

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (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 10, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 22) – Bukit Benut Palm Oil Mill Location of Certification Unit: KM 12, Jalan Mengkibol, 86009 Kluang, Johor, Malaysia
Date of Final Report: 11/12/2022

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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	Membership Approval Date	07/09/2004
Address	Level 10, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 22) – Bukit Benut Palm Oil Mill		
Location / Address	KM 12, Jalan Mengkibol, Kluang, 86009 Johor, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Mdm Shylaja Devi Vasudevan Nair (Head, Sustainability Unit GSC) Mr. Anuar bin Zakaria (Mill Manager)	E-mail	shylaja.vasudevan@simedarbyplantation.com kks.bk.benut@simedarbyplantation.com
Telephone	+603-78484379 (HQ) +6013-2086959 (Mill)	Facsimile	+603-78484363 (HQ) +607-7766479 (Mill)

2. Certification Information			
Certificate Number	RSPO 591229	Certificate Start Date	05/10/2021
Date of First Certification	05/10/2011	Certificate Expiry Date	04/10/2026
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	Determination of the conformity of the client's management system, or parts of it, with audit criteria and evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	20 mt/hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 682040	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	27/12/2022
MSPO 686845	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3	BSI Services Malaysia Sdn Bhd	27/12/2022
MSPO 714131	MSPO Supply Chain Certification: 2018	BSI Services Malaysia Sdn Bhd	17/09/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Bukit Benut Palm Oil Mill	KM 12, Jalan Mengkibol, 86009 Kluang, Johor	1° 55' 50.64" N	103° 20' 50.71" E
Bukit Benut Estate	KM 12, Jalan Mengkibol, 86009 Kluang, Johor	1° 54' 40.46" N	103° 19' 58.94" E
Lambak Estate	Ladang Lambak/Elais 86009 Kluang, Johor	1° 58' 1.13" N	103° 19' 35.58" E

Note: CEP Niyor Estate – Transferred to SOU 21 Gunung Mas effective from July 2021.

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> 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
Bukit Benut Estate	2,536.70	24.18	238.90	2,799.78	90.6
Lambak Estate	3,344.72	2.65	392.79	3,740.16	89.43
Total	5,881.42	26.83	631.69	6,539.94	90.02

Note: CEP Niyor Estate – Transferred to SOU 21 Gunung Mas effective from July 2021.

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6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Bukit Benut Estate	194.05	1,313.80	10025.35	3.50	2,342.65	194.05
Lambak Estate	409.16	1,535.58	10310.87	89.11	2,935.56	409.16
Total (ha)	603.21	2,849.38	20336.22	92.61	5,278.21	603.21
Note:						

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 2021 – Sep 2022)	Actual (Jul 2021 – Jun 2022)		Forecast (Oct 2022 – Sep 2023)
		Previous license period (Jul 2021 – Sep 2021)	Current license period (Oct 2021 – Jun 2022)	
Bukit Benut Estate	52,570.8	13,607.19	25,424.42	53,914.13
Lambak Estate	69,502.49	12,530.81	23,413.27	65,207.05
Total	122,073.29	74,975.69		119,121.18
Note:				

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 2021 – Sep 2022)	Actual (Jul 2021 – Jun 2022)		Forecast (Oct 2022 – Sep 2023)
		Previous license period (Jul 2021 – Sep 2021)	Current license period (Oct 2021 – Jun 2022)	
CEP Renggam Estate		502.72	1,035.97	
Cenas Estate		0.00	4,014.85	
Bukit Paloh Estate		826.57	398.52	
Cep Niyor Estate		962.22		
Kempas Klebang Estate		624.99		
Total		8,365.84		1877.48
Note:				

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 2021 – Sep 2022)	Actual (Jul 2021 – Jun 2022)		Forecast (Oct 2022 – Sep 2023)
		Previous license period (Jul 2021 – Sep 2021)	Current license period (Oct 2021 – Jun 2022)	
N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A		N/A

Note:

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	Jul 2021	10,094.46	-	10,094.46
2	Aug 2021	10,641.06	-	10,641.06
3	Sep 2021	8,318.98	-	8,318.98
4	Oct 2021	6,924.56	-	6,924.56
5	Nov 2021	8,179.66	-	8,179.66
6	Dec 2021	7,880.69	-	7,880.69
7	Jan 2022	3,521.97	-	3,521.97
8	Feb 2022	4,870.08	-	4,870.08
9	Mar 2022	6,288.74	-	6,288.74
10	Apr 2022	5,554.45	-	5,554.45
11	May 2022	5,162.41	-	5,162.41
12	Jun 2022	5,904.47	-	5,904.47
	TOTAL	83,341.53	0.00	83,341.53

