

### RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☐ Initial Assessmen	t
<b>⋈</b> Annual Surveillance Assessr	ment (2_1)
☐ Recertification Assessment (	Choose an item.

**□** Extension of Scope

### Client Company Name / Parent Company: Sime Darby Plantation Berhad

Client Company / Parent Company Address:

Level 3A, Main Block, Plantation Tower No 2, Jalan PJU 1A/7 47301 Ara Damansara Selangor, Malaysia

Certification Unit:

Strategic Operating Unit (SOU 18) - Diamond Jubilee Palm Oil Mill

Location of Certification Unit: KM 8, Jasin – Simpang Bekoh Road, 77100 Jasin, Melaka, Malaysia

Date of Final Report: 28/11/2022



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

1. Company Details				
Parent Company	Sime Darby Plantation Berhad			
RSPO Membership Number	1-0008-04-000-00 <b>Membership Approval Date</b> 07/09/2004			
Address	Level 3A, Main Block, Plantati Damansara, Selangor, Malays		2, Jalan PJU 1A/7 43	7301, Ara
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 18) – Diamond Jubilee Palm Oil Mill			
Location / Address	KM 8, Jasin – Simpang Bekoh	Road, 77100	Jasin, Melaka Mala	ysia
Website	www.simedarbyplantation.com			
Management Representative	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Compliance Unit, Group Sustainability Department) Syahrul Saramlah (SOU	E-mail	shylaja.vasudevan( antation.com syahrul.saramlah@ antation.com	
Telephone	Chairman)       Facsimile       603 78484363 (Head Office)         Office)       606-5292 019 (Mill)			

2. Certification Informat	2. Certification Information					
Certificate Number	RSPO 591224 Certificate Start Date 05/10/2021					
<b>Date of First Certification</b>	05/10/2011					
Scope of Certification	Production of Palm Oil and Pa	alm Kernel				
Visit Objectives	To conduct a surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organisation's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system					
Assessment Cycle	☐ Pre Assessment (Choose an item.) ☐ Initial Assessment					
	□ Initial Assessment     □ Annual Surveillance Assessment (ASA 2_1)					
	☐ Recertification Assessment	` - /				
	☐ Scope Extension					



Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020  ☐ RSPO P&C 2018 for the Production of Sustainable Palm Oil  ☐ Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil			
<b>Supply Chain Module</b>	☐ Identity Preserved; ☐ Mass Balance			
ISH certification Phase	□ Eligibility □ Milestone A □ Milestone B ⋈ Not Applicable			

3. Other Certifications							
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date				
MSPO 688335	MS 2530- 3:2013 Malaysian Sustainable Palm Oil (MSPO)	BSI Services (M) Sdn Bhd	09/01/2023				
MSPO 682043	MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO)	BSI Services (M) Sdn Bhd	09/01/2023				
MSPO 714120	MSPO Supply Chain Certification Standard 1 <sup>st</sup> October 2018	BSI Services (M) Sdn Bhd	11/7/2024				

4. Location(s) of Mill & Supply Bases						
Name	Location	GPS Coordinates				
(Mill / Supply Base / Group						
Manager / Smallholders)		Latitude	Longitude			
Diamond Jubilee Palm Oil Mill	KM 8, Jasin – Simpang Bekoh Road, 77100 Jasin, Melaka, Malaysia	2° 19′ 29″ N	102° 28′ 59″ E			
Diamond Jubilee Estate	KM 8, Jasin – Simpang Bekoh Road, 77100 Jasin, Melaka, Malaysia	2° 19′ 50″ N	102° 29′ 18″ E			
Bukit Asahan Estate	Jalan Asahan 77100 Melaka, Malaysia	2° 23′ 38″ N	102° 32′ 45″ E			
Welch Estate	Jalan Segamat-Jementah 85200 Segamat, Johor	2º 27′ 22″ N	102° 39′ 12″ E			

5. Description of Supply Base						
<b>New Planting Development</b> ⊠ No (no change in total planted area) ☐ Yes (please refer to Principle 7 for details)						
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted	
Diamond Jubilee Estate	2,642.99	5.58	187.62	2,836.19	93.18%	
Bukit Asahan Estate	2,965.53	1.36	105.29	3,072.18	96.53%	



Welch Estate	576.20	0.95	870.67	1,447.82	39.80%
Total	6,184.72	7.89	1,163.58	7,356.19	

6. Plantings & Cycle						
Estate / Smallholders	Estate / Smallholders Age (Years) - ha					Immature
	0 - 3	4 - 14	15 - 25	>25		
Diamond Jubilee	439.28	705.35	1292.12	206.24	2,203.71	439.28
Bukit Asahan	289.21	168.35	1,873.28	634.69	2,676.32	289.21
Welch	0	0	417.26	158.94	576.2	0
Total (ha)	728.49	873.7	3,582.66	793.63	5,456.23	728.49
Note:						

7. Summary of Certified Tonnage of FFB (Own Certified Scope)							
Estate /		Tonnage (	(MT) / year				
Smallholders	Estimated last year (Oct 2021 – Sept	Actual (July 2021 – June 2022)				(Oct 2021 – Sept (July 2021 – June 2022)	Forecast (Oct 2022 – Sept
	2022)	Previous license period (July 2021 – Feb 2022)	Current license period (Mar – June 2022)	2023)			
Bukit Asahan Estate	47,917.00	18,690.48	9,345.24	40,000.00			
Diamond Jubilee Estate	54,051.00	29,318.35	14,659.18	35,915.00			
Welch Estate 13,311.00 5,141.31 2,570.66 32,000.00							
Total 115,279 79,725.22 107,915							
Note:	Note:						

8. Summary of Certified Tonnage of FFB (from other certified unit(s))						
Estate /		Tonnage (MT) / year				
Smallholders	Coct 2021 - Sept   Coct 2022   Previous license period   Previous li		1100000			
			Previous license period (July 2021 – Feb 2022)	2023)		
Pertang Estate		177.89	0			
Tangkah Estate		1,243.67	621.83			
Serkam Estate		84.31	42.16			
Total 2,169.86						
Note:						



9. Summary of Non-Certified Tonnage of FFB (outside supplier — excluded from certificate)							
Out growers / smallholders	Tonnage (MT) / year						
	Estimated last year (Oct 2021 – Sept		Actual (July 2021 – June 2022)				
	2022)	Previous license period (July 2021 – Feb 2022)	Current license period (Mar – June 2022)	2023)			
Not applicable							
Total							
Note:							

9A. I	9A. Monthly Records of Certified and Uncertified FFB Received since the last audit								
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)					
1	July 2021	10,571.53	0	10,571.53					
2	Aug 2021	5,445.42	0	5,445.42					
3	Sept 2021	2,419.78	0	2,419.78					
4	Oct 2021	8,181.25	0	8,181.25					
5	Nov 2021	7,012.48	0	7,012.48					
6	Dec 2022	6,490.75	0	6,490.75					
7	Jan 2022	5,592.71	0	5,592.71					
8	Feb 2022	7,010.84	0	7,010.84					
9	Mar 2022	7,875.65	0	7,875.65					
10	April 2022	7,072.22	0	7,072.22					
11	May 2022	6,484.10	0	6,484.10					
12	June 2022	7,738.37	0	7,738.37					
	TOTAL 81,895.08 0 81,895.08								
Note	Note:								



Estimated last year (Oct 2021 – Sept 2022)	(3	Ac uly 2021 -	Forecast (Oct 2022 – Sept 2023		
	Previous license period (July 2021 – Feb 2022)		Current license period (Mar – June 2022)		
FFB		F	FB	FFB	
115 270	52,724.74	52,724.74 mt 29,170.34 mt		107.015.00 ***	
115,279 mt	TOTAL		107,915.00 mt		
CPO (OER: 21.59%)		CPO (OER	R: 22.17%)	CPO (OER: 21.50%)	
24 000 74	11,604.05 mt		6,549.83 mt		
24,888.74 mt	TOTAL		18,153.88	23,201.93 mt	
PK (KER: 5.23%)		PK (KER	: 4.75%)	PK (KER: 5.20%)	
C 020 00t	2,459.56	mt	1,433.44 mt	F (11 (2)	
6,029.09 mt	TOTAL	3,893.00 mt		5,611.63 mt	

10A.	10A. Monthly Records of Certified CPO & PK since the last audit							
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)					
1	July 2021	2,304.51	456.62					
2	Aug 2021	1,176.53	268.79					
3	Sept 2021	549.44	134.68					
4	Oct 2021	1,835.53	416.41					
5	Nov 2021	1,530.38	321.44					
6	Dec 2022	1,449.87	290.55					
7	Jan 2022	1,227.18	259.76					
8	Feb 2022	1,530.62	311.31					
9	Mar 2022	1,669.57	346.69					
10	April 2022	1,555.98	325.10					
11	May 2022	1,428.64	320.01					
12	June 2022	1,895.65	441.64					
	TOTAL	18,153.88	3,893.00					
Note	Note:							



11. Summary of Actual Volume sold									
Current License period (Mar 2022 – June 2022)									
	DCDO Contified	Other Scher	Other Schemes Certified		Total				
	RSPO Certified	ISCC	Others	Conventional	Total				
CPO (MT)	4,994.51	0	0	1,542.09	6,536.60				
PK (MT)	1,245.48	0	0	0	1,245.48				
Credits	-	-	-	-	-				
Previous Lice	ense period (July 2021	- February 2022	)						
CPO (MT)	8,446.57	0	0	3,120.71	11,567.28				
PK (MT)	2,631.19	0	0	0	2,631.19				
Credits	-	-	-	-	-				
Note:				<u> </u>					
Conventional is	s RSPO certified material b	out sold as non-RSF	O.						

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)							
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)			
1	Non-disclosure	Non-disclosure	13,441.08	3,876.67			
		TOTAL	13,441.08	3,876.67			
Note:							

11B. Re	11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)								
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)					
	Not applicable								
		TOTAL							
Note:									

11C. Records of CPO & PK Sold as conventional since the last audit (if any)						
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)			
1	Non-disclosure	4,662.8	0			
	TOTAL	4,662.8	0			



TOTAL

11D. Re	11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)							
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold					
	Nil							

Note:

Note:

	Estimated last year (key in period)			Actual (key in period)			Forecast (key in period)		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB									
IS-CSPO									
IS-CSPKO									
IS-CSPKE									
CSPK									

12A.	12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit								
No.Month - YearFFB (MT)Certified CPO (MT)Certified PK (MT)Certified PKO (MT)Certified PKO (MT)									
	TOTAL								
Note	Note: 1 mt = 1 credit								

13. Inde	13. Independent Smallholders Actual Sold Tonnage / Volume									
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE			
Current Li	icense period (k	(ey in period)								
Credits										
Physical										
Previous License period (key in period)										



Credits				
Physical				

13A.	13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No. Buyers Name PalmTrace Trading License Number FFB Sold (MT) Certified CPO Sold (MT/credit) Certified PK Sold (MT/credit) Ce								
	TOTAL							
Note	Note:							



#### **Section 2: Assessment Process**

#### **Certification Body:**

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067) Suite 29.01 Level 29, The Gardens North Tower, Mid Valley City, Lingkaran Syed Putra, 59200 Kuala Lumpur, Malaysia.
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#### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **04-07/07/2022** The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **22/9/2022**. The audit programs are included in Section 2.3.

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

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

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

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

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

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



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

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

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

Assessment Program							
Name (Mill / Supply Base)	Year 1 (Re- Certification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)		
Diamond Jubilee POM	√	√	√	√	√		
Diamond Jubilee Estate	√	√	√	√	√		
Bukit Asahan Estate	√	√	√	√	√		
Welch Estate	√	√	√	√	√		

Tentative Date of Next Visit: August 1, 2023 - August 3, 2023

**Total Number of Mandays: 9 MD** 

#### 2.2 BSI Assessment Team

Name	Role	Competency
Mohd Hidhir Zainal Abidin (MHZ)	Team Leader	<b>Education:</b> Bachelor Degree in Chemical Engineering, National University of Malaysia
		Work Experience:
		1) 7 years working experience in palm oil industry specifically on palm oil milling for 5 years
		2) Auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO since 2012
		Training attended:
		1) ISO 9001 Lead Auditor Course
		2) ISO 14001 Lead Auditor Course
		3) OHSAS 18001 Lead Auditor Course in 2012
		4) Endorsed RSPO P&C Lead Auditor Course in 2013 5) MSPO Awareness Training in 2014
		6) Endorsed RSPO SCCS Lead Auditor Course
		7) SMETA Auditor training
		Aspect covered in this audit:
		Legal requirements, mill best practice, environmental, safety and health, policies and commitment, social aspects, contract



		agreement, human rights, land use rights, and workers' welfare
		Language proficiency:
		English and Bahasa Malaysia
Vijay Kanna	Team Member	Education:
Pakirisamy (VK)	T COMM T TOTAL COMM	Holds a Bachelor Degree in Agribusiness Science Management with Honours, University Utara Malaysia.
		Work Experience:
		10 years' experience in Oil Palm Estate Management in leading Oil Palm Companies such as KL Kepong Bhd, IOI Plantations and United Plantations. The last position held was Senior Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He has been an sustainable palm oil auditor since 2019.
		Training attended:
		Completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, HCV & HCS Introductory Training g and SMETA Requirements Training, RSPO Independent Smallholder (IHS) Auditor Training.
		<b>Aspect covered in this audit:</b> During this assessment, he assessed on the aspects of Environmental Best Practises, HCV and supply chain requirements.
		Language proficiency: He is fluent in English, Bahasa Malaysia, Tamil.
Yusof Khairan	Team Member	Education:
Nizar Ahmad Tarmizi (YKN)		Holds a Bachelor of Corporate Administration (Hons), MARA University of Technology and a Master of Science in Occupational Safety and Health Management-Northern University of Malaysia.
		Work Experience:
		Has more than 30 years of working experience in varies industries including as safety officer in manufacturing company; consultant and trainer for management systems including ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, OHSAS 18001:2007, MS1722:2011, Environmental Legislation; contract auditor with varies accredited certification bodies for scheme including Malaysia Sustainable Palm Oil (MSPO), RSPO Principles & Criteria; MPOCC Registered Peer Reviewer and was a Certificate of Safety and Health Officer-Malaysian Insurance Institute.
		Training attended:
		Completed ISO 9001:2000 IRCA/IATC A Lead Auditor Training; ISO 14001:2004 IEMA Approved EMS Advanced Lead Auditor Training Course; OH&SMS IRCA Certified Lead Auditor Training Course; MS 1722 Lead Auditor Training; MSPO Auditing; Endorsed RSPO P&C 2018 Lead Auditor Course;



SMETA Requirements Training; HCV & HCS Introductory Training. Also attended the Quality & Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment – For Bodied Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality Malaysia, ISO/IEC 17021. MSPO Peer Reviewer Training (MPOCC).
Aspect covered in this audit:  Economic management plan, mill best practices, Occupation Health Safety requirement, HIRARC, training and management plan and RSPO supply chain requirements.
Language proficiency: Fluent in English and Bahasa Malaysia

**Accompanying Persons: Nil** 

#### 1.3 Assessment Plan

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

Date	Time	Subjects	MHZ	VKP	YKN
Sunday 3/7/2022	PM	Audit team travel to Melaka. Check in at Hatten Hotel, Dataran Pahlawan, Melaka.	√	√	√
Monday 4/7/2022	0730	Audit team travel to Bukit Asahan Estate	√	√	√
Bukit Asahan Estate	0830 0900	<ul> <li>Opening Meeting:</li> <li>Opening Presentation by Audit team leader.</li> <li>Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation).</li> <li>Verification on previous audit findings</li> </ul>			
	0900 1300	Bukit Asahan Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	1300 1400	Lunch	√	√	√
	1400 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630 1700	Interim Closing Briefing	V	√	√



Tuesday 5/7/2022	0730	Travel to Diamond Jubilee Estate	√	√	√
Diamond Jubilee POM	0830 1300	Diamond Jubilee 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. Visit to laboratory, weighbridge and palm product storage area.			
	1000 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1300 1400	Lunch	<b>√</b>	√	√
	1400 1630	Diamond Jubilee POM  Document Review P1 – P7: SOPs. Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring	√	√	√
	1620	records, CIP & implementation etc  RSPO Supply chain requirements for mill - Identity Preserved Module - Internal Audit - Outsourcing activities - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities - Record keeping - Extraction Rate - Processing - Registration of transaction - Claims	√	√	-
	1630 1700	Interim Closing Briefing	$\checkmark$	√	√
Wednesday 7/7/2022 <b>Welch Estate</b>	0730 0830 1300	Travel to Welch Estate  Welch 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.	√	√	√
	1000 1300	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	-	-
	1300 1400	- Lunch break	<b>√</b>	√	√
	1400 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√



i	_			1	
	1630 1700	Interim Closing Briefing	√	√	√
Thursday 10/2/2022	0730	Travel to Diamond Jubilee Estate	√	√	√
Diamond Jubilee Estate	0830 1300	Piamond Jubilee 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.			
	1300 1400	- Lunch break	√	√	√
	1300 1630	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	1630 1700	Interim Closing Briefing	√	√	√
Friday 11/7/2022	AM	Audit team travel back to KL	-	-	√

Major NC close out

PRELIMINARY AGENDA				
Time	Subjects	Mohd Hidhir		
Wednesday PM	Travel to Melaka. Check in at Hatten Hotel, Melaka	√		
Thursday 22/9/2022 0745 0830 – 0845	Auditor travel to Bukit Asahan Estate Opening Meeting  Opening Presentation by Audit team leader.  Briefing on the verification plan	V		



PRELIMINARY AGENDA						
Time	Subjects	Mohd Hidhir				
0845 – 1130	Verification on previous Major NC.  i) 2221809-202207-M1 – document review and site visit (Bukit Asahan & Diamond Jubilee Estate)  ii)2221809-202207-M2 – workers interview (individual and group session) and document review (Bukit Asahan Estate)  iii)2221809-202207-M3 – Site observation, workers/stakeholder interview (individual and group session) and document review (Bukit Asahan & Diamond Jubilee Estate)  iv) 2221809-202207-M4 – Workers/stakeholder interview (individual and group session) and document review (Bukit Asahan Estate)	√				
1130 – 1200	Closing meeting - conclusion and recommendation	√				



#### **Section 3: Assessment Findings**

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

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. SDP TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.  As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): <a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations">http://www.simedarby-plantation-completes-divestment-of-its-liberia-operations</a>	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?  If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1st Oct 2018, the mill has completed the selling off transaction.  In Indonesia, PT Mitral Austral Sejahtera was sold and currently SDP have no control in the management.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.  If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No. There is no new acquisitions as at latest TBP 2021.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Although there are deviation has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.	Complied
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?	Yes. Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh	Complied



No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units.	Complied
Un-Certified Units or Holdings		
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as these 2 assets were disposed.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> noncompliance shall be raised	Although there lapses has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.	Complied
Have there been any irelated lancer in	Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019.  Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.  Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter:  www.rspo.org/certification/public-announcement  For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI):  www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations.  ACOP 2020 has been cross-referenced as below:  www.rspo.org/members/29	Complied
	management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS	

Complied



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Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	New plantings within Sime Darby Plantation Berhad that have completed NPP notification
	1. NBPOL (Poliamba Limited) 23/05/2020 – no comments
	https://rspo.org/certification/new-
	plantingprocedure/public-consultations/sime-
	darbyplantation-berhad-nbpol-poliamba-limited
	2. NBPOL (Guadalcanal Plain Palm Oil Ltd)
	06/04/2018 – no comments https://rspo.org/certification/new-
	plantingprocedure/public-consultations/new-
	<u>britainpalm-oil-a-subsidiary-of-sime-darby-</u>
	<u>plantationbhd-guadalcanal-plain-palm-oil-ltd</u>
	3. NBPOL (Ragu Agri Industries Limited)
	29/01/2018 – no comments
	https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-
	ramuagri-industries-ltd
	4. NBPOL (Ragu Agri Industries Limited)
	02/09/2016 – no comments
	https://rspo.org/certification/new-
	plantingprocedure/public-consultations/new-
	britainpalm-oil-ltd-ramu-agri-industries-limited
	5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/certification/new-
	plantingprocedure/public-consultations/new-
	britainpalm-oil-ltd-higaturu-oil-palms
	6. NBPOL (Poliamba Limited – Lamawan)
	07/04/2014 – no comments captured in RSPO Website
	https://rspo.org/certification/new- plantingprocedure/public-consultations/nbpol-
	poliambalimited-lamawan-png
	7. NBPOL (Poliamba Limited – Lamendauen)
	07/04/2014 – no comments captured in RSPO Website
	https://rspo.org/certification/new-
	plantingprocedure/public-consultations/nbpol- poliambalimited-lamendauen-png
	8. NBPOL (Roka Mini estate) 04/11/2013 – no
	comments captured in RSPO website
	https://rspo.org/certification/new-
	plantingprocedure/public-consultations/new-
	<u>britainpalm-oil-ltdroka-mini-estate</u>
	9. NBPOL (J estate) 01/11/2013 – no comments

captured in RSPO website

https://rspo.org/certification/new-

plantingprocedure/public-consultations/new-



Did the company conduct internal audit for those uncertified estates against the uncertified	Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the making excellence	Complied  a habit™
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Sime Darby Plantation maintain corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism	Complied
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 4.4, 4.5, 4.6, 4.7 and 4.8.	https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc-new-planting-assessment  12. Sime Darby (Liberia) Plantation Inc 06/03/2012  – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-incnew-planting-assessment1  13. Sime Darby (Liberia) Plantation Inc 06/03/2012  – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-incnew-planting-assessment Management units for 11 – 13 above were disposed.  No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as both sites was disposed.  The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancy between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of 14/07/2021, 10 LUCAs were approved with 0 conservation liability and remaining 9 are still pending from RSPO.	Complied
	britainpalm-oil-ltdj-estate  10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website  https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-limited-higaturu-oil-palm  11. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website	
	The second second second	



management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue are mainly awaiting for Land Titles. The last audit was conducted between August 2021.  The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.	
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No any critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company.	Complied

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

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



#### **Approved Time Bound Plan**

#### SDP - RSPO Certification for Time Bound Plan - Malaysia Operations

No	Management Unit	Supply Base	Time Bound	Location	Status	<b>Certified Date</b>	Remarks			
	SOU Name		Plan							
1	Sungai Dingin	Sungai Dingin Oil Mill	-	Karangan, Kedah	Certified	12/08/2011	-			
		Anak Kulim Estate								
		Sungai Dingin Estate								
		Somme Estate								
		Bukit Selarong Estate								
		Padang Buluh Estate								
		Bukit Hijau Estate								
		Jentayu Estate		]						
2	Chersonese	Chersonese Oil Mill	-	Kuala Kurau, Perak	Certified	05/10/2011	-			
		Chersonese Estate								
		Kalumpong Estate								
		Tali Ayer Estate								
		Holyrood Estate								
3	Elphil	Elphil Oil Mill	-	Sungai Siput,	Certified	16/08/2011	-			
		Kamuning Estate		Perak						
		Elphil Estate								
		Kinta Kellas Estate								
4	Flemington	Flemington Oil Mill	-	Teluk Intan,	Certified	05/10/2011	-			
		Flemington Estate		Perak						
		Bagan Datoh Estate								





