 and RM 42.31/ day started from January 2019. Interviewed with the contractor confirmed that he paid RM 40.00/ day for workers since January 2019 due to the price offered by the management was low. Total 15 payslips on November 2018, 13 payslips on December 2018 and 14 payslips on January 2019 were sighted.</p> <p>The 1st sampling for stack was not conducted for 2018 at Elphil POM.</p> <p>Thus, a major non-conformance was raised.</p>	

Criterion / Indicator		Assessment Findings	Compliance
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	<p>SOU3 had documented the Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment.</p> <p>Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.</p> <p>Evaluation of the legal requirements and compliance status with legal requirement are monitored by the operating units.</p> <p>Elphil POM – Latest evaluation was done on 8/2/2019. Kamuning Estate – Latest review was done on 4/1/2019 Elphil Estate – Latest review was done on 9/2/2019 Kinta Kellas Estate – Latest review was done on 28/1/2019</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	<p>A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units. PSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance. Refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.</p> <p>Evaluation of the legal requirements and compliance status with legal requirement are monitored by the operating units.</p> <p>Elphil POM – Latest review was done on 28/1/2019. Kamuning Estate – Latest review was done on 4/1/2019 Elphil Estate – Latest review was done on 9/2/2019 Kinta Kellas Estate – Latest review was done on 28/1/2019</p>	Complied
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	<p>Tracking system to identify changes in the relevant regulations is available through the head office, website information and is communicated from the Group Head Office.</p> <p>On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operation. Tracking system on any changes in the law had been well implemented.</p>	Complied
<p>Criterion 2.2: 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.</p>			

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>All the estates and mill under the Elphil CU-SOU 3 operated under a legal ownership of land tenure. The details of the documents as shown below.</p> <table border="1"> <thead> <tr> <th></th> <th>OU</th> <th>No hak milik</th> <th>Lot no</th> <th>Plan No</th> <th>Ref</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Elphil POM</td> <td>45690</td> <td>1195</td> <td>127</td> <td>PTG.PK 6/10-150(A)</td> </tr> <tr> <td>2</td> <td>Elphil</td> <td>82499</td> <td>18737</td> <td>448</td> <td>SJK(K)-SIME-PK-13</td> </tr> <tr> <td></td> <td></td> <td>47063</td> <td>1191a</td> <td>448</td> <td>SJK(K)-SIME-PK-13</td> </tr> <tr> <td></td> <td></td> <td>45680</td> <td>18271</td> <td>448</td> <td>SJK(K)-SIME-PK-13</td> </tr> <tr> <td>3</td> <td>K Kelas</td> <td>2242</td> <td>2257</td> <td>D-158</td> <td>PTG.PK.5-8SJ3</td> </tr> <tr> <td></td> <td></td> <td>150883</td> <td>3074</td> <td>D-158</td> <td>PTG.PK.5-8SJ3</td> </tr> <tr> <td></td> <td></td> <td>150181</td> <td>16792</td> <td>D-158</td> <td>PTG.PK.5-8SJ3</td> </tr> <tr> <td>4</td> <td>Kamuning</td> <td>12937</td> <td>6418</td> <td>53426</td> <td>PTG.PK3/10/45A</td> </tr> <tr> <td></td> <td></td> <td>12935</td> <td>6462</td> <td>53426</td> <td>PTG.PK3/10/45A</td> </tr> <tr> <td></td> <td></td> <td>12944</td> <td>6463</td> <td>53426</td> <td>PTG.PK3/10/45A</td> </tr> </tbody> </table> <p>All the estates had multiple of land titles, records of which were sighted and shown above on partial.</p>						OU	No hak milik	Lot no	Plan No	Ref	1	Elphil POM	45690	1195	127	PTG.PK 6/10-150(A)	2	Elphil	82499	18737	448	SJK(K)-SIME-PK-13			47063	1191a	448	SJK(K)-SIME-PK-13			45680	18271	448	SJK(K)-SIME-PK-13	3	K Kelas	2242	2257	D-158	PTG.PK.5-8SJ3			150883	3074	D-158	PTG.PK.5-8SJ3			150181	16792	D-158	PTG.PK.5-8SJ3	4	Kamuning	12937	6418	53426	PTG.PK3/10/45A			12935	6462	53426	PTG.PK3/10/45A			12944	6463	53426	PTG.PK3/10/45A	Complied
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Criterion / Indicator		Assessment Findings	Compliance												
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	<p>All the audited units have boundary stone/markers adjacent to forest reserves/neighbouring properties. This is indicated in “GPS Surveyed Map” and verified at site. The areas visited are as follows;</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Boundary details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Elphil</td> <td>P1998G- PDRM Sg Siput Residences</td> </tr> <tr> <td>2</td> <td>K Kelas</td> <td>PR2017A – Kg Seri Jaya</td> </tr> <tr> <td>3</td> <td>Kamuning</td> <td>P2000D - Government road</td> </tr> </tbody> </table> <p>Fencing parameters are established around the mill building complex to separate the management boundary of estate and the mill. The housing and other recreational facilities are also maintained separately under different management of the host estate and the mill</p>		Estate	Boundary details	1	Elphil	P1998G- PDRM Sg Siput Residences	2	K Kelas	PR2017A – Kg Seri Jaya	3	Kamuning	P2000D - Government road	Complied
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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 -	There is no land dispute in SOU 3 Elphil operating unit at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified. Interviewed with the neighbouring villagers and smallholders confirmed that no encroachment of land by the company. Trenches and boundary stones were in place to demarcate the boundaries.	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 dispute in SOU 3 Elphil operating unit at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified. Interviewed with the neighbouring villagers and smallholders confirmed that no encroachment of land by the company. Trenches and boundary stones were in place to demarcate the boundaries.	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 dispute in SOU 3 Elphil operating unit at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified. Interviewed with the neighbouring villagers and smallholders confirmed that no encroachment of land by the company. Trenches and boundary stones were in place to demarcate the boundaries.	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 dispute in SOU 3 Elphil operating unit at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified. Interviewed with the neighbouring villagers and smallholders confirmed that no encroachment of land by the company. Trenches and boundary stones were in place to demarcate the boundaries.	Complied
Criterion 2.3:			
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 -	There is no land dispute in SOU 3 Elphil operating unit at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified. Interviewed with the neighbouring villagers and smallholders confirmed that no encroachment of land by the company. Trenches and boundary stones were in place to demarcate the boundaries.	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 -	There is no land dispute in SOU 3 Elphil operating unit at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified. Interviewed with the neighbouring villagers and smallholders confirmed that no encroachment of land by the company. Trenches and boundary stones were in place to demarcate the boundaries.	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 -	There is no land dispute in SOU 3 Elphil operating unit at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified. Interviewed with the neighbouring villagers and smallholders confirmed that no encroachment of land by the company. Trenches and boundary stones were in place to demarcate the boundaries.	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 -	There is no land dispute in SOU 3 Elphil operating unit at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified. Interviewed with the neighbouring villagers and smallholders confirmed that no encroachment of land by the company. Trenches and boundary stones were in place to demarcate the boundaries.	Complied

Criterion / Indicator	Assessment Findings	Compliance
Principle 3: Commitment to long-term economic and financial viability		
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.		

Criterion / Indicator	Assessment Findings	Compliance
<p>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 -</p>	<p>The mill has a business plan prepared annually in the form of year budget and the projection for 5 years prepared as guidance for future planning. The business plan among others contains;</p> <ul style="list-style-type: none"> a) FFB yield & CPO production forecast b) Extraction Ratios – OER / KER, c) Cost of production d) EVIT running accounts e) CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses. <p>Similarly, all the three estates audited possessed a similar budget format. Inclusive there is also a 5-year budget/forecast financial plan 2018-2022 allocating categories among others;</p> <ul style="list-style-type: none"> a) Crop yielding area b) Mature cost c) General charges/upkeep/collection/depreciation d) Cost/ha & cost /mt FFB e) CAPEX <p>Separately the cost of immature areas is also shown which among others comprises of the following items;</p> <ul style="list-style-type: none"> a) Labour statement / Allocation of wages / Labour benefit summary b) Yield statement oil palm c) Summary of vehicle and running schedule / Job allocation for vehicles d) Summary of workshop running schedule e) Summary of budget f) Summary of general charges g) CAPEX <p>The five years planning horizon 2019-2023 is available.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance																												
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 -	<p>The replanting program for the three estates is compiled as follows. The program is reviewable on an annual basis which is subject for amendment where deemed necessary by the higher management. All figures in Hectares otherwise stated.</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Elphil</th> <th>K Kelas</th> <th>Kamuning</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>221.93</td> <td>0</td> <td>95</td> </tr> <tr> <td>2020</td> <td>0</td> <td>71.04</td> <td>145</td> </tr> <tr> <td>2021</td> <td>149.25</td> <td>58.64</td> <td>140</td> </tr> <tr> <td>2022</td> <td>61.70</td> <td>57.70</td> <td>136</td> </tr> <tr> <td>2023</td> <td>112.99</td> <td>111.31</td> <td>133</td> </tr> <tr> <td>2024</td> <td>127.08</td> <td>84.67</td> <td>151</td> </tr> </tbody> </table>	Year	Elphil	K Kelas	Kamuning	2019	221.93	0	95	2020	0	71.04	145	2021	149.25	58.64	140	2022	61.70	57.70	136	2023	112.99	111.31	133	2024	127.08	84.67	151	Complied
Year	Elphil	K Kelas	Kamuning																												
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Principle 4: Use of appropriate best practices by growers and millers																															
Criterion 4.1:																															
Operating procedures are appropriately documented, consistently implemented and monitored.																															

Criterion / Indicator		Assessment Findings	Compliance
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	<p>Elphil CU SOU 3 adopted the following manuals / guidelines for the day-to day operations of the estates and mill. It includes the operation activities in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. The SOPs for the Mill include the operation activities from the FFB receipt, grading, processing, quality analysis, effluent management, water treatment and dispatch of CPO & PK.</p> <p>The estates followed the guidelines of the following documents.</p> <ul style="list-style-type: none"> a) Agriculture Reference Manual (ARM) dated 01/07/11. b) Estate Quality Management System (EQMS) Manual dated 01/11/08, c) Safety Standard Operating Procedures (SSOP) dated 25/2/15, <p>Similarly the mill adopted the following manuals</p> <ul style="list-style-type: none"> a) MQMS - Mill Quality Mgmt System dated 1/11/18 b) MQM – Mill Quality Mgmt SOM & SOP dated 1/11/08 c) SPMS – Sustainability Plantation Mgmt System dated revised on 1/6/16 <p>In common both the estates and mill used the following manual and SOPs</p> <ul style="list-style-type: none"> a) Sustainable Plantation Management System Manual (SPMS), b) Guidelines on River Management” Manual, c) ESH Management System Manual dated 01/07/2012, d) Occupational Safety and Health Manual dated 03/03/2008, e) Pictorial Safety Standards and Security Guidelines (PSS). <p>The procedures as documented in the Agriculture Reference Manual were disseminated to the staff/workers through morning briefings and trainings. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. Field inspection and interviews with the workers confirmed that the SOPs had been implemented and they understood the requirements of the SOPs.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	The mechanisms to check the implementation of procedures were carried out through internal audit, safety and health meeting and routine inspection (workplace inspection) by assistant manager, staff and hospital assistant. In addition, a team QA (quality assurance) from HQ has conducted quarterly monitoring regarding on quality of implementation procedure such as loose fruit collection, harvested bunch left and unharvested bunches, Safe working condition, mechanization etc. sighted the report from this team "Structured Crop Recover Assessment (SCRA) During the site visit at both estates/mill all workers were in proper PPE i.e. helmet, gloves, mask, apron, sickle cover, internal management for the estates also implemented daily inspection vehicle (farm tractor) to monitor there was no leakage and missing bolt from tractor or vehicle tyres. The mill produces daily production report having details i.e. FFB processed, ramp balance, CPO/CPK stock lab results, downtime and throughput figures among others. ,	Complied
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	The monitoring of the SOP implementation was closely made by the all levels of the supervisory personnel with records maintained and checked. Among others the records are; <ul style="list-style-type: none"> a) Daily production/work records for the core activities at the estates b) field cost book, c) chemical consumption record d) mature/immature field work program - fertilizer application, - herbicide spraying, - rat baiting , - Harvesting and collection of FFB. The mill monitors the performance through the daily production report having details i.e. FFB processed, ramp balance, CPO/CPK stock lab results, downtime and throughput figures among others. These performances were summarised in a monthly report and annually. All the above records were kept for a minimum period of 12 months.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	Elphil POM records all the origin of the 3 rd party crop. The OCP FFB attributed to approximately 65-70% of the total crop received adopting the mass balance supply chain system.	Complied
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	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. - Minor compliance -	<p>Elphil CU continued to manage and improve soil fertility to a level that ensures optimal and sustained yield by monitoring the fertilizer inputs through annual fertilizer applications. The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents;</p> <ul style="list-style-type: none"> a) EQMS chapter B8 - Leguminous Cover Crops b) EQMS chapter B14 – Manuring c) ARM Section 8 – Manuring <p>The process of the fertilizer application follows a flow chart Fertilizer application, which was of utmost importance for maintenance of soil commencing from an agronomist visit for a leaf sampling to determine the level of nutrient therein. Thereafter the calculation will be made for an input of fertilizer to maintain/improve the nutrient at the desired level. Estates will use this input for the entire requirement in the field identified.</p>	Complied

<p>4.2.2</p>	<p>Records of fertiliser inputs shall be maintained. - Minor compliance -</p>	<p>Fertiliser application program was monitored using records among others as described below;</p> <ul style="list-style-type: none"> a) program sheets, bin cards, b) Field cost book, fertiliser application monitoring forms, etc. c) Reconciliation of empty bags versus the issuance. <p>Records of programs and applications of fertilisers were reviewed by auditors. Review of the records showed that the actual fertilisers applied in 2018 were in line with the program.</p> <table border="1" data-bbox="981 651 1760 922"> <thead> <tr> <th colspan="4">Elphil Estate</th> </tr> <tr> <th></th> <th>Field no</th> <th>Type</th> <th>Dosage</th> <th>Month</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>P99L</td> <td>RP</td> <td>1.00</td> <td>Dec 18</td> </tr> <tr> <td></td> <td></td> <td>AC</td> <td>1.50</td> <td>Mac-Apr18</td> </tr> <tr> <td></td> <td></td> <td>MOP</td> <td>1.50</td> <td>Mac-Apr 18</td> </tr> <tr> <td>2</td> <td>P12A</td> <td>RP</td> <td>1.50</td> <td>Dec 18</td> </tr> <tr> <td></td> <td></td> <td>AC</td> <td>1.25</td> <td>Mac-Apr18</td> </tr> <tr> <td></td> <td></td> <td>MOP</td> <td>1.25</td> <td>Mac-Apr 18</td> </tr> </tbody> </table> <table border="1" data-bbox="981 954 1760 1161"> <thead> <tr> <th colspan="4">Kinta Kelas Estate</th> </tr> <tr> <th></th> <th>Field no</th> <th>Type</th> <th>Dosage</th> <th>Month</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>P1999</td> <td>AC</td> <td>1.50</td> <td>Feb</td> </tr> <tr> <td>2</td> <td>2016A</td> <td>Borate</td> <td>0.10</td> <td>Oct</td> </tr> <tr> <td></td> <td></td> <td>Kieserite</td> <td>1.00</td> <td>Oct</td> </tr> <tr> <td></td> <td>P2014</td> <td>MOP</td> <td>2.00</td> <td>Sept</td> </tr> </tbody> </table> <table border="1" data-bbox="981 1161 1760 1394"> <thead> <tr> <th colspan="4">Kamuning Estate</th> </tr> <tr> <th></th> <th>Field no</th> <th>Type</th> <th>Dosage</th> <th>Month</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2000D</td> <td>AC</td> <td>1.7</td> <td>July/Aug</td> </tr> <tr> <td></td> <td></td> <td>Kieserite</td> <td>1.25</td> <td>Nov</td> </tr> <tr> <td></td> <td></td> <td>RP</td> <td>1.00</td> <td>Jan 19</td> </tr> <tr> <td>2</td> <td>2005A</td> <td>AC</td> <td>1.70</td> <td>July/Aug</td> </tr> <tr> <td></td> <td></td> <td>Kieserite</td> <td>1.00</td> <td>Nov</td> </tr> </tbody> </table>	Elphil Estate					Field no	Type	Dosage	Month	1	P99L	RP	1.00	Dec 18			AC	1.50	Mac-Apr18			MOP	1.50	Mac-Apr 18	2	P12A	RP	1.50	Dec 18			AC	1.25	Mac-Apr18			MOP	1.25	Mac-Apr 18	Kinta Kelas Estate					Field no	Type	Dosage	Month	1	P1999	AC	1.50	Feb	2	2016A	Borate	0.10	Oct			Kieserite	1.00	Oct		P2014	MOP	2.00	Sept	Kamuning Estate					Field no	Type	Dosage	Month	1	2000D	AC	1.7	July/Aug			Kieserite	1.25	Nov			RP	1.00	Jan 19	2	2005A	AC	1.70	July/Aug			Kieserite	1.00	Nov	<p>Complied</p>
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4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	<p>Periodic tissue and soil sampling were carried out in the Estates CU to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. Soil samplings are made on a 5 year cycle to detect the following analysis.</p> <ul style="list-style-type: none"> a) PH, Carbon b) Total N, P, K, Ca, Mg, Na <p>Elphil Estate conducted recent soil analysis in Dec 2018, Kinta Kelas estate analysis was on 4/12/18 whilst Kemuning made on July 2016. The foliar analysis by Sime Darby Plantations Research Centre were carried out to facilitate the 2019 fertilizer programme</p> <ul style="list-style-type: none"> a) 21-22/2/18 for Elphil Estate b) 13/2/18 for K Kelas Estate c) 15/5/18 for Kemuning Estate 				Complied	