Note:

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10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Oct 2021 – Sep 2022)	Actual (Jul 2021 – Jun 2022)		Forecast (Oct 2022 – Sep 2023)
	Previous license period (Jul 2021 – Sep 2021)	Current license period (Oct 2021 – Jun 2022)	
FFB	FFB		FFB
122,073.29 mt	29,054.50 mt	54,287.03 mt	119,121.18 mt
	TOTAL	83,341.53 mt	
CPO (OER: 21.11%)	CPO (OER: 20.19%)		CPO (OER: 21.18 %)
25,769.67 mt	5,863.63 mt	10,961.21 mt	25,235.66 mt
	TOTAL	16,824.84 mt	
PK (KER: 5.5%)	PK (KER: 4.72%)		PK (KER: 5.5%)
6,714.03 mt	1,338.80 mt	2,596.09 mt	6,551.70 mt
	TOTAL	3,934.89 mt	
Note:			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Jul 2021	1,972.28	442.80
2	Aug 2021	2,223.64	499.76
3	Sep 2021	1,667.71	396.24
4	Oct 2021	1,463.74	361.03
5	Nov 2021	1,633.46	395.61
6	Dec 2021	1,674.19	399.82
7	Jan 2022	714.607	160.16
8	Feb 2022	986.365	218.85
9	Mar 2022	1,237.91	293.12
10	Apr 2022	1,105.57	265.17
11	May 2022	998.734	230.59
12	Jun 2022	1,146.63	271.74
	TOTAL	16,824.84	3,934.89
Note:			

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11. Summary of Actual Volume sold					
Current License period (Oct 2021 – Jun 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	10,999.76	-	-	-	10,999.76
PK (MT)	2,466.38	-	-	-	2,466.38
Credits	-	-	-	-	-
Previous License period (Jul 2021 – Sep 2021)					
CPO (MT)	4,693.46	-	-	-	4,693.46
PK (MT)	1,338.80	-	-	-	1,338.80
Credits	-	-	-	-	-

Note: Conventional is RSPO certified material but sold as non-RSPO.

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	Sime Darby Oils Commodities Sdn Bhd	TR-0e451d0d-3a2e	155.47	-
2	Sime Darby Oils Commodities Sdn Bhd	TR-810cb3b4-499f	116.86	-
3	Sime Darby Oils Commodities Sdn Bhd	TR-ffb52397-9f67	117.73	-
4	Sime Darby Oils Commodities Sdn Bhd	TR-f15a4183-a5c0	195.78	-
5	Sime Darby Oils Commodities Sdn Bhd	TR-e551262f-d01d	121.53	-
6	Sime Darby Oils Commodities Sdn Bhd	TR-74829c21-b753	351.40	-
7	Sime Darby Oils Commodities Sdn Bhd	TR-6ecdba5e-585e	79.32	-
8	Sime Darby Oils Commodities Sdn Bhd	TR-ae6dc24b-8260	157.58	-
9	Sime Darby Oils Commodities Sdn Bhd	TR-a953cfcb-2a6c	39.64	-
10	Sime Darby Oils Commodities Sdn Bhd	TR-8a9b7b9e-c119	117.23	-
11	Sime Darby Oils Commodities Sdn Bhd	TR-bac573a6-569b	158.74	-
12	Sime Darby Oils Commodities Sdn Bhd	TR-adb01faa-3c61	39.74	-
13	Sime Darby Oils Commodities Sdn Bhd	TR-c615991a-9552	39.80	-
14	Sime Darby Oils Commodities Sdn Bhd	TR-2f398ae2-194e	79.93	-
15	Sime Darby Oils Commodities Sdn Bhd	TR-146766ef-a7c7	119.81	-
16	Sime Darby Oils Commodities Sdn Bhd	TR-b5173ceb-95ba	195.24	-
17	Sime Darby Oils Commodities Sdn Bhd	TR-5a8a5104-46f6	312.58	-
18	Sime Darby Oils Commodities Sdn Bhd	TR-4d2110a2-58cb	40.80	-
19	Sime Darby Oils Commodities Sdn Bhd	TR-f96b3d85-8c34	116.59	-