		Sabak Bernam Estate					
		Sg. Samak Estate					
5	Seri Intan/Selaba	Seri Intan Oil Mill	-	Teluk Intan,	Certified	03/03/2011	-
		Selaba Oil Mill		Perak			
		Seri Intan (+ Selaba) Estate					
		Sabrang Estate					
		Sogomana Estate					
		Sg. Wangi Estate					
		Bikam Estate					
		Cluny (+ Bedford) Estate					
6	Tennamaram	Tennamaram Oil Mill	-	Bestari Jaya, Selangor	Certified	03/03/2011	-
		Tennamaram Estate	_				
		Sungai Buluh Estate					
		Bukit Talang Estate					
7	Bukit Kerayong	Bukit Kerayong Oil Mill	-	Kapar Selangor	Certified	15/04/2011	-
		Bukit Kerayong Estate					
		Bukit Cheraka Estate					
		Elmina Estate	1				
8	East	East Oil Mill	-	Carey Island,	Certified	19/05/2011	-
		East Estate		Selangor			
		Sepang Estate					
		Dusun Durian Estate					
9	West	West Oil Mill	_	Carey Island,	Certified	19/05/2011	-
		West Estate		Selangor			

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10	Bukit Puteri	Bukit Puteri Oil Mill	-	Raub, Pahang	Certified	07/07/2011	-
		Bukit Puteri Estate					
11	Kerdau	Kerdau Oil Mill	-	Temerloh, Pahang	Certified	07/07/2011	Jentar Estate has merged with Kerdau Estate
		Kerdau Estate					and reported to the CB in March/April 2021.
		Jentar Estate					
		Mentakab Estate					
		Chenor Estate					
		Sg Mai Estate					
12	Jabor	Jabor Oil Mill	-	Kuantan, Pahang	Certified	07/07/2011	-
		Jabor Estate					
13	Labu	Labu Oil Mill	-	- Nilai, Negeri Sembilan	Certified	30/12/2011	New Labu Estate has become a division of Labu Estate.
		Labu Estate					
14	Tanah Merah	Tanah Merah Oil Mill	-	Port Dickson,	Certified	19/05/2010	-
		Tanah Merah Estate		Negeri Sembilan			
		Bukit Pelandok Estate					
15	Sua Betong	Sua Betong Oil Mill	-	Port Dickson,	Certified	18/02/2014	Siliao Estate has now been merged into
		Sua Betong Estate		Negeri Sembilan			Salak Estate and Bradwall Estate.
		Sengkang Estate					
		Bradwall Estate					
		PD Lukut Estate					
		Tampin Linggi Estate					
		Sg. Bahru Estate					
		Salak Estate					
16	Kok Foh	Kok Foh Oil Mill	-		Certified	07/07/2011	

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		Muar River Estate Sg. Senarut Estate Sg. Gemas Estate Kok Foh Estate Bukit Pilah Estate St. Helier Estate Sungai Sabaling Estate Pertang Estate		Bahau, Negeri Sembilan			Sg. Gemas Estate has now been merged into Sg. Senarut Estate.
17	Kempas	Kempas Oil Mill Kempas Estate Tangkah Estate Kemuning Estate	-	Jasin, Melaka	Certified	19/05/2010	Serkam Estate, previously from SOU18 (Diamond Jubilee) is now part of SOU 17 (Kempas)
18	Diamond Jubilee	Diamond Jubilee Palm Oil Mill Serkam Estate Diamond Jubilee Estate Bukit Asahan Estate	-	Jasin, Melaka	Certified	05/10/2011	Serkam Estate, previously from SOU18 (Diamond Jubilee) is now part of SOU 17 (Kempas) Welch Estate, previously from SOU 19 (Pagoh) is now part of SOU 18 (Diamond Jubilee)
19	Pagoh	Pagoh Oil Mill Pagoh Estate Welch Estate Lanadron Estate Pengkalan Bukit Estate	- - -	Muar, Johor	Certified	28/1/2014	-
20	Chaah	Chaah Oil Mill Chaah Estate Sg. Simpang Kiri Estate	-	Chaah, Johor	Certified	18/11/2010	-

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		North Labis Estate					
21	Gunung Mas	Gunung Mas Oil Mill	-	Kluang, Johor	Certified	19/05/2010	* SDP acquired Lian Seng Estate in Johor
		Gunung Mas Estate					in April 2017. Lian Seng Estate is merged into Bkt Paloh Estate of SOU 21 Gunung
		Kempas Klebang Estate					Mas, Lian Seng has been incorporated in
		Bukit Paloh Estate					the RSPO Certification Scope of SOU
		Yong Peng Estate					Gunung Mas in 2018.
22	Bukut Benut	Bukit Benut Oil Mill	-	Kluang, Johor	Certified	05/11/2011	* SDP acquired Talisman Estate in Johor in
		Bukit Benut Estate					April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and
		Lambak Elaeis Estate					has been incorporated in the RSPO Certification Scope of SOU Bk Benut in
		CEP Nyior Estate					2018.
23	Ulu Remis	Ulu Remis Oil Mill	-	Layang-Layang, Johor	Certified	11/04/2011	-
		Ulu Remis Estate					
		Cenas Estate					
		Bukit Badak Estate					
		Tun Dr. Ismail Estate					
		Pekan Estate					
		Sembrong Estate					
24	Hadapan	Hadapan Oil Mill	-	Layang-Layang,	Certified	29/3/2011	-
		Sri Pulai Estate		Johor			
		Kulai Estate					
		Layang Estate					
		CEP Renggam Estate					
26	Sandakan Bay	Sandakan Bay	-	Sandakan, Sabah	Certified	01/10/2008	-
		Tun Tan Siew Sin					



		Tunku Estate						
		Tigowis Estate						
		Sentosa Estate						
		Segaliud Estate						
27	Melalap	Melalap Oil Mill	-	Tenom, Sabah	Certified	21/1/2011	-	
		Melalap Estate						
		Sapong Estate						
28	Binuang	Binuang Oil Mill	-	Kunak, Sabah	Certified	16/1/2009	-	
		Binuang Estate						
		Sungang Estate						
		Tingkayu Estate						
		Jeleta Bumi Estate						
29	Giram	Giram Oil Mill	-	Kunak, Sabah	Certified	16/1/2009	-	
		Giram Estate						
		Mostyn Estate						
30	Merotai	Merotai Oil Mill	-	Tawau, Sabah	Certified	16/1/2009	-	
		Merotai Estate						
		Imam Estate						
		Tiger Estate						
		Table Estate						
31	Layang	Lavang Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-	
		Lavang Estate						
		Rasan Estate						
		Belian Estate						



		T			I	1	T
		Kelida Estate					
		Lavang (Special) Estate					
		Pekaka Estate					
		Ruai Estate					
		Dulang Estate					
		Charquest Estate					
		Paroh Estate					
32	Rajawali	Rajawali Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Rajawali Estate					
		Samudera Estate					
		Semarak Estate					
		Bayu Estate					
33	Derawan	Derawan Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Derawan Estate					
		Sahua Estate					
		Takau Estate					
		Damai Estate					
34	Pekaka	Pekaka Mill	-	Bintulu, Sarawak	Withdrawn	NA	Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang.
35	Bintang	Bintang Oil Mill	-	Johor	NA	NA	* SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on



			hold. As at 1st Oct 2018, the mill has completed the selling off transaction.
			completed the bening on transaction

#### **SDP - RSPO Certification for Time Bound Plan - Indonesia Operations**

No	Management Unit	Mill and Supply Base	Time Bound Plan	Latest Internal / External	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name			Audit Date				
1	PT Lahan Tani Sakti	Alur Dumai Mill	-	-	Rokan Hilir	Certified	16/01/2012	-
		Alur Dumai Estate			District – Riau			
2	PT Sajang Heulang	Mustika Mill	-	-	Tanah Bumbu	Certified	03/07/2013	KKPA & Plasma is not under the
		Mustika Estate			District – South Kalimantan			management control of Sime Darby Plantation. The decision of certification is
		KKPA-2 PT.SHE Estate			Naiiiiidiilaii			from KKPA / Plasma themselves.
		KKPA-3 PT.SHE Estate						
		KKPA-5 PT.SHE Estate						
		Pantai Bonati Estate					06/07/2011	
3	PT Ladangrumpun	Angsana Mill	-	-	Tanah Bumbu	Certified	06/07/2021	KKPA & Plasma is not under the
	Suburabadi	Angsana Estate			District – South Kalimantan			management control of Sime Darby Plantation. The decision of certification is
		Pantai Bonati Estate			Kallillalitali			from KKPA / Plasma themselves.
		Gunung Sari Estate						
		KKPA-1 PT.SHE Estate						
		KKPA-4 PT.SHE Estate						
		Subur Abadi Plasma 1 Estate	TBC	TBC		TBC	TBC	
4	PT Langgeng	Bebunga Mill	-	-		Certified	16/03/2012	KKPA & Plasma is not under the
	Muaramakmur	Bebunga Estate						management control of Sime Darby

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		Sungai Cengal Estate Bakau Estate			Kotabaru District  – South  Kalimantan			Plantation. The decision of certification is from KKPA / Plasma themselves.
		KKPA LMR	TBC	TBC	Kalimantan	TBC TBC	TBC	
5	PT Kridatama Lancar	Sukamandang Mill	-	-	Seruyan and	Certified	05/07/2011	-
		Sukamandang Estate			East- Kotawaringin			
		Sapiri Estate			District Central			
		Barasdanum Estate						
		Kuala Kuayan Estate						
6	PT Bahari Gembira	Ladang Panjang Mill	-		Muaro Jambi	Certified	09/07/2012	Only Division 3 is certified (1,202 Ha). Total
	Ria	Ladang Panjang Estate			District - Jambi			Areas of Division 1 and 2 (1,796.19 ha) HGU still in process
		Plasma BGR Estate	TBC	TBC		TBC	TBC	Sum in process
								KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
7	PT Tunggal Mitra	Manggala Mill	-	-	Rokan Hilir	Certified	25/11/2010	-
	Plantations	Manggala 1 Estate			District – Riau			
		Manggala 2 Estate						
		Manggala 3 Estate						
8	PT Paripurna	Pondok Labu Mill	-		Kotabaru District	Certified	16/03/2012	-
	Swakarsa	Pondok Labu Estate	-	-	<ul><li>South</li><li>Kalimantan</li></ul>			
		Binturung Estate			Kaliffaffaff			
		Rampa Estate						
		Sesulung Estate		_				
9	PT Bersama	Gunung Aru Mill	-			Certified	05/07/2011	-
	Sejahtera Sakti	Gunung Aru Estate						

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		Gunung Kemasan Estate			Kotabaru District			
		Laut Timur Estate			- South			
		Pantai Timur Estate			Kalimantan			
		ККРА МВР	TBC	TBC		TBC	ТВС	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
10	PT Guthrie	Rantau Panjang Mill	-	-	Musi Banyuasin	Certified	16/03/2012	Remarks: Land legalisation process for
	Pecconina	Rantau Panjang Estate			District – South Sumatera			4152.70 ha is still in process.
		Bumi Ayu Estate			Sumatera			
		Karang Ringin Estate						
		Napal Estate						
		Mangun Jaya Estate						
		Sungai Jernih Estate and GPI KKPA Estate	2023	-		-	-	890.98 Ha – Still under Land legalisation process - Process Kadastral.
								Sg Jernih estate and KKPA was separated in 2022 and recorded separately.
								KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
11	PT Laguna Mandiri	Rantau Mill	-	-	Kotabaru District	Certified	30/12/2011	
		Rantau Estate			– South Kalimantan			
		Matalok Estate			Kalimantan			
		Betung Mill					01/04/2014	
		Betung Estate						
		Sekayu Estate						
12		Sekunyir Mill	-	-		Certified	23/11/2010	-

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	PT Indotruba Tengah	Sekunyir Seruyan Estate			Seruyan and West Kotawaringin District – Central Kalimantan			
13	PT Swadaya Andika	Selabak Mill Selabak Estate Randi Estate Sangkoh Estate Lanting Estate	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	Mill closed down and all the supply bases was transferred to Rantau Mill – PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri – Rantau Factory certification.
14	PT Bina Sains Cemerlang	Sungai Pinang Mill Sungai Pinang Estate Bukit Pinang Estate	-	-	Musi Rawas District – South Sumatera	Certified	11/09/2012	Remarks: Land legalisation process for 308.35 ha is still in process.
15	PT Teguh Sempurna	Pemantang Mill Pemantang Estate Kawan Batu Estate Hatan Tiring Estate Batang Garing Estate	-	-	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	05/07/2011	-
16	PT Bhumireksa Nusa Sejati	Teluk Bakau Mill Teluk Bakau Estate Nusa Lestari Estate Nusa Perkasa Estate Mandah Mill Mandah Estate Rotan Semelur Estate	-	-	Indra Giri Hilir District – Riau	Certified	01/04/2014	-
17		Teluk Siak Mill	-	-		Certified	11/10/2011	-

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	PT Aneka	Teluk Siak Estate			Pekanbaru, Siak			
	Intipersada	Pinang Sebatang Estate			District – Riau			
		Aneka Persada Estate						
18	PT Tamaco Graha	Ungkaya Mill	-	-	Morowali District	Certified	10/7/2012	-
	Krida	Ungkaya Estate			– Sulawesi - Tengah –			
		Plasma TGK Estate	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
19	PT SIME Indo Agro	Bukit Ajong Mill	-	-	Sanggau District	Certified	18/10/2010	Land legalisation process for East Est for
		West Estate			-West Kalimantan			5815.64 ha is still in process.
		East Estate			Kalimantan			
		East* Estate /Sei Mawang Estate	2023	-		-		Land legalisation for Sei Mawang is still in process
		East Plasma Estate	-	-		Certified	18/7/2016	-
		West Plasma Estate						
20	PT Padang Palma	Blang Simpo Mill	-		Aceh Tamiang	Certified	03/05/2013	-
	Permai /PT Perkasa Subur Sakti	Tamiang (PT PPP) Estate	-	-	and East Aceh District –			
	Subui Sukti	Batang Ara (PT PSK) Estate			Nanggroe Aceh Darussalam			
		Blang Simpo-01 Estate						
		Blang Simpo-02 Estate						
21	PT Sandika Natapalma	Lembiru Mill	-	-	Ketapang District  - West	Certified	03/07/2014	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru
		Lembiru Estate			Kalimantan			Mill.
		Awatan Estate						

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		Karya Palma Estate	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the
		KKPA SNP Estate	TBC	TBC		TBC	TBC	management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
22	PT Budidaya Agro	Pelanjau (PT BAL) Estate	-	-	Ketapang District	Certified	03/07/2019	-
	Lestari	Sungai Putih (PT BAL) Estate	2023	-	– West Kalimantan	-		Land Approval is obtained in 2015 while the other approvals are still in processing HGU obtained as per May 2018
		Beturus (PT BAL) Estate	2023	-		-		
		KKPA BAL Estate	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
23	PT Mitral Austral	MAS Mill	NA	NA	Sanggau District	NA	NA	The properties was sold and currently SDP
	Sejahtera	MAS 1 Estate			– West Kalimantan			have no control in the management. Please find latest information on 'Updates on PT
		MAS 2 Estate			Kalimantan			MAS' worksheet and updates to RSPO
		MAS 4 Estate						Secretariat.
		Plasma MAS Estate						

#### SDP - RSPO Certification for Time Bound Plan - New Britain Palm Oil (NBPOL) Operations (as at March 2021)

No	Management Unit	Mill and Supply Base	Time Bound	Location	Status	Certified	Remarks (for uncertified unit)
	SOU Name		Plan			Date	
1	1 Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	-	Guadalcanal Province, Solomon Islands	Certified	18/03/2011	-
		Tetere Estate	-				
		Ngalimbiu Estate					
		Mbalisuna Estate					
		Smallholders – West Zone (83)					
		Smallholders – Central Zone (53)					



					1	1	
		Smallholders – MBA East Zone (59)					
		Smallholders – MBE East Zone (37)					
2	Milne Bay Estate (MEB)	Hagita Oil Mill	-	Milne Bay	Certified	15/02/2018	-
		Giligili Estate		Province, PNG			
		Hagita Estate					
		Waigani Estate					
		Sagarai Estate					
		Padipadi Estate					
		Mariawatte Estate					
		Smallholders – East Gurney Estate (264)					
		Smallholders – West Gurney Estate (229)					
		Smallholders – East Sagarai Estate (157)					
		Smallholders – West Sagarai Estate (221)					
3	Poliamba (POL)	Poliamba Oil Mill	-	New Ireland	Certified	19/03/2012	-
		Kara Estate		Province, PNG			
		Nalik Estate					
		West Coast Estate					
		Noatsi Estate					
		Madak Estate					
		Smallholders -North Division (615)					
		Smallholders- South Division (868)					
		Smallholders -West Division (309)					
4	Ramu Agricultural	Gusap Mill	-	Morobe	Certified	05/08/2010	-
	Industrial Ltd (RAIL)	Gusap East (Gusap) Estate		Province, PNG			



				I	1	1	
		Gusap West (Paddox) Estate					
		Surinam Estate					
		Dumpu Estate					
		Ngaru Estate					
		J Estate (Jephcott) Estate					
		Smallholders - Madang VOPs (71)					
		Smallholders - Morobe VOPs (253)					
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	-	Oro Bay	Certified	01/02/2013	-
		Mamba Oil Mill		Province, PNG			
		Embi Estate					
		Ambogo Estate					
		Sangara Estate					
		Sumbiripa Estate					
		Mamba Estate					
		Sambogo Estate					
		Scheme Smallholder Sorovi Division(2019)					
		Scheme Smallholder Saiho Division(842)					
		Scheme Smallholder Aeka Division (911)					
		Scheme Smallholder Igora Division (1367)					
		Scheme Smallholder Ilimo Division (671)					
6	West New Britain (WNB)	Mosa Oil Mill	-	Kimbe, West New Britain,	Certified	10/09/2008	
		Kumbango Oil Mill	New Britain, PNG				
		Kapiura Mill		<u> </u>			



Nives ve de AAU
Numundo Mill
Waraston Mill
Bebere Estate
Kumbango Estate
Togulo Estate
Dami Estate
Waisisi Estate
Kautu Estate
Karausu Estate
Moroa Estate
Bilomi Estate
Loata Estate
Haella Estate
Garu Estate
Daliavu Estate
Sapuri Estate
Malilimi Estate
Rigula Estate
Numundo Estate
Navarai / Karato ME /KDC EU Estate
Volupai / Lotomgam / Natupi / Goruru Estate
Lolokoru Estate
Ove Estate
Tamare Estate



		Smallholders LSS Mosa (1822)					
		Smallholders VOP East (1817)					
		Smallholders VOP Central (1964)					
		Smallholders VOP West (1279)					
		Smallholders LSS Kapiura (551)					
		Smallholders VOP Kapiura (850)					
		Smallholder Kaulong / Akami / Pushiki / Repamira / Sakapei					
7	Markham Farms	Erap Mill	-	Markham Farms	Certified	27/3/2020	There is total area NPP: 710.30ha which is
	Company Limited (MFCL) / Markham Agro Pte Ltd	Munum Estate					currently excluded from the certification scope until the NPP is approved
	/ Markham Agro Fte Ltu	Maralumi Estate				scope until the INFF is approved	
		Erap Estate					



#### 3.3 Details of Nonconformities

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

During this Assessment there were *four* (4) Critical; *two* (2) Minor nonconformities and *one* (1) *OFI* Opportunity For Improvement raised. The Diamond Jubilee POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity	Non-conformity				
NCR Ref #	2221809-202207-M1	Issued Date	7/7/2022		
Due Date	6/10/2022	Closure Date	6/10/2022		
Indicator & Category (Critical / Minor)	6.2.4 (Critical)				
Statement of Nonconformity:	Compliance with Employee's Minimum Standards of Housing, Accommodations and Amenities Act 1990 and was not effectively demonstrated				
Requirement Reference:	The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.  Normative reference: i) Section 23, weekly inspection of employee's housing - 1 (b): the perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water ii) Sime Darby Plantation, Peraturan Umum Kompleks Perumahan Pekerja iii) Safe Handling and Storage of Petrol at Employees Housing Procedure, UM/HSE/OCP/06, version:0, effective date: 24/3/2021.				
Objective Evidence:	sump and discharge drain the parameter drains which Bukit Asahan Estate Sighted at house No. block in jerry can. Safe handling Handling and Storage of Po UM/HSE/OCP/06, version: Diamond Jubilee POM Sighted at house #100, for	line site, parameter drain lead found to be clogged. Undergrand blocked the free flow of water and storage of petrol was not etrol at Employees Housing Properties, effective date: 24/3/2021.	owth was also found in er.  I petrol kept at backyard in lined with Safe ocedure,		



	Employees Housing Procedure LIM/HSE/OCD/06 version 0 effective dates
	Employees Housing Procedure, UM/HSE/OCP/06, version:0, effective date: 24/3/2021.
	Diamond Jubilee Estate Sighted at the backyard of house # 91 - 93, undergrowth to permit free flow of water was not cleared. Also drain in between house # 92 and # 93 was collapsed and resulting to stagnant and slow free flow of water.
Corrections:	BAE, DJE & DJ Mill: To remove the petrol can from housing area and briefed workers that the storage of petrol nearby housing area is against the SOP. Instruction from the management not to stored petrol at housing compound. Centralised petrol storage only available at Bk Asahan, Ayer Tekah Div.
	WE: All the perimeter drain has been cleared off from debris/ undergrowth
	DJE: Repairing work for collapsed drain at housing compound has started and in progress. The undergrowth was cleared off
Root Cause Analysis:	BAE & Mill: Petrol was not stored in accordance with SOP. The employees were not briefed on the SOP for safe storage of petrol since the employer has yet to decide on centralized storage for petrol as mentioned in the SOP.
	WE: The latest housing inspection which took place before grass cutting has reported a clean perimeter drains and sedimentation sump. The cloggage was due to left over trashes/ dried organic matters resulted from grass cutting that took place after the housing inspection. The containers were washed off from nearby village area during recent heavy rainfall which happened after the housing inspection.
	DJE: Housing inspection carried a week earlier reported good condition of drains. Soil eroded and collapsed into the drain due to heavy rainfall a day before the following weekly inspection took place. This has resulted in the collapsed drain and stagnant water at the mentioned drain
Corrective Actions:	BAE & Mill: To do regular briefing to workers on safe storage of petrol. To include checking on chemical containers at housing area and inspection of centralized petrol storage at Ayer Tekah Division  DJE & WE: To brief the workers on housing cleanliness, grasscut routine and hygiene at housing area.  Monitoring on drain repair progress through weekly housing inspection for DJ Estate.
Assessment Conclusion:	Major NC Close Out Evidence: i) Briefing to workers on safe storage of petrol was done on 3/8/222 and 20/9/2022 at Bukit Asahan Estate and Diamond Jubilee Estate. Petrol stored at each house/housing area has been cleared and no more petrol stored at respective house based on site verification on 22/9/2022. ii) Line site inspection was carried out on weekly basis by respective operating units. Records of line site inspection for August and September 2022 was made available for verification. No evidence of petrol stored at home recorded. iii) Briefing of workers to properly disposed trashes of grass cutting was carried out for external party on 18/7/22 and internal 11/7/22) at Welch Estate. Based on pictorial evidence submitted, drain has been cleared and no more debris/undergrowth sighted.



iv) At Diamond Jubilee Estate, drain repair work is progressively done and clearing off activities was done and verified during site verification on 22/9/2022. Briefing to workers has been done in a few sessions (5 & 12/9/22, 15 & 22/8/22) with regards to house rules.
Implemented evidence was found to be sufficient to close the NC on 6/10/2022. Continuous implementation will be further verified in the audit.