Criterion / Indicator		Assessment Findings	Compliance																				
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>The EFB application records are as follows. Effluent application was confined to <i>Elphil Estate</i> being the nearest to the effluent pond. Method of application through flat beds and furrows into field no P 1998L</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>mt (entire 2018)</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Elphil</td> <td>20160.80</td> <td>1076.27</td> </tr> <tr> <td>2</td> <td>K Kelas</td> <td>2012A – 106.07 mt</td> <td>134.13 (<i>Partial</i>)</td> </tr> <tr> <td>3</td> <td>Kamuning</td> <td>P01B – 20.55</td> <td>54</td> </tr> <tr> <td></td> <td></td> <td>P00B- 47 ha</td> <td>47</td> </tr> </tbody> </table> <p>Guidelines for EFB application adopted by the estates i.e. mature 25mt/ha. Immature at 20mt/ha.</p>		Estate	mt (entire 2018)	Ha	1	Elphil	20160.80	1076.27	2	K Kelas	2012A – 106.07 mt	134.13 (<i>Partial</i>)	3	Kamuning	P01B – 20.55	54			P00B- 47 ha	47	Complied
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<p>Criterion 4.3: Practices minimise and control erosion and degradation of soils.</p>																							

<p>4.3.1</p>	<p>Maps of any fragile soils shall be available. - Major compliance -</p>	<p>The soil series for the 3 estates comprises of the following. Soil maps are prepared by SDP <i>Research And Advisory Dept (Precision Agriculture Unit)</i>. Respective dates of map preparation was recorded;</p> <table border="1" data-bbox="994 491 1608 927"> <thead> <tr> <th colspan="4">Kamuning Estate – source dated May 2016</th> </tr> <tr> <th></th> <th>Soil type</th> <th></th> <th>Soil type</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bungor</td> <td>9</td> <td>Muncong</td> </tr> <tr> <td>2</td> <td>Durian</td> <td>10</td> <td>Munchong shallow</td> </tr> <tr> <td>3</td> <td>Harimau</td> <td>11</td> <td>Munchong /bungor</td> </tr> <tr> <td>4</td> <td>Jerangau</td> <td>12</td> <td>Rengam</td> </tr> <tr> <td>5</td> <td>Klau</td> <td>13</td> <td>Rengam shallow</td> </tr> <tr> <td>6</td> <td>Langkawi /muchong</td> <td>14</td> <td>Tavy shallow</td> </tr> <tr> <td>7</td> <td>Bungor shallow</td> <td>15</td> <td>unclassified</td> </tr> <tr> <td>8</td> <td>Local alluvium</td> <td></td> <td></td> </tr> </tbody> </table> <table border="1" data-bbox="994 959 1608 1161"> <thead> <tr> <th colspan="4">Elphil Estate- source dated 26/4/13</th> </tr> <tr> <th></th> <th>Soil type</th> <th></th> <th>Soil type</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bungor</td> <td>5</td> <td>Langkawi</td> </tr> <tr> <td>2</td> <td>Durain</td> <td>6</td> <td>Malacca</td> </tr> <tr> <td>3</td> <td>Holyrood</td> <td>7</td> <td>munchong</td> </tr> <tr> <td>4</td> <td>Klau</td> <td>8</td> <td>Rengam</td> </tr> </tbody> </table> <table border="1" data-bbox="994 1193 1608 1394"> <thead> <tr> <th colspan="4">Kinta Kelas Estate in May 2016</th> </tr> <tr> <th></th> <th>Soil type</th> <th></th> <th>Soil type</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reverine alluvium</td> <td>9</td> <td>Mixed bungor</td> </tr> <tr> <td>2</td> <td>Malacca</td> <td>10</td> <td>Bungor Malacca/SLA</td> </tr> <tr> <td>3</td> <td>Munchong</td> <td>11</td> <td>Malacca/bungor</td> </tr> </tbody> </table>	Kamuning Estate – source dated May 2016					Soil type		Soil type	1	Bungor	9	Muncong	2	Durian	10	Munchong shallow	3	Harimau	11	Munchong /bungor	4	Jerangau	12	Rengam	5	Klau	13	Rengam shallow	6	Langkawi /muchong	14	Tavy shallow	7	Bungor shallow	15	unclassified	8	Local alluvium			Elphil Estate- source dated 26/4/13					Soil type		Soil type	1	Bungor	5	Langkawi	2	Durain	6	Malacca	3	Holyrood	7	munchong	4	Klau	8	Rengam	Kinta Kelas Estate in May 2016					Soil type		Soil type	1	Reverine alluvium	9	Mixed bungor	2	Malacca	10	Bungor Malacca/SLA	3	Munchong	11	Malacca/bungor	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance
		4	Mixed durian, bungor	12		
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 -	SDP had a management strategy in place for planting on slopes and to minimize and control erosion and degradation of soils. Among the strategies for plantings on slopes between 6 and 25 degrees are: a) Slope & River Protection Policy – Buffer zone & 25 degree slope b) Item 8 Section 4 – Land preparation for terracing in ARM Manual. All the 3 estates had also implemented prevention of soil erosion measures such as construction of moisture conservation pits (MCP) in steep slope areas. Cover crops were observed to be in place as the CU management had generally encouraged the establishment of soft growth. Visits to the site found that significant areas of the ground were covered with <i>Neprolepis biserrata</i> . Most slopes had well established <i>Mucuna bracteata</i> .				Complied
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	During the field visit, it was observed that the main and field roads of CU were in satisfactory condition and accessibility was made possible by regular maintenance. There was evidence of road maintenance programmes which consist of the following works a) road resurfacing with grading & compaction b) culvert maintenance, c) Road side pruning. d) Planting of <i>Guatemala /vertivar</i> grasses Work schedule were staggered into fields and months. Concentration of timing is targeted in Jan – May avoiding the monsoon months. Programs for all the audited estates were sighted.				Complied
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 -	All the three estates visited possessed NIL peat soil area. Hence this indicator is not applicable.				Complied

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 -	All the three estates visited possessed NIL peat soil area. Hence this indicator is not applicable.	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 -	All the three estates visited possessed NIL peat soil area. Hence this indicator is not applicable.	Complied
Criterion 4.4: 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>SOU 3 has established water management plan and documented in the Environmental Management Plan SOU Elphil 2018. The monitoring was conducted on quarterly basis. The plan covers on monitoring quality of main water, contingency plan during water shortage, and monitoring usage of treated water, reuse/recycle of waste water and protection of watercourse/wetland. The plan also include the mitigation plan and person responsible.</p> <p><u>Elphil POM</u> The water management plan has been established and reviewed annually. The plan covers on water pollution monitoring and Emergency Water Shortage. The latest review was conducted on 3/1/2019. Sighted the implementation of the water management plan:</p> <p>Monitoring of effluent discharge was conducted monthly. Sighted the effluent analysis report as follows:</p> <ul style="list-style-type: none"> i. Dec 2018 – Date sampled taken 21/12/2018. Refer report no EP44/2019. ii. Nov 2018 – Date sampled taken 22/11/2018. Refer report no EP1/2019. iii. Oct 2018 – Date sampled taken 18/10/2018. Refer report no EP498/2018. <p>The parameters from all sample of final discharge sampled were found within the limit.</p> <p><u>Kamuning Estate</u> The water management plan 2019 has been reviewed on 3/1/2019. Sighted the implementation of the water management plan as follows:</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
	<p>i. Monitoring of water quality – the estate has conducted river water sampling to monitor the pollution from the estate operation. Sighted the sampled of river water (Sg Nyamuk) as follows:</p> <ul style="list-style-type: none"> a. October 2018 – report no. IE1233/2018.Result within the limit. b. June 2018 – report no. IE783/2018. Result within the limit. <p><u>Elphil Estate</u> The water management plan 2019 has been reviewed on 3/1/2019. Sighted the implementation of the water management plan as follows:</p> <p>i. Monitoring of water quality – the estate has conducted drinking water analysis and river water sampling to monitor the pollution from the estate operation. Sighted the sampled of drinking water and river water (Sg Kerdah) as follows:</p> <ul style="list-style-type: none"> a. Drinking water (November 2018) – report no. ML568/2018.Result within the limit. b. River (November 2018) – report no. PL930/2018. Result within the limit. <p><u>Kinta Kellas Estate</u> The water management plan 2019 has been reviewed on 3/1/2019. Sighted the implementation of the water management plan as follows:</p> <p>ii. Monitoring of river water quality – the estate has conducted river water sampling to monitor the pollution from the estate operation. Sighted the sampled of drinking water and river water (Sg Raya) as follows:</p> <ul style="list-style-type: none"> a. December 2018) – report no. IE472/2018. Result above the limit. Based on CPAR dated 26/12/2018, the result was higher due to sample taken after heavy rain. 	

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). Buffer zones established as following:</p> <table border="1"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 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>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p><u>Kamuning Estate</u> There are no spraying activity along the river buffer zone with Sungai Nyamuk. The vegetation along the river buffer zone are well preserved.</p> <p><u>Elphil Estate</u> There are no spraying activity along the river buffer zone at field 2016B with Sungai Kerдах. The vegetation along the river buffer zone are well preserved.</p> <p><u>Kinta Kellas Estate</u> There are no spraying activity along the river buffer zone with Sungai Raya. The vegetation along the river buffer zone are well preserved.</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
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Revision 7 (Aug /2018)

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 -	<p>Monitoring of effluent discharge was conducted monthly. Sighted the effluent analysis report as follows:</p> <ul style="list-style-type: none"> i. Dec 2018 – Date sampled taken 21/12/2018. Refer report no EP44/2019. ii. Nov 2018 – Date sampled taken 22/11/2018. Refer report no EP1/2019. iii. Oct 2018 – Date sampled taken 18/10/2018. Refer report no EP498/2018. <p>Type of discharge was through Land Irrigation.</p> <p>The parameters from all sample of final discharge sampled were found within the limit.</p> <p>Water quality analysis was done on quarterly basis. Sighted the report as follow:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Parameter</th> <th>Sg Kerdah</th> <th>Mill Reservoir</th> <th>Drain</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Apr 18</td> <td>BOD</td> <td><1</td> <td>3</td> <td>4</td> </tr> <tr> <td>S. Solid</td> <td>70</td> <td>8</td> <td>4</td> </tr> <tr> <td rowspan="2">Jul 18</td> <td>BOD</td> <td><1</td> <td><1</td> <td><1</td> </tr> <tr> <td>S. Solid</td> <td>12</td> <td>8</td> <td>10</td> </tr> <tr> <td rowspan="2">Oct 18</td> <td>BOD</td> <td>2</td> <td>1</td> <td>3</td> </tr> <tr> <td>S. Solid</td> <td>238</td> <td>24</td> <td>12</td> </tr> </tbody> </table>	Month	Parameter	Sg Kerdah	Mill Reservoir	Drain	Apr 18	BOD	<1	3	4	S. Solid	70	8	4	Jul 18	BOD	<1	<1	<1	S. Solid	12	8	10	Oct 18	BOD	2	1	3	S. Solid	238	24	12	Complied
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4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	The mill water source for processing is from the owned water reservoir. In POM, the water usage monitoring for FFB/tonne. Sighted the records for the month of: a. Oct 2018 – 0.85 m ³ /mt FFB b. Nov 2018 – 0.95 m ³ /mt FFB c. Dec 2018 – 0.92 m ³ /mt FFB d. Jan 2019 – 1.03 m ³ /mt FFB	Complied
Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.			
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	All the three estates in the CU continued to implement Integrated Pest Management (IPM). The estates continued to manage pests, disease, weeds and invasive introduced species using appropriate IPM techniques guided by the ARM Section No 15–Pest And Diseases The IPM program among others involved the following practices; a) Includes pest management of rats, bagworms, nettle caterpillars, rhinoceros beetles and ganoderma. b) In order to minimize use of pesticides and bagworm control the estates had planted beneficial plants mainly <i>Tunera subulata</i> , <i>cassia cobanensis</i> and <i>Antigonon leptopus</i> with maps indicating areas planted. c) All the estates carried census on rat damage and diseases like Ganoderma. Rat baiting was by calendar baiting at 2 campaigns per year. Baiting was continued until bait acceptance fell below 20%. Barn Owl boxes are erected at ratio of 1:10 ha to 1:20 ha.	Complied

Criterion / Indicator		Assessment Findings	Compliance																								
4.5.2	<p>Training of those involved in IPM implementation shall be demonstrated.</p> <p>- Minor compliance -</p>	<p>Trainings were provided to the employees on the IPM management and procedures. Details as listed below.</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Date</th> <th>Participants</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Elphil</td> <td>10/3/18 - BOB</td> <td>6</td> </tr> <tr> <td></td> <td></td> <td>10/3/18 – IPM</td> <td>5</td> </tr> <tr> <td>2</td> <td>Kamuning</td> <td>7/1/19 - BP</td> <td>9</td> </tr> <tr> <td>3</td> <td>Kinta Kelas</td> <td>18/2/19 – IPM</td> <td>4</td> </tr> <tr> <td></td> <td></td> <td>14/7/18 - BOB</td> <td>4</td> </tr> </tbody> </table> <p>The training includes the management and practices of IPM as specified in 4.5.1 above</p>		Estate	Date	Participants	1	Elphil	10/3/18 - BOB	6			10/3/18 – IPM	5	2	Kamuning	7/1/19 - BP	9	3	Kinta Kelas	18/2/19 – IPM	4			14/7/18 - BOB	4	Complied
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<p>Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment</p>																											
4.6.1	<p>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.</p> <p>- Major compliance -</p>	<p>All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II class III & class IV pesticides.</p> <p>a) No illegal agrochemicals (stated by local and international laws) paraquat was used in their estates.</p> <p>b) The usage of the agrochemicals was based on the Agricultural Reference Manual (ARM) Section 15 and 16, SOP and in the Pictorial Safety Standard Book where written justifications had been provided for various fields operations.</p> <p>The Manual has included chemical register list which indicates the use of selective products that are specific to the targeted pest, weed or disease. The procedures also covered the use of PPE when handling the chemicals. The estates continued to use pesticides as per the SOPs</p>	Complied																								

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<p>4.6.2</p> <p>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.</p> <p>- Major compliance -</p>	<p>Elphil CU had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha. Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available and verified. All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II, class III & class IV pesticides. No illegal agrochemicals (stated by local and international laws) in particular <i>paraquat</i> were used in the estates.</p>	<p>Complied</p>

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 -	Elphil CU is committed to minimize the usage of agrochemicals through the implementation of IPM practices among others; <ul style="list-style-type: none"> a) The planting of beneficial plants i.e. <i>Tunera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptopus</i> rate of 10 dm: 1 ha. b) Blanket spraying was not practiced by this CU and soft grasses maintained in the field. It had also been the practice that insecticides are used only after a threshold level has been exceeded as per the Agricultural Reference Manual (ARM) Section 15 -Plant Protection c) No prophylactic use of such pesticides is permitted. d) The practices of Barn Owl in estates at ratio 10 ha: 1box was sighted with census records maintained. 	Complied