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20	Sime Darby Oils Commodities Sdn Bhd	TR-b989986e-0a37	390.48	-
21	Sime Darby Oils Commodities Sdn Bhd	TR-d3e176be-affc	237.19	-
22	Sime Darby Oils Commodities Sdn Bhd	TR-fc2f2559-07b6	80.75	-
23	Sime Darby Oils Commodities Sdn Bhd	TR-dd857ecd-6472	116.22	-
24	Sime Darby Oils Commodities Sdn Bhd	TR-4e3e5b5a-b29d	318.97	-
25	Sime Darby Oils Commodities Sdn Bhd	TR-f307780a-2586	204.27	-
26	Sime Darby Oils Commodities Sdn Bhd	TR-02fb1d77-7849	82.82	-
27	Sime Darby Oils Trading Sdn Bhd	TR-41f5a6ae-3508	38.77	-
28	Sime Darby Oils Trading Sdn Bhd	TR-21fc847b-8afc	191.94	-
29	Sime Darby Oils Trading Sdn Bhd	TR-645c959a-d793	78.40	-
30	Sime Darby Oils Trading Sdn Bhd	TR-83ae656f-e756	39.30	-
31	Sime Darby Oils Trading Sdn Bhd	TR-7d7e0a86-adb4	197.03	-
32	Sime Darby Oils Trading Sdn Bhd	TR-5d021c43-b90e	197.54	-
33	Sime Darby Oils Trading Sdn Bhd	TR-37192cf8-5043	78.67	-
34	Sime Darby Oils Trading Sdn Bhd	TR-ae511db-6483	156.57	-
35	Sime Darby Oils Trading Sdn Bhd	TR-65b43c03-ac71	80.03	-
36	Sime Darby Oils Trading Sdn Bhd	TR-2fa80f8b-2ff5	159.62	-
37	Sime Darby Oils Trading Sdn Bhd	TR-f86f0d42-e64c	79.79	-
38	Sime Darby Oils Trading Sdn Bhd	TR-25a63459-91b6	199.80	-
39	Sime Darby Oils Trading Sdn Bhd	TR-c632d90f-e2e1	194.51	-
40	Sime Darby Oils Trading Sdn Bhd	TR-8c7bf4e5-7b25	159.24	-
41	Sime Darby Oils Trading Sdn Bhd	TR-18cab332-9b5b	160.83	-
42	Sime Darby Oils Trading Sdn Bhd	TR-8befe7a1-01fa	39.75	-
43	Sime Darby Oils Trading Sdn Bhd	TR-274113a5-602e	119.35	-
44	Sime Darby Oils Trading Sdn Bhd	TR-66315ac1-d117	118.87	-
45	Sime Darby Oils Trading Sdn Bhd	TR-e4ac41bd-18a1	40.29	-
46	Sime Darby Oils Trading Sdn Bhd	TR-72d504f7-85f3	236.07	-
47	Sime Darby Oils Trading Sdn Bhd	TR-0ea6d51c-5966	242.20	-
48	Sime Darby Oils Trading Sdn Bhd	TR-c8a130a0-17e9	39.84	-
49	Sime Darby Oils Trading Sdn Bhd	TR-2b64981b-fa9b	197.60	-
50	Sime Darby Oils Trading Sdn Bhd	TR-187aeac9-d61c	41.14	-
51	Sime Darby Oils Trading Sdn Bhd	TR-829752b9-531f	80.81	-
52	Sime Darby Oils Trading Sdn Bhd	TR-b8240c38-e59c	79.06	-
53	Sime Darby Oils Trading Sdn Bhd	TR-1414d3ac-d7ed	199.22	-
54	Sime Darby Oils Trading Sdn Bhd	TR-89258805-867e	39.91	-
55	Sime Darby Oils Trading Sdn Bhd	TR-d4506d44-4a0e	159.89	-