Non-conformity				
NCR Ref #	2221809-202207-M2	Issued Date	7/7/2022	
Due Date	6/10/2022	Closure Date	6/10/2022	
Indicator & Category (Critical / Minor)	4.2.3 (Critical)			
Statement of Nonconformity:	Process to keep parties to a grievance informed of its progress, including against agreed timeframe and the outcome was not effective and communicated to relevant stakeholders.			
Requirement Reference:	Requirement Reference:  The unit of certification keeps parties to a grievance informed of its progress including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.  Normative reference:  IOM (CEOUM/036/06/2022) Foreign Workers Management Process Flow, Lea Request Process - 06 Leave request process (Peninsular Malaysia)		nt Process Flow, Leave	
Objective Evidence:	Feedback raised by 2 (two) foreign workers at Bukit Asahan Estate with regards to leave application process. They have not been informed on the status of leave application (approved or denied) so far. Further check on the records for both workers;  1) Bikas - leave application dated 13/5/22, apply for 2 months leave (25/9/22 - 25/11/22), leave approved but deferred to 1-3/2023.  2) Marsan - leave application letter was just submitted on 1/7/2022. Status of leave in still on-hold.  No evidence of attendance during meeting with workers (for leave application) in June 2022. No minute of meeting or information on the approval/deferment for the said workers.			
Corrections:	BAE: The management has conducted meeting with workers and responded in written to their leave request via and to give response letter towards leave application and get acknowledged of receipt.			
Root Cause Analysis:	BAE: The PIC do not aware of the SOP to response to workers leave request. Hence the response is not as per IOM			
Corrective Actions:	Re-briefing on the SOP to Executive In Charge (EIC). EIC has been assigned to monitor on passport management including leave request. EIC to ensure the progress or update of leave request is communicated to respective workers			
Assessment Conclusion:  Major NC Close Out Verification:  i) Meeting with worker's representative was carried out on 16/7/2022. If the workers leave arrangement and date of repatriation was briefed and				



recorded in the minute of meeting. Interview with workers representative and complainants on 22/9/22 has confirmed the arrangement of repatriation by management. The workers will received official notification letter from management for leave approval.  ii) Evidence of re-briefing of SOP and related work stream to executive in charge was done on 16/7/2022.
Implemented evidence was found to be sufficient to close the NC on 6/10/2022. Continuous implementation will be further verified in the audit.

Non-conformity	Non-conformity				
NCR Ref #	2221809-202207-M3	Issued Date	7/7/2022		
Due Date	6/10/2022	Closure Date	6/10/2022		
Indicator & Category (Critical / Minor)	6.7.3 (critical)				
Statement of Nonconformity:	requirements of related SO	and storage not consisten Ps in the Bathing Room for vesters, MTG Driver, 3 Manu	sprayers in Bukit Asahan		
Requirement Reference:	Workers use appropriate personal protective equipment (PPE), which is prove free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, lan preparation, and harvesting. Sanitation facilities for those applying pesticides available, so that workers can change out of PPE, wash and put on their personal protective equipment (PPE), which is proved free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, lan preparation, and harvesting. Sanitation facilities for those applying pesticides available, so that workers can change out of PPE, wash and put on their personal protective equipment (PPE), which is proved free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, lan preparation, and harvesting.		er all potentially chine operations, land e applying pesticides are		
Objective Evidence:	<ul> <li>Sighted during site visit at Bathing Room for Sprayer in Bukit Asahan Estate, all PPEs such as Apron, Face Mask, Safety Boots, Googles, Nitrile Gloves were not found in the cabinet and hang for drying purpose while no spraying activity on the day.</li> <li>According to Safe Operating Procedure Version 1 (01/11/2021), Pesticides Spraying (After) Bathing, washing and changing cloth before going back home.</li> <li>According to SOP/BAE/03/01-2009 Tatacara Kerja Selamat (Keselamatan Penggunaan Bahan Racun), PPE Required Breathing Mask, Apron, Gloves, Safety Boots and Googles. Para 12 mentioned All Sprayer has to wash all PPEs with soap and keep neatly at the storage cabinet. All apron to be washed and hanged.</li> <li>Sighted 2 harvesters not wearing safety helmets, eye protection and one of them not wearing shirt while harvesting at Field P15B and driver of MTG (Grabber) sighted not wearing helmet while loading FFB from the ground.</li> <li>According to Safe Working G/lines for harvesting (SOP/DJE/02/01-2009) stated that harvester required to wear PPE and suitable attire such as Gloves, Safety boots (Wellington), Sleeve shirts and long pants, Sickle cover</li> <li>OSH Risk Assessment Register for Harvesting revised and dated 26/05/22 mentioned for hazard of falling bunches (risk level 6), falling of frond (risk level 10) and falling of FFB (risk level 15), all current risk control stated to wear PPE (helmets, safety eyeware).</li> <li>OSH Risk Assessment Register for collect FFB using MTG revised and dated 21/12/21 mentioned for hazard crushed by FFB (risk level 4), current risk control stated provide safety helmet and safety boots.</li> </ul>				



	<ul> <li>Sighted 3 manurers not wearing safety helmets, goggles and using 3M mask, one not wearing long sleeve shirts and white coloured hand obviously due to exposed of fertilizer Ground Magnesium Limestone (GML) 15-18%/Mg0, which applied at field P07H.</li> <li>According to Safe Working G/lines for Manuring (SOP/DJE/13/01-2009) stated manurer required to wear PPE approved by JKKP such as Breathing protection, Apron, Hand protection, Foot protection.</li> <li>OSH Risk Assessment Register for Manuring revised and dated 11/02/22 mentioned for hazard dusty (risk level 6) to wear long sleeve shirt, cloth glove and face mask N95. While hazard of dusty (RP &amp; GML Fertilizer) (risk level 4), current risk control stated long sleeve shirts, cloth gloves &amp; latex gloves, face mask N95 and safety eyeware.</li> <li>Sampled PPE Matrix Ladang Diamond Jubilee stated as for Harvesting, PPE applicable (Eye Protection, Vest, Safety helmet, Wellington boots), while for Manurer, PPE applicable (Cotton rubber gloves, Apron, Vest, Safety Helmets, Wellington boots, Face mask.</li> </ul>
Corrections:	BAE: To brief sprayers on the function of bathing room and cabinet. To brief on the Safe Working Procedure  DJE: To brief workers on the Safe Working Procedure and correct PPE types as per SWP, CHRA and HIRARC
Root Cause Analysis:	BAE: Sprayers were not briefed on the function of bathing room and cabinet.  Sprayers were not briefed on safe working procedure on to wash all PPEs with soap and keep neatly at the storage cabinet.  DJE Workers were not trained on control measures in OSH Risk Assessment
Corrective Actions:	BAE: To do regular briefing to the sprayers to wash their PPE and cloths in bathing room and keep in neatly in the cabinet. To make all sprayers logged in their washing activity in Buku Log Mandi provided at Bathing Room, DJE: To do regular briefing on the correct PPE usage, spot check and routine inspection during working.
Assessment Conclusion:	Major NC Close Out Verification: i) Briefing to the sprayers on the function of bathing room and cabinet and Safe Working Procedure was done on 17/8/22 and 8/9/22. Records of related training/briefing was made available for verification. ii) Log book for sprayer or "Buku Log Mandi" was created to record sprayers washing activity. Records for September 2022 was verified and recorded in the logbook.  Implemented evidence was found to be sufficient to close the NC on 6/10/2022. Continuous implementation will be further verified in the audit.

Non-conformity			
NCR Ref #	2221809-202207-M4	Issued Date	7/7/2022
Due Date	6/10/2022	Closure Date	6/10/2022
Indicator & Category (Critical / Minor)	7.2.10 (critical)		



Statement of Nonconformity:	Annual Medical Surveillance for pesticides operators not conducted in 2022 as sampled from related reports.
Requirement Reference:	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.
Objective Evidence:	<ul> <li>In Bukit Asahan Estate, sampled in Medical Surveillance Record Book, available a list of 4 workers (Chemical Mixer, 2 Foreman, Foggers (Workshop Attendant). No sprayer (pesticides operator) sent for Medical Surveillance on 02/06/22 to One Medic Healthcare Sdn Bhd.</li> <li>In Welch Estate, a Medical Surveillance Programme reported by Klinik Segamat as Report No. 032/OHD/2022 for 4 workers (Premixer Unit, Fogger Unit, Workshop Unit and Fogger &amp; Workshop Unit). Report No. 060/OHD/2022 for one worker for Ammonia Unit. 3 Sprayers (Herivant, Aapel and Abdullah) not send for Medical Surveillance in 2022.</li> </ul>
Corrections:	BAE&WE: To arrange for medical surveillance programme for all pesticide operators
Root Cause Analysis:	BAE & WE: Lack of clarity on medical surveillance programme whereby the programme was only applicable for affected pesticide operators as listed in CHRA.
<b>Corrective Actions:</b>	To inform on the requirement of medical surveillance for all pesticide operators as per RSPO requirement through issuance of memo to all estates and mill
Assessment Conclusion:	Major NC Close Out Verification: i) Medical surveillance was carried out for 18 workers (pesticides operator) from Bukit Asahan Estate on 22/7/22 by registered OHD, HQ/20/DOC/00/00519. From the report, no occupational poisonings/disease reported based on certificate of fitness (USECHH 3) issued by OHD. ii) Medical surveillance was carried out for 12 workers (pesticides operator) from Welch Estate on 21/7/22 by registered OHD, HQ/08/DOC/00/00545. From the report, no occupational poisonings/disease reported based on certificate of fitness (USECHH 3) issued by OHD. iii) Inter Office Memo (IOM) dated 11/7/2022 issued to all operating units under Central West Region was verified. The intent of this memo is to continue annual medical surveillance programme for pesticide operator.  Implemented evidence was found to be sufficient to close the NC on 6/10/2022. Continuous implementation will be further verified in the audit.

Non-conformity				
NCR Ref #	2221809-202207-N1	Issued Date	7/7/2022	
Due Date	6/7/2023	Closure Date	In the next surveillance audit	
Indicator & Category (Critical / Minor)	3.3.2 (minor)			
Statement of Nonconformity:	The Water Quality Monitoring SOP was not adequately implemented.			



Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.	
Objective Evidence:	Referred to Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System; SOP for Water Quality Monitoring; Date: 01/06/2016; 5.5 Evaluation of Laboratory Test Results.  - Upon receiving the complete results, the Head of Operating Unit shall check whether it exceeds, or no not meet the related requirement. If the results are of limit, an investigation shall be initiated to solve the issue.  - Arrangement for a re-sampling and analysis of the parameter of concern shall be done concurrently with the investigation and sent to the laboratory within 1 week of receiving the results.  Bukit Asahan Estate monitors the water quality (River Water) for the stream that flows adjacent to the estate as per the Water Management Plan. Water Analysis Test Report were received with non-conforming results and the implementation there after was not in accordance with the SOP.  1. The corrective/preventive action report for non-conforming water analysis results were not done for Water Analysis Test Report dated 08/01/2022 (Report Number: PL121/2022) and 06/07/2021 (Report Number:IE738/2021)  2. Resampling was not done within a week of receiving the off spec results for Water Analysis Test Report dated 14/03/2022 (Report Number: IE349/2022), 08/01/2022 (Report Number: PL121/2022), 29/11/2021 (report Number: IE1170/2021) and 06/07/2021 (Report Number: IE738/2021)	
Corrections:		
COTTCCUOTES.	To arrange for investigation for off spec in parameters  To arrange for resampling if required upon investigation within the stipulated time	
Root Cause Analysis:	The PIC did not follow the procedure as per in SOP	
Corrective Actions:	PIC is briefed on the follow up procedure for water analysis. PIC is responsible to arrange for investigation and resampling	
Assessment Conclusion:	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.	

Non-conformity				
NCR Ref #	2221809-202207-N2			
Due Date	6/7/2023	Closure Date	In the next surveillance audit	
Indicator & Category (Critical / Minor)	7.3.2 (minor)			
Statement of Nonconformity:	Waste Materials were not disposed responsibility and in accordance with national legal requirements.			
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.			
Objective Evidence:	Bukit Asahan Estate Sighted the disposal of 11 units of Scheduled Waste items – SW102 (spent batteries) to JG Utek Sdn Bhd on 01/07/2022. Nevertheless, it was verified that the contractor does not have the required DOE License to transport the			



	scheduled waste items out of the generator's premise.		
	Welch Estate During the field visit at field P02C1, it was sighted there were two 20 litres containers in the stream.		
Corrections:	BAE: To stop dispose spent batteries to the contractor. To arrange for disposal as scheduled wastes		
	WE: To clear the containers from the location and arrange for disposal as scheduled wastes		
Root Cause Analysis:	BAE: There is no validation on contractor has been carried out whether or not the contractor is allowed to collect the wastes.		
	WE: The containers were washed off from nearby villagers during heavy rainfall		
Corrective Actions:	BAE: To monitor and keep a copy of permit / approval of DOE to contractor to collect Scheduled Wastes		
	WE: To consult with villagers on the waste management including on storage of waste		
	To do periodic monitoring for wastes in estate and to dispose it accordingly		
<b>Assessment Conclusion:</b>	The corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.		

Opport	Opportunity for Improvements			
OFI#	Description			
OFI 1	2221809-202207-I1-			
	Indicator $3.6.1:$ All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented			
	Details: The hazard identification and risk assessment as in OSH Risk Assessment Register to further enhanced and reviewed in line with introduction of the mechanisation programme under Continuous Improvement Plan Both hazard and risk further considered with recommendation for Additional Risk Control to be more specifically mentioned such as PPE and consistent with what stated in the SOPs.			

Positive Findings		
PF#	Description	
PF 1	Good cooperation given by management team of SOU18	

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

Non-conformity				
NCR Ref # 2132778-202111-N1 Issued Date 18/11/2021				
Due Date	17/11/2022	Closure Date	7/7/2022	



Indicator & Category (Critical / Minor)	6.7.2 (Minor)
Statement of Nonconformity:	Accident reporting to DOSH was not as per standard operating procedure established.
Requirement Reference:	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.
Objective Evidence:	Noted during document review, it was noted that accident cases occur at watchman station/operation on 22/04/2021 with sick leave at 8 days. However, the JKKP 6 notification was only made on 20/05/2021. The reporting period was not according to Sime Darby Plantation ESH Management System Manual Incidents, Accidents and Non-conformance Management under section 4.1 Reporting incident/Non-conformance. Refer Doc no. SD/SDP/SQM (ESH)/001-2-9 rev. 0 dated 01/07/2012
Corrections:	To give briefing and training on accident reporting SOP to the respective PIC
Root Cause Analysis:	PIC was no trained on the SOP
<b>Corrective Actions:</b>	The management to do monitoring on the accident reporting to JKKP within the timeline
Assessment Conclusion:	ASA2_1 verification:  Medical Assistant (MA) was assigned to do monitoring of Medical Leave received by workers in Medical Certificate Book Record on monthly basis. The book found updated from January-July 2022 as verified with MA. No recurrence of issue observed thus the previous minor NC is effectively closed on 7/7/2022.

Non-conformity			
NCR Ref #	2132778-202111-N2	Issued Date	18/11/2021
Due Date	17/11/2022	Closure Date	Not closed. Upgraded to major NC
Indicator & Category (Critical / Minor)	4.2.3 (minor)		
Statement of Nonconformity:	Evidence that a grievance parties been informed of progress of their grief issues were insufficiently available		
Requirement Reference:	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.		
Objective Evidence:	Based on the on-site stakeholder consultation with school representative in Diamond Jubilee Estate, it was learnt that they had earlier write-in to estate management on issue of drainage surrounding the school. Trailing of related records of complain/grievance shown letter dated 9/7/2020 kept by management together with photo showing a worker cleaning school drainage on 30/7/2020. However, there's no evidence that the school been informed on the actual progress		



	and/or condition by the estate since the issue still raised by the school representative during on-site consultation.			
Corrections:	To give response letter from estate management to school			
Root Cause Analysis:	The PIC did not get acknowledgement from the school for completion of issues due to the closure of school during MCO			
Corrective Actions:	1.To keep records of response and request 2.To follow up and monitor the completion of a request or grievances with the complainant			
Assessment Conclusion:	ASA2_1 verification: The corrective action plan was not effectively implemented thus the previous minor NC escalated to major NC based on RSPO P&C System Nov 2022.			

Opportunity for Improvement		
OFI#	Description	
OFI 1	OFI Statement: Not applicable	
	Verification / Follow-up actions:	

#### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1358112M1	Major	6.5.2	22/7/2016	Closed out on 05/08/2016
1358112N1	Minor	2.1.2	22/7/2016	Closed out on 12/7/2017
1358112N2	Minor	4.7.6	22/7/2016	Closed out on 12/7/2017
1358112N3	Minor	6.10.3	22/7/2016	Closed out on 12/7/2017
1501387-201707-N1	Minor	4.6.10	12/7/2017	Closed out on 07/09/2018
1501387-201707-N2	Minor	5.3.3	12/7/2017	Closed out on 07/09/2018
1678718-201806-N1	Minor	6.9.3	7/09/2018	Closed out on 09/08/2019
1678718-201806-N2	Minor	5.1.3	7/09/2018	Closed out on 09/08/2019
1810910-201906-M1	Major	SCCS 5.4.1	09/08/2019	Closed out on 06/11/2019
1810910-201906-N1	Minor	4.7.3	09/08/2019	Closed out on 10/07/2020
1927569-202007-M1	Critical/Major	3.6.1	10/07/2020	Closed out on 18/09/2020
1927569-202007-N1	Minor	6.7.2	10/07/2020	Closed out on 14/07/2021
1927569-202007-N2	Minor	6.7.5	10/07/2020	Closed out on 14/07/2021
1927569-202007-N3	Minor	7.3.2	10/07/2020	Closed out on 14/07/2021
1927569-202007-N4	Minor	7.8.1	10/07/2020	Closed out on 14/07/2021
2132778-202111-N1	Minor	6.7.2	18/11/2021	Closed out on 7/07/2022
2132778-202111-N2	Minor	4.2.3	18/12/2021	Upgraded to major NC
2221809-202207-M1	Major	6.2.4	7/7/2022	Closed out on 6/10/2022



2221809-202207-M2	Major	4.2.3	7/7/2022	Closed out on 6/10/2022
2221809-202207-M3	Major	6.7.3	7/7/2022	Closed out on 6/10/2022
2221809-202207-M4	Major	7.2.10	7/7/2022	Closed out on 6/10/2022
2221809-202207-N1	Minor	3.3.2	7/7/2022	"Open"
2221809-202207-N2	Minor	7.3.2	7/7/2022	"Open"

#### 3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss *Strategic Operating Unit (SOU 18) Diamond Jubilee 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.

Stakeholders contacted		
<b>Type of Stakeholder</b> (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	<b>Means of communication</b> (e.g. face to face interview, email, phone interview, comment from public notice)
Internal Stakeholder	WEC representative, foreign workers representative, gender committee representative	Face to Face
Contractor/Vendor	Sundry shop Diamond Jubilee Estate	Face to Face
Government Department	SJK (T) Ladang Bukit Asahan, SK Asahan, SJK(T) Ladang Diamond Jubilee, Police Department Simpang Bekoh	Face to Face



Stakel	nolders comment
1	<b>Feedbacks:</b> Gender Committee Representatives & female workers – Based on interview, the female workers understand the function of Gender committee and aware of the complaint mechanism if there is any issues. They were treated equally without any discrimination by the management.
	<b>Audit Team verification and response:</b> The management will respect the rights of female employees and keep monitoring if there is any case of sexual harassment and violence happen. No further issue.
2	<b>Feedbacks:</b> Foreign workers representative – Their wages are paid according to Minimum Wage Order 2020 and overtime was offered to them on voluntary basis. Other terms of employment were clearly understood by them. The new house repair request using OPP @ OilPalmPal is very effective by using QR code. They can always highlight any issues during Social Dialogue sessions.
	<b>Audit Team verification and response:</b> Positive comments highlighted by worker's representative. No further comment.
3	<b>Feedbacks:</b> Sundry Shop - Frequent price monitoring was done by the management to check if there is any price hike to ensure affordable price of goods to all workers.
	Audit Team verification and response: No further issue
4	<b>Feedbacks:</b> School Headmaster/Representative - – Good cooperation given to the school in terms of monetary contribution and also manpower assistance. Estate will try to assist in their capacity for any written request from school.
	Audit Team verification and response: No further issue.

List of land owner / user contacted						
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions	
Not applicable						
Not applicable as all estates has undergone the 2 <sup>nd</sup> cycle of planting.						

Previous land owner / user comment	
	Feedbacks: Not applicable
	Audit Team verification and response:

#### Impartiality and conflict of interest 3.5

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



#### **Formal Signing-off of Assessment Conclusion and Recommendation**

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that *Strategic Operating Unit (SOU 18) Diamond Jubilee Palm Oil Mill* has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that *Strategic Operating Unit (SOU 18) Diamond Jubilee Palm Oil Mill* is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Bin Zainal Abidin	Name: Synhoul Die Savainlah.
Company Name: BSI Services (M) Sdn Bhd	Company Name: The China Engineers (m) Sd
Title: Lead Auditor	Title: Manager
Signature:	Signature:
	(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.)
	THE CHINA EGNINEERS (MALAYSIA) SDN BHD, BUKIT AS AHAN ISTATE
	SYAHRUL BIN SARAMLAH
Date: 20 <sup>th</sup> October 2022	Date: 31 10 22



#### **Appendix A: Summary of Findings**

Criterio	n / Indicator	Assessment Findings	Compliance
Principl	e 1: Behave ethically and transparently		
	<b>n 1.1:</b> The unit of certification provides adequate information to relevant ate languages and forms to allow for effective participation in decision makes	ing.	SPO Criteria, in
1.1.1	(C) Documents that are specified in the RSPO P&C are made available to the public Critical (Major) compliance -	SDPB continued to use the internet to disseminate public information management documents such as land titles, OHS plans, EIA and SIA reports, HCV documentation, pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and continual improvement plans. All operating units have individual documents and records to demonstrate compliance to this indicator.  a) The website address is <a href="http://www.simedarbyplantation.com/">http://www.simedarbyplantation.com/</a> .  b) Information relating to social program on education, environment, community and health, etc, Yayasan Sime Darby as the Foundation has expanded its wings from offering scholarships to outstanding and deserving individuals to funding impactful conservation, outreach and development programmes.  c) The SDPB website address <a href="http://www.yayasansimedarby.com/">http://www.yayasansimedarby.com/</a> .  d) Figures of gender distribution within all workers categorized by management, administrative staff and workers (both permanent casual workers, piece rate workers) were made available at estate and mill office with record titled `SEMUA – EMPLOYEE MASTER LISTING'.	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	Information available in appropriate languages and accessible to relevant stakeholders through sample meeting latest conducted at each specific operating unit. For example, at Bukit Asahan Estate,	Complied

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	- Minor compliance -	stakeholder meeting was carried out on 12/5/2022. Stakeholder bulletin and social dialogue reinforcement were discussed in the meeting. Stakeholder meetings carried out at other visited management units:  i) Diamond Jubilee POM and estate: 23/5/2022  ii) Welch Estate: 26/5/2022	
1.1.3	(C) Records of requests for information and responses are maintained Critical (Major) compliance -	Request by stakeholders conducted through stakeholders meeting, visitor books, letter and forms. The operating units maintain records of all request and response. Engagement process via email/letter to stakeholders were also done together with feedback form if there is any issue to be reported or highlighted to the management. For example at Welch Estate the following was recorded in request and response logbook/file:  i) Request to use estate area for cross-country marathon. Status: Estate has no issue to allow cross-country marathon in the estate. Anyhow, estate management will not responsible for any incidents ii) Request to rehabilitation of SK Ladang Welch football field. Status - approved: To arrange the work 2 days before to block JCB work schedule.	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.  - Critical (Major) compliance -	The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues.	Complied
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.  - Minor compliance -	Both the estate and the mill continued to maintain the stakeholders information (address, contact number, nominated representatives) which included the contractors, vendors/suppliers, foreign recruitment agencies, embassy, government agencies, schools, local communities, CPO/PK customers, etc.The list of stakeholders	Complied

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		has been established by the mill. The list was updated on for 2022 comprises of various parties, neighbouring communities and Government Agencies.	
		The subjects discussed during the meeting held on 5/6/2022 with the presence including stakeholders among others discussed on the following subjects;	
		a) Company Policies and SOP b) Issues relating to neighborhood and concerns c) Appointment of social liaison officer for each OU d) Explanation of 11 ILO indicators There is no major course of concern of issues highlighted during the meeting	
Criterio	on 1.2: The unit of certification commits to ethical conduct in all business of	perations and transactions.	
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.  - Minor compliance -	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	Complied
	Pintor compilance	strictly prohibited to have any bribery related in the business processes. The policy was developed in Bahasa Malaysia and English.	