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4.6.4	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, 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.</p> <p>- Minor compliance -</p>	<p>All the 3 estates confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.</p> <ul style="list-style-type: none"> a) The review of the chemical register concluded that all pesticides used were of class II, III & class IV. The use of paraquat had been prohibited in all SDP estates. b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. c) Sighted from records and interviews with workers, staff and estate assistants, concluded that trainings were held with all precautions being taken and all legal requirements <p>The chemical used in the estate captured from the chemical register updated on 2/1/19 among others as listed below;</p> <table border="1"> <thead> <tr> <th></th> <th>Chemical name</th> <th>Class</th> <th></th> <th>Chemical name</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Glyphosate isopropylamine</td> <td>III</td> <td>6</td> <td>Cypermethrin</td> <td>III</td> </tr> <tr> <td>2</td> <td>Sodium chlorate</td> <td>III</td> <td>7</td> <td>Triclopyr butoxy e/ester</td> <td>III</td> </tr> <tr> <td>3</td> <td>Glufosinate ammonium</td> <td>III</td> <td>8</td> <td>Canyon 20G</td> <td>IV</td> </tr> <tr> <td>4</td> <td>Alion</td> <td>III</td> <td>9</td> <td>Amine 2.4 D</td> <td>III</td> </tr> <tr> <td>5</td> <td>Metsulfuron methy 20% w/w</td> <td>III</td> <td>10</td> <td>Bayfolan</td> <td>III</td> </tr> </tbody> </table>					Chemical name	Class		Chemical name	Class	1	Glyphosate isopropylamine	III	6	Cypermethrin	III	2	Sodium chlorate	III	7	Triclopyr butoxy e/ester	III	3	Glufosinate ammonium	III	8	Canyon 20G	IV	4	Alion	III	9	Amine 2.4 D	III	5	Metsulfuron methy 20% w/w	III	10	Bayfolan	III	Complied
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<p>4.6.5</p>	<p>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 -</p>	<p>The staff and workers such as the storekeepers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. The trade and generic names of the chemicals were made known to the workers through the SDS training. It was also noted that SDS are available at all sites during the audit. Trainings on pesticide handling were available in all the visited estates. Among others extracted for records are;</p> <table border="1" data-bbox="981 619 1872 1385"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Date</th> <th>Subject</th> <th>attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kamuning</td> <td>22/1/19</td> <td>Chemical handling – workshop</td> <td>10</td> </tr> <tr> <td></td> <td>Estate</td> <td>7/1/19</td> <td>PPE & Chemical handling</td> <td>14</td> </tr> <tr> <td></td> <td></td> <td>20/12/18</td> <td>Spraying techniques – safety</td> <td>31</td> </tr> <tr> <td></td> <td></td> <td>21/6/18</td> <td>Spraying technique and safety</td> <td>17</td> </tr> <tr> <td>2</td> <td>Elphil Mill</td> <td>29/1/18</td> <td>Chemical Handlings</td> <td>15</td> </tr> <tr> <td>3</td> <td>Elphil</td> <td>17/1/19</td> <td>Spraying, Chemical handling</td> <td>27</td> </tr> <tr> <td></td> <td>Estate</td> <td>8/1/19</td> <td>Safe chemicals handlings</td> <td>24</td> </tr> <tr> <td></td> <td></td> <td>5/6/18</td> <td>Spraying technique</td> <td>5</td> </tr> <tr> <td></td> <td></td> <td>27/2/18</td> <td>Spraying/ pump maintenance</td> <td>6</td> </tr> <tr> <td></td> <td></td> <td>12/1/18</td> <td>Chemical handling /SW</td> <td>24</td> </tr> <tr> <td>4</td> <td>K Kelas</td> <td>13/12/19</td> <td>Chemical handling</td> <td>7</td> </tr> <tr> <td></td> <td></td> <td>24/5/18</td> <td>Spraying techniques</td> <td>10</td> </tr> <tr> <td></td> <td></td> <td>12/3/18</td> <td>Fertiliser application</td> <td>12</td> </tr> <tr> <td></td> <td></td> <td>29/11/18</td> <td>Trunk injection</td> <td>6</td> </tr> </tbody> </table>	No	Estate	Date	Subject	attendees	1	Kamuning	22/1/19	Chemical handling – workshop	10		Estate	7/1/19	PPE & Chemical handling	14			20/12/18	Spraying techniques – safety	31			21/6/18	Spraying technique and safety	17	2	Elphil Mill	29/1/18	Chemical Handlings	15	3	Elphil	17/1/19	Spraying, Chemical handling	27		Estate	8/1/19	Safe chemicals handlings	24			5/6/18	Spraying technique	5			27/2/18	Spraying/ pump maintenance	6			12/1/18	Chemical handling /SW	24	4	K Kelas	13/12/19	Chemical handling	7			24/5/18	Spraying techniques	10			12/3/18	Fertiliser application	12			29/11/18	Trunk injection	6	<p>Complied</p>
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		The training included the safety aspects and usage of PPE when handling with pesticides. Record of training was available for verification. All workers involved in pesticide application were provided with appropriate PPE and replaced when damaged. PPE issue and replacements records were verified by the auditors. From interviews conducted with workers and staffs in the field and stores clerks it was established that they had been trained and were aware of safe handling procedures	
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 chemical stores in all estates were found to be in compliance with the Occupational Safety and Health Act 1994 (Act 514) as well as in the Pesticides Act 1974 (Act 149). <ul style="list-style-type: none"> a) Records of purchase, storage and use were maintained. b) All store buildings were equipped with exhaust fans with the door was secured. c) Only authorized personnel are assigned to handle the chemicals. d) All the chemicals were segregated in storage accordingly. Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Thereafter disposal arrangement will follow accordingly as per procedures	Complied
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	During the audit, it was noted that Elphil CU had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions. <ul style="list-style-type: none"> a) <i>Paraquat</i> usage has been prohibited in all units and the entirety of the organization. b) The Safety Procedures for pesticides application were well described in Pictorial Safety Standard. c) Training on pesticide handling was made with details in 4.6.5. The training included the safety aspects and usage of PPE when handling with pesticides. 	Complied

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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 -	Aerial application of agrochemicals is not practiced in the CU. This is confirmed through observation during the site visit, estate complex and interview with the employees.	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 -	Training on pesticide/chemical handling was continuously carried out at the CU. The trainings included the safety aspects and usage of PPE when handling with pesticides and herbicides. From interviews with the staff and workers such as the storekeepers and workers who applied fertilizers, it was evident that they have been trained and understood the hazards involve and how the chemicals should be used in a safe manner. Records of training were sighted and given in 4.7.3	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 -	The procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established. Collection of SW is made by SDI on completion of every vehicle servicing. The clinical waste is disposed to <i>Kualiti Alam Sdn Bhd</i> a DOE licensed vendor. Empty containers were tripled rinsed, pierced and delivered to a registered recycler company M/s SS Setia (Approved by DOE & DOA) Domestic wastes are delivered to the respective landfill – All Estates/Mill in the CU at <i>Majlis Perbandaran Kuala Kangsar</i> . Collection at interval of 2-3x/week.	Complied

<p>4.6.11</p>	<p>Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -</p>	<p>The CHRA for Elphil POM was conducted on 11/8/2015 by <i>Tn Hj Shaari Chin (JKKP HIE 127/171-2(124))</i>. The recommendation from the CHRA is mainly on the training for operators working in laboratory, ETP, WTP, Boiler, workshop, scheduled waste and chemical store. In addition the assessor recommended medical surveillance be conducted for the categories of employees in the workshop and laboratory and chemicals handlers. Similar CHRA was compiled for the estates with details provided below. The CHRA report among others described requirement of medical surveillance to be made for the listed category of employees. The CHRA assessors are as follows;</p> <table border="1" data-bbox="981 715 1832 1018"> <thead> <tr> <th>OU</th> <th>Date</th> <th>Assessor</th> <th>DOSH no</th> </tr> </thead> <tbody> <tr> <td>Elphil Mill</td> <td>11/8/15</td> <td>Global Advance Consultancy</td> <td>127/171-2(124).</td> </tr> <tr> <td>Kamuning</td> <td>9/3/17</td> <td>Global Advance Consultancy</td> <td>127/171-2(124).</td> </tr> <tr> <td>Elphil</td> <td>10/3/17</td> <td>Global Advance Consultancy</td> <td>127/171-2(124).</td> </tr> <tr> <td>Kinta Kelas</td> <td>9/3/17</td> <td>Global Advance Consultancy</td> <td>127/171-2(124).</td> </tr> </tbody> </table> <p>Medical surveillance was carried out on in the CU as follows;</p> <table border="1" data-bbox="981 1114 1872 1353"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">OU</th> <th colspan="5">Employees categories</th> </tr> <tr> <th>Date</th> <th>workshop</th> <th>Laboratory</th> <th>sprayers</th> <th>WTP</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Elphil Mill</td> <td>14/11/18</td> <td>19</td> <td>3</td> <td>-</td> <td></td> </tr> <tr> <td>2</td> <td>Elphil</td> <td>20/7/18</td> <td>-</td> <td>-</td> <td>21</td> <td>1</td> </tr> <tr> <td></td> <td></td> <td>2/4/18</td> <td>-</td> <td>-</td> <td>9</td> <td>-</td> </tr> <tr> <td>3</td> <td>Kamuning</td> <td>30/1/19</td> <td>5</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>4</td> <td>K Kelas</td> <td>23/1/19</td> <td>2</td> <td>-</td> <td>5</td> <td>-</td> </tr> </tbody> </table>	OU	Date	Assessor	DOSH no	Elphil Mill	11/8/15	Global Advance Consultancy	127/171-2(124).	Kamuning	9/3/17	Global Advance Consultancy	127/171-2(124).	Elphil	10/3/17	Global Advance Consultancy	127/171-2(124).	Kinta Kelas	9/3/17	Global Advance Consultancy	127/171-2(124).		OU	Employees categories					Date	workshop	Laboratory	sprayers	WTP	1	Elphil Mill	14/11/18	19	3	-		2	Elphil	20/7/18	-	-	21	1			2/4/18	-	-	9	-	3	Kamuning	30/1/19	5	-	-	-	4	K Kelas	23/1/19	2	-	5	-	<p>Complied</p>
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		All medical surveillance was conducted an OHD Doctor of <i>Klinik Tweedie OHD DOSH Rgn No. HQ/QQ/DOC/00/200</i> and <i>Klinik Edina Simpang Pulai (DOSH Rgn No. HQ/08/DOC/001/649)</i> The chemical handlers where recommended were excluded from the medical surveillance as the risk for the work unit was adequately control through appropriate PPE and clothing provided as stated in the CHRA report therein. The results for the entire workers were positive and declared FIT to handle chemical.	
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	All the estates and mill in the CU complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation whereby no work with pesticides is given to pregnant or breast-feeding women. <i>Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan</i>) The estates maintained the list of sprayers. Identification of pregnancy status is made by the respective appointed Medical Assistant during the monthly check-up. Field interviews with the lady workers confirmed that such a regulation is a standard practice in the estates and in compliance.	Complied
<p>Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:</p>			

Criterion / Indicator	Assessment Findings	Compliance
<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.</p> <p>- Major compliance -</p>	<p>The Group Occupational Safety & Health Management Policy had been established and implemented. The policy was signed by the Managing Director of Sime Darby Plantation dated January 2015 and displayed prominently on notice boards in English and local language <i>Bahasa Malaysia</i>. The Policy is implemented through the OSH activities by the Regional SQM Executives and monitored by SQM Department at Head Office. Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors. In interviews with the workers and staff during the site visit workshop, office compound, workshop, laboratory, engine room, boiler house) revealed that the employees had been briefed and had understood the policy. The plan also covered OHS objectives which included the following:</p> <ul style="list-style-type: none"> a) zero accident case in major accident (class I and class II). b) to achieve > 1000,000-man hours without LTI c) to enhance OSH awareness through comprehensive ESH Training (target 70%). d) to extent the awareness of safety from operation area to Housing Complex. <p>The implementation of OSH plan was monitored by internal audits conducted by OSH officers from SQM department</p>	<p>Complied</p>

<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. - Major compliance -</p>	<p>The Mill and Estates had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. HIRARC is subject for a review in event of the following;</p> <ul style="list-style-type: none"> a) Change in work process b) Revision/changes in legislative requirement c) Occurrence of accidents <p>HIRARC for the mill/estates was formalized on in 2008 with review made annually. The significant and routine activities for mill were covered with details as follows;</p> <table border="1" data-bbox="981 751 1834 986"> <thead> <tr> <th></th> <th>Areas/Activities (Mill)</th> <th></th> <th>Areas /Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reception –Wbridge/Ramp</td> <td>7</td> <td>Engine Room</td> </tr> <tr> <td>2</td> <td>Fruit Handling</td> <td>8</td> <td>Product storage /Despatch</td> </tr> <tr> <td>3</td> <td>Sterilizer</td> <td>9</td> <td>Laboratory</td> </tr> <tr> <td>4</td> <td>Threshing</td> <td>10</td> <td>Water treatment</td> </tr> <tr> <td>5</td> <td>Clarification / Oil Room</td> <td>11</td> <td>Effluent Treatment Pond</td> </tr> <tr> <td>6</td> <td>Boiler House</td> <td>12</td> <td>Compound upkeep</td> </tr> </tbody> </table> <p>Similarly the estates analysed the risk in all the major operations with control measures documented. The work activities among others include the following;</p> <table border="1" data-bbox="981 1150 1834 1382"> <thead> <tr> <th></th> <th>Areas/Activities (Estates)</th> <th></th> <th>Areas /Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Palm /bunch census</td> <td>10</td> <td>Harvesting & collection</td> </tr> <tr> <td>2</td> <td>Circle /selective spraying</td> <td>11</td> <td>Transportation of workers</td> </tr> <tr> <td>3</td> <td>Confined space</td> <td>12</td> <td>Walking form palm to palm</td> </tr> <tr> <td>4</td> <td>Drainage – machinery and manual</td> <td>13</td> <td>Loose fruit collection</td> </tr> <tr> <td>5</td> <td>Grass cutting</td> <td>14</td> <td>In field machine to 3mt bin</td> </tr> </tbody> </table>		Areas/Activities (Mill)		Areas /Activities	1	Reception –Wbridge/Ramp	7	Engine Room	2	Fruit Handling	8	Product storage /Despatch	3	Sterilizer	9	Laboratory	4	Threshing	10	Water treatment	5	Clarification / Oil Room	11	Effluent Treatment Pond	6	Boiler House	12	Compound upkeep		Areas/Activities (Estates)		Areas /Activities	1	Palm /bunch census	10	Harvesting & collection	2	Circle /selective spraying	11	Transportation of workers	3	Confined space	12	Walking form palm to palm	4	Drainage – machinery and manual	13	Loose fruit collection	5	Grass cutting	14	In field machine to 3mt bin	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance
		6	Compound sanitation	15	Water catchment – all activities	
		7	Fertilizer application	16	Chemical mixing	
		8	Replanting	17	Nursery (where applicable)	
		9	Water T Plant (where relevant)	18	Working at chemical store	
<p>Appropriate risk control measures were determined and implemented for the respective activities and operation. Most of the moving part and rotating machinery were installed with machine guarding and properly covered. Appropriate administrative controls such as safety signage were displayed at all work stations in the mill office and workshop. In general, the control measures were appropriate to the identified risks. A person-in-charge at each site were appointed to monitor the implementation of the control measures through the 5S initiative.</p>						