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56	Sime Darby Oils Trading Sdn Bhd	TR-c2d29d89-fb4a	197.32	-
57	Sime Darby Oils Trading Sdn Bhd	TR-1e6f86ae-0152	120.48	-
58	Sime Darby Oils Trading Sdn Bhd	TR-26a39b02-6dd4	399.43	-
59	Sime Darby Oils Trading Sdn Bhd	TR-2061c0e6-34df	236.21	-
60	Sime Darby Oils Trading Sdn Bhd	TR-3a286fd4-8c40	198.08	-
61	Sime Darby Oils Trading Sdn Bhd	TR-9986b349-df7b	40.36	-
62	Sime Darby Oils Trading Sdn Bhd	TR-8b951584-55e7	393.87	-
63	Sime Darby Oils Trading Sdn Bhd	TR-fd2b41d3-a19a	154.68	-
64	Sime Darby Oils Trading Sdn Bhd	TR-218bb9df-aafb	39.74	-
65	Sime Darby Oils Trading Sdn Bhd	TR-daaee2ca-421b	278.83	-
66	Sime Darby Oils Trading Sdn Bhd	TR-614d6a5a-2feb	237.37	-
67	Sime Darby Oils Trading Sdn Bhd	TR-bb9f0551-98b9	238.80	-
68	Sime Darby Oils Trading Sdn Bhd	TR-209d904c-50f8	239.00	-
69	Sime Darby Oils Trading Sdn Bhd	TR-ae5b4722-ced4	355.87	-
70	Sime Darby Oils Trading Sdn Bhd	TR-ce0839d1-2e8c	40.28	-
71	Sime Darby Oils Trading Sdn Bhd	TR-dee077ad-aab6	196.91	-
72	Sime Darby Oils Trading Sdn Bhd	TR-442e6a07-f2a9	123.59	-
73	Sime Darby Oils Trading Sdn Bhd	TR-c86ddaaa-4048	75.34	-
74	Sime Darby Oils Trading Sdn Bhd	TR-2c877b2d-8cf0	39.96	-
75	Sime Darby Oils Trading Sdn Bhd	TR-6adc1a90-e477	119.37	-
76	Sime Darby Oils Trading Sdn Bhd	TR-9866729d-e164	77.33	-
77	Sime Darby Oils Trading Sdn Bhd	TR-6049b242-c4cf	41.34	-
78	Sime Darby Oils Trading Sdn Bhd	TR-0c68fcab-43be	81.85	-
79	Sime Darby Oils Trading Sdn Bhd	TR-fd6ddd84-d655	121.55	-
80	Sime Darby Oils Trading Sdn Bhd	TR-88b4821b-b86a	120.63	-
81	Sime Darby Oils Trading Sdn Bhd	TR-fa3ed032-05b9	39.52	-
82	Sime Darby Oils Trading Sdn Bhd	TR-0f65f155-d258	41.17	-
83	Sime Darby Oils Trading Sdn Bhd	TR-0d57d120-8682	39.53	-
84	Sime Darby Oils Trading Sdn Bhd	TR-a5525d17-b196	39.49	-
85	Sime Darby Oils Trading Sdn Bhd	TR-2c51e83b-b1d1	78.27	-
86	Sime Darby Oils Trading Sdn Bhd	TR-66b06fdc-d612	39.72	-
87	Sime Darby Oils Trading Sdn Bhd	TR-096a3b8e-9886	78.27	-
88	Sime Darby Oils Trading Sdn Bhd	TR-a0d26f89-347e	40.41	-
89	Sime Darby Oils Trading Sdn Bhd	TR-9851cab9-b7e0	39.32	-
90	Sime Darby Oils Trading Sdn Bhd	TR-71186ff1-b9ab	41.48	-
91	Sime Darby Oils Trading Sdn Bhd	TR-f75cdb53-b360	39.11	-