1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.  - Minor compliance -	Sime Darby Plantation has established the Vendor Integrity Pledge (VIP) and Vender COBC as a due diligence for external parties engaged by Operating Units. Sighted sampled as below:  i. Kebun Abah Enterprise (CA0300312-A) signed on 15/3/2021  ii. Mekar Angkut Sdn Bhd, (251845-H), VIP signed on 30/6/22  iii. TEMIS (M) Sdn Bhd (654972-W) signed on 4/5/2021  iv. MTJJ Enterprise (MA025462P) signed on 1/2/2022  v. PRG Electrical Service and Trading (MA 0034598-P) signed on 1/7/21  vi. Sri Yogaletchumi Kali Enterprise (MA0040150-X) signed on 1/1/2022	Complied
Princip	le 2: Operate legally and respect rights		
Criterio	on 2.1: There is compliance with all applicable local, national and ratified in	ternational laws and regulations.	
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	Sime Darby Plantation under Bukit Asahan Estate has made a declaration of 100% Compliance Status as signed by Estate Manager dated May 2022.  • Diesel Permit under Regulation 18 Control of Supply (Amendment) Regulations 2021, Reference No. SK(M)051/2005(D) for 18,200 litres and valid from 25/01/22-24/01/25.  • Licence to Abstract Water under Section 15, Water Resources Enactment 2014 for Ladang Bukit Asahan valid from 01/01/2022-31/12/22.  • MPOB License No. 527615002000 for Bukit Asahan Estate with size of 2,965.53 Ha. Valid from 01/03/2022-28/02/23.	Complied



- Noise Risk Assessment was conducted by Assessor (HQ/16/PEB/00/158). Area
- Audiometric Test Results (Baseline) testing date on 03/05/21. 32 workers tested. Area and Personal Monitoring on 13/08/20.
- Calibration of weighing machine by Metrology Corporation Malaysia Sdn Bhd, 60,000 kg, reference no: D045107, expired on 14/10/2022.

Sime Darby Plantation under Diamond Jubilee POM has made a declaration of 100% Compliance Status as signed by Mill Manager dated 31/05/22.

- Audiometric Report was conducted as reported September 2021 by Klinik TTMC Ayer Keroh. 39 workers send for test.
- Weight Bridge calibration under Akta Timbang Sukat 1972 for capacity of 60,000 by De Metrology Sdn. Bhd.
- Mill Manager is registered CePSWaM effective date 29/06/21 as certificate serial No. CePSWaM/04698.
- Environmental Audit was conducted by NISAFETY Consultancy (Salasiah Bt. Abd Rahman EA 0057) dated 17/06/22. Zlst yesr conducted by Ahmad Azuan b. Sheikh Omar EA 0087) dated 09/12/21.
- Mill in the process of renewing license to abstract water of Sungai Chohong under Water Resources Enectment (Melaka) 2014 as renewal application letter dated 01/03/22 with submission of Borang B Serial No. 0717. Expired on 30/04/22
- License under Section 18 (1) of Environmental Quality Act 1974 expiry on 30/06/23.
- Fire Certificate expiry date on 26/05/22, in the process of renewal as letter sent to JBPM Melaka as FC4 and email from AE Eequitas

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Sdn Bhd dated 18/06/22 on status of application for renewal pending Bomba's inspection.

- Fume Cupboard Exhaust (Chimney No. 3) as stated in Written Notification dated 22/02/22 as submitted by NISAFETY Consultancy Sdn Bhd dated 25/01/22 (Ref. No. NC/WN/KKSDJ/1221).
- Genset with capacity of 1,054 KW have permit under Section 21 of Electrical Services Act 1990 under Suruhanjaya Tenaga. Valid 1 year from 16/03/22.
- MPOB License No. 500288804000 valid from 01/10/21-30/09/22. Welch Estate

Sime Darby Plantation under Welch Estate has made a declaration of 100% Compliance Status as signed by Estate Manager dated May 2022.

- MPOB License No. 522499002000 with size of 576.2 Ha valid from 01/08/21-31/07/22.
- Compressor JH PMT 22626 found inspected by DOSH Officer and valid till 10/02/23
- Diesel and Petrol Permit under Regulation 9(2) Control of Supply of Goods Regulation 1974 (54,600 litres for diesel and 270 for petrol). Valid from 12/08/21-11/08/24.
- JTK approved for Salary Deduction under Section 24 of Employment Act 1955 as letter dated 26/08/19 for water bill deduction not more than RM 20 (bachelor) and RM 50 (Married) for each worker monthly.

		• JTK approved for Salary Deduction under Section 24 of Employment Act 1955 as letter dated 06/07/17 for electricity bill deduction. Approved for Sime Darby Darby Plantation Sdn. Bhd and all estates.	
		• JTK approved for Salary Deduction under Section 24 of Employment Act 1955 as letter dated 21/07/16 for Tabung Surau RM 5.00 monthly for applied workers.	
		Audiometric Test was conducted by ETOSH Consult & Engineering PLT on 03/05/21 for 11 workers (2 Sprayers, 5 Drivers, 3 Grass Cutters, 1 Gen Workers) but for 2022 not conducted yet. In 2022 tested on 12/04/22 by Specialist Mobile Safety Supplies Sdn Bhd for 10 workers.	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.  - Minor compliance -	register of Legal and Other Requirements (LORR) as reviewed updated May 2022 by Group Sustainability & Quality Management (GSQM). In year 2022 found updated:	Complied
		<ul> <li>23/05/22: Occupational Safety and Health Act 2022</li> <li>April 2022: Perintah Pencegahan dan Kawalan Penyakit Berjangkit Peraturan dan Pengawalan Penyakit Berjangkit (Langkah-langkah Dalam Kawasan empaan jangkitan) (Pelan Pemulihan Negara) (Fasa Peralihan ke Endermik) 2022. May 2022: Minimum Wage Order 2022.</li> </ul>	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	Available GPS survey maps where all area of Bukit Asahan Estate with demarcated boundary marking located in Block P10A, P02H, P01H, P00K and P01J.	Complied
	- Minor compliance -	Welch Estate	

		Available Boundary Stone Map which marked at Field P020C which clearly seen and visible adjacent to Cheng Lim Realty Estate (Durian orchard).	
Criterio	on 2.2: All contractors providing operational services and supplying labour,	and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	•
2.2.1	A list of contracted parties is maintained Minor compliance -	A list of contracted parties maintained by all operating units within SOU18 in their respective List of Stakeholders Information FY 2022 which consists of stakeholders among Local Community Heads, Neighbours, Local Authorities, Vendors (Contractors & Suppliers) and Outside Crop Purchase (OCP) Suppliers (Mill only).	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.	Contracts contain specific clauses on meeting applicable legal requirements available in the Vendor Integrity Pledge records for sampled contractors/vendor/buyer i.e.	Complied
	Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
	- Minor compliance -	ii) Mekar Angkut Sdn Bhd, (251845-H), VIP signed on 30/6/22, contract for transportation of CPO, contract validity: 1/7/21-31/7/22.	
		iii) TEMIS (M) Sdn Bhd (654972-W) VIP signed on 4/5/2021, supply, fabrication, deliver to site, erection, testing, commissioning and guarantee performance of fuel retrieval system for KKS Diamond Jubilee, ref: ED/284/284/2021/CWR.	
		iv) MTJJ Enterprise (MA025462P) VIP signed on 1/2/2022, for rubbish collection, ref:01/2022 valid until 31/12/2022.	
		v) Shareprime Sdn Bhd (266702M) VIP signed on 1/1/2022 for backhoe rental, dated 1/1/2022, valid until 31/12/2022. ref: E128-Welch Estate.	

Criterio	on 3.1: There is an implemented management plan that aims to achieve lor	ng-term economic and financial viability.	
Princip	le 3: Optimise productivity, efficiency, positive impacts and resilie	nce	
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator2.3.1.  - Minor compliance -	The mill only received FFB from Sime Darby Group Estates. The mill has the information on the geo-location, evidence of the ownership status to the land and valid MPOB license. Hence there are no indirectly sourced FFB for Diamond Jubilee POM.	Complied
	valid use of land by the grower/smallholder  • One or more supporting documents for claims  • Valid MPOB license  - Critical (Major) compliance -	The mill has the information on the geo-location, evidence of the ownership status to the land and valid MPOB license.	
2.3.1	<ul> <li>For all directly sourced FFB, the mill requires:</li> <li>Information on geo-location of FFB origins</li> <li>Evidence of the ownership status or the right/claim to the land, or wall dues of land by the grower/cmallholder</li> </ul>	The mill receives FFB from its own supply base estates under SOU 18 and FFB diversion from other Sime Darby Plantation Berhad certified SOU. The FFB suppliers were listed in the Diamond Jubilee POM FFB Supplier list.	Complied
Criterio	2.3: All FFB supplies from outside the unit of certification are from legal	sources.	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.  - Minor compliance -	The contract documents and Vendor Integrity Pledge (VIP) records sighted in the indicator 2.2.2 above also contain clauses disallowing child, forced and trafficked labour. No young workers are employed by contractors and vendors.	Complied
		vii) Sri Yogaletchumi Kali Enterprise (MA0040150-X) VIP signed on 1/1/2022, machinery hire agreement (backhoe) valid until 31/12/2022.	
		vi) PRG Electrical Service and Trading (MA 0034598-P) VIP signed on 1/7/21, job scope electrical services for main division and Bkt Kajang Div. Ref: E126 – Diamond Jubilee Estate	

3.1.1	© A business or management plan (minimum three years) is documented	Bukit Asahan Estate								Complied	
	that includes, where applicable, a jointly developed business case for Scheme Smallholders.	Business planning to ensure long—term economic and financial viability was evident. The annual budgets for the period 2021 - 2026									
	- Critical (Major) compliance -	•	as evident. ted. The bu			_		•			
	Critical (Flajor) compilance		, harvesting								
			udgets incli								
			n per MT & ed as sighte				get w	vas est	tablish	ed and	
		Welch Est	ate								
			state Busin								
			op projecto & collectio								
		harvesting & collection, upkeep, transport) and other expenses.  Diamond Jubilee Estate									
		Available a budget for Estate operation from 2022-2025 considering									
		projected crops, expenses and operational cost of the estate. No scheme smallholders involved.									
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.		Asahan Esta three years	•				-	-		Complied
	- Minor compliance -	Division	Field	Year Planted	На	2023	2024	2025	2026	2027	
		A. Tekah	E2642000C	2000	66.92	-	66.92	-	-	-	
		A. Tekah	E2642000D	2000	70.15	-	70.15	-	-	-	
		A. Tekah	E2642000E	2000	60.38	-	-	60.38	-	-	
		A. Tekah	E2642000G	2000	51.42	-	-	52.42	-	-	
		Home	E2642000H	2000	66.16	66.16	-	-	-	-	
		Home	E2642000I	2000	40.97	40.97	-		-	-	
		A. Tekah	E2642000L	2000	61.34	-	-	61.34	-	-	



Home	E2642001A	2001	21.79	ı	-	1	21.79	-
Home	E2642001B	2001	34.97	-	-	-	-	34.97
Home	E2642001C	2001	68.22	-	-	-	-	68.22
Home	E2642001D	2001	56.40	-	-	-	-	56.4
Home	E2642001F	2001	46.49	-	-	46.49	-	-

#### Welch Estate

Available a long term annual replanting programme and reviewed annually as below:

Field	На	2024	2025	2026	2027	2028	2028	2030
P99	33.04	33.04						
P00	70.66	40.00	30.66					
P00A	55.24		55.24					
P02C	79.65			79.65				
P02C1	67.51				67.51			
PO2A1	87.83					87.83		
P02A	87.82						87.82	
P05	94.45							94.45
Total	576.2	73.04	85.90	79.65	67.51	87.83	87.82	94.45

#### Diamond Jubilee Estate

Old Filed No	New Field No	2022	2023	2024	2025	2026
2022A	96H2A	57.24				

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		I I	•	,		,			1	
		2024A	2000H			74.92				
		2025A	2000H1				63.88			
		2026A	200H1					60.39		
		2026B	2001H1					45.40		
		2026C	2002H					48.99		
		2026D	2002H, 1996H3					44.35		
		Total		57.24	0.00	74.92	63.88	199.13		
-3.1.3	The unit of certification holds management reviews at planned intervals	Bukit Asahan	Estate						Complie	d
	appropriate to the scale and nature of the activities undertake.  - Minor compliance -	Management Main Office Assistants, 4 Diamond Jubi	and attended Field Supervis	d by Es	state N	lanager,				
		Management Management KKS Diamon Engineers, Q such as Opera performances recommendat	Review cond d Jubilee. A uality Assura ational inputs s, Changes th	lucted o ttended nce and and out at could	n 17/0 by M Proté puts, S affect	6/22 at lill Mana gé. Disc Sustaina the mai	Meeting ager, 3 cussion obility Ma nagemen	Room of Assistar of matter nagemer nt system	of at s t	
		Diamond Jubilee Estate								
		The Manage Meeting Roo Assistant, 2 Auxilliary Poli- inputs and Changes the recommendate	m and atte Estate Assist ce Sargent. D outputs, Sus nat could	nded b ant, 5 Discussio Stainabili affect	y Esta Fields n of m ty Ma the	ate Mar Staff, 3 atters su nageme manag	nager, S Office uch as O nt perf gement	Sr. Estat Staff an peration ormance system	e d al	

	on 3.2: The unit of Certification regularly monitors and reviews their econor w demonstrable Continuous improvement in key operations.	nic, social and environmental performance and develops and implemen	ts action plans
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.  - Critical (Major) compliance -	The latest Continual Improvement Plan for 2022 was adopted in the RSPO/MSPO CIP for the mill and all estates. The improvement plans include the mail social and environmental impacts such as workers welfare, waste management, occupational health & safety and operations improvements. For example, a number of improvement projects have been initiated for the field/mill operation and workers quarters.  Diamond Jubilee POM	Complied
		<ol> <li>Inverter installation at EB Press to control motor speed at optimum oil loss in empty bunch.</li> <li>Conveyor cover and guarding installation</li> <li>Overhead water tank safety platform installation.</li> </ol>	
		4. E-Sime Card is implemented for effective outcome where E-Sime Card QR Code is displayed at most station.  5. Installation Industrial Fan at each station to ensure workers	
		work with comfortable and in good air ventilation.  6. To conduct domestic waste management campaign for residence.	
		7. Provide futsal and netball court c/w poles and nets for daily training.	
		Welch Estate  1. Introduction of mechanical spraying using Mist Blower for Circle Spraying in mature field to reduce labour dependency.	

		Change from Ramp to Bin System.      Diamond Jubilee Estate     Introduction of mechanical spraying using ST Geo for circle spraying mature field. To reduce labour dependency.	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].  PROCEDURAL NOTE:  The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.  Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.  - Minor Compliance -	RSPO metric template version 2.1 is used for the reporting of SOU 18 Diamond Jubilee Certification Unit's metrics (economic, social and environment). Data reporting period is January to December 2021 for (social and environment metrics) and economic metrics from Jun 2021 – May 2022 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.	Complied
Criterio	on 3.3: Operating procedures are Appropriately documented, consistently in	nplemented and monitored.	
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place Critical (Major) compliance -	SOP was established for the Estate Operation. Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU18 as a guidance document to conduct estate operation. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc. Available a folder contained a Mill Quality Management System (Standard Operating Procedure). Version 1:2008. In Bukit Asahan Estate, Diamond Jubilee Estate sighted a folder of SOP maintain for Estate Quality Management System issue date 1/11/2008. The main category of the SOP under: Estate Upkeep and cultivation	Complied

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Planning for replanting/new planting	
Felling/clearing and land preparation	
Weeding/Spraying-Mature	
Weeding/Spraying-Immature	
Road construction	
Road Bridges, culverts	
Soil and water conservation	
Boundaries	
Leguminous cover crops	
Lining, holing, planting	
Census/supplying	
Thinning	
Pests and dieses	
Manuring	
Water management	
Harvesting and Collection	
Harvesting	
D 12 Block Harvesting system	
Ripeness standard	
Diamond Jubilee Mill	
Available a folder contained a Mill Quality Management System (Standard Operating Procedure). Version 1:2008. Included an operation of:	
Reception Station	
Fruit Handling Station	
Sterilization Station	

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		,	
		Threshing Station	
		Pressing Station	
		Clarification Station	
		Depericarping Station	
		Kernel Recovery Station	
		Boiler Station	
		Power generation	
		Product Storage and Despatch	
		Laboratory	
		Oil Recovery Station	
		Water Treatment Plant	
		Effluent treatment Plant Sime Darby has established a system to	
		monitor the mill operation.	
3.3.2	A mechanism to check consistent implementation of procedures is in place.  - Minor Compliance -	Sime Darby Plantation has established a mechanism for checking consistency implementation of the procedure is through Plantation Advisory and Mechanization Department and Group Corporate Audit Department that conducted internal audit 2 times a year Sime Darby Plantation has established mechanism to check.	Non- compliance
		In Diamond Jubilee POM, found available Structured Oil Recovery Assessment (SORA) SOU 18 KKS DiamondFY2022 R1 dated 07-12 February 2022.	
		Diamond Jubilee Estate has conducted Internal Audit as part of mechanism to check and ensure consistent implementation of procedures in estate operation on 09/02/2022	
		The Water Quality Monitoring SOP was not adequately implemented. Referred to Sime Darby Plantation; Plantation Quality Management System; Sustainable Plantation Management System;	

		SOP for Water Quality Monitoring; Date: 01/06/2016; 5.5 Evaluation of Laboratory Test Results.	
		- Upon receiving the complete results, the Head of Operating Unit shall check whether it exceeds, or no not meet the related requirement. If the results are off limit, an investigation shall be initiated to solve the issue.	
		- Arrangement for a re-sampling and analysis of the parameter of concern shall be done concurrently with the investigation and sent to the laboratory within 1 week of receiving the results.	
		Bukit Asahan Estate monitors the water quality (River Water) for the stream that flows adjacent to the estate as per the Water Management Plan. Water Analysis Test Report were received with non-conforming results and the implementation there after was not in accordance with the SOP.	
		1. The corrective/preventive action report for non-conforming water analysis results were not done for Water Analysis Test Report dated 08/01/2022 (Report Number: PL121/2022) and 06/07/2021 (Report Number:IE738/2021)	
		2. Resampling was not done within a week of receiving the off spec results for Water Analysis Test Report dated 14/03/2022 (Report Number: IE349/2022), 08/01/2022 (Report Number: PL121/2022), 29/11/2021 (report Number: IE1170/2021) and 06/07/2021 (Report Number:IE738/2021). Thus a minor NC was raised.	
3.3.3	Records of monitoring and any actions taken are maintained and available Minor Compliance -	Records of monitoring and action taken such as Mill/Plantation Advisor Visit, Performance Monitoring Visit, SORA/SCRA visit, Agronomist visit and Internal Audit. In Diamond Jubilee Estate, available report of Performance Monitoring visit dated 15/02/22.	Complied

	on 3.4: A comprehensive Social and Environmental Impact Assessment (SEI ment and monitoring plan is implemented and regularly updated in ongoing		d environmental
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.  - Critical (Major) compliance -	The estates conducted Environmental Impact Assessment to identify the environmental aspect in all estate activities and documented in Environmental Aspects Impacts Identification form and Environmental Impacts Evaluation form. The assessment covers all activities in the estates such as r The assessment was conducted base on SOP established. Refer SOP Standard Operation Manual; subsection 5.4; Planning and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure.  No new planting in all estates within SOU 18. For existing	Complied
		operations, the operating unit of SOU 18 documented the continual improvement plan for social in the Social Management Plan. Identified main social aspects and impacts from SIA considered in the plan including the following categories:  - Workers' Housing Condition/Living Improvement - Workers' Working Condition	
		- External stakeholders feedbacks Improvements conducted by individual operating units within SOU 18 including housing improvement programs, minimum wages achievement monitoring and community contribution programs.	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.  - Minor Compliance -	No new planting in all estates within SOU 18. For existing operations, the operating unit of SOU 18 documented the continual improvement plan for social in the Social Management Plan. Identified main social aspects and impacts from SIA considered in the plan including the following categories:  - Workers' Housing Condition/Living Improvement	Complied

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		<ul> <li>Workers' Working Condition</li> <li>External stakeholders feedbacks</li> <li>Improvements conducted by individual operating units within SOU 18 including housing improvement programs, minimum wages achievement monitoring and community contribution programs.</li> </ul>	
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.  - Critical (Major) compliance -	The operating units sampled have established the Environmental Management Program base on the significant impacts identified in the EAI/EIE conducted. The plan stated the Environmental issue, mitigating measures and person responsible. The plan was reviewed on annually basis.  Reviewed the implementation of the management plan as follows:  a. Monitoring of HCV and Buffer Zone areas on a monthly basis.  b. Monitoring of RTE species that are sighted in the estates.  c. Monitoring of Water quality for Incoming and Outgoing water courses.  d. Monitoring of Smoke Emission by the Mill which is done twice in a year.  e. Monitoring of Effluent Final Discharge on a monthly basis.  f. Disposal of Schedule Waste Items in accordance with National Regulations.	Complied
Criterio	n 3.5: A system for managing human resources is in place.		
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.  - Minor Compliance -	The Human Resource Department in HQ has established Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019 and Workforce Management Unit Liaison & Recruitment procedure (WMU/LR-SOPP/MARCH2016, Rev. 0 dated 30/03/2016) to explain the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries.	Complied

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3.5.2	Employment procedures are implemented, and records are maintained Minor Compliance -	Application form, employment interview assessment form, medical check-up report and employment contract was sighted for new recruited employees. The latest recruitment of workers in Diamond Jubilee POM was on 20 <sup>th</sup> June 2022. A copied of identification card was kept as record. Interviewed with the clerk confirmed that if there is any job vacancy available, they will publish a job vacancy advertisement/flyer at the places nearby the villages.	Complied			
Criterio	Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.					
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented Critical (Major) compliance -		Complied			
		(M) Sdn Bhd. The Baseline Noise Risk Assessment Report (Report Number: HQ/LPROYKPEB/20/ 00271) was available for verification.				