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<p>4.7.3 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>Trainings and briefings on the operations were provided for workers to educate them on safe working practices to ensure applicable precautions are adhered. Training for employees are conducted from time to time based on needs through various method such as on the job training, briefings, meetings, etc. The staff and workers such as the storekeepers, Mill workers, harvesters, pruners, field workers, sprayers, fertilizer and rat bait workers were trained, and they had understood the hazards involved and how the chemicals should be used in a safe manner. Based on the HIRARC carried out at the estates and mill the PPE types for the various activities has been identified and implemented.</p> <table border="1" data-bbox="981 751 1861 1082"> <thead> <tr> <th></th> <th>Type of work</th> <th>PPE issuance</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Harvester</td> <td>Safety helmet, sickle cover, hand glove. Wellington boots</td> </tr> <tr> <td>2</td> <td>Sprayers</td> <td>Respirator, nitrile glove (Chemical Resistant) goggles, wellington boots, apron.</td> </tr> <tr> <td>3</td> <td>Manurer</td> <td>Apron, wellington boots, dust mask, nitrile glove.</td> </tr> <tr> <td>4</td> <td>Mill operators</td> <td>Safety shoes, ear muff, safety vest, helmet, cotton glove</td> </tr> <tr> <td>5</td> <td>WTP operator</td> <td>Safety boots, ear muff, safety vest, helmet, cotton glove, dust mask.</td> </tr> </tbody> </table> <p>Workers were observed in PPE adherence during the field and mill visits.</p>		Type of work	PPE issuance	1	Harvester	Safety helmet, sickle cover, hand glove. Wellington boots	2	Sprayers	Respirator, nitrile glove (Chemical Resistant) goggles, wellington boots, apron.	3	Manurer	Apron, wellington boots, dust mask, nitrile glove.	4	Mill operators	Safety shoes, ear muff, safety vest, helmet, cotton glove	5	WTP operator	Safety boots, ear muff, safety vest, helmet, cotton glove, dust mask.	<p>Complied</p>
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<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>Both the Estates / Mill Managers were appointed as the Chairman of the ESH committee. The letter of appointment for the Managers signed by the Regional CEO was sighted. The Manager subsequently assigned duties of ESH coordinator to the Assistants for the down line implementation of ESH practices in the estates. Similar appointment was made for all the estates and the mill. All identified Executives were officially given a letter for such an appointment. Both estates and the mill management conduct regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held by both estates are recorded below</p> <table border="1" data-bbox="994 683 1529 983"> <thead> <tr> <th>Estate</th> <th>1st</th> <th>2nd</th> <th>3rd</th> <th>4th</th> </tr> </thead> <tbody> <tr> <td>Kamuning</td> <td>21/12/18</td> <td>21/9/18</td> <td>12/6/18</td> <td>23/3/18</td> </tr> <tr> <td>K Kelas</td> <td>20/12/18</td> <td>21/9/18</td> <td>22/6/18</td> <td>26/3/18</td> </tr> <tr> <td>Elphil</td> <td>20/12/18</td> <td>20/9/18</td> <td>18/6/18</td> <td>19/3/18</td> </tr> <tr> <td>Elphil Mill</td> <td>4/1/19</td> <td>25/9/18</td> <td>29/6/18</td> <td>30/3/18</td> </tr> </tbody> </table> <p>Workers during the meeting participated in the discussion mainly on housing and safety. All units adopted the agenda as released SQM. The agenda as discussed during the meeting among others includes the following;</p> <ul style="list-style-type: none"> a) <i>Laporan Pemakaian PPE</i> b) <i>Laporan Prestasi ESH/Kesehatan</i> c) <i>Laporan LatIhan & SOP/HIRARC</i> d) <i>Laporan Pematuhan Undang-Undang</i> e) <i>Laporan Pematuhan Oleh Kontraktor</i> f) <i>Laporan Kemalangan</i> g) <i>Laporan Pemeriksaan Tempat Kerja</i> h) <i>Laporan Bahan Buangan Berjadual.</i> 	Estate	1st	2nd	3rd	4th	Kamuning	21/12/18	21/9/18	12/6/18	23/3/18	K Kelas	20/12/18	21/9/18	22/6/18	26/3/18	Elphil	20/12/18	20/9/18	18/6/18	19/3/18	Elphil Mill	4/1/19	25/9/18	29/6/18	30/3/18	<p>Complied</p>
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	i) <i>Laporan Kesehatan & Kawasan Perumahan</i>	

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<p>4.7.5 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. - Minor compliance -</p>	<p>Procedures guidelines were issued by SQM and amended to tailor to the situation differences in the estates and mills.</p> <table border="1" data-bbox="981 459 1854 995"> <thead> <tr> <th></th> <th>Emergencies Situation</th> <th>Mill</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Fire Hazard</td> <td>/</td> <td>/</td> </tr> <tr> <td>2</td> <td>Injury At Site</td> <td>/</td> <td>/</td> </tr> <tr> <td>3</td> <td>CPO spillage</td> <td>/</td> <td></td> </tr> <tr> <td>4</td> <td>Dieseline spillage</td> <td>/</td> <td>/</td> </tr> <tr> <td>5</td> <td>Explosion</td> <td>/</td> <td></td> </tr> <tr> <td>6</td> <td>Poisonous animals attack</td> <td></td> <td>/</td> </tr> <tr> <td>7</td> <td>Flood</td> <td></td> <td>/</td> </tr> <tr> <td>8</td> <td>Workers' Strike</td> <td>/</td> <td>/</td> </tr> <tr> <td>9</td> <td>Electrocution /Electric shock</td> <td>/</td> <td>/</td> </tr> <tr> <td>10</td> <td>Gas Release/Leaks</td> <td>/</td> <td></td> </tr> <tr> <td>11</td> <td>Exposion Incident</td> <td>/</td> <td></td> </tr> <tr> <td>12</td> <td>Rescueretrieval Worker Confined Space</td> <td>/</td> <td></td> </tr> </tbody> </table> <p>ERT members will receive training and practice in emergency procedures appropriate to their respective workplace and degree of risk. The trainings are conducted by an accredited or qualified organisation who can demonstrate their suitability to provide training. The trained personnel for the First Aid were among the employees working in the mill on shift and the estates staff/mandores. The first aid boxes were available at various points in the mill complex including laboratory, office, workshop, process control room etc. Similarly, the estates distributed the first aid box to the mandores and brought along to the field during operations.</p>		Emergencies Situation	Mill	Estate	1	Fire Hazard	/	/	2	Injury At Site	/	/	3	CPO spillage	/		4	Dieseline spillage	/	/	5	Explosion	/		6	Poisonous animals attack		/	7	Flood		/	8	Workers' Strike	/	/	9	Electrocution /Electric shock	/	/	10	Gas Release/Leaks	/		11	Exposion Incident	/		12	Rescueretrieval Worker Confined Space	/		<p>Complied</p>
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4.7.6	All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -	<p>SOU Elphil provides medical care to the employees with Klinik Ladang established within the premises. Cases requiring higher attention of medical care are referred to Klinik Kesehatan Lintang 8 km away or Hospital Sg Siput located 20 km from the Estates/Mill vicinity. Kinta Kelas nearest Hospital facilities is at Batu Gajah town. The estates and mill use the RHB Insurance Bhd for the FW insurance coverage.</p> <table border="1"> <thead> <tr> <th></th> <th>OU</th> <th>Policy No</th> <th>Validity</th> <th>No - workers</th> <th>SOCSO file no</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Elphil POM</td> <td>MW 225939</td> <td>12/5/18 – 11/5/19.</td> <td>3</td> <td>508207112399.</td> </tr> <tr> <td>2</td> <td>Elphil</td> <td>MW272000</td> <td>23/10/18-22/10/19</td> <td>3</td> <td>D4500000544M</td> </tr> <tr> <td>3</td> <td>Kamuning</td> <td>MW230472</td> <td>7/6/18-6/6/19</td> <td>33</td> <td>D4500000544M</td> </tr> <tr> <td>4</td> <td>K Kelas</td> <td>MW240656</td> <td>13/6/18-12/6/18</td> <td>4</td> <td>D41000002187A</td> </tr> </tbody> </table> <p>SOCSO coverage was made for the local workers. The inclusion of FW workers in the same scheme will commence on expiry of their insurance coverage.</p>						OU	Policy No	Validity	No - workers	SOCSO file no	1	Elphil POM	MW 225939	12/5/18 – 11/5/19.	3	508207112399.	2	Elphil	MW272000	23/10/18-22/10/19	3	D4500000544M	3	Kamuning	MW230472	7/6/18-6/6/19	33	D4500000544M	4	K Kelas	MW240656	13/6/18-12/6/18	4	D41000002187A	Complied
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4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>Accident statistics are being maintained and periodically reviewed (quarterly basis) during 'Health and Safety' committee meeting – minutes reviewed. The following accident incidents were reviewed:</p> <ul style="list-style-type: none"> a) JKPP 8 for FY 2018 submitted on 08/1/19 by the Mill. b) JKPP 8 Elphil Estate was forwarded on 25/1/19 c) K Kelas submission was on 8/1/19 <table border="1"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Estate /Mill</th> <th colspan="2">Cases with LTI</th> <th>Cases non LTI</th> </tr> <tr> <th>No</th> <th>LTI</th> <th>No</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Elphil Mill</td> <td>2</td> <td>50</td> <td>0</td> </tr> <tr> <td>2</td> <td>Elphil</td> <td>3</td> <td>39</td> <td>0</td> </tr> <tr> <td>3</td> <td>Kinta Kelas</td> <td>1</td> <td>20</td> <td>0</td> </tr> <tr> <td>4</td> <td>Kamunting</td> <td>2</td> <td>46</td> <td>0</td> </tr> </tbody> </table> <p>There is 1 case of 1 mill workshop apprentice 29/7/18 suffering a cut /finger bone fractured with LTI of 47 days. Investigation was made with remedial measures given. HIRARC was reviewed 2/8/2018. Kamuning estate involved an accident related to communicating on a motorcycle fell while riding with LTI of 30 days.</p> <p>Accident Statistics are being maintained in a satisfactory manner.</p>				Estate /Mill	Cases with LTI		Cases non LTI	No	LTI	No	1	Elphil Mill	2	50	0	2	Elphil	3	39	0	3	Kinta Kelas	1	20	0	4	Kamunting	2	46	0	Complied
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<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>																																	

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<p>4.8.1</p>	<p>A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -</p>	<p>The training program for 2019 covering all aspects of the RSPO Principles and Criteria and other essential operations activities has been established. Regular assessments of training needs were available and verified. Training needs identification matrix has been established with target dates for of implementation. The training program/subjects among others includes</p> <table border="1" data-bbox="981 555 1818 1391"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Subjects</th> <th colspan="3">Month</th> </tr> <tr> <th>1-4</th> <th>5-8</th> <th>9-12</th> </tr> </thead> <tbody> <tr><td>1</td><td>ESH Legal & Other requirements</td><td>/</td><td></td><td></td></tr> <tr><td>2</td><td>Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000</td><td>/</td><td></td><td></td></tr> <tr><td>3</td><td>Accident Investigation Techniques</td><td>/</td><td></td><td></td></tr> <tr><td>4</td><td>Emergency Respond Plan Training (Chemical spill, poisoning, Fire. Lightning)</td><td>/</td><td></td><td>/</td></tr> <tr><td>5</td><td>First Aid Training</td><td>/</td><td></td><td>/</td></tr> <tr><td>6</td><td>Scheduled waste management</td><td>/</td><td>/</td><td></td></tr> <tr><td>7</td><td>Safe Work Procedure for All Stations.</td><td>/</td><td></td><td>/</td></tr> <tr><td>8</td><td>Confined Space Training</td><td></td><td>/</td><td></td></tr> <tr><td>9</td><td>Policy Training</td><td>/</td><td></td><td>/</td></tr> <tr><td>10</td><td>Effective workplace inspection</td><td></td><td>/</td><td>/</td></tr> <tr><td>11</td><td>GAP training / SW</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>12</td><td>RSPO & Management Training,</td><td>/</td><td></td><td>/</td></tr> <tr><td>13</td><td>RSPO Human Right Training,</td><td>/</td><td></td><td>/</td></tr> <tr><td>14</td><td>Briefing on S Darby Policies (Gender & Conservation).</td><td>/</td><td></td><td>/</td></tr> <tr><td>15</td><td>Maintenance of spraying equipment</td><td>/</td><td>/</td><td>/</td></tr> <tr><td>16</td><td>HCV Training for Region</td><td></td><td>/</td><td>/</td></tr> <tr><td>17</td><td>Safe handling of Electrical Equipment</td><td>/</td><td></td><td>/</td></tr> <tr><td>18</td><td>MSDS/CSDS</td><td>/</td><td></td><td>/</td></tr> <tr><td>19</td><td>5 S Housekeeping</td><td>/</td><td>/</td><td></td></tr> </tbody> </table>		Subjects	Month			1-4	5-8	9-12	1	ESH Legal & Other requirements	/			2	Use & Standard Exposure of Chemical Hazardous to Health (USECHH) 2000	/			3	Accident Investigation Techniques	/			4	Emergency Respond Plan Training (Chemical spill, poisoning, Fire. Lightning)	/		/	5	First Aid Training	/		/	6	Scheduled waste management	/	/		7	Safe Work Procedure for All Stations.	/		/	8	Confined Space Training		/		9	Policy Training	/		/	10	Effective workplace inspection		/	/	11	GAP training / SW	/	/	/	12	RSPO & Management Training,	/		/	13	RSPO Human Right Training,	/		/	14	Briefing on S Darby Policies (Gender & Conservation).	/		/	15	Maintenance of spraying equipment	/	/	/	16	HCV Training for Region		/	/	17	Safe handling of Electrical Equipment	/		/	18	MSDS/CSDS	/		/	19	5 S Housekeeping	/	/		<p>Complied</p>
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14	Briefing on S Darby Policies (Gender & Conservation).	/		/																																																																																																						
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16	HCV Training for Region		/	/																																																																																																						
17	Safe handling of Electrical Equipment	/		/																																																																																																						
18	MSDS/CSDS	/		/																																																																																																						
19	5 S Housekeeping	/	/																																																																																																							

Criterion / Indicator		Assessment Findings					Compliance
		20	PPE adherence	/	/		
		21	Estate Activities / Mill Work stations	/	/	/	
		22	Triple rinsing	/	/		
		23	Effective work place inspection		/	/	
		24	HIRARC	/		/	
		25	Safe driving techniques	/		/	

<p>4.8.2</p>	<p>Records of training for each employee shall be maintained. - Minor compliance -</p>	<p>SOU Elphil had trained their staff, workers and records of training were kept in the RSPO training file. The records included information on the title of the training, name and signature of the attendees, name of the trainer, time and venue. Among others the training held by the units in Elphil CU are listed below.</p> <table border="1" data-bbox="1003 523 1854 1267"> <thead> <tr> <th colspan="4">Elphil Palm Oil Mill</th> </tr> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr><td>1</td><td>15/2/18</td><td><i>kesedaran kitar semula</i></td><td>15</td></tr> <tr><td>2</td><td>14/2/18</td><td>EAI/EIE briefing</td><td>5</td></tr> <tr><td>3</td><td>7/2/19</td><td>WTP operator</td><td>6</td></tr> <tr><td>4</td><td>31/10/18</td><td>MSPO SCCS</td><td>3</td></tr> <tr><td>5</td><td>31/1/19</td><td>MSPO/RSPO for Contractors</td><td>4</td></tr> <tr><td>6</td><td>6/2/18</td><td>Hearing Conservation/PPE</td><td>Entire</td></tr> <tr><td>7</td><td>6/2/18</td><td>Pay slip/Passport keeping</td><td>entire</td></tr> <tr><td>8</td><td>29/1/18</td><td>Chemical Handlings</td><td>15</td></tr> <tr><td>9</td><td>28/1/19</td><td>COBC, Whistle blowing</td><td>Entire</td></tr> <tr><td>10</td><td>28/1/19</td><td>Policies briefing</td><td>Entire</td></tr> <tr><td>11</td><td>16/1/19</td><td>First Aid /BOFA</td><td>16</td></tr> <tr><td>12</td><td>28/5/18</td><td>Laboratory operations</td><td>5</td></tr> <tr><td>13</td><td>28/5/18</td><td>Mill operations/processing</td><td>Entire</td></tr> <tr><td>14</td><td>16/4/18</td><td>Mill operations /parameter</td><td>Entire</td></tr> <tr><td>15</td><td>2/4/18</td><td>Prohibition of open burning</td><td>Entire</td></tr> <tr><td>16</td><td>19/3/18</td><td>Process control</td><td>Entire</td></tr> <tr><td>17</td><td>26/2/18</td><td>Safety at work place</td><td>entire</td></tr> <tr><td>18</td><td>12/2/18</td><td>Accident incidence alert</td><td>Entire</td></tr> <tr><td>19</td><td>5/2/18</td><td>Environmental issues</td><td>Entire</td></tr> <tr><td>20</td><td>22/1/18</td><td>Accident incidences alert</td><td>Entire</td></tr> </tbody> </table> <table border="1" data-bbox="1003 1299 1854 1401"> <thead> <tr> <th colspan="4">Elphil Estate</th> </tr> <tr> <th></th> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>14/2/19</td> <td>Whistle blowing guidelines</td> <td>Entire</td> </tr> </tbody> </table>	Elphil Palm Oil Mill					Date	Subject	Attendees	1	15/2/18	<i>kesedaran kitar semula</i>	15	2	14/2/18	EAI/EIE briefing	5	3	7/2/19	WTP operator	6	4	31/10/18	MSPO SCCS	3	5	31/1/19	MSPO/RSPO for Contractors	4	6	6/2/18	Hearing Conservation/PPE	Entire	7	6/2/18	Pay slip/Passport keeping	entire	8	29/1/18	Chemical Handlings	15	9	28/1/19	COBC, Whistle blowing	Entire	10	28/1/19	Policies briefing	Entire	11	16/1/19	First Aid /BOFA	16	12	28/5/18	Laboratory operations	5	13	28/5/18	Mill operations/processing	Entire	14	16/4/18	Mill operations /parameter	Entire	15	2/4/18	Prohibition of open burning	Entire	16	19/3/18	Process control	Entire	17	26/2/18	Safety at work place	entire	18	12/2/18	Accident incidence alert	Entire	19	5/2/18	Environmental issues	Entire	20	22/1/18	Accident incidences alert	Entire	Elphil Estate					Date	Subject	Attendees	1	14/2/19	Whistle blowing guidelines	Entire	<p>Complied</p>
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		2	14/2/19	Recycled program	Entire
		3	14/2/19	Buffer zone	Entire
		4	13/2/19	EAI/EIE/EMP briefing	Entire
		5	7/12/18	Replanting – safety briefing	7
		6	28/8/18	Driver competency	20
		7	16/8/18	Harvesting competency	10
		8	10/10/18	FronD stacking	9
		9	19/7/18	Safety – overhead power line	3
		10	19/6/18	Induction Program FW	3
		11	26/9/18	Harvesting & crop quality	20
		12	10/3/18	Barn Owl Boxes	8
		13	19/1/18	LSS briefing	12
		14	23/2/18	FronD stacking	16
		15	26/2/18	Pruning	8
		16	10/3/18	IPM program,	5
		17	23/1/19	Company policies briefing	Entire
		18	27/9/18	Safety awareness	Entire
		19	15/8/18	Accident investigation	8
		20	29/3/18	<i>Kesedaran Alam Sekitar</i>	Entire
		21	11/12/18	Fire Drill	Entire
		22	3/1/19	Fire Drill	Entire
		23	17/1/19	Spraying, Chemical handling	27
		24	8/1/19	Safe chemicals handlings	24
		25	5/6/18	Spraying technique	5
		26	4/6/18	Induction program FW	5
		27	27/2/18	Spraying/ pump maintenance	6
		28	12/1/18	Chemical handling /SW	24
		29	10/4/18	HIRARC Accd. investigation	17
		30	14/5/18	Safety Town Hall 6.0	Entire
		31	26//1118	Fertiliser application	7