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92	Sime Darby Oils Trading Sdn Bhd	TR-13d5a7e0-1a34	40.98	-
93	Sime Darby Oils Trading Sdn Bhd	TR-c5ec0815-b3f5	39.51	-
94	Sime Darby Oils Trading Sdn Bhd	TR-4cd96dbe-fe47	39.66	-
95	Sime Darby Oils Trading Sdn Bhd	TR-75abdf25-6018	36.57	-
96	Sime Darby Oils Trading Sdn Bhd	TR-d137cf29-5d98	40.62	-
97	Sime Darby Oils Trading Sdn Bhd	TR-3f0a8802-f554	37.95	-
98	Sime Darby Oils Trading Sdn Bhd	TR-f97f84f7-1ad1	39.46	-
99	Sime Darby Oils Trading Sdn Bhd	TR-bdc601eb-bd67	38.62	-
100	Sime Darby Oils Trading Sdn Bhd	TR-7efc518c-36c2	39.23	-
101	Sime Darby Oils Trading Sdn Bhd	TR-d734f97c-8a29	38.97	-
102	Sime Darby Oils Trading Sdn Bhd	TR-19fc21a0-df0d	39.06	-
103	Sime Darby Oils Trading Sdn Bhd	TR-b57a8d50-d13e	40.63	-
104	Sime Darby Oils Trading Sdn Bhd	TR-3d06430f-a26a	38.89	-
105	Sime Darby Oils Trading Sdn Bhd	TR-5b80d07c-8218	39.31	-
106	Sime Darby Oils Trading Sdn Bhd	TR-09c5919f-8424	38.94	-
107	Sime Darby Oils Trading Sdn Bhd	TR-ace5a4ef-247c	39.97	-
108	Sime Darby Oils Trading Sdn Bhd	TR-5b6a0cfb-5433	38.01	-
109	Sime Darby Oils Trading Sdn Bhd	TR-67c09a79-a83c	40.12	-
110	Sime Darby Oils Trading Sdn Bhd	TR-7123604c-eb42	39.48	-
111	Sime Darby Oils Trading Sdn Bhd	TR-688b9ad2-bd28	38.18	-
112	Sime Darby Oils Trading Sdn Bhd	TR-1b24d9b2-e662	40.29	-
113	Sime Darby Oils Trading Sdn Bhd	TR-19da713f-c30f	41.39	-
114	Sime Darby Oils Trading Sdn Bhd	TR-ec3f010a-c0c4	39.92	-
115	Sime Darby Oils Trading Sdn Bhd	TR-e6c471ad-fd80	39.8	-
116	Sime Darby Oils Trading Sdn Bhd	TR-1c4661d7-6d1f	38.66	-
117	Sime Darby Oils Trading Sdn Bhd	TR-491f9731-6f73	40.48	-
118	Sime Darby Oils Trading Sdn Bhd	TR-f1b975f8-6361	40.95	-
119	Sime Darby Oils Trading Sdn Bhd	TR-f89d49fd-359e	41.00	-
120	Sime Darby Oils Trading Sdn Bhd	TR-e87bef60-5ded	40.59	-
121	Sime Darby Oils Trading Sdn Bhd	TR-89d76287-d01c	40.61	-
122	Sime Darby Oils Trading Sdn Bhd	TR-03b7ee80-4b46	40.47	-
123	Sime Darby Oils Trading Sdn Bhd	TR-855b1e59-654d	39.44	-
124	Sime Darby Oils Trading Sdn Bhd	TR-7ba45666-a595	40.86	-
125	Sime Darby Oils Trading Sdn Bhd	TR-e872d68d-7e3e	39.69	-
126	Sime Darby Oils Trading Sdn Bhd	TR-7c6cc0b6-7529	40.47	-
127	Sime Darby Oils Trading Sdn Bhd	TR-0d02614d-1cdb	39.45	-

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128	Sime Darby Oils Trading Sdn Bhd	TR-03950764-3447	39.13	-
129	Sime Darby Oils Trading Sdn Bhd	TR-9c43b113-71b2	40.78	-
130	Sime Darby Oils Trading Sdn Bhd	TR-9038b977-75b1	39.59	-
131	Sime Darby Oils Trading Sdn Bhd	TR-88e70df6-9b65	40.77	-
132	Sime Darby Oils Trading Sdn Bhd	TR-b7a68252-c1a2	38.97	-
133	Sime Darby Oils Trading Sdn Bhd	TR-eed110f0-8f27	39.99	-
134	Sime Darby Oils Trading Sdn Bhd	TR-1214ba0c-1217	41.05	-
135	Sime Darby Oils Trading Sdn Bhd	TR-0652865c-b589	40.90	-
136	Sime Darby Oils Trading Sdn Bhd	TR-64930c4b-2122	40.69	-
137	Sime Darby Oils Trading Sdn Bhd	TR-475845a1-d906	39.19	-
138	Sime Darby Oils Trading Sdn Bhd	TR-909e0b1d-992d	39.88	-
139	Sime Darby Oils Trading Sdn Bhd	TR-073db2b0-6bb2	39.26	-
140	Sime Darby Oils Trading Sdn Bhd	TR-621c3c1b-d5f2	39.52	-
141	Sime Darby Oils Trading Sdn Bhd	TR-3db1fa7b-4546	40.02	-
142	Sime Darby Oils Trading Sdn Bhd	TR-cbe921cc-71d8	38.76	-
143	Sime Darby Oils Trading Sdn Bhd	TR-90b3ef51-a19b	40.41	-
144	Sime Darby Oils Trading Sdn Bhd	TR-6015ddb2-f11d	39.87	-
145	Sime Darby Oils Trading Sdn Bhd	TR-b1833cc9-fe6c	38.93	-
146	Sime Darby Oils Trading Sdn Bhd	TR-5c01d4f9-b79d	39.51	-
147	Sime Darby Oils Trading Sdn Bhd	TR-3fbc82a0-7605	40.26	-
148	Sime Darby Oils Trading Sdn Bhd	TR-bcb6d547-3a7d	39.26	-
149	Sime Darby Oils Trading Sdn Bhd	TR-0a189000-a4b2	39.56	-
150	Sime Darby Oils Trading Sdn Bhd	TR-42d99657-5c0b	39.31	-
151	Sime Darby Oils Trading Sdn Bhd	TR-7eedd75-30ac	41.09	-
152	Sime Darby Oils Trading Sdn Bhd	TR-4c026e64-fcb6	39.90	-
153	Sime Darby Oils Trading Sdn Bhd	TR-bfea181a-1df0	39.63	-
154	Sime Darby Oils Trading Sdn Bhd	TR-f5b356e4-7d95	39.78	-
155	Sime Darby Oils Trading Sdn Bhd	TR-7776985c-3a4c	39.53	-
156	Sime Darby Oils Trading Sdn Bhd	TR-d7e7a4e9-deee	37.23	-
157	Sime Darby Oils Trading Sdn Bhd	TR-88f83318-cfab	38.87	-
158	Sime Darby Oils Trading Sdn Bhd	TR-1a52fe1d-6b05	38.76	-
159	Sime Darby Oils Trading Sdn Bhd	TR-308f6272-e03d	38.92	-
160	Sime Darby Oils Trading Sdn Bhd	TR-cf6d9d17-d374	38.58	-
161	Sime Darby Oils Trading Sdn Bhd	TR-e268cf05-7e8e	39.81	-
162	Sime Darby Oils Trading Sdn Bhd	TR-add8f8ab-4462	40.46	-
163	Sime Darby Oils Trading Sdn Bhd	TR-c3b5b205-9950	39.22	-