		Diamond Jubilee POM  Sampled accident reported in year 2022 and found Hirarc (OSH Risk Assessment Register) was revised accordingly:  Security on 20/06/22.  Process (Engine Room) on 20/05/22  Process (Kernel Storage/Despatch) on 17/05/22  General cleaning (Mill compound) on 12/04/22  Process (Confined space) on 18/06/22  Workshop (Mechanical) on 05/04/22  All recommendation for Additional Risk Control to be more specifically mentioned other than just PPE.  Welch Estate  HIRARC was reviewed in 2022 as HIRARC Summary consist of reviewed of 10 activities due to accident occurred. Refer to a usage of Mist Blower and Change from Ramp to Bin system as one of the mechanisation programme under continuous Improvement Plan Year 2022 dated 29/04/22. Both hazard and risk not identified and assessed.  Noise Risk Assessment was conducted by Assessor (HQ/16/PEB/00/158) where Area and Personal Monitoring was conducted on 15/07/20. Report No. HQ/LPROYKPEB/20/00272.	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.  - Critical (Major) compliance -	The operating units in SOU 18 has established and monitored Safety and Health Management Plan. The plans includes OSH Risk Management, OSH Structure, Incident Reporting, Emergency Preparedness and Response, Chemical Safety Management, Noise Management, Contractor Safety Management, Communication, Inspection, Awareness and Competency Training and DOSH Visit and Audit.	Complied

		The management plan was monitored or reviewed and annually basis.	n quarterly basis and	
		Diamond Jubilee Estate		
		Available and documented OSH Plan monitoring evidence for Q1 (Jan-Mac) and activities such as:		
		Review of OSH related target, programm	ne, performance.	
		Legal Compliance Review		
		Hirard Review		
		Review of OSH related contract		
		ESHC Meeting		
		ESHC workplace inspection		
		Drill (Fire, Spillage, First Aid).		
		Submission of JKKP 8 and etc.		
Criterio	n 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract	workers are appropriately trained.		
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.  - Critical (Major) compliance -	All operation units within SOU 18 have estable a training plan base on the training not conducted on annual basis. Sighted Training which covers all job designation including the No scheme smallholders and out-growers with the state of the	eed analysis which is g Schedule 2021 - 2022 ne contractors.	Complied
3.7.2	Records of training are maintained Minor Compliance -	The operating units maintained the training Reviewed the training records as follows:	ing records conducted.	Complied
		Diamond Jubilee POM		
		Training	Date	



First Aid Training	20/06/2022	
Fire Drill Training	20/06/2022	
Chemical Management & PPE Handling	17/06/2022	
Workshop on Mass Balance & Palm Trace	14/06/2022	
Roles & Responsibility Training	13/06/2022	
SCCS Procedure Training	07/06/2022	
HCV Awareness Training	01/06/2022	
Sexual Awareness Training	10/03/2022	
<u>Diamond Jubilee Estate</u>		
Training	Date	
Briefing on Payslip	18/01/2022	
Briefing on PPE	20/01/2022	
Helpline Briefing (Whistleblowing, Suara Kami and Ulula)	22/01/2022	
Briefing on Employment Contract	05 - 07/03/2022	



	Circle & Spot Spraying Training	07/03/2022
	Reproductive Rights and Sexual Harassment Training	10 - 11/03/2022
	HCV Training	13/05/2022
В	Bukit Asahan Estate	
	Training	Date
	HCV Awareness Training	10/05/2022
	Safe Harvesting Procedure Training	13/05/2022
	First Aid Training	28/06/2022
5	Sexual Harassment Awareness	11/03/2022
	Grievance Channel Training	21/04/2022
	Sprayer Training by MyCrop	02/12/2021
	,	
<u> </u>	Velch Estate	
	Training	Date

		First Aid Training & ERT Training	01/07/2022	
		PPE Training	18/06/2022	
		Hearing Conservation Training	18/06/2022	
		Tractor Drivers Training	15/06/2022	
		Fire Drill Training	22/03/2022	
		HIRARC Training	25/11/2022	
		Working at Height Training	12/11/2021	
		Sprayers Training	03/11/2021	
	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.  - Minor Compliance -	The mill continuously provided training to the SCCS. Reviewed the training records as follows:		Complied
		1. RSPO SCCS Briefing for Contractors – 02	2/03/2022	
		2. RSPO SCCS Briefing for Mill Personals –	02/03/2022	
		3. RSPO SCCS Procedures Briefing – 07/06	/2022	
		4. RSPO Mass Balance & Palm Trace Works	shop – 14/06/2022	
		The trainings were attended by particle departments of the mill such as additional supervisors, weighbridge, laboratory, accontractor.		



(note: A	note: All supply chain requirements are considered as Critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle				
3.8.1	Identity Preserved Module  A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.	FFB were obtained from all Sime Darby certified estates only. There were no third party's crop nor non-certified FFB received by the mill. This was verified during the stakeholders meeting, transaction records and site visit at mill.	Complied		
	Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.				
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	FFB were obtained from all Sime Darby certified estates only. There was no third party's crop nor non-certified FFB received by the mill. This was verified during the stakeholders meeting and site visit at mill. Thus, this indicator is not applicable.	Not Applicable		
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.	Complied		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The registration of PalmTrace will be carried out by the GSQM Department. All transaction will be registered in the PalmTrace.	Complied		

		Diamond Jubilee POM registered license available in PalmTrace as following:  - Member ID: RSPO_PO1000000187  - Member category: Oil Mill  - RSPO Membership No.: 1-0008-04-000-00	
3.8.5	Documented procedures  The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:  a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.  b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).  c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.  d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.	<ol> <li>Documented procedures available as following:</li> <li>Procedure namely Sime Darby Plantation – Sustainable Supply Chain and traceability Procedure for Palm Oil Mill; Version 1; Issue no.: 01; Issue date: 01 June 2022.</li> <li>The procedure was established which covers responsibility, reporting of certified CPO/PK, non-conformance material, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint Communication and Claim and etc.</li> <li>The Mill Manager as Head of Operating Unit has the overall responsibility for the implementation of SOP, and he may assign roles to relevant personnel or invite personnel from various departments necessary to assist in the SOP implementation. Sighted the identified and assigned suitable employees to implement and maintain the traceability system by management is En. Hanif Bin Ab. Talib (Assistant Manager) – PIC for Environmental and Quality Management Systems dated 01/05/2019.</li> </ol>	Complied
		The procedures for receiving and processing certified and non- certified FFBs are documented in the Sime Darby Plantation – Standard Operating Procedure (SOP) for Sustainable Supply Chain	



		and Traceability Procedure for Upstream Malaysia, doc. ID:SD/SDP/GSD/SCCS/0522/01, effective date: 1/6/2022	
3.8.6	<ul> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</li> <li>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b. Effectively implements and maintains the standard requirements within its organisation.</li> <li>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</li> </ul>	Internal audit conducted based on the SOP for Sustainable Supply Chain and Traceability of SPMS Appendix 15 (18: Internal Audit); Version 2; Issue # 5; Date: April 2019. The procedure conforms to the requirements in the RSPO SCCS.  The latest Internal Audit for RSPO SCCS was done on 10/05/2022 conducted by Sustainability Compliance Unit, Group Sustainability Department. There were no findings raised on the RSPO SCCS requirements.	Complied
3.8.7	<ul> <li>Purchasing and Goods In</li> <li>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul>	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. E.g. of information available in the DO is as follows:  • Consignment note no. (133391)  • Estate's names (Diamond Jubilee Estate)  • Date & time of delivery (23/6/2022)  • Field No. (05H1)  • No. of bunches (359 bunches)  • Vehicle no. (JQS58842D11)  • Net weight (8.01 mt)	Complied

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In estate's consignment note, details of RPPO certificate number available for verification. RSPO cert. no. (RSPO 591224) Diversion from (Kempas SOU17 certification unit) estate; • Ticket no. (23249) • Estate's names (Tangkah Estate) • Date & time of delivery (30/7/2021) • Field No. (05A, 2010A) • No. of bunches (748 bunches) • Vehicle no. (MBY 8897) • Net weight (14.190 mt) RSPO certificate no.: RSPO-PC00101 Diversion from (Kok Foh SOU16 certification unit) estate; • Ticket no. (7741) • Estate's names (Pertang Estate) • Date & time of delivery (4/12/21) • Field No. (06P2) • No. of bunches (1,210 bunches) • Vehicle no. (SYB1185) • Net weight (31.36 mt) RSPO certificate no.: GGC-SDPKF-RSPOPC-J1-2021 There has been no projected overproduction during the period under reviewed. Nonetheless, based on interview with the staff, the facility is aware of this requirement.

		Handling of non-conforming FFB and/or documents is addressed in the Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019, Clause 7.7. There has been no issue about non- conforming FFB and/or document during the period under review.	
3.8.8	Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):  a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number.	<ul> <li>Diamond Jubilee POM has ensured the required information is available in document form.</li> <li>Based on sampled contract for CPO, [i.e. S/PSD/2203/CPO0090B], the following information was available: <ul> <li>The name and address of the buyer: XXX</li> <li>The name and address of the seller i.e. Diamond Jubilee Oil Mill, 77009, Jasin, Melaka</li> <li>The loading or shipment/delivery date: Despatch ticket: 010889, dated 17/3/2022</li> <li>The date on which the documents were issued: 17/3/2022</li> <li>A description of the product, including the applicable supply chain model, i.e. "Crude Palm Oil (CPO) – RSPO CPO-IP"</li> <li>The quantity of the products delivered: 40.45 mt</li> <li>Related transport documentation, e.g. Despatch note: 010889</li> <li>Supply chain certificate number of the seller e.g. in weighbridge ticket i.e. RSPO 591224</li> <li>A unique identification numbers - available in a few forms e.g. DN no., seal no., etc. (palm trace ID: TR-9ae4d569-b01b)</li> </ul> </li> </ul>	Complied
		Based on sampled contract for PK, [i.e. S/PSD/2204/PK0136], the following information was available:	

		The name and address of the buyer: XXX	
		The name and address of the seller i.e. Diamond Jubilee Oil Mill, 77009, Jasin, Melaka	
		The loading or shipment/delivery date: Despatch ticket: 010995, dated 18/5/2022	
		The date on which the documents were issued: 18/5/2022	
		A description of the product, including the applicable supply chain model, i.e. "Palm Kernel (PK) – RSPO PK-IP"	
		The quantity of the products delivered: 28.49 mt	
		Related transport documentation, e.g. Despatch note: 010995	
		Supply chain certificate number of the seller e.g. in weighbridge ticket i.e. RSPO 591224	
		A unique identification numbers - available in a few forms e.g. DN no., seal no., etc. (palm trace ID: TR-78dfe3c8-2b3e)	
3.8.9	Outsourcing Activities  i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification  ii) The mill shall ensure the following:  a) The mill has legal ownership of all input material to be included in outsourced processes	The mill does not outsource any of its milling activities to any third party. With regards to the contracted CPO and PK transporters, it is stated in the contract agreement between Diamond Jubillee POM and the contractors in Annexure 5, RSPO Supply Chain Certification Standard, that the site has legal ownership of all input material to be included in outsourced processes. Sighted the contract agreement with Mekar Angkut Sdn Bhd (Duration Contract: 01/06/2022 – 31/07/2022) and Teo Tuan Kwee Sdn Bhd (Duration Contract: 01/07/2022 – 31/07/2022) available for verification.	Complied
	b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure		

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	that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.  c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.  d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Details of contractors are available in the list of contractors.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The list of contractors is updated from time to time by the mill. The information of any newly appointed contractor is shared with BSI through pre-audit information request prior to the audit. The information is provided to the assessment team.	Complied
3.8.12	<ul> <li>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</li> <li>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</li> <li>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>iv) For Mass Balance Module, the mill:</li> </ul>	<ul> <li>i) 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.</li> <li>ii) The retention period for maintaining the traceability records is 3 years as stated in the Section 5 in - Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability Procedure for Upstream Malaysia, doc. ID:SD/SDP/GSD/SCCS/0522/01, effective date: 1/6/2022</li> <li>iii) Not applicable.</li> <li>iv) a) All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are recorded on a 3 monthly basis in the mill's Daily Production Report</li> <li>b) Deliveries of CPO and PK deducted from the</li> </ul>	Complied

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	<ul> <li>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</li> <li>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</li> <li>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.</li> </ul>	material accounting system according to conversion ratios stated by RSPO.  c) Delivery of mass balance product sales from positive stock.	
3.8.13	Extraction Rate  The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	The extraction rate for mill is calculated in daily production detail report. Conversion factor of CPO and PK production is depending on the actual OER and KER.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Conversion factor of CPO and PK production is depending on the actual OER and KER.	Complied
3.8.15	Processing  For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	Complied
3.8.16	Registration of Transactions  i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after	The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace.  Based on the announcement summary, all the registrations were found to be in order.	Complied



	dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.  ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	No RSPO volume sold for other scheme. RSPO certified volume only downgraded to conventional CPO/PK.	
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
Genera	l 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 Diamond Jubilee POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc). Thus, this indicator is not applicable	Not Applicable
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 Diamond Jubilee POM as to date.	Not Applicable
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 Diamond Jubilee POM as to date.	Not Applicable



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 Diamond Jubilee POM as to date.	Not Applicable
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 Diamond Jubilee as verified through documentations and websites.	Complied
ess to business communications		
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.	Complied
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/Palm Kernel RSPO IP) and RSPO certificate number.	Complied
<ul> <li>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:</li> <li>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.</li> <li>b. If the distributor or wholesaler is supply chain-certified they should</li> </ul>	Diamond Jubilee POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	Not Applicable
	cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.  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.  Business to Business communications  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.  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.  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.	cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.  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.  Ses to business communications  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, 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.  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



Busin	ess 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.	Business to Business communication were made through the CSPO and CSPK trading contractual and transactions documentations between the mill and buyers. No further communications made by Diamond Jubilee POM for its raw products beyond its refinery and oleochemical plants buyers.	Not Applicable
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. Diamond Jubilee POM only producing crude and unfinished product. This is not applicable for Diamond Jubilee POM.	Not Applicable
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. Diamond Jubilee POM only producing crude and unfinished product. This is not applicable for Diamond Jubilee POM.	Not Applicable
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. Diamond Jubilee POM only producing crude and unfinished product. This is not applicable for Diamond Jubilee POM.	Not Applicable
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. Diamond Jubilee POM only producing crude and unfinished product. This is not applicable for Diamond Jubilee POM.	Not Applicable
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. Diamond Jubilee POM only producing crude and unfinished product. This is not applicable for Diamond Jubilee POM.	Not Applicable
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. Diamond Jubilee POM only producing crude and unfinished product. This is not applicable for Diamond Jubilee POM.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these	No business to consumer communication on product specific claim made. Diamond Jubilee POM only producing crude and unfinished product. This is not applicable for Diamond Jubilee POM.	Not Applicable



	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 <a href="https://www.rspo.org">www.rspo.org</a> .		
MODUL	E A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES		
Certifie	d oil palm content (IP)		
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	CPO produce for IP certified containing 100% oil palm content	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	CPO produce for IP certified containing 100% oil palm content	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	CPO produce for IP certified containing 100% oil palm content	Complied
Labellin	g and trademark (IP)		
	Members are allowed to use the RSPO label in one of the following ways:  • RSPO trademark which includes the tag 'CERTIFIED' or	Diamond Jubilee POM is producing crude palm product and does not involved in any labelling of end product.	Complied

sustainable palm oil'. Where applicable trademark licens under or next to the tradema font size must be at least	des the tag 'This product contains certified ever a RSPO trademark is displayed, the e number must be shown immediately rk or the 'statement'. Font must be Calibri, 4pt (1.4 mm or 0.06 inch). In on-pack rademark can be printed anywhere on the		
Messaging (IP)			
<ul> <li>may include some or all of the formal palm products contain come from RSPO sources.</li> <li>By choosing this product, you oil. For more information: www.</li> <li>RSPO-certified sustainable of other oil palm products throut certified sustainable oil palm certified mills and plantations.</li> <li>The entire supply chain is more auditors. www.rspo.org</li> <li>RSPO-certified sustainable prenvironmental and social critical contains.</li> </ul>	ned in this product have been certified to ww.rspo.org u are sure it contains RSPO-certified palm ww.rspo.org oil palm products were kept apart from aghout the supply chain. www.rspo.org n products can be traced back to RSPO-s. www.rspo.org onitored by independent, RSPO-accredited oalm oil has been produced to stringent	Diamond Jubilee POM is producing crude palm product and does not involved in any labelling of end product.	Complied



Principle 4: Respect community and human rights and deliver benefits				
Criteri	on 4.1: The unit of Certification respects human rights, which includes respect	ecting the rights of Human Rights Defenders.		
4.1.1	<b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	Quality Policy Statement dated 02/12/2019 approved by Group Managing Director where the company is respecting, upholding &	Complied	
	- Critical (Major) compliance -	Besides, Policy on the Protection of Human Rights Defenders (HRDs) was established with effective date on 25/03/2020. Sime Darby Plantation respect and safeguard human rights, notion of democracy and its institution. They recognize that Human Rights Defenders have the role and responsibility of upholding human rights and the need for them to be able to lodge complaints that may arise from their business activities and relationship with SDP.		
		The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the estate. sighted as sample training was conducted by Sentosa Estate latest on 24/05/2022 & 18/04/2022 - Induction Course to Newly Joined workers, COBC Briefing, SD Policy Charter, Grievance Channel, Agreement Briefing, Sexual Harassment Briefing, PDPA and etc.		
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations.  - Minor compliance -	Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the estates within SOU 18 do not instigate violence or use any form of harassment in their operations.	Complied	

4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.  - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistle blowers, complainants and community spokespersons play by lodging complaints in confidence.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.  - Minor compliance -	Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in <a href="https://www.simedarbyplantation.com/corporate/whistleblowing">https://www.simedarbyplantation.com/corporate/whistleblowing</a> . Besides, the company has implemented "Suara Kami" as a platform for the workers to raise any issue. The workers in Diamond Jubilee Palm Oil Mill were briefed on the complaint mechanism during morning muster. Besides, external stakeholders were briefed during the stakeholder meeting. Interviewed with the internal and external stakeholders confirmed that they have been briefed and understood on the complaint mechanism implemented by the company. The latest initiative introduced (ULULA - Impact Worker Helpline) effective from 27/8/2021.	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.  - Minor compliance -	A Standard Operating Manual (SOM) was established and maintained i.e. Sime Darby Plantation Estate Quality Management System as a system for dealing with complaints and grievance was defined in Sub-section 5.5 Management Responsibility, Appendix 5.5.3.2 Procedure for External Communication, version 2, issue 0, dated 25/5/2015.	Non- compliance

		The complaints and grievances are open to effected parties including internal and external stakeholders. The time frame to deal with external communications should be within two weeks of the date of receipt for communication requiring direct feedback (Clause 6.3 of the procedure) and within one week of the completion of the investigation, for communication required investigation.  Process to keep parties to a grievance informed of its progress, including against agreed timeframe and the outcome was not effective and communicated to relevant stakeholders.  Feedback raised by 2 (two) foreign workers at Bukit Asahan Estate with regards to leave application process. They have not been	
		informed on the status of leave application (approved or denied) so far. Further check on the records for both workers;	
		1) Bikas - leave application dated 13/5/22, apply for 2 months leave (25/9/22 - 25/11/22), leave approved but deferred to 1-3/2023.	
		2) Marsan - leave application letter was just submitted on 1/7/2022. Status of leave in still on-hold.	
		No evidence of attendance during meeting with workers (for leave application) in June 2022. No minute of meeting or information on the approval/deferment for the said workers.	
		Thus, a major NC was raised due to recurrence of issue under the same indicator.	
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.  - Minor compliance -		Complied



Criterio	on 4.3: The unit of Certification contributes to local sustainable developmen	t as ag	reed by local com	nmunities.				
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated.  - Minor compliance -	i) Pro	ributions made as gramme with KEN ne Darby Program	1AS ( Hari	Potensi Ka	nak-Kanak	( KEMAS)	Complied
Criterio	on 4.4: Use of the land for oil palm does not diminish the legal, customary	or user	rights of other us	ers withou	t their free	e, prior an	d informed cons	sent.
4.4.1	<b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history of land tenure and the actual legal or customary use of the land are available.	respe	es of land titles of ctive land titles (settive land titles (set shown below). It is shown to be so that the control of the co	sample) to Quit rents	demonstra were paid	ate the rig accordingl	ht to use the ly. There was	Complied
	- Critical (Major) compliance -	Estates		Land title				
				HS(D) No.	PTD/ lot Ref	Size (ha)	Expiry date/land use type	
		1	Bukit Asahan Estate Total of 44 land titles (3,072.18 ha)	22022	49	138.6 046 ha	Freehold (no specific term)	
		2	Welch Estate Total of 6 land titles (	121096	2175	399.01 94	Freehold (no specific term)	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	that	No issues of land dispute issue occurs in all estates within SOU 18 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.			Complied		



4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.  - Minor compliance -	No issues of land dispute issue occurs in all estates within SOU 18 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.  - Minor compliance -	No issues of land dispute issue occurs in all estates within SOU 18 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.  - Minor compliance -	No issues of land dispute issue occurs in all estates within SOU 18 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).  - Critical (Major) compliance -	No issues of land dispute issue occurs in all estates within SOU 18 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.  - Minor compliance -	No issues of land dispute issue occurs in all estates within SOU 18 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied

4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.  - Critical (Major) compliance -	No issues of land dispute issue occurs in all estates within SOU 18 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.  - Minor compliance -	No issues of land dispute issue occurs in all estates within SOU 18 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
	on 4.5: No new plantings are established on local peoples' land where it calealt with through a documented system that enables these and other stake		
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.  - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.2	<b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.  - Critical (Major) compliance -	within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted	Not Applicable
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	No new planting and issues of customary land occurs in all estates within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable



	- Minor compliance -		
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.  - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.  - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.  - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.  - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.  - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable

**Criterion 4.6:** Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.  - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.  - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.  - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.  - Minor compliance -	· · · · · · · · · · · · · · · · · · ·	Not Applicable
	on 4.7: Where it can be demonstrated that local peoples have legal, cushment of rights, subject to their FPIC and negotiated agreements.	stomary or user rights, they are compensated for any agreed land	acquisitions and
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	No new planting and issues of customary land occurs in all estates within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable



	- Critical (Major) compliance -		
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.  - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
Criterio rights.	on 4.8: The right to use the land is demonstrated and is not legitimately co	ntested by local people who can demonstrate that they have legal, cu	stomary, or user
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.  - Minor compliance -	within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.  - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)  - Minor compliance -		Complied