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Kinta Kelas Estate			
	Date	Subject	Attendees
1	19/1/19	HCV briefing	Entire
2	19/2/19	Harvesting & Collection SD1	16
3	13/12/19	Chemical handling	7
4	6/11/18	Fire Drill	Entire
5	27/8/18	FronD stacking	8
6	19/7/18	pruning	8
7	24/5/18	Spraying techniques	10
8	12/3/18	Fertiliser application	12
9	9/4/18	Pruning	5
10	30/3/18	spraying	5
11	30/3/18	Circle spraying	6
12	16/3/18	harvesting	17
13	16/7/18	MSPO/RSPO briefing	Entire
14	13/2/18	Briefing of wages calculation	11
15	8/2/18	Fertiliser application	9
16	29/1/18	Accident alert	Entire
17	10/1/18	FronD stacking	5
18	18/2/19	First Aid Briefing	11
19	20/2/18	First Aid Briefing	8
20	7/5/18	Town Hall 6.0	entire
21	9/2/19	Safety briefing at workplace	entire
22	29/11/18	Trunk injection	6
23	25/10/18	Motorcycle safe riding	entire
24	12/9/18	Tractor safe driving	10
25	27/4/18	Line site hygiene and upkeep	entire
26	18/2/19	IPM – BOB c ensus	4
27	14/7/18	IPM – Beneficial plant	4

Kamuning Estate			
	Date	Subject	Attendees
1	22/1/19	Chemical handling – workshop	10
2	15/12/19	Company policies briefing	Entire
3	14/2/19	First Aid	22
4	12/2/19	EAI & EIE activities	6
5	15/2/19	Company policies briefing	Entire
6	14/2/19	Harvesting operations	10
7	14/2/19	Recycling program	Entire
8	13/2/19	Line site upkeep	Entire
9	11/2/19	RSPO/MSPO/HCV/COBC	Entire
10	7/1/19	PPE & Chemical handling	14
11	17/1/19	Machine handling/maint.	9
12	5/1/19	Fertiliser application/PPE	10
13	29/12/18	Safety briefing – Induction	4
14	17/1/19	Replanting – Safety briefing	7
15	20/12/18	Spraying techniques – safety	31
16	21/11/18	FronD stacking	12
17	29/9/18	FronD stacking procedure	20
18	15/8/18	Emergency Fire drill	Entire
19	10/8/18	Induction program new FW	10
20	31/7/18	Fire prevention & house safety	entire
21	27/7/18	Tractor driving	8
22	26/7/18	Fertiliser application	8
23	21/6/18	Spraying technique and safety	17
24	7/5/18	Town Hall 6.0	Entire
25	27/4/18	Line site <i>Gotong Royong</i>	Entire

Criterion / Indicator	Assessment Findings	Compliance
Principle 5: Environmental responsibility and conservation of natural resources and biodiversity		
Criterion 5.1: 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.		

<p>5.1.1</p>	<p>An environmental impact assessment (EIA) shall be documented. - Major compliance -</p>	<p>Based on the Standard Operation Manual; subsection 5.4; Planning and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure, POM and Estates carried out the annual review of environmental impacts documented in Registration of Environmental Aspects and Impacts. The assessment covers all main and support operation at mill and estate.</p> <p><u>Elphil POM</u></p> <ul style="list-style-type: none"> a. Reception Area b. Sterilizer Bay c. EFB Ramp d. Workshop e. Schedule Waste Store f. Press station and etc. <p>Latest review was conducted on 14/2/2019. The documents has been reviewed and some dome documents eliminated due to not applicable with Elphil POM.</p> <p><u>Estates</u></p> <ul style="list-style-type: none"> a. Workshop b. Oil Palm Nursery c. Schedule Waste Store d. Replanting e. FFB transportation d. Disposal of scheduled waste <p>Kamuning Estate, Elphil Estate has reviewed the Environmental Aspect Identification and Environmental Impact Evaluation on 2/1/2019 and 29/1/2019. No changes on the existing environmental aspect.</p> <p>At Kinta Kellas Estate, the review was done on 2/1/2019 to include assessment for fire incident and disposal of scheduled waste.</p>	<p>Complied</p>
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Criterion / Indicator	Assessment Findings	Compliance
<p>5.1.2</p>	<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. - Minor compliance -</p> <p>SOU 3 has established Environmental Management the document was available in the estates/mill for review. The management plan established base on operation with significant impact to the environment. The management plan was reviewed annually. The management plan stated the environmental issue, mitigation actions, monitoring plan and person responsible for monitoring implementation.</p> <p>Operating units has appointed QA supervisor as person responsible for Environmental/Quality Management Systems as per appointment letter dated 2/2/2019 signed by the estate/mill manager.</p> <p>Elphil POM has established the Environmental Management Plan and was review annually by the Environmental Performance Monitoring Committee. Sighted the minutes of EPMC meeting no 01/2019 dated 4/1/2019 and 06/2018 dated 25/9/2018. The management plan stated the issue of concern, mitigating measures, person responsible and monitoring period.</p> <p><u>Kamuning Estate</u> The Environmental Management plan was reviewed annually. Latest review was conducted on 2/1/2019.</p> <p><u>Elphil Estate</u> Environmental Management Plan was reviewed annually. Latest review was conducted on 22/1/2019.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
5.1.3	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. - Minor compliance -	The monitoring records of the Environment Improvement Plan / Pollution Prevention Plan / Continuous Improvement Plan are available. The plan was reviewed annually.	Complied
Criterion 5.2: 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 operations managed to best ensure that they are maintained and/or enhanced.			
5.2.1	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). - Major compliance -	HCV Re-Assessment for Strategic Operating Unit (SOU) 3 Elphil has been conducted on 4-6/5/2017 by Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Sdn. Bhd. Final Report (Version 2.0) dated February 2017 was sighted. Total HCV area identified for SOU 3 Elphil falls under: <ol style="list-style-type: none"> 1. Water Catchment area – category HCV 4 (Kamuning Estate, Elphil Estate and Kinta Kellas Estate) 2. River Reserve – category HCV 4 (Kamuning Estate, Elphil Estate and Kinta Kellas Estate) 3. Slope/ Rocky area – category HCV 4 (Kamuning Estate) 4. Isolated remnant forest – category HCV 4 (Kamuning Estate) Limestone hill and cave – category HCV 3 (Elphil Estate)	Complied
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 -	No RTE was identified within the planted or surrounding village area based on the HCV assessment report dated February 2017. Signage that no hunting, no fishing, no swimming and water polluting activities were verified on-site at the estates visited (eg: Kamuning Estate, Elphil Estate and Kinta Kellas Estate) found to have been satisfactorily maintained.	Complied

Criterion / Indicator	Assessment Findings	Compliance
5.2.3 There shall be 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 -	No RTE species at Kamuning Estate, Elphil Estate and Kinta Kellas Estate. However, the signages no hunting, no fishing were installed in the estate to educate the workforce. For Kamuning Estate, the latest HCV training conducted on 11/2/2019 while for Elphil Estate the HCV training was conducted on 14 and 16/2/2019.	Complied
5.2.4 Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	Action Plan Biodiversity FY19 for Kamuning Estate was sighted. The scope includes the monitoring of riparian reserved/buffer zone, biodiversity signages, awareness training. The last monitoring was done on 11/2/2019. Action Plan Biodiversity 2019 for Elphil Estate was sighted. The scope includes the slope marking, muster briefing and awareness training for workers, warning signage. The training related to HCV was done on 14 and 16/2/2019. Action Plan Biodiversity 2019 for Kinta Kellas Estate was sighted. The scope includes the slope river at Sg Raya and pond, awareness training for workers, warning signage. The training related to HCV was done on 19/1/2019.	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 -	HCV Re-Assessment for Strategic Operating Unit (SOU) 3 Elphil has been conducted on 4-6/5/2017 by Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Sdn. Bhd. Final Report (Version 2.0) dated February 2017 was sighted. Total HCV area identified for SOU 3 Elphil falls under: 1. Water Catchment area – category HCV 4 (Kamuning Estate, Elphil Estate and Kinta Kellas Estate) 2. River Reserve – category HCV 4 (Kamuning Estate, Elphil Estate and Kinta Kellas Estate) 3. Slope/ Rocky area – category HCV 4 (Kamuning Estate) 4. Isolated remnant forest – category HCV 4 (Kamuning Estate) 5. Limestone hill and cave – category HCV 3 (Elphil Estate)	Complied
Criterion 5.3:			
Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	Mill and estates visited has identified all waste products and source of pollution and documented in Environmental Management Plan under section Waste Management. The waste identified has been categorized as follows: i. Domestic waste ii. Industrial waste: EFB, boiler ash, decanter cake, Scrap metal, POME iii. Scheduled Waste: filters/cotton rags, lubricants, empty container, waste chemical, used PPE iv. Recyclable Waste: Empty pesticides containers	Complied

<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.</p> <p>Sighted the sampled scheduled waste disposal records for mill and estates visited:</p> <p><u>Elphil POM</u> In POM, scheduled waste dispose through licensed contractor: Kualiti Alam Sdn Bhd. Latest consignment note for disposal of scheduled waste : i. 12/10/2018 for SW 109; C/N no: 2018101209MKW6YQ : 0.0410 mt ii. 12/10/2018 for SW 305; C/N no: 2018101209YV8CZ0 : 0.0140 mt iii. 12/10/2018 for SW 306; C/N no: 2018101209JUNASH: 0.4030 mt iv. 12/10/2019 for SW322; C/N no: 2018101209GZ25S8: 0.110 mt v. 12/10/2018 for SW409; C/N no: 2018101209OY9RQG: 0.652 mt vi. 12/10/2018 for SW410; C/N no: 2018101292HLGKX: 0.0125 mt</p> <p>Scheduled waste inventory was recorded daily according to the date waste generated. Sighted the record of SW inventory for the month of Dec 2018, January 2019. The data reported to DOE through E-SWISS.</p> <p><u>Kamuning Estate</u> Chemical containers has been triple rinse and puncture was categorized under recycle waste and disposed through recycle waste contractors SS Setia Teknology Enterprise. Sighted the disposal of empty pesticides container dated 18/1/2019. Refer invoice no. 1279.</p> <p><u>Elphil Estate</u></p>	<p>Complied</p>
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		Chemical containers has been triple rinse and puncture was categorized under recycle waste and disposed through recycle waste contractors SS Setia Teknology Enterprise. Sighted the disposal of empty pesticides container dated 18/1/2019. Refer invoice no. 1278.	
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<p>5.3.3</p>	<p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p>	<p>SOU3 has established Waste Management Plan and documented in Environmental Management Plan/Environmental Improvement Plan/Pollution Prevention Plan. The plan was reviewed annually. The plan has identified the waste category, location generated, mitigation plan, person responsible and monitoring period. Sighted the implementation of the management plan at mill and estate visited as follows:</p> <p><u>Elphil POM</u> Sighted the implementation of waste management plan as follows: i. EFB was disposed by application to the estate. Sighted the records of EFB transportation to the estate as follows: a. Nov 18 – 3,712.86 MT b. Dec 18 – 4,550.85 MT c. Jul 2018 – 4,403.01 MT</p> <p>ii. Fiber and shell was used as boiler fuel. Sighted the records as follows: a. Fiber – Jan 19 – 3,415.22mt @ 0.165 mt/ FFB production Dec 18 – 3,374.79mt @ 0.165 mt/ FFB production Nov 18 – 3,372.97mt @ 0.165 mt/ FFB production b. Shell – Jan 19 – 620.95mt @ 0.03 mt/ FFB production Dec 18 – 613.60mt @ 0.03 mt/ FFB production Nov 18 – 613.27mt @ 0.03 mt/ FFB production</p> <p><u>Kamuning Estate and Elphil Estate</u> Sighted the implementation as follows: i. Domestic waste collection was carried out 2 times a week by Majlis Perbandaran Kuala Kangsar.</p> <p><u>Kinta Kellas Estate</u> Sighted the implementation as follows: i. During site visit the waste water from the premix area was pump back to be used for chemical premix.</p>	<p>Complied</p>
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		<p>SW409, SW410, SW305 and SW306 was disposed as per scheduled waste regulation. The management had communicate with DOE to extend the period (180 days), sighted the letter to DOE on 21/7/2018 and communication by email on 219/2/2019. The approval still pending due to officer incharge has been transferred (email by DOE Officer dated 20/2/2019).</p>	
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>			
<p>5.4.1</p>	<p>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>	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It was monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement.</p> <p>Apart from use of grid supple (TNB) for electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler. The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO.</p> <p>Electricity generation was through steam turbine and boiler where Palm fibre and PK shells were used as renewable energy/fuel.</p> <p>Monthly records of energy consumption of non-renewable and renewable fuel per metric ton of palm product at the Mill were available.</p> <p>Sighted the sample diesel usage monitoring records as follows:</p> <ol style="list-style-type: none"> a. Jan 19 – 0.29 L/ mt Palm product b. Dec 18 – 0.38 L/ mt Palm product c. Nov 18 – 0.38 L/ mt Palm product d. Oct 18 – 0.38 L/ mt Palm product e. Sept 18 – 0.38 L/ mt Palm product f. Aug 18 – 0.31 L/ mt Palm product 	<p>Complied</p>