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164	Sime Darby Oils Trading Sdn Bhd	TR-b1e79402-da58	39.00	-
165	Sime Darby Oils Trading Sdn Bhd	TR-68c67bbe-d7ea	39.37	-
166	Sime Darby Oils Trading Sdn Bhd	TR-6be7127a-8651	41.03	-
167	Sime Darby Oils Trading Sdn Bhd	TR-e7be950e-7faf	39.74	-
168	Sime Darby Oils Trading Sdn Bhd	TR-4ac33133-87fb	41.33	-
169	Sime Darby Oils Trading Sdn Bhd	TR-1664ada7-cdd6	40.73	-
170	Sime Darby Oils Trading Sdn Bhd	TR-2fab8d36-0fdf	40.22	-
171	Sime Darby Oils Trading Sdn Bhd	TR-4953c27a-5f96	39.22	-
172	Sime Darby Oils Trading Sdn Bhd	TR-ac27e0d3-99f7	39.90	-
173	Sime Darby Oils Trading Sdn Bhd	TR-6bd1c2f0-9629	41.16	-
174	Sime Darby Oils Trading Sdn Bhd	TR-90153e68-4067	39.29	-
175	Sime Darby Oils Trading Sdn Bhd	TR-f7dd8833-a621	39.73	-
176	Sime Darby Oils Trading Sdn Bhd	TR-20767d5f-fe2e	39.89	-
177	Sime Darby Oils Carey Island Kcp Sdn. Bhd.	TR-a5cb17e9-a282	-	141.47
178	Sime Darby Oils Carey Island Kcp Sdn. Bhd.	TR-a1bff8ff-c3b3	-	99.89
179	Sime Darby Oils Carey Island Kcp Sdn. Bhd.	TR-5d167056-67d3	-	100.00
180	Sime Darby Oils Carey Island Kcp Sdn. Bhd.	TR-bf2fb96b-2d96	-	200.00
181	Sime Darby Oils Carey Island Kcp Sdn. Bhd.	TR-fb063beb-714b	-	35.02
182	Sime Darby Oils Carey Island Kcp Sdn. Bhd.	TR-4a0f402b-8b60	-	350.00
183	Sime Darby Oils Carey Island Kcp Sdn. Bhd.	TR-4df9cf40-86d2	-	200.00
184	Sime Darby Oils Carey Island Kcp Sdn. Bhd.	TR-f4a74000-2c47	-	300.00
185	Sime Darby Oils Carey Island Kcp Sdn. Bhd.	TR-0a1cd27a-d44a	-	400.00
186	Sime Darby Oils Carey Island Kcp Sdn. Bhd.	TR-52af3fc7-67a4	-	149.18
187	Sime Darby Oils Carey Island Kcp Sdn. Bhd.	TR-cc721268-f354	-	350.00
188	Sime Darby Oils Carey Island Kcp Sdn. Bhd.	TR-ad71ae05-3d42	-	550.00
189	Sime Darby Oils Carey Island Kcp Sdn. Bhd.	TR-7b500a52-99ee	-	29.62
190	Sime Darby Oils Carey Island Kcp Sdn. Bhd.	TR-d1f64ae6-8b38	-	200.00
191	Sime Darby Oils Carey Island Kcp Sdn. Bhd.	TR-aca656fd-8207	-	300.00
192	Sime Darby Oils Carey Island Kcp Sdn. Bhd.	TR-f8582881-0541	-	400.00
TOTAL			15,693.22	3,805.18