4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).  - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 18 that requires FPIC process and compensation since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
Princip	le 5: Support smallholder inclusion		
Criterio	on 5.1: The unit of certification deals fairly and transparently with all small	nolders (Independent and Scheme) and other local businesses.	
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders.  - Minor compliance -	Current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary by Region. The mill received FFB from sister estate from SOU 18 and FFB diversion from other certified SOU. The FFB supplier were listed in the Diamond Jubilee POM FFB Supplier list. No external FFB suppliers for DJ POM.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request).  - Critical (Major) compliance -	There are no smallholders under the SOU 18 Diamond Jubilee POM and Supply Base certification units. The mill received FFB from sister estate from SOU 18 and FFB diversion from other certified SOU. The FFB supplier were listed in the Diamond Jubilee POM FFB Supplier list	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.  - Critical (Major) compliance -	There are no smallholders under the SOU 18 Diamond Jubilee POM and Supply Base certification units. The mill received FFB from sister estate from SOU 18 and FFB diversion from other certified SOU. The FFB supplier were listed in the Diamond Jubilee POM FFB Supplier list.	Complied
5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	There are no smallholders under the SOU 18 Diamond Jubilee POM and Supply Base certification units. The mill received FFB from sister estate from SOU 18 and FFB diversion from other certified SOU. The FFB supplier were listed in the Diamond Jubilee POM FFB Supplier list.	Complied



	- Critical (Major) compliance -		
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.  - Minor compliance -	There are no smallholders under the SOU 18 Diamond Jubilee POM and Supply Base certification units. The mill received FFB from sister estate from SOU 18 and FFB diversion from other certified SOU. The FFB supplier were listed in the Diamond Jubilee POM FFB Supplier list.	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.  - Critical (Major) compliance -	Contract payment was made through the Finance Department from the Head Office. The payment were made within the agreed time frame. Reviewed the payment records as follows:	Complied
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).  - Minor compliance -	Weight Bridge calibration under Akta Timbang Sukat 1972 for capacity of 60,000 by De Metrology Sdn. Bhd. Expiry date of calibration is on 09/01/23.	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.  - Minor compliance -	There are no smallholders under the SOU 18 Diamond Jubilee POM and Supply Base certification units.	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.  - Critical (Major) compliance -	Addressed in Standard Operation Manual; Date: 1/11/2008 that documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2) for grievance handling. No independent smallholders within DJ POM certification unit.	Complied



Criterio	on 6.1: Any form of discrimination is prohibited.		
Princip	le 6: Respect workers' rights and conditions		
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.  - Minor compliance -	There are no smallholders under the SOU 18 Diamond Jubilee POM and Supply Base certification units. The mill received FFB from sister estate from SOU 18 and FFB diversion from other certified SOU. The FFB supplier were listed in the Diamond Jubilee POM FFB Supplier list.	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling Critical (Major) compliance -	No training on pesticides handling for scheme smallholders as there are no smallholders under the SOU 18 Diamond Jubilee POM and Supply Base certification units.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.  - Minor compliance -	There are no smallholders under the SOU 18 Diamond Jubilee POM and Supply Base certification units. The mill received FFB from sister estate from SOU 18 and FFB diversion from other certified SOU. The FFB supplier were listed in the Diamond Jubilee POM FFB Supplier list.	Complied
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS).  - Minor compliance -	There are no smallholders under the SOU 18 Diamond Jubilee POM and Supply Base certification units. The mill received FFB from sister estate from SOU 18 and FFB diversion from other certified SOU. The FFB supplier were listed in the Diamond Jubilee POM FFB Supplier list.	Complied
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.  - Minor compliance -	There are no smallholders under the SOU 18 Diamond Jubilee POM and Supply Base certification units. The mill received FFB from sister estate from SOU 18 and FFB diversion from other certified SOU. The FFB supplier were listed in the Diamond Jubilee POM FFB Supplier list.	Complied

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

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6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.  - Minor compliance -	Interviewed with the female employees in Diamond Jubilee Palm Oil Mill and other visited estates confirmed that pregnancy testing is not conducted prior to work. They still will be able to offer for work if they are pregnant.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.  - Critical (Major) compliance -	The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly. SDPB has introduced the new Terms of Reference (TOR) for Gender Representatives and Gender Committee, dated March 2021 which supersede the previous Gender Committees Gender Committee Handbook, First Edition 2014. In this new TOR, a more definitive roles, and responsibilities as well as governance structure and programmes were added in.  Gender Committee were established by the mill and estates management and verified at each operating unit. Meetings conducted once every 3 months or whenever necessary (OU basis) and for SOU gender representative carried out on monthly basis. Meetings conducted at respective units as below:  SOU18 meeting:  Bukit Asahan Estate: 11/3/2022, 30/4/2022  Diamond Jubilee POM: 25/6/2022, 7/3/2022  Welch Estate: 28/6/2022, 25/2/2022  There was no sexual harassment case reported so far at all OU.	Complied
6.1.6	There is evidence of equal pay for the same work scope Minor compliance -	There is no discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder's consultation, worker's interview, complaint book and trade union meeting. Sighted the job description of each	Complied

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		workers mention the same regardless of skin colour, religion, race or caste	
	on 6.2: Pay and conditions for staff and workers and for contract workers a iving wages (DLW).	llways meet at least legal or industry minimum standards and are suffice	cient to provide
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.  - Critical (Major) compliance -	Sime Darby has sign the Collective Agreement with National Union of Plantation Workers (NUPW). Sample of employment contracts are reviewed and the agreements are signed in both English and home country language (i.e. Hindi, Bahasa Malaysia/Indonesia). Upon the foreign workers arriving to the estate, they will be inducted for the terms and conditions of employment contract and briefed on the company's policies. This has confirmed by interviewed with the foreign workers.	Complied
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.  - Critical (Major) compliance -	contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination,	Complied
		Payroll documents, namely the payslip, also give accurate information on compensation for all work done. This includes those who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay. Also confirmed via sampled payslips that wages were paid in compliance with national legal requirements. Salary deductions and overtime were in accordance with the relevant laws (SOCSO, EPF, EIS) and Labour Office permits. None of the sampled workers had any family members performing work.	

		<ul> <li>Employment contracts template, "Employment Contract Extension for Foreign Worker (Peninsular – Indonesia/ Nepalese) – ECE1</li> <li>Check-roll records, Estate/mill daily attendance report, CKRRD005</li> <li>Employee Master List, SEMUA report.</li> </ul>	
6.2.3	(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.  - Critical (Major) compliance -	Based on review of punch cards, workers' employment contracts and payslips, evidence was available that West POM and estate were able to demonstrate compliance with Employment Contracts 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSO, EPF, EIS) and non-statutory deductions (e.g. union/NUPW, water, electricity bills, etc) in accordance with Labour Office permits. These permits are as detailed out under Indicator 2.1.1 above. Sampled during the audit were the following workers' employment contracts and payslips for the month of July 2021 (peak), September 2021 (low) and May 2022 (average/medium)  Diamond Jubilee POM (6 workers sampled from total of 60 workers)  Employee ID 10544, joined date 1/12/2003  Employee ID 90606, joined date 4/5/2013  Employee ID 166872, joined date 1/8/2016  Employee ID 169591, joined date 12/3/2016  Employee ID 169591, joined date 20/6/2022  Bukit Asahan Estate (11 workers sampled from total of 176 workers)  1) Employee ID 156518, joined date 29/11/2019	Complied

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2) Employee ID 156521, joined date 29/11/2019	
3) Employee ID 51149, joined date 29/06/2010	
4) Employee ID 57486, joined date 11/11/2010	
5) Employee ID 87375, joined date 1/2/2013	
6) Employee ID 102339, joined date 5/6/2014	
7) Employee ID 102342, joined date 5/6/2014	
8) Employee ID 108473, joined date 1/12/2014	
9) Employee ID 143817, joined date 11/7/2018	
10) Employee ID 162096, joined date 8/2/2021	
11) Employee ID 155048, joined date 28/9/2019	
Welch Estate (7 workers sampled from total of 67 workers)	
1) Employee ID 75507, joined date 25/11/2011	
2) Employee ID 105304, joined date 15/7/2014	
3) Employee ID 114688, joined date 10/6/2015	
4) Employee ID 143500, joined date 28/6/2018	
5) Employee ID 145512, joined date 14/9/2018	
6) Employee ID 150332, joined date 29/4/2019	
7) Employee ID 157758, joined date 28/1/2020	
Diamond Jubilee Estate (11 workers sampled from total of 184	
workers)	
1) Employee ID 86468, joined date 4/1/2013	
2) Employee ID 157941, joined date 21/9/2019	
3) Employee ID 144963, joined date 16/8/2018	
4) Employee ID 133358, joined date 11/5/2017	
5) Employee ID 121459, joined date 28/10/2011	

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6.2.4	(C) The unit of continue manifes adequate hereing	6) Employee ID 155790, joined date 24/10/2019 7) Employee ID 107394, joined date 13/11/2014 8) Employee ID 114872, joined date 17/6/2015 9) Employee ID 108560, joined date 3/12/2014 10) Employee ID 155500, joined date 7/10/2019 11) Employee ID 140919, joined date 7/3/2018	Non
6.2.4	(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.  - Critical (Major) compliance -	Workers Housing Management Procedure and 'OilPalmPal' Digital Housing Complaint System (OPP DHCS). Inter-office mail (Ref. No: UM/HSE/013/11/2021), dated 26 <sup>th</sup> November 2021 from CEO Upstream Malaysia. General house rule is written under " <i>Peraturan Umum Kompleks Perumahan Pekerja</i> "  Linesite inspection (housing complex/nest/community hall weekly inspections (PIOA) carried out as per the following:  Diamond Jubilee POM – 30/6/2022, 23/6/22, 16/6/2022, 10/6/2022  EWC (Employee Welfare Committee) carried out every quarter on 16/6/22 and 2/3/22 for each house unit inspection by appointed EWC committee. At Welch Estate, PIOA inspection carried out on 1/6/2022, 7/6/2022, 18/6/2022 and 29/6/22.  Compliance with Employee's Minimum Standards of Housing, Accommodations and Amenities Act 1990 and was not effectively demonstrated as the following objective evidences:  Welch Estate  Sighted during site visit at line site, parameter drain leading to sedimentation sump and discharge drain found to be clogged. Undergrowth was also found in the parameter drains which blocked the free flow of water. It was also found that green and blue empty containers were dumped near to the line site area.	Non- compliance

		Bukit Asahan Estate Sighted at house No. block B #15 and block A #5, found petrol kept at backyard in jerry can. Safe handling and storage of petrol was not in lined with Safe Handling and Storage of Petrol at Employees Housing Procedure, UM/HSE/OCP/06, version:0, effective date: 24/3/2021.  Diamond Jubilee POM Sighted at house #100, found petrol kept in improper container. Safe handling and storage of petrol was not in lined with Safe Handling and Storage of Petrol at Employees Housing Procedure, UM/HSE/OCP/06, version:0, effective date: 24/3/2021.	
		Diamond Jubilee Estate Sighted at the backyard of house # 91 - 93, undergrowth to permit free flow of water was not cleared. Also drain in between house # 92 and # 93 was collapsed and resulting to stagnant and slow free flow of water.  Thus, a major NC was issued.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.  - Minor compliance -	There were sundry shops located in the estates compound. The workers can easily access to adequate, sufficient and affordable foods and goods. Price of goods were displayed at the sundry shops. Workers interview confirmed that they can easily purchase foods at the nearest shop or choose to go nearest town away from the estate by using their transport until the main guard post and public transport to the nearest town.	Complied



6.2.6 A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.

#### **PROCEDURAL NOTE:**

STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE

With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).

Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.

In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.

For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage in the RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).

SOU 18 conducted the Prevailing Wage Assessment and calculated individual local and foreign workers current salary including non-monetary benefit given average DJPOM for local worker RM: 2,134.41; FW: RM2,111.09. DLW assessment conducted by Group Sustainability & Quality Manager (GSQM) Sime Darby Plantation.

Complied

	Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:  - Updated assessment on prevailing wages and in-kind benefits  - There is annual progress on the implementation of living wages  - Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment  - The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.  - Minor compliance -		
6.2.7	Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.  - Minor compliance -	There are no casual workers hired in Diamond Jubilee POM and supply bases. All employees are permanent employee (for locals) and contracted employee (for foreign workers). All permanent and full-time employment or contract workers used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2.mployment contracts detailing payments and conditions of employment available to the permanent workers employed as per samples sighted in indicator 6.2.2 above. No casual, temporary and day labour employed within all operating units within SOU 18	Complied
freedom	on 6.3: The unit of Certification respects the rights of all personnel to form of association and collective bargaining are restricted under law, the employersonnel.		
6.3.1	(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.  - Critical (Major) compliance -		Complied

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		<ul> <li>Respecting From the of employees choice and to</li> <li>Company respecting trade unions of the order of t</li></ul>	will not condone discri- eedom of Association: to join and form orga- bargain collectively. ect the rights of all per of their choice to barga- with workers, there are n from the company to	We respect the rights anisations of their own sonnel to form and join	
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	were verified. The	meeting involved the	spected operating unit representative from s summarized as per	Complied
	- Minor compliance -	Estate/mill	Date of meeting	Remarks	
		Bukit Asahan Estate	26/4/2022	Annual official	
		Diamond Jubilee POM	13/6/2022	meeting	
		Welch Estate	1/7/2022		
		Diamon Jubilee Estate	20/10/2021		
		Minutes of meetings operating units.	available for verific	ation at each visited	
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely	representative made f	from the election amo	selection of NUPW ng the NUPW member workers included in the	Complied

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	elected representatives for all workers including migrant and contract workers.  - Minor compliance -	committee formation and appointment letter sighted. The selection also based on the election meeting.	
Criterio	on 6.4: Children are not employed or exploited.		
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.  - Minor compliance -	<ul> <li>The Group Sustainability &amp; Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</li> <li>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</li> <li>Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.</li> <li>Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively.</li> <li>Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations.</li> <li>Enhancing Safety and Health: We provide a safe and healthy working environment for our employees and workers in our operations and support the wellbeing of our communities.</li> <li>Respecting Community Rights and the Rights of Indigenous People: We uphold the process of Free, Prior and Informed Consent and recognise that the local communities have the right to give or withhold their consent to proposed projects that may affect the lands they own, occupy or otherwise use.</li> <li>Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of</li> </ul>	Complied

	different abilities and refugees.	
	<ul> <li>Protecting the Rights of Children: We seek to promote the wellbeing of children, and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography.</li> </ul>	
	Verification of workers master list confirmed that there is no child labour hired.	
	For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children.	
(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.  - Critical (Major) compliance -	The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign workers, the Workforce Management Unit Liaison & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).	Complied
(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work Critical (Major) compliance -	There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Employee Master Listing and through interviewed with the stakeholders.	Complied
The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	The management has communicated to the stakeholders regarding the Human Rights Charter and emphasized that the risk of child labour to the stakeholders. For example, COBC briefing was given on 25/6/22 at Welch Estate.	Complied
	files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.  - Critical (Major) compliance -  (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.  - Critical (Major) compliance -  The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers	- Protecting the Rights of Children: We seek to promote the wellbeing of children, and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography.  Verification of workers master list confirmed that there is no child labour hired. For contractors, the clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC dated 21/06/2020, Human Rights Charter-protecting the rights of children.  (C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.  - Critical (Major) compliance -  (C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.  - Critical (Major) compliance -  The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child labour to the stakeholders. For example, COBC briefing was given on 25/6/22 at Welch Estate.

6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.  - Critical (Major) compliance -	The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:  We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:  • Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims.  • Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation.  The policy was communicated through the Gender Committee meeting on 11/3/2022.	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.  - Critical (Major) compliance -	SDPSB has implemented Social Policy, Gender 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 was displayed on the notice board which was accessible by the workers. Briefing of the policies was conducted during morning muster and the policies was displayed at the notice board outside the office.	Complied
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.  - Minor compliance -	In Bukit Asahan Estate, the assessment for new needs for new mother was conducted by Gender Committee. There were new needs as sampled below:  20/06/22: No specific request by mother as she breast pump in the morning before going to work. (MA: Azimah Ismail)	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	Sime Darby Plantation has developed Gender Committee Handbook, First Edition 2014 for implementation framework and guidelines where grievance reporting procedure for gender was developed.	Complied

	- Minor compliance -	The new Term of Reference for Gender Representative and Gender Committee, dated March 2021 has been introduced to improve on the implementation of gender related activities in Sime Darby Plantation.	
		Any cases must be reported to Social & Environment Projects Unit of the PSQM Department. Incident report template was established. Flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008 was implemented as well. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in <a href="http://www.simedarbyplantation.com/corporate/governance/whistleblowing">http://www.simedarbyplantation.com/corporate/governance/whistleblowing</a> . Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.	
Criterio	on 6.6: No forms of forced or trafficked labour are used.		
6.6.1	<ul> <li>(C) All workers have entered into employment voluntarily and the following are prohibited:</li> <li>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>Charging the workers for recruitment fees.</li> <li>Contract substitution</li> <li>Involuntary overtime</li> <li>Lack of freedom of workers to resign</li> </ul>	Interviewed with the workers confirmed that no forced and trafficked labor in SOU18. The Indian workers informed that they did not pay any recruitment fee to agent as they employed directly by Sime Darby. The terms and conditions offered by the company were similar in their home country and when arrived in the plantations. No contract substitution has occurred. They keep their passport. Overtimes was monitored by the company and the workers are giving freedom to choose to overtime and resign. There was no penalty for termination of employment if they wish to	Complied

	<ul> <li>Penalty for termination of employment</li> <li>Debt bondage</li> <li>Withholding of wages</li> <li>Critical (Major) compliance -</li> </ul>	terminate the contract earlier as per the employment contract signed.  1. If the workers in the mill who want to work for overtime, they will need to fill in the Overtime Details form. Those who worked on rest day and public holiday is required to fill in the application form Kerja/ Kerja lebih masa pada hari rehat & Kerja/ kerja lebih masa pada hari cuti am. Approval from the Supervisor and Assistant is required.	
6.6.2	(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.  - Critical (Major) compliance -	SDPB has implemented a Sime Darby's Human Rights Charter revised 2020 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) Providing decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs e) Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution.  All the foreign workers will be provided with induction training prior to work. Besides, they were provided with decent living condition and free from any discrimination. The workers informed that they were treated equally without any discrimination and allow joining NUPW freely. No contract substitution has occurred through interviewed with the workers.	Complied

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		They also provided awareness and training to all the foreign workers for them to understand their responsibility in respect of human rights as included in the Group Sustainability Policy on 18/6/2022 at Welch Estate	
Criterio	on 6.7: The unit of certification ensures that the working environment unde	r its control is safe and without undue risk to health.	
6.7.1	(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.  - Critical (Major) compliance -	Mr. Syahrul Saramlah, Bukit Asahan Estate Manager on 01/07/2019 appointed as the person in charge for the worker's safety and health signed by Mr Rozli alwi, RCEO Central West. Bukit Asahan Estate has conducted regular OSH committee meetings on quarterly basis and when necessary due to accidents that occur. The meeting discussed issues on employees' safety, health and welfare such as operational risks and health achievement report, estate security, safety compliance by contractors, workplace inspection, legal compliance, safety and health training. Sighted the latest OSH Meeting Minutes dated as follows:  • Year 2022 – 25/02/2022, 25/05/2022 • Year 2021 - 29/11/2021, 24/12/2021	Complied
		Diamond Jubilee POM  Safety and Health Committee established as Organization Chart sighted. Chairman is the Mill Manager, Secretary is Assistant Manager (Hanif b. Abu Talib). Appointment Letter for all members sighted approved by Mill Manager. The meeting was conducted frequently as required at least once in every 4 months. Evidence of minutes of meeting dated 13/06/22, 17/03/22/14/12/21, 30/09/21. OSH issues and performances were discussed and decided as stated in the minutes accordingly.	
6.7.2	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the	Bukit Asahan Estate Accident and emergency procedures were available and made visible to the workforce. During the interview session with the spraying gang, the workers were able to demonstrate a fair	Complied

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language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.

- Minor compliance -

understanding regarding on the emergency incident. Emergency Response Plan Flow Charts were available to address emergencies such as Chemical Spillage (Field), Vehicle Accident, Fire Outbreak at Office/Store/Housing, Fire in Field/Peat Areas in Own or Neighbouring Estate, Storekeeper/Bagworm Treatment Workers/Other Workers and Control & Prevention of COVID-19 Infection at the estates.

The Bukit Asahan Estate has established Emergency Response Team lead by Estate Managers. The ERT chart and Fire Extinguisher Map were available for verification. Sighted the ERP trainings titled Emergency Response Team Training conducted on 25/02/22 Diamond Jubilee POM

Emergency Preparedness and Response Procedure (UM/HSE/SP/02), approved 17/11/21. Established and documented. Information found adequately explained and able to be understood by workers. Available Emergency Response Team Organization Chart where Mill Manager is the Incident Commander, assisted by Mill Assistant Manager and sub team (Oil/Chemical Spillage, Fire, ETP Overflow, Accident/1st Aid and Disaster/Pandemic Disease). Post Mortem Report of Fire Drill conducted on 20/06/22 was sighted. Evacuation duration stated as 1 Min and 25 seconds. 1<sup>st</sup> Aider Box inspection records available done by PIC Norashikin bt. Mohad Tholihen (office staff). Monthly basis on every 22th of the month for 7 units (AP Post (1), Office (2), lab (3), Workshop (4), Boiler Station (5), Supervisor Room (6), Assessor Room (7). Record of accident are kept and maintained as below:

A total of 10 accidents were recorded in 2022 such as below: 17/06/22: Factory Compound-Fall during patrolling (Haidi Md Deris) 24/05/22: Workshop-Exposure to harmful substances/radiation (Roslan b. Abu)

		20/05/22 14 1 1 5 1 1 5 1 1 1 1 1 1 1 1 1 1 1 1	1
		30/05/22: Workshop-Exposure to harmful substances/radiation	
		(Nazmeer Shah)	
		13/05/22: Production/Process Area-Commuting accident (K.	
		Subramaniam)	
		09/05/22: Production/Process Area-Contact with sharp object (Aidil	
		Azrul)	
		14/02/22: Production/Process Area-Hearing impairment (Mohamad Juzaili)	
		04/04/22: Production/Process Area-Caught in between object	
		(Muhamad Ruhasri)	
		14/02/22: Workshop-Expose to harmful substance (Mohamad	
		Erwin)	
		14/02/22: Workshop-Expose to harmful substance (Mohammad	
		Azizan)	
		13/01/22: Workshop-Contact with sharp object (Muhammad	
		Hakimi)	
		Welch Estate	
		Available Emergency Response Team for Welch Estate where Esatte	
		Manager is the Incident Commander supported by Chemical Spillage	
		& Motor Accident Team, Fire & Flood Disaster Team, 1st Aid team,	
		Security Team and Wild/Poisonous Animal Attack Team. Available	
		Monthly Checklist for 1st Aid Bow/Kit dated 29/06/22 for 5 units	
		(Zamry, Shahrizan, Rosli, Jailani and Avanish, Main Office, Field	
		Office, Chemical Mix Area, Gen. Store, Chemical Store, Workshop).	
6.7.3	(C) Workers use appropriate personal protective equipment (PPE), which	Bukit Asahan Estate	Non-
3	is provided free of charge to all workers at the place of work to cover all	Appropriate PPE is provided by the estate's management based on	compliance
	potentially hazardous operations, such as pesticide application, machine	the job scope to the workers without any charges. Verified the	- 3111 <b>F</b> 1131113
	operations, land preparation, and harvesting. Sanitation facilities for	Borang Pemberian Alat Pelindung Diri (Individu) available for each	
	those applying pesticides are available, so that workers can change out	estate which records the PPE issuance for each worker. Sample	
	of PPE, wash and put on their personal clothing.	taken on following workers:	
	· · · · · · · · · · · · · · · · · · ·	• Employee No: IPIP/101/1217/23691	

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- Critical (Major) compliance -• Employee No: IPIP/101/1217/23649 During Site visit at Filed O6C in Air Tekah Division for harvesting activities sighted 2 harvesters and frond stacker wearing PPE provided such as safety helmets, safety vests, safety boots. During interview session all responded by saying PPEs provided free without charging to them. Sighted during site visit at Bathing Room for Sprayer in Bukit Asahan Estate, as during audit day, no schedule of spraying and all PPEs such as Apron, Face Shield, Safety Boots, Googles, Nitrile Gloves were not found in the cabinet and hang for drying purpose. According to Safe Operating Procedure Version 1 (01/11/2021), Pesticides Spraying (After) Bathing, washing and changing cloth before going back home. According to SOP/BAE/03/01-2009 Tatacara Kerja Selamat (Keselamatan Penggunaan Bahan Racun), PPE Required Breathing mask, Apron, Gloves, Safety boots and Googles. Para 12 mentioned All Sprayer has to wash all PPEs with soap and keep neatly at the storage cabinet. All apron to be washed and hang. Diamond Jubilee POM Available as sampled PPE Record Books issued to individual worker as stated below: • Mohd Khir b. Abd Gani (Safety Boots, helmets, ear plugs and vest) on 20/06/22 • Mohamad Hazim b. Hanafi (Safety Boots, helmets, ear plugs, vest) on 13/06/22 • Mohamad Arif Hazig (Safety Boots and Helmets) on 21/03/22 and Ear Plug and vest (19/04/22) Welch Estate Available PPE Matrix FY 2022 consist of protection of hand (Nitrile gloves, cotton gloves), face (goggle, face shield), body(Apron, Long

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sleeve shirt, Overall), head (Safety helmet), foot (Safety boots, Wellington boots), ear (Ear plugs, ear muff), respiratory (Face mask, cartridge mask) and miscellaneous (Safety harness and Safety vest). Record of issuance of PPE sighted for harvesting, general workers, in the month of April, May and June 2022.