Criterion 5.5:			
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 -	Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law –EQA and Regulations 1974. No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as (felling & chipping, cambering/land forming and path construction).	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 -	No use of fire for land preparation during replanting	Complied
Criterion 5.6:			
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>Various monitoring has been conducted including the effluent analysis, stack monitoring and river water monitoring.</p> <p>Monitoring of effluent discharge was conducted monthly. Sighted the effluent analysis report as follows:</p> <ul style="list-style-type: none"> i. Dec 2018 – Date sampled taken 21/12/2018. Refer report no EP44/2019. ii. Nov 2018 – Date sampled taken 22/11/2018. Refer report no EP1/2019. iii. Oct 2018 – Date sampled taken 18/10/2018. Refer report no EP498/2018. <p>Type of discharge was through Land Irrigation.</p> <p>The parameters from all sample of final discharge sampled were found within the limit.</p> <p>Water quality analysis was done on quarterly basis. Sighted the report as follow:</p> <table border="1" data-bbox="1093 895 1767 1165"> <thead> <tr> <th>Month</th> <th>Parameter</th> <th>Sg Kerdah</th> <th>Mill Reservoir</th> <th>Drain</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Apr 18</td> <td>BOD</td> <td><1</td> <td>3</td> <td>4</td> </tr> <tr> <td>S. Solid</td> <td>70</td> <td>8</td> <td>4</td> </tr> <tr> <td rowspan="2">Jul 18</td> <td>BOD</td> <td><1</td> <td><1</td> <td><1</td> </tr> <tr> <td>S. Solid</td> <td>12</td> <td>8</td> <td>10</td> </tr> <tr> <td rowspan="2">Oct 18</td> <td>BOD</td> <td>2</td> <td>1</td> <td>3</td> </tr> <tr> <td>S. Solid</td> <td>238</td> <td>24</td> <td>12</td> </tr> </tbody> </table> <p>For continuous emission reporting system, it always online and send to HQ of Department of Environment in Putrajaya. Measurement of dust particulate concentration of Stack – Boiler 1 and Boiler 2 by Environmental Science (M) Sdn Bhd. Following is the monitoring report sighted:</p>	Month	Parameter	Sg Kerdah	Mill Reservoir	Drain	Apr 18	BOD	<1	3	4	S. Solid	70	8	4	Jul 18	BOD	<1	<1	<1	S. Solid	12	8	10	Oct 18	BOD	2	1	3	S. Solid	238	24	12	<p>Complied</p>
Month	Parameter	Sg Kerdah	Mill Reservoir	Drain																															
Apr 18	BOD	<1	3	4																															
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	S. Solid	238	24	12																															

		<p>a. Ref no: L-PG-AQ1809-NBS-0293 dated 21/9/2018 Boiler Stack No 2; The monitoring result indicated at 0.2715 gm/Nm³, above than the permissible limit of 0.15 gm/ Nm³ stipulated under the Environmental Quality (Clean Air) Regulations, 2014.</p> <p>b. Ref no: L-PG-AC1811CSD-0312 dated 12/12/2018 Boiler Stack No 1; The monitoring result indicated at 0.3393 gm/Nm³, above than the permissible limit of 0.15 gm/ Nm³ stipulated under the Environmental Quality (Clean Air) Regulations, 2014.</p> <p>The management had established the plan to install electrostatic precipitator (ESP), expected full load run in September 2019. The proposal by appointed contractor was submit to DOE on January 2019, waiting approval from DOE Perak.</p> <p>The management had summarize the GHG for 2018 using PalmGHG Calculation. The detail as per Appendix C.</p>	
5.6.2	<p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance</p>	<p>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.</p> <p>For mill, the management plan was established eg: construction of biogas plant at Elphil POM by Q4 2020.The Biogas masterplan by Renewables Department was sighted.</p>	Complied

5.6.3	<p>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.</p> <p>- Minor compliance -</p>	<p>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.</p> <p>The water samples were sent to Sime Darby R&D Laboratory for analysis. Records are maintained and verified on-site to have met the permissible regulatory limits. Quarterly reporting to DOE was also done and record documented.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 is used and the management opted for full version was applied.</p> <p>These GHG calculations were done as per certification unit basics including 3 estate and mill. Summary emissions:</p> <p>a. Emission/ mt CPO= 1.18 tCO₂e/mt CPO b. Emission/ mt PK= 1.18 tCO₂e/mt PK</p>	Complied
<p>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</p>			
<p>Criterion 6.1: 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.</p>			
6.1.1	<p>A social impact assessment (SIA) including records of meetings shall be documented.</p> <p>- Major compliance -</p>	<p>Elphil POM and the supplying estates (Elphil Estate, Kamuning Estate and Kinta Kellas Estate) have carried out Social Impact Assessment (SIA) on 24-27/8/2015 by Social & Environment Projects Unit, PSQM Department. The assessment was carried out by using site observation, documentation review and field interviews with local communities, contractors and workers. All the inputs from the stakeholders were recorded in the report.</p>	Complied

6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	The assessment has involved the participation of the stakeholders such as contractors, government authorities, local communities and workers. The inputs from the stakeholders were recorded in the report.	Complied
6.1.3	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. - Major compliance -	Elphil POM and Kamuning Estate have developed Management Plan on Social Impact Assessment/ Social Action Plan FY2019 dated 11/2/2019 and 31/1/2019 where the positive and negative impacts raised during stakeholder meeting, NUPW meeting and Safety meeting were recorded in the plan with action plan, status, person in charge and the completion date. Social Management Plan Financial 2019 was also developed to monitor quarterly on the progress of the action.	Complied
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 will be reviewed on yearly basis and the last review was carried out on 11/2/2019 in Elphil POM, 31/1/2019 in Kamuning Estate and 10/1/2019 in Elphil Estate.	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 was no scheme smallholder involved in the certification unit.	Not applicable

Criterion 6.2:
There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.

6.2.1	<p>Consultation and communication procedures shall be documented.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has developed Procedure for External Communication, Sime Darby Plantation Mill/ Estate Quality Management System – Standard Operation Manual, Sub-section 5.5, Appendix 5.5.3.2, version 1, issue date 1/11/2008. The procedure has outlined the process of handling complaints from stakeholders and the time frame for external communication to be dealt with. The time frame to provide feedback is within two weeks from the date of receipt of communication and within one week of the completion of the investigation.</p>	Complied
6.2.2	<p>A management official responsible for these issues shall be nominated.</p> <p>- Minor compliance -</p>	<p>Manager of the POM and Kamuning Estate have been appointed by the Regional GM and CEO to act as the responsible person to handle social issue in Elphil POM and Kamuning Estate. Appointment letter dated 15/12/2018 and 1/1/2018 was sighted. Roles and responsible has been clearly stated in the appointment letter.</p> <p>Assistant Manager of Elphil Estate has been appointed as social officer to handle social issue in the estate by Manager and appointment letter dated 10/9/2018 was sighted.</p>	Complied

6.2.3	<p>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 -</p>	<p>Stakeholder list was developed by include the relevant stakeholders such as government authorities, local communities, FFB suppliers, contractors and suppliers.</p> <p>The latest stakeholder meeting was carried on 30/1/2019 in Elphil POM with the participation of stakeholders such as contractors, government authorities, FFB suppliers and local communities. Meeting minutes and attendance list was sighted. Comments raised by the stakeholders were recorded and responded during the meeting.</p> <p>Kamuning Estate and Elphil Estate has organized a combined stakeholder consultation meeting on 16/1/2019 with the participation of government authorities, contractors and internal workers. The stakeholders have expressed their gratitude towards the management for the kind assistance and contribution. Besides, there were issues raised to the management as well and the management has incorporated the issue into the Social Management Plan with propose action to be taken.</p> <p>Kinta Kellas Estate has conducted stakeholder meeting on 22/1/2019 with stakeholders such as government authorities, villagers, mosque and temple’s representatives and cattle’s owners. Requests by the stakeholders were recorded in the minutes and the management has responded on the spot with the proposed action.</p>	Complied
<p>Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.</p>			
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. - Major compliance -</p>	<p>Sime Darby Plantation Berhad has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 1/11/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in www.simedarbyplantation.com.</p>	Complied

6.3.2	<p>Documentation of both the process by which a dispute was resolved and the outcome shall be available.</p> <p>- Major compliance –</p>	<p>Elphil POM has implemented Internal & External Complaint Book to record grievances and complaints. Verified the complaint book found no issue was received since Y2017. Besides, the mill has implemented Repair & Job Requisition Bungalows & Linesite form to record all the housing complaint by the workers. Sampled the complaint lodged on 22/1/2019 for House No. 24 for the broken dustbin. The management has made purchase order on 24/1/2019 and seen the Store Issue Note dated 2/2/2019 where the dustbin has been issued to the House No. 24. The occupant has acknowledged on the form on 17/2/2019.</p> <p>Kamuning Estate has implemented Housing Defect Complaint Record Book to record all the housing defects by the workers. The carpenter will carry the book to the morning muster every day to record housing complaint. The actions have been taken accordingly to repair the defects and complainant acknowledged after the repair work has been completed.</p> <p>Elphil Estate has implemented Linesite Report, Building Repair Records and Electric & General Repair book to record all types of housing defect by the workers. Actions have been taken accordingly and interviewed with the workers confirmed that the management has taken action to rectify their complaints.</p>	Complied
<p>Criterion 6.4: 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	<p>A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 and issue date: 1/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.</p>	Complied

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>	<p>SOP as per indicator 6.4.1.</p> <p>Besides, the company has implemented Social Policy dated January 2015 where they are committed to ensure that any negotiations concerning compensation for loss of legal or customary 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>	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>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
<p>Criterion 6.5: 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>			

<p>6.5.1</p>	<p>Documentation of pay and conditions shall be available. - Major compliance -</p>	<p>Mill and estate have employed local and foreign workers. All the mill and estates workers are under direct employment and under contract. The payslip has included basic pay, allowances, working days, deduction of salary such as Union, electricity and temple fund. Payslip for April 2018, July 2018 and January 2019 was sampled based on the crop summary as below:</p> <ul style="list-style-type: none"> a. Employee No.: 119973 (EPOM) b. Employee No.: 120219 (EPOM) c. Employee No.: 132890 (EPOM) d. Employee No.: 133146 (EPOM) e. Employee No.: 91953 (KE) f. Employee No.: 134372 (KE) g. Employee No.: 112439 (KE) h. Employee No.: 133723 (KE) i. Employee No.: 132218 (EE) j. Employee No.: 85191 (EE) k. Employee No.: 105251 (EE) l. Employee No.: 132220 (EE) m. Employee No.: 86572 (KKE) n. Employee No.: 116762 (KKE) o. Employee No.: 132027 (KKE) p. Employee No.: 102648 (KKE) <p>All the sampled workers have achieved the minimum wage order. Kamuning Estate has briefed to the workers on the new Minimum Wage Order 2018 for the revised salary to RM 1100 on 2/2/2019. The POM has also engaged contractor to supply skill workers to work in the workshop. Seen the payslip from October 2018 to January 2019 for the two contractor’s workers (Passport No.: BL0176894 and Passport No.: BQ0484289) has achieved the Minimum Wage Order as per the legal requirement.</p>	<p>Complied</p>
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<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. - Major compliance -</p>	<p>Employment contract are available and explained in language that understood by workers. The contract was signed by the workers and sampled of contracts as below:</p> <ul style="list-style-type: none"> a. Employee No.: 132890 (EPOM) b. Employee No.: 133146 (EPOM) c. Employee No.: 119973 (EPOM) d. Employee No.: 143175 (EPOM) e. Employee No.: 129718 (KE) f. Employee No.: 134372 (KE) g. Employee No.: 133723 (KE) h. Employee No.: 136515 (KE) i. Employee No.: 132218 (EE) j. Employee No.: 132220 (EE) k. Employee No.: 135480 (EE) l. Employee No.: 86572 (KKE) m. Employee No.: 129837 (KKE) n. Employee No.: 141931 (KKE) o. Employee No.: 136482 (KKE) <p>Besides, for workers who workers more than 2 years (Indonesian) and 3 years (other nationalities) have signed an extension contract (version: EMP04/INDO/2017/01) as below:</p> <ul style="list-style-type: none"> a. Employee No.: 120219 (EPOM) b. Employee No.: 95860 (EPOM) c. Employee No.: 91953 (KE) d. Employee No.: 91595 (KE) e. Employee No.: 43681 (KE) f. Employee No.: 85191 (EE) g. Employee No.: 105251 (EE) h. Employee No.: 98760 (EE) i. Employee No.: 88014 (KKE) j. Employee No.: 102648 (KKE) 	<p>Major nonconformance</p>
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		<p>k. Employee No.: 116762 (KKE)</p> <p>Elphil POM: The POM has also engaged contractor to supply skill workers to work in the workshop. Seen the employment contract signed between the contractor and the workers. However, the terms and conditions as below were not properly stated in the contract:</p> <ul style="list-style-type: none"> a. Notice of Period b. Termination of service by the employee c. Clause 7: Overtime on Rest Day or Public Holiday: Salary x 2.0 <p>Elphil Estate: The employment contracts for the contractor’s workers sighted where Clause 4.1 stated daily rate of pay is RM 38.40 per day which is not accordance to Minimum Wage Order 2016.</p> <p>Thus, a major non-conformance raised.</p>	
6.5.3	<p>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.</p> <p>- Minor compliance –</p>	<p>Linesite inspection was carried out on weekly basis in Elphil POM, Kamuning Estate and Elphil Estate. The inspection was carried out by using the Housing Complex// Nest/ Community Hall Inspections Form by Medical Assistant and Assistant Manager.</p> <p>The workers were provided with free housing facilities and water supply. Electricity was supplied by TNB with a domestic rate. Welfare amenities such as football field, clinic, temple and mosque were provided to the workers and their family members as well. The mill and estates were located nearby the town and therefore the children can easily access to the government schools located at the nearby town.</p>	Complied
6.5.4	<p>Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p>	<p>The mill and estates are located nearby to the town and workers are easily access to the adequate, sufficient and affordable foods. Interviewed with the workers confirmed that they will purchased their foods and goods from nearest town such as Sepang town.</p>	Complied

<p>Criterion 6.6: 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.</p>			
6.6.1	<p>A published statement in local languages recognising freedom of association shall be available. - Major compliance -</p>	<p>Sime Darby has implemented Social Policy dated January 2015 where the management is committed and respect the rights of all personnel to form and join trade unions of their choice and to bargain collectively. The policy was developed in Bahasa Malaysia and English. The policy has been briefed to all the workers on 28/1/2019 in Elphil POM, 15/2/2019 in Kamuning Estate and 19/1/2019 in Kinta Kellas Estate. The policy was displayed at the notice board outside the office. Interviewed with the workers confirmed that they understood on the policy and aware that they are freely to join any association.</p>	Complied
6.6.2	<p>Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -</p>	<p>NUPW meeting was carried out on 29/1/2019 in Elphil POM with total 7 participants from management and workers. There were issues raised by the workers and were recorded in the meeting minutes with targeted date of completion and person in charge.</p> <p>Kamuning Estate has maintained Communication Record to record all the issues raised by the workers with Union Representative and Employer Representative. Action taken was recorded in the record. For eg: the workers who was not attended to morning muster has been given with verbal warning with acknowledgement from the workers.</p> <p>Kinta Kellas Estate has conducted NUPW meeting on 8/2/2019 with total 9 participants from management and workers. Issues were raised by the workers and verified that some of the issues have been rectified.</p>	Complied
<p>Criterion 6.7: Children are not employed or exploited.</p>			

6.7.1	<p>There shall be documentary evidence that minimum age requirements are met.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantation Berhad has developed Child Protection Policy and Social Policy dated January 2015 where they are committed to comply with the minimum age of employees. The policy has been briefed to all the workers on 28/1/2019 in Elphil POM, 15/2/2019 in Kamuning Estate and 19/1/2019 in Kinta Kellas Estate. The policy was displayed at the notice board outside the office. Document reviewed on the master listing of the employees found that all workers employed were above 18 years old. Interviewed with the workers confirmed that no child labour was found in the plantations.</p>	Complied
<p>Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.</p>			
6.8.1	<p>A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.</p> <p>- Major compliance -</p>	<p>SDPB has implemented Social Policy, Social & Humanity Management Policy dated January 2015 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age. The policy has been briefed to all the workers on 28/1/2019 in Elphil POM, 15/2/2019 in Kamuning Estate and 19/1/2019 in Kinta Kellas Estate. The policy was displayed at the notice board outside the office.</p>	Complied
6.8.2	<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>Interviewed with the workers consisted of different nationalities and different gender confirmed that they are treated equally without any discrimination. The benefits that provided to them were the same such as free water supply and medical treatment, overtime was offered to everyone whenever necessary and trainings were provided according to job needs.</p>	Complied
6.8.3	<p>It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has developed Workforce Management Unit Liaison & Recruitment (LR) Procedure with Doc. No. WMU/LR-SOPP/MARCH2016, rev. 0 dated 30/3/2016. The recruitment process was clearly stated in the procedure where the recruitment was based age, medical fitness and etc. There is no any discrimination based on religion, gender, nationality and etc during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc.</p>	Complied

Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	Sime Darby Plantation Berhad has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy has been briefed to all the workers on 28/1/2019 in Elphil POM, 15/2/2019 in Kamuning Estate and 19/1/2019 in Kinta Kellas Estate. The policy was displayed at the notice board outside the office.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	SDPB has implemented Social Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy has been briefed to all the workers on 28/1/2019 in Elphil POM, 15/2/2019 in Kamuning Estate and 19/1/2019 in Kinta Kellas Estate. The policy was displayed at the notice board outside the office.	Complied

6.9.3	<p>A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation Berhad has developed Gender Committee Handbook, First Edition and the purpose of the development of this handbook is to provide general guide to the management, Gender Committee and other relevant parties to the specific components of the Gender Policy. Gender Committee was established in every operating unit to implement, promote and disseminate values and principles of the Gender Policy. It enhances the awareness of employees on issues related to women in the workplace, gender discrimination as well as fair and equal opportunity. Flowchart to handle the social issues was stated in the handbook as well. Besides, the company has established Whistleblowing channel that could be found in www.simedarbyplantation.com to enable the employees to anonymously report actual, potential, or suspected wrongdoings without fearing repercussions.</p> <p>Elphil POM and Elphil Estate has established Gender Committee and meeting was carried out once every three months. The last quarterly meetings were conducted on 29/1/2018, 25/4/2018, 25/7/2018, 25/10/2018 and 28/1/2019. Issues raised by the committees were recorded in the minutes.</p>	Complied
<p>Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.</p>			
6.10.1	<p>Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.</p> <p>- Minor compliance -</p>	<p>Elphil POM has received FFB from own supplying estates and purchased FFB from two outsiders. The current and past prices was displayed at the weighbridge office.</p>	Complied
6.10.2	<p>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).</p> <p>- Major compliance -</p>	<p>There are two OCPs supplied FFB to the mill and they were briefed on the pricing mechanism as well as the mechanism was clearly stated in the Second Schedule and Third Schedule of the agreement.</p>	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 -	There are two OCPs supplied FFB to the mill and seen the agreement between the OCPs and Sime Darby as below: a. Agreement No.: P/P/0119/FFB01328L valid from 1/1/2019 to 31/12/2019. Agreement No.: P/P/0119/FFB01330L valid from 1/1/2019 to 31/12/2019.	Complied
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	According to the agreement, the payment divided into two portions. One is advance payment which on weekly basis where the payment of 70% of the value equivalent to the total FFB delivered every 7 days or more during the delivery month shall be made at any time prior to the end of the week of the said month. Final payment will be made on or before the 10 th day of the following month. Reviewed on the payment statement for January 2019 where the payment was made according to the agreement. The payment was made three days after received the Purchase Order and on weekly basis.	Complied
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	The mill and estates’ management have made contribution to the local communities such as donation to the school event upon request by the school’s management. Besides, the mill management has carried out “ <i>Gotong-royong</i> ” in the linesite to prevent the Aedes diseases. Kamuning Estate’s management has assigned workers to clean up the compound of Hindu Cemetery.	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 –	There was no scheme smallholder involved in the certification unit.	Not applicable
Criterion 6.12: No forms of forced or trafficked labour are used.			

6.12.1	<p>There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -</p>	<p>The company has recruited all the employees with legal identification for local and valid passport and work permit for foreign workers. Contract of employment in their national language was signed by the workers prior to work. Sampled of foreign workers with valid work permit as below:</p> <ul style="list-style-type: none"> a. Permit No.: PE 1217232 valid until 25/9/2019 (EPOM) b. Permit No.: PE 6737309 valid until 7/3/2020 (EPOM) c. Permit No.: PE 6912075 valid until 27/3/2020 (EPOM) d. Permit No.: PE 6740271 valid until 23/3/2020 (EPOM) e. Permit No.: PE 0438574 valid until 5/6/2019 (KE) f. Permit No.: PE 0712442 valid until 12/6/2019 (KE) g. Permit No.: PE 6142168 valid until 16/5/2019 (KE) h. Permit No.: PE 6017311 valid until 11/11/2019 (KE) i. Permit No.: PE 0172147 valid until 20/3/2019 (EE) j. Permit No.: PE 1988661 valid until 15/11/2019 (EE) k. Permit No.: PE 0172149 valid until 20/3/2019 (EE) l. Permit No.: PE 1367471 valid until 1/8/2019 (EE) m. Permit No.: PE 6541482 valid until 22/12/2019 (KKE) n. Permit No.: PE 0452596 valid until 26/3/2019 (KKE) o. Permit No.: PE 1177637 valid until 15/7/2019 (KKE) 	Complied
6.12.2	<p>Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –</p>	<p>Interviewed with the foreign workers confirmed that the job that promised in the home country by the agent was the similar to the job they are working for. No contract substitution has occurred.</p>	Complied

6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	SDPB has implemented a Sime Darby's Human Rights Charter and can be easily access via www.simedarbyplantation.com where they committed as below: a. Providing equal opportunity b. Respecting freedom of association c. Eradicating any form of exploitation d. Ensuring favourable working conditions e. Enhancing Safety and Health All the foreign workers will be provided with induction training prior to work. Besides, they were provided with decent living condition and free from any discrimination. The workers informed that they were treated equally without any discrimination and allow to join NUPW freely. No contract substitution has occurred through interviewed with the workers.	Complied
Criterion 6.13: Growers and millers respect human rights.			
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 -	The Social and Humanity Management Policy covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff union monitor to ensure no violations. The policy has been briefed to all the workers on 28/1/2019 in Elphil POM, 15/2/2019 in Kamuning Estate and 19/1/2019 in Kinta Kellas Estate. The policy was displayed at the notice board outside the office.	Complied
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 in Peninsular Malaysia.	Not applicable
Principle 7: Responsible development of new plantings			
Elphil 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 annual surveillance assessment. The immature areas are replanted area.			
Principle 8: Commitment to continual improvement in key areas of activity			

Criterion 8.1: Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.			
8.1.1	<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"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>Continuous improvement plan was established at Elphil POM and supply bases as follow:</p> <ol style="list-style-type: none"> 1. To recover supernatant from buffer tank to reduce oil losses at raw effluent 2. To reduce electricity consumption (TNB) 3. To reduce generating salt consumption for water treatment 4. To generate profit from sale of palm kernel shell 5. To increase the press worm screw lifespan 6. To recover loose fruit before empty bunch press 7. To reduce consumption of A4 paper 8. To reduce telephone bill 9. To reduce repairing cost of worker quarters 10. To reduce raking cost/palm 11. To reduce painting cost of FFB Bins 	Complied

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

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SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
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	
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.

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SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
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
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

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SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
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	Pamakan 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

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NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
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
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

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NO	Name of PT	Name of Mill	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
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

Legends

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

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2018 for Elphil Palm Oil Mill 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, PK Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in 2018 for Elphil Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.39
PK	1.39

Extraction	%
OER	20.35
KER	5.51

Production	t/yr
FFB Process	206484.57
CPO Produced	42029.49
PKO Produced	11387.39

Land Use	Ha
OP Planted Area	5262.93
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	5262.93

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	50948.47	0.68	0	0	0	0	50948.47	0.68
CO ₂ Emission from fertilizer	5107.60	0.07	0	0	0	0	5107.60	0.07
NO ₂ Emmision	6027.45	0.08	0	0	0	0	6027.45	0.08
Fuel Consumption	163.19	0	0	0	0	0	163.19	0
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-48292.39	-0.65	0	0	0	0	-48292.39	-0.65
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	13954.32	0.19	0	0	0	0	13954.32	0.19

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	40474.47	0.2
Fuel Consumption	62.49	0
Grid Electricity Utilisation	849.15	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	41386.11	0.2

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	15840.52
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*This mill has no kernel crusher operation.

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

POME Diverted to Anaerobic Digestion:	
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

5.1 Applicability of the general chain of custody requirements for the supply chain			
	Requirement	Evidence For any N/A raised, justification is required.	Compliance (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.	Elphil Palm Oil Mill takes legal ownership and physically handles its RSPO certified oil palm products i.e. CPO and PK.	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.	Elphil POM is not a trading company. Therefore, this requirement is not applicable.	Yes
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.	The parent company (Sime Darby Plantation Sdn Bhd) is the member of RSPO [membership no.: 1-0008-04-000-00] and the mill is registered in the Palm Trace system [member ID: RSPO_PO1000000191].	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.	Yes
5.2 Supply chain model			
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 Elphil certification unit and other Sime Darby group estates 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.	Elphil POM was MB certified and the sales of product were MB or conventional.	Yes
5.3. Documented Procedures			
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"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	<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"> • Responsibilities • control of documents & records • delivery of FFB from the estate • receiving FFB at the mill • process monitoring • CPO and PK dispatch • Non-conforming products and/or documents • Product claims • Outsourced contractor • Training • Reclassification of mill's supply chain model • Production volume • Conversion factors • Internal audit • Complaints • Management review 	Yes
	<ul style="list-style-type: none"> • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	<p>Among the records included in the procedures are:</p> <ul style="list-style-type: none"> • Weighbridge tickets • Dispatch of CPO/PK – weighbridge ticket, delivery order, shipping document • Daily production report 	Yes

		<ul style="list-style-type: none"> Record and balance All the records were found to be up-to-date. 	
	<ul style="list-style-type: none"> 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. 	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.	Yes
5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization;	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).	Yes
	<p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>ii) effectively implements and maintains the standard requirements within its organization</p>	Combined RSPO P&C and SCC Internal audit for supply chain was last conducted on 24-15/4/2019 by 2 internal auditor sourced from other department (GSQM). There were 3 Major NC raised as the results of the audit. All NC raised was closed on 14/2/19 with sufficient evidence of implementation.	Yes
5.4. Purchasing and goods in			
5.4.1	<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"> The name and address of the buyer; The name and address of the seller; The loading or shipment/delivery date; The date on which the documents were issued; 	<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"> Consignment note no. Estate’s names Date & time of delivery Field No. No. of bunches 	Yes

	<ul style="list-style-type: none"> • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	<ul style="list-style-type: none"> • Vehicle no. • Seal no. • RSPO certificate number (RSPO 550180) <p>E.g. of information available in the mill's weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> • Weighbridge ticket no.: • Name of estates • Field No. • Name of driver • Vehicle no. • Date & time in/out • Total bunches • Seal no. • Net weight 	
	<ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). 	<p>The information was available in various documents such as delivery order and weighbridge tickets.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> • The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required 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. 	<p>The mill has a list of certified FFB suppliers which has the information about certificate number and validity period. This is applied to both second and third party FFB suppliers [ref.: clause 7.2 of SOP for Sustainable Supply Chain and Traceability]</p>	<p>Yes</p>
	<ul style="list-style-type: none"> • 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 	<p>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 (www.rspo.org). For the last</p>	<p>Yes</p>

	<p>(www.rsपो.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.</p> <ul style="list-style-type: none"> 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. 	<p>review period March 2018 to January 2019, no diversion crop received from other certified management units.</p> <p>NA – this part is applicable for supply chain actor after refinery.</p>	<p>Yes</p>
5.4.2	<p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	<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: MB to conventional.</p>	<p>Yes</p>
<p>5.5. Outsourcing activities</p>			
5.5.1	<p>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 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>	<p>Ref.: Agreement between Sime Darby Plantation Bhd and Mayang Bayumas, dated 19/12/2017. Requirement to adhere to RSPO Supply Chain Standard is stated in clause 3 Sustainability and Traceability of Product.</p>	<p>Yes</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>	<p>Not applicable. No outsourcing activity.</p>	<p>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.	Not applicable. No outsourcing activity.	N/A
	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	Not applicable. No outsourcing activity.	N/A
	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.	Not applicable. No outsourcing activity.	N/A
5.5.3	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.	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.	N/A
5.6. Sales and goods out			
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"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; 	<p>Elphil POM ensured the required information is available in document form. Sampled contract: S/C-PSD/1811/CPO0677H dated 19/11/18, quantity 250 mt</p> <ul style="list-style-type: none"> • The name and address of the buyer; XXX • The name and address of the seller: KKS Elphil, Sg Siput (U), Perak. • The loading or shipment/ delivery date; e.g. 30/11/18 • The date on which the documents were issued; 	Yes

	<ul style="list-style-type: none"> • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number 	<ul style="list-style-type: none"> • 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 MB • The quantity of the products delivered; e.g. 40.02 mt • Any related transport documentation; e.g. Despatch note e.g. #012755 • Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 550180 • A unique identification number: TR-f44eb85f171b Available in a few forms e.g. DN no., seal no., etc. 	
	<ul style="list-style-type: none"> • 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). 	Information is complete and available in various documents such as sales contract, mill weighbridge ticket, delivery note, transporter collection order.	Yes
	<ul style="list-style-type: none"> • For sites that are required 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 of shipments. Refer to section 5.7.1 of this document for further guidance. 	For the last review period from March 2018 to January 2019, only 2 transaction of certified CPO registered in palm trace. i) Transaction ID: TR-f44eb85f171b, date: 19/1/19, quantity: 250 mt ii) Transaction ID: TR-afc0d16e3748, date: 19/1/19, quantity: 190 mt	Yes
5.7. Registration of transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> • are mills, traders, crushers and refineries and; • 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. 	The registration of Palm Trace is done by the Sime Darby's Global Trade Marketing Department, HQ. All transactions of CSPO and CSPK will be registered in the Palm Trace.	Yes

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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"> 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. 	Based on the announcement summary from March 2018 to January 2019, all the registrations were found to be in order. Total registered transaction (extracted from Palm Trace) summarized as per below: CPO: 450 mt PK: 0 mt Detailed transaction can be found under Appendix E, Table C of the report.	Yes
	<ul style="list-style-type: none"> 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. 	Not applicable. Products are not sold beyond refinery.	N/A
	<ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 	Based on the quarterly mass balance accounting sheet, the removal of volumes was done correctly when the products were sold as conventional.	Yes
	<ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	Based on the announcement summary, all the confirmations were found to be in order.	Yes
5.8. Training			
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 2017/2018 were available which training for RSPO Supply Chain has been included.	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.	Relevant personnel to supply chain implementation as defined by the CU are the personnel that involve in supply chain implementation such as Assistant Managers, QA, clerk, lab supervisor & assistant, weighbridge operators. At	Yes

		Elphil POM case, 8 personnel were identified. The latest RSPO training was carried out on 31/1/19.	
5.9. Record Keeping			
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
5.10. Conversion factors			
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 (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its derivatives. 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. Last year's average from March 2018 to January 2019 were 20.36% (OER) & 5.45% (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
5.11. Claims			

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
General corporate communications			
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 Elphil POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	N/A
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. 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.	Not applicable as no off-product claim made by Elphil POM as to date.	N/A
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 Elphil 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 Elphil 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 Elphil POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	Yes

Business to business communications			
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.	Yes
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.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e product/commodity with SCC model (CPO-RSPO MB) and RSPO certificate number; RSPO 550180. Refer to weighbridge ticket number 02739 dated 12/11/18.	Yes
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: 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. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	Elphil POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Yes
5.4	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. For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified	Elphil 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.	N/A

	status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.		
Business to consumer communication			
6.1	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.	No business to consumer communication on product specific claim made Elphil POM and only producing crude and unfinished product. This is not applicable for POM.	N/A
6.2	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.	No business to consumer communication on product specific claim made Elphil POM and only producing crude and unfinished product. This is not applicable for POM.	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 Elphil 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 Elphil 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 Elphil 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 Elphil 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 Elphil POM and only producing crude and unfinished product. This is not applicable for POM.	N/A

6.8	<p>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 applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>	<p>No business to consumer communication on product specific claim made Elphil POM and only producing crude and unfinished product. This is not applicable for POM.</p>	<p>N/A</p>
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content (MB)			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>Elphil POM is producing crude palm products</p>	<p>Yes</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>Elphil POM is producing crude palm products</p>	<p>Yes</p>
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. 	<p>Elphil POM is producing crude palm product and does not involved in any labelling of end product</p>	<p>Yes</p>

	<ul style="list-style-type: none"> • 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. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • 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). • 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 & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [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. • 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. • 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. 	<p>Elphil POM is producing crude palm product and does not involved in any labelling of end product</p>	<p>Yes</p>

	<p>Messaging NOT ALLOWED in storytelling in product-related communications: Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</p>	<p>Elphil POM is producing crude palm product and does not involved in any labelling of end product</p>	<p>Yes</p>
<p>MODULE C – PARTIAL PRODUCT CLAIMS</p>			
	<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"> • 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. • At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB. • The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume. • The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'. • 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. 	<p>Elphil POM is producing crude palm product and does not involved in any labelling of end product</p>	<p>Yes</p>
<p>MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES</p>			
	<p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p> <p>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</p>	<p>Elphil POM is producing crude palm product and does not involved in any labelling of end product</p>	<p>Yes</p>