Diamond Jubilee Estate

Sighted 2 harvesters not wearing safety helmets and one of them not wearing shirt while harvesting at Field P15B and driver of SD3 (Grabber) sighted not wearing helmet while loading FFB from the ground. According to Safe Working G/lines for harvesting (SOP/DJE/02/01-2009) stated that harvester required to wear PPE and suitable attire such as:

- Gloves
- Safety boots (Wellington)
- Sleeve shirts and long pants
- Sickle cover

While also sighted 3 manurers not wearing safety helmets, goggles and using 3M mask, not wearing long sleeve shirts and white colour hand obviously due to exposed of fertilizer Ground Magnesium Limestone 15-18%/Mg0 which applied at field P07H. According to Safe Working G/lines for Manuring (SOP/DJE/13/01-2009) stated manurer required to wear PPE approved by JKKP such as:

- Breathing protection
- Apron
- Hand protection
- Foot protection.

Related SDS issued January 2021 by Blue Deebaj (M) Sdn. Bhd. and stated Classification as non-hazardous, white colour, personal



protection mentioned wear suitable gloves when handling the product over long period of time. Diamond Jubilee Estate Sighted 3 manurers not wearing safety helmets, goggles and using 3M mask, one not wearing long sleeve shirts and white coloured hand obviously due to exposed of fertilizer Ground Magnesium Limestone (GML) 15-18%/Mg0, which applied at field P07H. According to Safe Working G/lines for Manuring (SOP/DJE/13/01-2009) stated manurer required to wear PPE approved by JKKP such as Breathing protection, Apron, Hand protection, Foot protection. OSH Risk Assessment Register for Manuring revised and dated 11/02/22 mentioned for hazard dusty (risk level 6) to wear long sleeve shirt, cloth glove and face mask N95. While hazard of dusty (RP & GML Fertilizer) (risk level 4), current risk control stated long sleeve shirts, cloth gloves & latex gloves, face mask N95 and safety eveware. Sampled PPE Matrix Ladang Diamond Jubilee stated as for Harvesting, PPE applicable (Eye Protection, Vest, Safety helmet, Wellington boots), while for Manurer, PPE applicable (Cotton rubber gloves, Apron, Vest, Safety Helmets, Wellington boots, Face mask. Sighted 2 harvesters not wearing safety helmets, eye protection and one of them not wearing shirt while harvesting at Field P15B and driver of MTG (Grabber) sighted not wearing helmet while loading FFB from the ground. According to Safe Working G/lines for harvesting (SOP/DJE/02/01-2009) stated that harvester required to wear PPE and suitable attire such as Gloves, Safety boots (Wellington), Sleeve shirts and long pants, Sickle cover OSH Risk Assessment Register for Harvesting revised and dated 26/05/22 mentioned for hazard of falling bunches (risk level 6),

		falling of frond (risk level 10) and falling of FFB (risk level 15), all current risk control stated to wear PPE (helmets, safety eyeware). OSH Risk Assessment Register for collect FFB using MTG revised and dated 21/12/21 mentioned for hazard crushed by FFB (risk level 4), current risk control stated provide safety helmet and safety boots.  Thus, a major NC was issued.	
6.7.4	All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.  - Minor compliance -	Diamond Jubilee POM Sighted Form 8A for SOCSO contribution made for month of January 2022 for amount of RM 4,253.30 for 92 workers. March 2022 for amount of RM 4,483.10 for 92 workers. June 2022 for amount of RM 5,141.50 for 94 workers. Welch Estate Sighted SOCSO Form 8A for month of January 2022 with amount of RM 3,385.20 for 130 workers, February 2022 with amount of RM 3,207.40 for 124 workers and March 2022 with amount of RM 3,142.60 for 118 workers as contribution made for providing coverage and insurance for incident of work related.	Complied
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics Minor compliance -	Records of accidents were maintained by all estates and updated to the HQ on a monthly basis. Accidents that occur are also discussed in the quarterly held JKKP Meetings.  Bukit Asahan Estate The estate management has submitted the JKPP 8 form for the year ending 2021 to the Department of Safety & Health on 26/01/2022. Reference No: JKKP8/108534/2021. There was a total of 7 major accident cases reported for the year with a loss of 99 days. There were 5 accident cases reported for the year 2022 as of the audit date.	Complied

		Diamond Jubilee POM A total of 10 accidents were recorded in 2022. Previous year it was recorded as 6 cases of accidents.  Form JKKP 8 found submitted to JKKP dated 18/01/22, where 6 accidents reported, where 4 cases were classified as Loss Working Day with 107 Total Loss Working Days. Total working hours in 2021 was 239,976,00	
Princip	le 7: Protect, conserve and enhance ecosystems and the environm	ent	
Criterio	on 7.1: Pests, diseases, weeds and invasive introduced species are effective	ely managed using appropriate Integrated Pest Management (IPM) tecl	nniques.
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.  - Critical (Major) compliance -	IPM Plans are stated in the Sime Darby EQMS Standard Operation Manual (SOM); Sub Section 5.4 Planning; Year 2020. Each estate has incorporated an IPM Plan and Programme for the year 2020 where they have identified the proposed IPM plans for the estate. Among the plans are:  • Continuous Establishment of Beneficial Plants  • Barn Owl Box Establishment Bukit Asahan Estate  1. Barn owl census was conducted twice a year. Latest census was conducted in August 2021 with occupancy recorded at 79.11%  2. Latest rat baiting campaign was conducted in the month of September to November 2021. The application was conducted in 2 – 3 rounds with acceptance level recorded at 19% - 20%	Complied
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.  - Minor compliance -	The estates has conducted assessment on list of species invasiveness used for biological control. No invasive species listed in the CABI.org introduced in the estate. Flora species were used for IPM such as Tunera subulata, Cassia cobanensis, Antigonan leptopus and Euphorbia heterophylla. Fauna species were used for IPM were Tyto alba.	Complied



7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.  - Minor compliance -	No evidence and records of fire usage for pest control at all estate visited. Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on2/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest: "We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through: ix. Zero tolerance of the use of fire within our land boundaries and conservation areas, and the establishment of effective monitoring and prevention systems, as well as protective firefighting measures in and around our operation."
Criterio	on 7.2: Pesticides are used in ways that do not endanger health of workers	families, communities or the environment.
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.  - Critical (Major) compliance -	All pesticides used were those officially registered under the Pesticide Act 1974. The CU confined usage to only class II, class III & class IV pesticides.  a) No illegal agrochemicals (stated by local and international laws) paraquat was used in the CU estates.  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.  c) 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.  d) Purchases of pesticides are made on a centralized arrangement via Regional Office thus a control by the organization.

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7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.  - Critical (Major) compliance -	Sighted a record of pesticide use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained from January-October 2021 and kept by the estates.	Complied
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans Critical (Major) compliance -	During the audit, it was observed and recorded that SOU 18 Estates had not use chemicals categorized as World Health Organization (WHO) type 1A or 1B or listed by the Stockholm or Rotterdam Conventions.  a) Paraquat 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.	Complied
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.  - Minor compliance -	The estates of SOU 18 are committed to minimize the usage of agrochemicals through the implementation of IPM practices among others;  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  There is no prophylactic use of pesticides. The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5.	Complied
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and	Addressed in the Sime Darby Plantation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on	Complied

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	paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.  The due diligence refers to:  a) Judgment of the threat and verify why this is a major threat  b) Why there is no other alternative which can be used  c) Which process was applied to verify why there is no other less hazardous alternative  d) What is the process to limit the negative impacts of the application  e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.  - Minor compliance -	2/12/2019 and Responsible Agriculture Charter under section 3.3: Protect and disclose environmental impacts and minimise resource use stated: 'We aim to minimise our foot print and continuously reduce our use of resources through implementing integrated pest management programs, with no use of paraquat or chemicals classed as hazardous under the WHO 1A. We will phase out the WHO 1B and those additional chemicals listed in the Stockholm or Rotterdam Conventions." Reviewed and verified chemical register for all estates sampled, Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class III & IV chemical used at visited estates.	
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.  - Critical (Major) compliance -	Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the product.  a) 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 handled in a safe method.  b) The trade and generic names of the chemicals were made known to the workers through the SDS training. SDS was also displayed at all storage areas as observed during the audit.  c) The training included the safety aspects and usage of PPE when handling with pesticides. Records of training are shown in 4.6.9 and verified.  d) All workers involved in pesticide application were provided with appropriate PPE and replaced when worn-out. PPE issuance & replacement records were verified by the auditors.  e) 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 procedure.	Complied



		f) Training in relation to pesticides & chemical handling among others as shown in 3.7.2	
7.2.7	(C) Storage of all pesticides is in accordance with recognised best practices.  - Critical (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).  a) Records of purchase, storage and use were maintained. b) All store buildings were equipped with exhaust fans with the door 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.	Complied
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.  - Minor compliance -	As part of recycling programme for HDPE container, used empty Chemical Containers were disposed as Recycle Waste to SS Setia Teknologi Enterprise. Verified the despatch records dated 28/06/2022 for the sales of 39 used chemical containers, 9 kenlon containers and 10Kg of ally containers.	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.  - Critical (Major) compliance -	Aerial application of agrochemicals is not practiced in SOU 18 Estates. This is confirmed through observation during the site visit, estate complex and interview with the employees. Such method is no longer in existence in the estates practices.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.  - Critical (Major) compliance -	Bukit Asahan Estate  Medical Surveillance (History & Physical Examination, General Blood & Urine Test and Spirometry (Lung Function Test). was conducted	Non- compliance

		as reported by One Medic Healthcare Sdn Bhd. (HQ/18/DOC/00/0017):	
		• 28/03/21: 6 workers (Sprayers and Manurers).	
		Klinik TTMC Ayer Keroh (HQ/OHD/17/00164) conducted Medical Surveillance for 18 workers on 23, 24 & 25/11/21 (exposed to Organophospate). No Toxic Level detected.	
		As letter from One Medic Healthcare Sdn. Bhd dated 13/07/22	
		As sampled in Medical Surveillance Record Book available a list of 4 workers (Chemical Mixer, 2 Foreman, Foggers (Workshop Attendant). Sent to Medical Surveillance on 02/06/22 to One Medic Healthcare Sdn Bhd.	
		Welch Estate	
		Medical Surveillance Programme reported by Klinik Segamat (HQ/08/DOC/00/545):	
		• Report No. 032/OHD/2022 for 4 workers (Premixer Unit, Fogger Unit, Workshop Unit and Fogger & Workshop Unit).	
		Report No. 060/OHD/2022 for a worker for Ammonia Unit.	
		3 Sprayers (Herivant, Aapel and Abdullah) not send for Medical Surveillance in 2022.	
		<u>Diamond Jubilee Estate</u>	
		14 Pesticides operator sent for Medical Surveillance examination conducted by Klinik TTMC Ayer Keroh (HQ/17/OHD/00/00094) as reported on 20/06/22.	
		Thus, a major NC was raised.	
7.2.11	<b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	All the estates and mill in the CU complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation whereby;	Complied

	- Critical (Major) compliance -	No work with pesticides is given to pregnant or breast-feeding women. Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan) 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.	
Criterio	n 7.3: Waste is reduced, recycled, reused and disposed of in an environment	entally and socially responsible manner.	
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.  - Minor compliance -	The Waste Management Plan was incorporated in the Environmental Management Plan 2022 for each operating unit. The plan states its objective of proper disposal of waste in accordance to SOP and legal requirements. Among the types of waste identified was Domestic Waste, Industrial Waste and Schedule Waste. Generally, the scheduled wastes and recyclable waste were disposed through licensed vendors and organic wastes were disposed through licensed 3 <sup>rd</sup> Party Contractors.	Complied
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.  - Minor compliance -	The workers have demonstrated good understanding in proper disposal of wastes as verified during the interview. The visited labour quarters were observed to be in clean condition, free from scheduled waste. General waste was segregated and separated accordingly.	Non- compliance
		<u>Diamond Jubilee POM</u>	
		1. Domestic waste is collected by the tractors at the linesite and dumped in a central trash bin, managed by Diamond Jubilee Estate, before it is disposed via a 3 <sup>rd</sup> party Contractor at a designated dump site outside the estate, permitted by the municipal council.	



- 2. Scheduled Wastes have been disposed via licensed contractor, Pentas Flora (Melaka) Sdn Bhd as per EQA Scheduled Waste Regulations 2005. Consignment Notes were verified as below.
  - SW305 Spent Lubricating Oil; Consignment Number: 202203111515S4VB; Date: 11/03/2022; Quantity: 0.3800 MT.
  - SW322 Spent IPA; Consignment Number: 2022031115DsCSM; Date: 11/03/2022; Quantity: 0.119 MT.
  - SW322 Spent Hexane; Consignment Number: 20220322111VHFS2; Date: 11/03/2022; Quantity: 0.0626 Mt.
  - SW409 Empty Chemical Containers; Consignment Number: 20220311155GAL7U; Date: 11/03/2022; Quantity: 0.5740 MT.

#### <u>Diamond Jubilee Estate</u>

- 1. Domestic waste is disposed via licensed 3<sup>rd</sup> Party Contractor, UER Resources Sdn Bhd. The estate has a contract agreement (Date: 01/06/2021) with the contractor to collect the domestic waste twice a week from the workers quarters. The waste is then brought to a designated disposal area that has been permitted by the municipal council.
- 2. Clinical Waste is disposed via the VMO (Klinik Penawar Dan Pembedahan) as permitted by DOE of Melaka. Records of disposal were available for verification.



- 3. Scheduled Wastes have been disposed via licensed contractor, Pentas Flora (Melaka) Sdn Bhd as per EQA Scheduled Waste Regulations 2005. Consignment Notes were verified as below.
  - SW305 (Spent Lubricating Oil); Consignment Note:
     202206271796H1MF; Date: 27/06/2022; Quantity Disposed: 0.4000 mt.
  - SW306 (Spent Hydraulic Oil); Consignment note:
     2022062718GVSDE8; Date: 27/06/2022; Quantity Disposed: 0.2000 mt.
  - SW 410 (Spent Oil Filters); Consignment Note:
     2022062718G8SFP; Date: 27/06/2022; Quantity Disposed:
     0.0745 mt.
  - SW 410 (Contaminated Rags, Gloves & PPE); Consignment Note: 2022062718UFSAOP; Date: 27/06/2022; Quantity:0.0165 mt.

#### **Bukit Asahan Estate**

- 4. Domestic waste is disposed via licensed 3<sup>rd</sup> Party Contractor, MTJJ Enterprise. The estate has a contract agreement (Validity Period: 01/05/2022 31/12/2022) with the contractor to collect the domestic waste twice a week from the workers quarters. The waste is then brought to a designated disposal area that has been permitted by the municipal council.
- 5. Scheduled Wastes have been disposed via licensed contractor, Pentas Flora (Melaka) Sdn Bhd as per EQA Scheduled Waste Regulations 2005. Consignment Notes were verified as below.



- SW410 Used Rags and Oil Filter; Consignment number: 20220421139X0VE4 & 20220421132A7UD4; Date: 21/04/2022; Quantity: 0.140 MT.
- SW305 Spent Lubricant; Consignment Number: 20220418116UJSF8; Date: 18/04/2022; Quantity: 0.500 MT.

#### Welch Estate

- 1. Used Empty Chemical Containers were disposed as Recycle Waste to SS Setia Teknologi Enterprise. Verified the despatch records dated 28/06/2022 for the sales of 39 used chemical containers, 9 kenlon containers and 10Kg of ally containers.
- 2. Domestic Waste is disposed via licensed Domestic waste is disposed via licensed 3<sup>rd</sup> Party Contractor, MTJJ Enterprise. The estate has a contract agreement (Validity Period: 01/02/2022 31/12/2022) with the contractor to collect the domestic waste twice a week from the workers quarters. The waste is then brought to a designated disposal area that has been permitted by the municipal council.
- 3. Scheduled Wastes have been disposed via licensed contractor, Kualiti Alam Sdn Bhd as per EQA Scheduled Waste Regulations 2005. Consignment Notes were verified as below.
  - SW404 (Clinical Waste); Consignment Note: 2022021016H6XUL7; Date: 08/02/2022; Quantity: 0.076mt.

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		- SW305 (Spent Lubricant); Consignment Note: 2022020417QEVZ2I; Date 04/02/2022; Quantity: 0.1800mt.  - SW306 (Spent Hydraulic Oil); Consignment Note: 2022020418QJRDNG; Date: 04/02/2022; Quantity: 0.0700mt.  Welch Estate Nevertheless, during the field visit at field P02C1, it was sighted there were two 20 litres containers in the stream.  Bukit Asahan Estate Sighted the disposal of 11 units of Scheduled Waste items – SW102 (spent batteries) to JG Utek Sdn Bhd on 01/07/2022. Nevertheless, it was verified that the contractor does not have the required DOE License to transport the scheduled waste items out of the generator's premise.  Hence, a minor nonconformity was raised.	
7.3.3	The unit of certification does not use open fire for waste disposal.  - Minor compliance -	The operating units adhered to the policy of "Zero Open Burning" for any replanting. From field visits and interviews with the workers, there were no open burning being practiced in the estates. SOU 18 estates had replanting program spanned over the forthcoming years as shown in 3.1.2. There was no evidence that fire had been used to for waste disposal as well.	Complied
Criterio	n 7.4: Practices maintain soil fertility at, or where possible improve soil fer	tility to, a level that ensures optimal and sustained yield.	
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.  - Minor compliance -	Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield.	Complied

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		content documen a) EQMS b) EQMS	The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents;  a) EQMS chapter B8 - Leguminous Cover Crops b) EQMS chapter B14 - Manuring c) ARM Section 8 - Manuring					
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.  - Minor compliance -	Bukit Asahan Estate  18 soil samples received on 06/04/18 as Soil Analysis Test Report No. S26/2018 by Chief Chemist II.  Welch Estate  Soil Analysis was conducted on 29/01/19 as test Report No. S17/2019 by Chief Chemist II.						Complied
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.  - Minor compliance -	Fruit Bui residues 1. E 2. F 3. F	nches (EFB), after replanting EFB applied at Fibre and POM Palm residues a decompose Summary-Mo	Palm Oil Mig. The strate selected field were use as after planting	II Effluent (F gy as follows Is at the estat compost mat were left in t	tes. terial. the biomass row the and Disposal Financial Ratio (EFB Disposal/FFB	m	Complied
		Jan	1,063.60	1,158.60	5,592.705	Processed) 0.190		
		Feb	1,185.39	1,125.39	7,010.835	0.169		

		Mac	1,593.52	1,573.52	7,875.650	0.202	
		Apr	1,271.80	1,276.80	7,072.221	0.180	
		May	1,116.19	1,111.19	6,484.098	0.172	
		Jun	1,727.19	1,657.19	7,735.422	0.223	
7.4.4	Records of fertiliser inputs are maintained Minor compliance -	agronom conducte	ist base on the dby heads of	foliar samplir f Performanc	ng conducted e Monitoring I	commendation b . Monitoring war Unit. The fertilise sited for review.	5
Criterio	n 7.5: Practices minimise and control erosion and degradation of soils.						
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available.  - Critical (Major) compliance -	Precision SOU 18.  Bukit A Munch Welch Es Soils se Agricultu Melacca/	Agriculture U Soil Identified Asahan Estate long, Local allustate ries map es re Unit on Bongor (4.6%	nit. No fragile as follows: soils series: E uvium, Malac stablished de January 20 ), Muchong E	e soils identific Bungor, Duriar ca, Prang, Tav one by R&I 12. Local Al Deep (19.9%),	epared by the AATed in all estates in high particular, Holyrood, Kulai vy, unclassified.  D-TTAS Precision (1.2%), Muching Medium (2.3%)	
			, Prang M 'Bungor Mediu			Shallow (8.3%) or (20.5%).	′
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.  - Minor compliance -					ee Estate and, no han 25 degree.	Complied



7.5.3	There is no new planting of oil palm on steep terrain Minor compliance -	Found no new planting conducted at all estates visited (Bukit Asahan Estate) as verified and sighted during site visit at Main Division and Ayer Tekah Division.	Complied		
	Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated in operations.				
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.  - Critical (Major) compliance -	Soil series map were available for all estates visited prepared by the AAT-Precision Agriculture Unit. No fragile soils identified in all estates in SOU 18.	Complied		
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.  - Minor compliance -	Sighted during site visit in all estates, no xtensive planting on marginal and fragile soils Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 02/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest: "We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through: vii. No new development of peat areas regardless of depth or location. We will seek to rehabilitate existing plantings on peats where possible,	Complied		
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.  - Minor compliance -		Complied		