	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	Elphil POM is producing crude palm product and does not involved in any labelling of end product	Yes
5.12. Complaints			
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.	Yes
5.13. Management Review			
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.	Management review was last conducted on 16/7/2018. It was chaired by Mill Manager and attended by 7 mill staff which include AMs, office clerk, lab supervisor, quality supervisor and weighbridge operator.	Yes
5.13.2	The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	Based on the minutes of meeting, the following agendas were adequately recorded: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. (item 1.8) • Customer feedback. (item 1.0.1) • Status of preventive and corrective actions. (item 1.8) • Follow-up actions from management reviews. (item 1.0.2) • Changes that could affect the management system. (item 3.0) Recommendations for improvement. (item 4.0)	Yes

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"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	<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>	Yes
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Appendix E: CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: Mass Balance)

Requirements	Evidence	Compliance
E.1 Definition		
<p>E.1.1 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>Elphil Palm Oil Mill receives and process both certified and non-certified FFB. It uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products</p>	Yes
E.2 Explanation		

<p>E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO 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.</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. (see Table 10)</p>	<p>Yes</p>
<p>E.2.2 The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>Yes</p>
<p>E.3 Documented procedures</p>		
<p>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;</p>	<p>Latest written documented procedures for the chain of custody is with Mass Balance (IMB) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15, issue: 4 dated September 2018. This developed based on the RSPO SCCS July 2017. The mill manager has the responsibility to ensure implementation assisted by the mill assistant.</p>	<p>Yes</p>
<p>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.</p>	<p>The mill manager and assistant manager have awareness of the supply chain system. The manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p>	<p>Yes</p>
<p>E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBS.</p>	<p>The receiving and processing certified and non-certified FFBS procedure is a addressed in the same procedure mentioned in E.3.1.</p>	<p>Yes</p>

E.4 Purchasing and goods in		
<p>E.4.1 The site shall verify and document the volumes of certified and non-certified FFBS received.</p>	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and noncertified FFB. Records verified by internal and external audit.</p> <p>The accompanying documents of incoming FFB from own estate are estate’s weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate’s ticket number is recorded in the mill’s ticket number.</p> <p>For non-certified third party crop (e.g. Eng Huat Latex Concentrate Sdn Bhd and Tang Tatt Trading Sdn Bhd), they presents their DO to the mill and mill’s issues weighbridge ticket as confirmation of receipt.</p>	<p>Yes</p>
<p>E.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>	<p>The facility is aware of this procedure. There was no projected overproduction for the period under review.</p>	<p>Yes</p>
E.5 Record keeping		
<p>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.</p>	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and noncertified FFB. Computerized system in place. Records verified by internal and external audit.</p>	<p>Yes</p>

<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 by RSPO.</p>	<p>Computerized system in place with the delivery deducted accordingly. Conversion ratio is based on actual OER and KER.</p>	<p>Yes</p>
<p>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.(ie product can be sold before it is in stock.)</p>	<p>Based on verification of MB accounting which the mill opted for three-monthly basis recording, it was found that the certified CPO was always delivered from positive stock. No negative stock recorded at the end of inventory period of 3 month. First quarter (January to March 2018): 3,749.24 mt</p>	<p>Yes</p>

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Supply Chain Declaration *(Applicable For Appendix E)*

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	03/2018	6,470.33	9,002.21	15,472.54
2	04/2018	5,440.70	9,019.08	14,459.78
3	05/2018	5,170.09	10,825.05	15,995.14
4	06/2018	4,973.10	10,173.71	15,146.81
5	07/2018	5,485.08	13,099.57	18,584.65
6	08/2018	5,788.88	14,053.04	19,841.92
7	09/2018	6,632.61	13,610.15	20,242.76
8	10/2018	6,773.59	12,894.00	19,667.59
9	11/2018	8,080.59	12,358.78	20,439.37
10	12/2018	8,031.39	12,494.83	20,526.22
11	01/2019	7,535.60	13,404.92	20,940.52
Total		70,381.96	130,935.34	201,317.30

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	03/2018	1,352.32	391.98
2	04/2018	1,133.24	367.04
3	05/2018	986.39	313.03
4	06/2018	999.05	271.38
5	07/2018	1,157.65	319.22
6	08/2018	1,170.69	305.04
7	09/2018	1,355.79	383.68
8	10/2018	1,366.93	371.75
9	11/2018	1,649.91	408.16
10	12/2018	1,598.58	377.17
11	01/2019	1,492.00	384.83
Total		14,262.55	3,893.28

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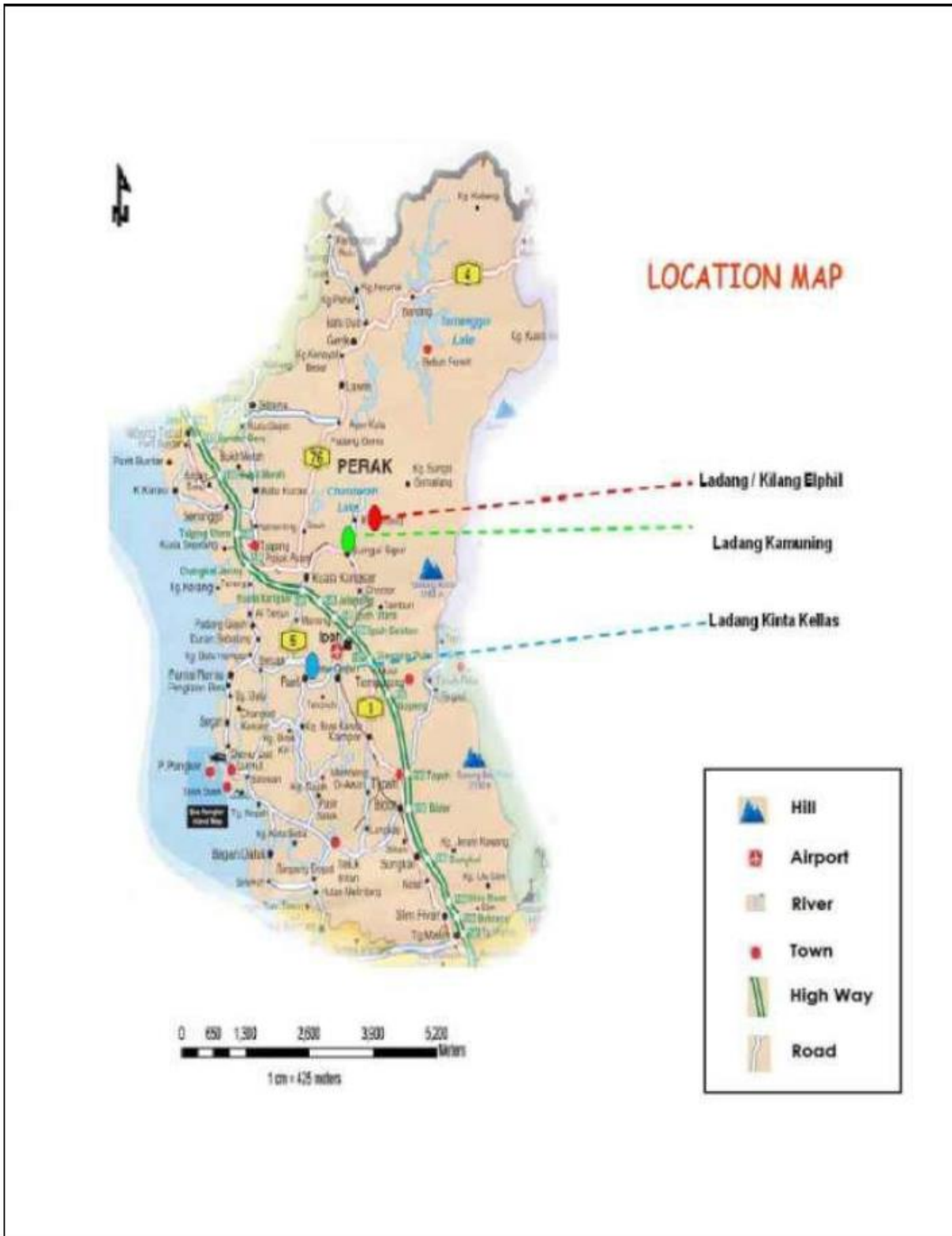
C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	XXXXX	TR-f44eb85f-171b, TR-afc0d16e-3748	440	-
Total			440	-

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
N/A				

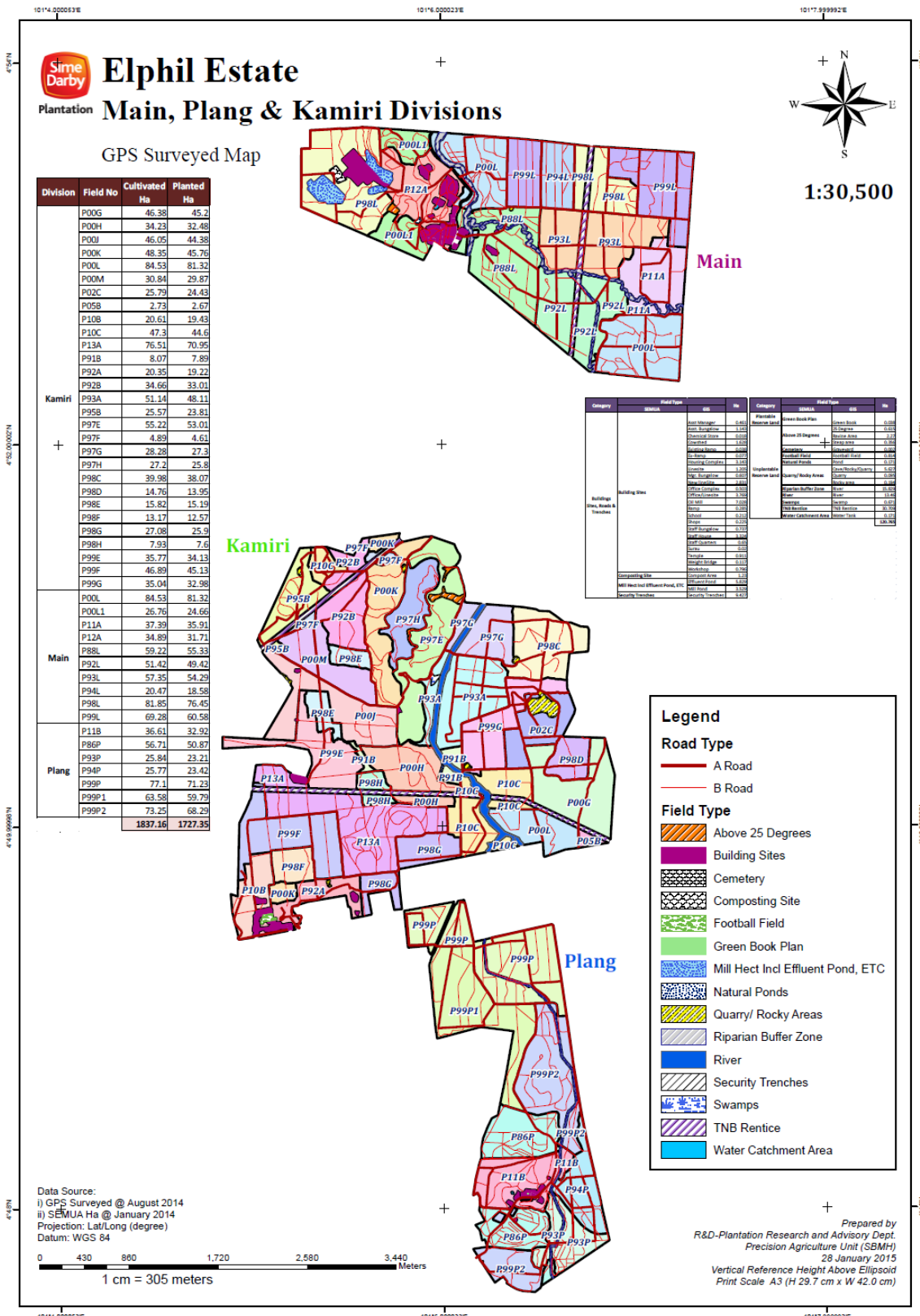
E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1.	XXXXX	10,250.91	-	
2.	XXXXX	-	2,720.54	
Total		10,250.91	2,720.54	

F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
1	-		

Appendix F: Location Map of Ephil Palm Oil Mill Certification Unit and Supply bases



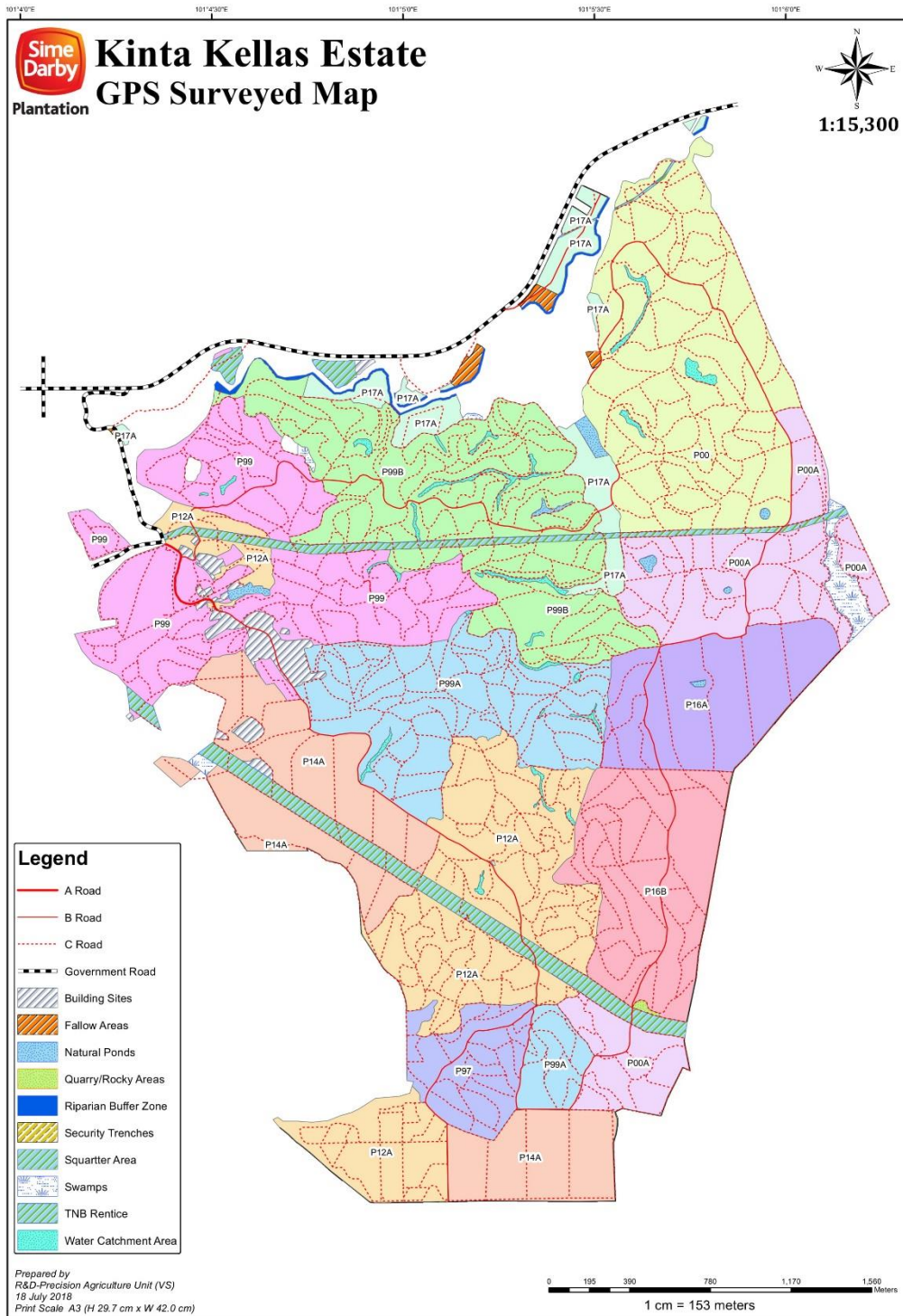
Appendix G: Elphil Estate Field Map



Appendix H: Kamuning Estate Field Map



Appendix I: Kinta Kellas Estate Field Map



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

-Not Applicable-

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