		Welch Estate Available Slope Maps prepared on 03/04/17 for Welch Estate as information guide the planning of drainage and irrigation systems, roads and other infrastructure as below:  0-2 = 0.19%  2-6 = 9.34%  6-12 = 35.69%  12-20 = 37.58%	
		20-25 = 15.6% >25 = 1.59%	
Criterio	n 7.7: No new planting on peat, regardless of depth after 15 November 20	018 and all peatlands are managed responsibly.	
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.  - Critical (Major) compliance -	No peat soil identified at all estates visited in SOU 18 as per Soil Series Map prepared by AAT – Precision Agricultural Unit. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.  PROCEDURAL NOTE:  Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).  - Minor compliance -	No peat soil identified at all estates visited in SOU 18 as per Soil Series Map prepared by AAT — Precision Agricultural Unit. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised Critical (Major) compliance -	No peat soil identified at all estates visited in SOU 18 as per Soil Series Map prepared by AAT — Precision Agricultural Unit. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable

7.7.4	(C) A documented water and ground cover management programme is in place Critical (Major) compliance -	No peat soil identified at all estates visited in SOU 18 as per Soil Series Map prepared by AAT — Precision Agricultural Unit. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or reilitated with natural vegetation.  This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.  Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.  - Critical (Major) compliance -	No peat soil identified at all estates visited in SOU 18 as per Soil Series Map prepared by AAT – Precision Agricultural Unit. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable
7.7.6	(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.  - Critical (Major) compliance -	No peat soil identified at all estates visited in SOU 18 as per Soil Series Map prepared by AAT — Precision Agricultural Unit. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable
7.7.7	<b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Reilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.	No peat soil identified at all estates visited in SOU 18 as per Soil Series Map prepared by AAT — Precision Agricultural Unit. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable

	- Critical (Major) compliance -						
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.							
7.8.1	A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:  a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.  b) Workers have adequate access to clean water.  - Minor compliance -	The operating units has estal documented in Environmental water management. The plan estal Palm Oil Mill: Contingency during of treated water on monthly bawetland and to reuse/recycle water (Bukit Asahan Estate, Estate): protection of watercour during water shortage, dry sprecycling water from the premix The operating unit monitor the basis. Reviewed monitoring recommends	Complied				
7.8.2	(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.  - Critical (Major) compliance -	clean water to all the workers of from Syarikat Air Melaka Berhad  Water courses and wetlands a Guidelines on River Reserve Ma Reserve in Sime Darby Plantation the buffer zones are guided by the state of the state	Complied				
		River width (m)	Buffer zone width				
		> 40	50				
		20 to 40	40				
		10 to 20	20				
		5 to 10	10				



< 5	5	
Monitoring based on Sustainable Appendix 7 Standard Operation samples from streams/rivers, vedated 01/11/2008.  Based on verification at all the sawere satisfactorily maintained, application seen.		
The restoring appropriate riparia waterways. The estates adopted the buffer by restricting agrundeveloped during replanting. protected including maintaining buffer zones. The guidelines a Management (Management of Plantation dated April 2014)		
Bukit Asahan Estate		
found to be equipped with pr spraying and manuring activities	t both sited water catchment area roper signages erected to avoid and any illegal activities such as any biodiversity value of the area.	
<u>Diamond Jubilee Estate</u>		
to protect illegal entrance, fishir	(HCV 4) found the pond is fenced ag and spraying activity. The area ration from plantation activity such	

		Welch Estate  Sampled at water catchment area identified as HCV 4 in HCV Report found properly fenced, warning sign of prohibition of fishing, entrance. Not sighted any spraying activity as area left and preserved as required.				
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.  - Minor compliance -	Mill effluent is treated in compliance with the Department of Environment (DOE); Syarat Syarat Lesen – Premis Kilang Minyak Kelapa Sawit Mentah (License Number: 0040439).  The mill monitors the effluent on a monthly basis and reports to DOE on a quarterly basis via the Online Environment Reporting (OER) System were available for verification.  Effluent Analysis Report results were available for verification as below:				Complied
		Parameter	April 2022	May 2022	June 2022	
		рН	7.7	7.3	7.2	
		BOD	1695	1670	1900	
		SS	16100	42200	36000	
		TN	806	900	290	
		AN	305	133	226	
		O&G	11	7	7	
7.8.4	Mill water use per tonne of FFB is monitored and recorded.  - Minor compliance -	The mill continues to monitor its water use per tonne FFB processed which data obtained from flowmeters i.e. at mill process, boiler operation and fire hydrant. Based on the records, the mill has consumed:				Complied
		Month Wate	er (m³) FFE	3 (mt) V	Vater/FFB (m³)	



r		1	ı	T	1	
		July 2021	12,106	10,571	1.15	
		Aug 2021	7,502	5,445	1.38	
		Sept 2021	3,702	2419	3.97	
		Oct 2021	11.587	8181	2.04	
		Nov 2021	9,797	7012	1.91	
		Dec 2021	9,012	6491	2.11	
		Jan 2022	7,931	5,593	3.07	
		Feb 2022	13,811	7,011	1.97	
		Mac 2022	15,861	7,876	2.01	
		Apr 2022	14,690	7,072	2.08	
		May 2022	12,947	6,484	2.00	
		June 2022	15,885	7,735	2.05	
Criterio	n 7.9: Efficiency of fossil fuel use and the use of renewable energy is optin	nised				
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.  - Minor compliance -	At the estat documented action plans diesel-powere operators on as part of mo At the mill, t operation is through turbi	Complied			

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	The use of Diesel, Electricity and Water were monitored on a monthly basis in the mill and estates and records were as follows.			
Diamond Jubilee	POM			
Month	Die	sel (L)	Electricity (kWh)	
July 2021	7	796	83,930	
Aug 2021	4	114	57930	
Sep 2021	4	102	47794	
Oct 2021	7	742	77398	
Nov 2021	4	171	68180	
Dec 2021	7	700	72548	
Jan 2022	Ţ	585	67502	
Feb 2022	Į.	537	72310	
Mar 2022	6	570	79297	
Apr 2022	Į.	569	77454	
May 2022	Ţ.	596	70761	
Jun 2022	Į.	570	70138	
<u>Diamond Jubilee</u>	<u>Estate</u>			
Month	Diesel (L)	Electricity (kWh)	/ Water (L)	
July 2021	5378	15890	5921	

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Aug 2021	3940	18704	9953
Sep 2021	4599	18065	12521
Oct 2021	5773	13248	13418
Nov 2021	4743	19272	13239
Dec 2021	4864	18654	13004
Jan 2022	4068	6473	8101
Feb 2022	4264	10330	14670
Mar 2022	5047	19945	29798
Apr 2022	3997	21404	10154
May 2022	3834	15968	13461
Jun 2022	4559	18586	9785

#### Bukit Asahan Estate

Month	Diesel (L)	Electricity (kWh)	Water (L)
July 2021	7461	40881	7177000
Aug 2021	5169	43213	8474000
Sep 2021	4592	42526	8062000
Oct 2021	4975	41479	9109000
Nov 2021	4920	44807	8168000
Dec 2021	4990	40960	7714000



Jan 2022	4558	40969	8829000
Feb 2022	4587	40609	8925000
Mar 2022	6553	37038	7267000
Apr 2022	4060	41754	7471000
May 2022	3911	36721	12122000
Jun 2022	5515	41417	-

#### Welch Estate

Month	Diesel (L)	Electricity (kWh)	Water (L)
July 2021	2867	17267	9033
Aug 2021	2467	18647	7414
Sep 2021	2327	18237	8931
Oct 2021	2082	18255	8044
Nov 2021	2042	16590	6579
Dec 2021	1676	16969	6640
Jan 2022	2835	16969	6628
Feb 2022	916	16987	5330
Mar 2022	1402	19969	4880
Apr 2022	2408	19969	5296
May 2022	2798	16072	6126

		Jun 2022	2158	17587	7288		
	<b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developed to minimise GHG emissions.						
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.  - Critical (Major) compliance -  Critical (Major) compliance -  Monitoring and reporting of the significant pollutants to water gaseous emissions to air and contamination on land are in place Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DII regulations and SW disposal were adhering to DOE requirements Water samples were regularly taken every month and tested by mile environment officer in charge and analyzed to ensure compliance to DOE requirements at final discharge points.				and are in place. CEMS monitoring pints as per DID DE requirements. and tested by mill	Complied	
		Calculator Versio	n 4.0 which is subtantion of various	ubmitted to the F record, the da	n RSPO PalmGHG RSPO Secretariat. ata in the RSPO		
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).  - Critical (Major) compliance -	rom since 2014.				Not Applicable	
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.  - Critical (Major) compliance -	Or Significant pollutants identification and plans are documented under Pollution Prevention Plan. Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.		Complied			
		Sighted the sam follows:	pled implementa	ition of the man	agement plan as		

		The mill conducted Stack sampling as per requirement stated in the compliance schedule for DOE license and contradiction license. Sighted the sample stack sampling as follows:				
		1. Isokinetic Stack & Air Emission Monitoring – December 2021				
		- Assessor: Alam Hijau Integrasi (M) Sdn Bhd				
		- Report Ref: ALM KKSDJ/1221/7171				
		- Monitoring Date: 08/12/2021				
		- <u>Results</u>				
		a. Total PM: 10.8 mg/m³				
		b. Carbon Monoxide, CO: 40.2 mg/m³				
		2. Isokinetic Stack & Air Emission Monitoring – January 2022				
		- Assessor: Alam Hijau Integrasi (M) Sdn Bhd				
		- Report Ref: ALM KKSDJ/1221/7171				
		- Monitoring Date: 12/01/2021				
		- <u>Results</u>				
		c. Total PM: 26.1 mg/m³				
		d. Carbon Monoxide, CO: 63.9 mg/m³				
		The results were found to be well within the limits of the Malaysian Environmental Quality (Clean Air) Regulation 2014.				
Criteri	Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area					
7.11.1	(C) Land for new planting or replanting is not prepared by burning Critical (Major) compliance -	There was no land prepared by burning as sampled and sighted in Bukit Asahan Estate, Diamond Jubilee Estate and Welch Estate. All other estates had continued to adhere to the policy as per the	Complied			

		Agricultural Manual and SOP on (Zero Burning) which advocates zero burning for land preparation and as per their Environmental Policy.	
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.	Hotspot monitoring managed by HQ (Fire Hotspot Monitoring Team) – if any fire detected, inform estate.	Complied
	- Minor compliance -	Sime Darby Daily Hotspot Monitoring system has been in place since November 2013 using NASA satellite data [ref.:	
		http://www.simedarbyplantation.com/sustainability/hotspot-dashboard/ ]. The system monitors any possible occurrence of fire within or nearby the concession areas throughout Sime Darby Plantation Upstream operation globally. At the estates level, there are fire prevention team established. Among the mechanisms to prevent fire are training on firefighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump.  Apart from that, Fire Prevention and Control Measures by GSQM was also established to provide guidance.	
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	The above-mentioned fire prevention and control measures were communicated to the stakeholders through:	Complied
	- Minor compliance -	1. Bukit Asahan Estate.	
		Fire Prevention and Control Measures were communicated to all stakeholders via memo that was presented to all stakeholders on 12/05/2022. The acknowledgement of the stakeholders was available for verification.	
		2. Welch Estate	
		Fire Prevention and Control Measures were communicated to all stakeholders via memo that was presented to all stakeholders	

		on 26/05/2022. The acknowledgement of the stakeholders was available for verification.	
		3. <u>Diamond Jubilee Estate</u>	
		Fire Prevention and Control Measures were communicated to all stakeholders via memo that was presented to all stakeholders on 23/05/2022. The acknowledgement of the stakeholders was available for verification.	
	on 7.12: Land clearing does not cause deforestation or damage any area represt. HCVs and HCS forests in the managed area are identified and protections.		Jh Carbon Stock
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.  A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance	The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest. There were no land clearing activities made nor had damaged any forest to protect or enhance the HCV. Therefore, this indicator was not applicable.	Complied
	document Critical (Major) compliance -	Sime Darby has conducted HCV assessment for all operating units and documented in reports as follows:	
		Welch Estate:	
		High Conservation Value (HCV) Re-assessment for Strategic Operating Units (SOU): 19 Pagoh dated August 2016	
		Diamond Jubilee and Bukit Asahan Estate:	
		High Conservation Value (HCV) Re-assessment for Strategic Operating Units (SOU): 18 Diamond Jubilee dated April 2017	
7.12.2	(C) HCVs, HCS forests and other conservation areas are identified as follows:	As per High Conservation Value (HCV) Re-assessment for Strategic Operating Units (SOU): 19 Pagoh dated August 2016 for Welch Estate and High Conservation Value (HCV) Re-assessment for Strategic Operating Units (SOU): 18 Diamond Jubilee dated April	Complied



	a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.		and Jubilee and Bukit Asal estates as follows:	nan Estate	, the HCV	
	b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the	Estate	Description	Area (Ha)	HCV	
	HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	Bkt Asahan Estate	Water Catchment (Ayer Tekah Division)	0.69	HCV 4	
	<b>PROCEDURAL NOTE:</b> Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).		Water Catchment (Main Division)	0.67	HCV 4	
	- Critical (Major) compliance -	Diamond Jubilee Estate	Water Catchment	5.58	HCV 4	
		Welch Estate	Water Catchment	0.95	HCV 4	
7.12.3	Indicator is not applicable in Malaysia context	-			_	Not Applicable
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).  - Critical (Major) compliance -	(refer 7.3.1 to 7.4.2) affecting present HCV and primary forest. There were no land clearing activities made nor had damaged any forest to protect or enhance the HCV. Therefore, this indicator was not applicable.			Not Applicable	

7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.  - Minor compliance -	The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest. There were no land clearing activities made nor had damaged any forest to protect or enhance the HCV. Therefore, this indicator was not applicable.	Not Applicable
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.  - Minor compliance -	A programme to regularly educate the workforce about the status of RTE species is in place. Evidence to continuously prevent and discourage illegal or hunting, fishing, or collecting activities were maintained and implemented. Interview with the workers indicate that they are aware of the restrictions of harming the RTE species animals.  Signage was utilised as part of creating awareness among employees on the restriction of poaching, capturing, harming, collecting and killing the RTE species.	Complied
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.  - Minor compliance -	For existing HCV areas, on-going monitoring was done on a monthly basis. HCV management plan incorporated under Environmental Management Plan for FY 2022 (January – December 2022). Animal sighting, encroachment/illegal activities and erosion being monitored and recorded using check sheet, "Pemantauan HCV dan Pelan Konservasi". Based on last 3 months records, no evidence of animal sighting, encroachment/illegal activities and erosion recorded.	Complied
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.  - Critical (Major) compliance -	No land clearing since without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018 within Diamond Jubilee certification unit. Thus, this indicator is not applicable.	Not Applicable



#### **Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2021** for **Diamond Jubilee POM** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2021 for Diamond Jubilee POM and supply base are as following:

Emission per product	tCO₂e/tProduct
СРО	1.34
РКО	1.34

Extraction	%
OER	21.86
KER	4.97

Production	t/yr		
FFB Process	90,006.75		
CPO Produced	19,678.16		
PKO Produced	4,469.82		

Land Use	На
OP Planted Area	9,478.88
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	9,478.88

#### **Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB
Emission								
Land Conversion	5,245.94	0.60	50,355.54	0.62	0.00	0.00	55,601.48	1.22
CO <sub>2</sub> Emission from fertilizer	719.08	0.08	6,150.50	0.08	0.00	0.00	6,869.57	0.16
NO <sub>2</sub> Emission	416.73	0.05	3,417.37	0.04	0.00	0.00	3,834.09	0.09
Fuel Consumption	4.45	0.00	18.28	0.00	0.00	0.00	22.73	0
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
Sink	Sink							
Crop Sequestration	-4972.45	-0.57	-47167.46	-0.58	0.00	0.00	-52139.91	-0.57
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0
Total	1413.74	0.16	12774.23	0.16	0.00	0.00	14187.96	0.16

\*Note: Includes both estates and smallholders



#### **Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
Emission		
POME	17,642.85	0.20
Fuel Consumption	1.28	0.00
Grid Electricity Utilization	595.14	0.01
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	18,239.27	0.20

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

Emissions	tCO₂e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

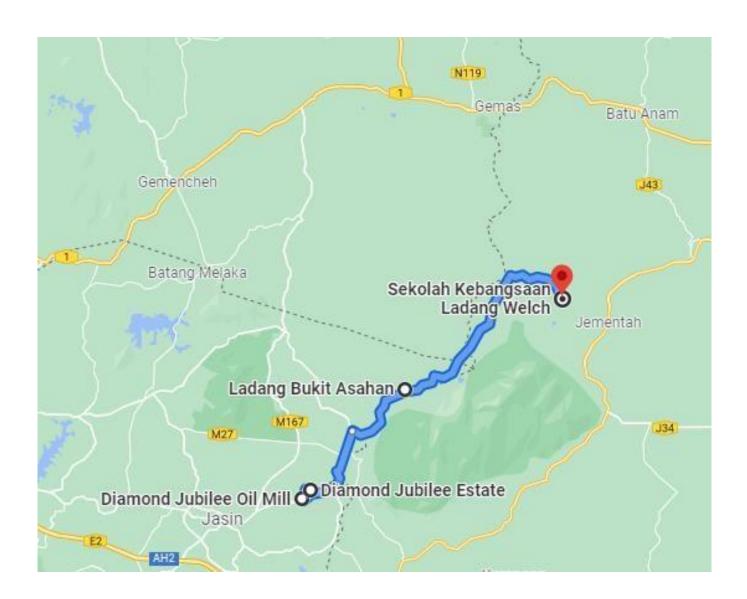
<sup>\*</sup>This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:			
Divert to Compost (%)	0.00		
Divert to anaerobic diversion (%)	100.00		

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

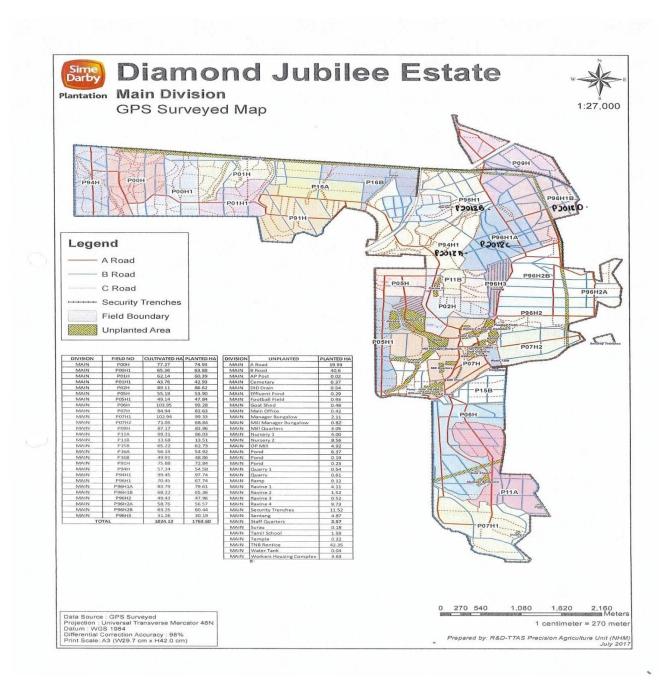


#### **Appendix C: Location Map of Certification Unit and Supply bases**

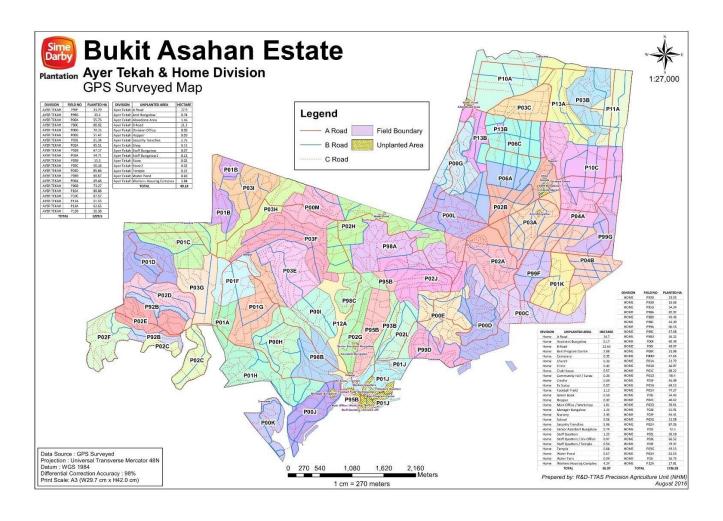




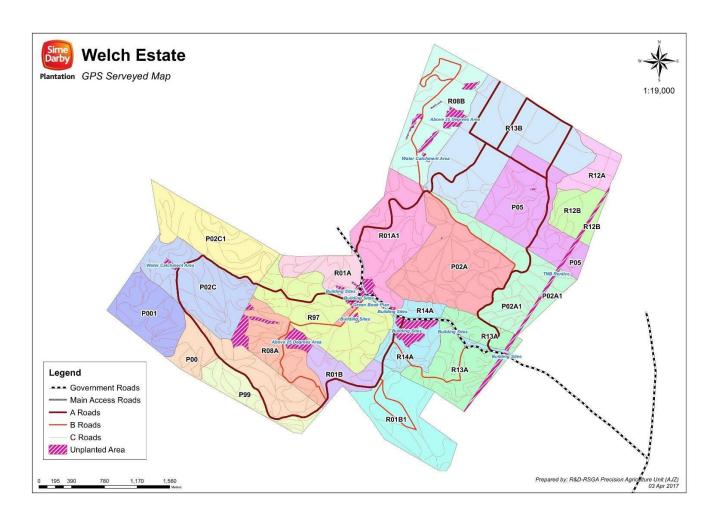
#### **Appendix D: Estate Field Map**













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

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area	annual FFB Production (MT)		
						-			
Noto	· * are smallholders	sampled in this audit.		Total					



#### **Appendix F: List of Abbreviations**

a.i Active Ingredient

BOD Biochemical Oxygen Demand

CB Certification Bodies

CHRA Chemical Health Risk Assessment

COD Chemical Oxygen Demand

CPO Crude Palm Oil

CSPO Certified Sustainable Palm Oil
CSPKO Certified Sustainable Palm Kernel Oil

EFB Empty Fruit Bunch

EHS Environmental, Health and Safety
EIA Environmental Impact Assessment
EMS Environmental Management System

FFB Fresh Fruit Bunch

FPIC Free, Prior, Informed and Consent

GAP Good Agricultural Practice

GHG Greenhouse Gas

GMP Good Manufacturing Practice
GPS Global Positioning System
HCV High Conservation Value
IPM Integrated Pest Management

IP Identity Preserved

IS - CSPO Independent Smallholder Certified Sustainable Palm Oil

IS – CSPKO Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE Independent Smallholder Certified Sustainable Palm Kernel Expeller

ISCC International Sustainable Carbon Certification

ISS Independent Smallholder Standard

LD50 Lethal Dose for 50 sample

MB Mass Balance

MSDS Material Safety Data Sheet

MT Metric Tonnes
OER Oil Extraction Rate

OSH Occupational Safety and Health

PK Palm Kernel
PKO Palm Kernel Oil
POM Palm Oil Mill

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment
RSPO Roundtable on Sustainable Palm Oil

P&C Principles & Criteria

RTE Rare, Threatened or Endangered species SCCS Supply Chain Certification Standard

SEIA Social & Environmental Impact Assessment

SIA Social Impact Assessment SOP Standard Operating Procedure