Note:

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)
1	N/A	N/A	N/A	N/A

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TOTAL	N/A	N/A
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.	N/A	N/A	N/A
TOTAL		N/A	N/A
Note:			

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
1.	N/A	N/A	N/A
TOTAL			N/A
Note:			

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Not applicable)			Actual (Not applicable)			Forecast (Not applicable)		
	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			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	
Note:									

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
1.	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A	N/A	N/A
Note:						

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13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Not applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Previous License period (Not applicable)							
Credits				N/A	N/A	N/A	N/A
Physical	N/A	N/A	N/A				
Note:							

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)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
1.	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A	N/A	N/A	N/A
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.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
Representative: Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)
Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **05 – 08/07/2022**. 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 **15/09/2022**. 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.

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.

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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 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 4)	Year 5 (ASA 5)
Bukit Benut Palm Oil Mill	√	√	√	√	√
Bukit Benut Estate	√	√	√	√	√
Lambak Estate	√	√	√	√	√

Tentative Date of Next Visit: July 3, 2023 - July 6, 2023

Total Number of Mandays: 12 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Muhammad Fadzli Masran (MFM)	Team Leader	<p>Education: Holds a Bachelor Degree in Forestry Science, University Putra Malaysia</p> <p>Work Experience: He has more than 10 years working experience in palm oil estate as Assistant Manager managing operations and sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. He involved in internal auditing on ISO9001 and ISO14001 standards at Kulim Plantations.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018, endorsed RSPO Lead Auditor Course in July 2018, MSPO Lead Auditor Course in October 2018, endorsed RSPO Supply Chain Certification training course in January 2019, MSPO Supply Chain Certification System (SCCS) Auditor training Course (MPOCC Endorsed), CQI and IRCA Certified ISO 9001:2015 Lead Auditor Training Course in April 2019, HCV and GIS Training in November 2019 and SMETA Requirements Training in April 2021.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of Occupation Health Safety requirement, HIRARC, training, management plan, good agriculture practice, GHG and RSPO supply chain requirements.</p> <p>Language proficiency: Fluent in in Bahasa Malaysia and English.</p>
Hafriazhar Mohd Mokhtar (HMM)	Team Member	<p>Education: Holds a Bachelor of Engineering (Hons.) Chemical Engineering, University Technology Malaysia</p> <p>Work Experience: He has 20 years of working experience in multiple engineering disciplines emphasized on science, technology and sustainability. He acquired many skills from being involved in various industrial</p>

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		<p>environments ranging from construction, plantation and mining before auditing. In summary, he started his career as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in palm oil mill, Project Control Engineer (2008-2011) in mining and Auditor (2011-present) with accredited certification bodies.</p> <p>Training attended: He has completed Social Auditing & SMETA Training, HCV & HCS Introductory Training, ISO 45001 LA Training, MSPO LA Training, Endorsed RSPO SCCS LA Training, Endorsed RSPO P&C LA Training, ISO 9001 LA Training, ISO 50001 LA Training, and ISO 14001 LA Training</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue and RSPO supply chain requirements.</p> <p>Language proficiency: Fluent Bahasa Malaysia and English.</p>
Amir Bahari (AB)	Team Member	<p>Education: Holds a Bachelor of Science (Hons) in Chemistry, University Science Malaysia & a Diploma in Palm Oil Milling Tech/Management, Malaysian Palm Oil Board.</p> <p>Work Experience: He has more than 30 years of plantation experience including managing rubber factories, palm oil mills and estates. Since 2014 he has started auditing professionally for varies scheme including RSPO and MSPO for varies accredited certification body.</p> <p>Training attended: He successfully completed the ISO 14001 Lead Auditor Course and Endorsed RSPO P&C Lead Auditor Course. He also attended HCV Awareness for RSPO/ MSPO auditors on December 2016 and RSPO HCV Audit Guidelines on April 2021.</p> <p>Aspect covered in this audit: During the assessment he covered mills and estates best practices, Legal Requirements, land & Legal issue environmental and HCV.</p> <p>Language proficiency: Fluent in in Bahasa Malaysia and English.</p>
N/A	Peer Reviewer	<p>Education: N/A</p> <p>Work Experience: N/A</p> <p>Training attended: N/A</p>

Accompanying Persons:

Name	Role
N/A	N/A

2.3 Assessment Plan

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

Date	Time	Subjects	MFM	HMM	AB
Monday, 04/07/2022	PM	Auditors travel to Kluang and check in at Anika Hotel.	√	√	√
Tuesday, 05/07/2022 Bukit Benut Estate	0900 - 0930	Opening meeting: <ul style="list-style-type: none"> Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation) 	√	√	√
	0930 - 1300	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. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
	1300 - 1400	Lunch break	√	√	√
	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	√	√	√
Wednesday, 06/07/2022 Lambak Estate	0900 - 1300	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. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
	1300 - 1400	Lunch break	√	√	√
	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	√	√	√

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Date	Time	Subjects	MFM	HMM	AB
Thursday 07/07/2022 Bukit Benut POM	0900 - 1300	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc. Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
	1300 - 1400	Lunch	√	√	√
	1400 - 1630	Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation.	√	√	√
	1630 - 1700	Interim closing briefing	√	√	√
Friday 08/07/2022 Bukit Benut POM	0900 - 1130	RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	√	√	
	1130 - 1200	Audit team discussion & preparation for closing meeting	√	√	
	1200 - 1245	Closing briefing	√	√	

Major NC Close Out Visit Plan

Date	Time	Subjects	MFM
Wednesday 14/09/2022	PM	Auditor Travelling	√
Thursday 15/09/2022	09.00 – 09.15	Opening Meeting: Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan	√
	09.00 – 12.00	Verification on previous Major NC: 1. 2220976-202207-M1 Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence	√
	12.00 – 13.00	Closing Meeting	√
	13.00	Audit Team travel back	√

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?	<p>Sime Darby Plantation Berhad TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Islands. Refer to the Time Bound Plan table.</p> <p>On 16/01/2020, Sime Darby Plantation Berhad under its subsidiary Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation – Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p> <p>http://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations</p>	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	<p>Generally all estates and mills excepted stated below or in the TBP are 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, 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 and on 01/10/2018, the mill has completed the selling off transaction. In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently Sime Darby Plantation Berhad have no control in the management.</p> <p>As the latest TBP, all units will be certified on 2023. SDP has submitted the latest TBP to be approved by RSPO Secretariat. As per reply from Deputy Director of Compliance, RSPO Secretariat on 26/01/2022, for RSPO membership date before 1st July 2018, the new TBP is before 30th June 2023. Since SDP TBP is within June 2023, no approval is required from RSPO Secretariat.</p>	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.	There is no new acquisitions as per the latest TBP 2021.	Complied

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<p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p>	<p>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.</p>	<p>Complied</p>
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>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 Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties was sold and currently Sime 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.</p> <p>PT Guthrie Econina: 890.98 Ha from Sg Jernih Estate still under Land legalisation process - Process Kadastral.</p> <p>Sg Jernih estate and KKPA was separated in 2022 and recorded separately.</p> <p>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.</p> <p>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</p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in 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</p> <p>ACOP 2021 has been cross-referenced as below: https://document.rspo.org/2021/Sime_Darby_Plantation_Berhad_ACOP2021.pdf</p>	<p>Complied</p>

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<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>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.</p>	<p>Complied</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as these 2 assets were disposed.</p>	<p>Complied</p>
<p>Un-Certified Units or Holdings</p>		
<p>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.</p>	<p>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.</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification</p> <ol style="list-style-type: none"> 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-britainpalm-oil-a-subsidiary-of-sime-darby-plantationbhd-guadalcanal-plain-palm-oil-ltd 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 	<p>Complied</p>

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	<p>https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamawan-png</p> <p>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</p> <p>8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-roka-mini-estate</p> <p>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate</p> <p>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</p> <p>11. 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-inc-new-planting-assessment</p> <p>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-inc.-new-planting-assessment1</p> <p>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-inc.-new-planting-assessment</p> <p>Management units for 11 – 13 above were disposed.</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as both sites was disposed.</p> <p>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</p>	<p>Complied</p>

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	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 July 2022, 16 LUCAs review completed with remaining 8 concept note required, 7 concept note approved by RSPO and 1 Concept note endorsed.	
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 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
Did the company conduct internal audit for those uncertified estates against the uncertified 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.	Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the 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 in 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.	Complied
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. There is no scheme smallholders and/ or out growers include in the scope of certification.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance

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<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	<p>Not applicable as there is no smallholder scheme under SOU 22 Bukit Benut Certification Unit.</p>	<p>Complied</p>
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Approved Time Bound Plan

SDP - RSPO Certification for Time Bound Plan - Malaysia Operations

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
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, Perak	Certified	16/08/2011	-
		Kamuning Estate					
		Elphil Estate					
		Kinta Kellas Estate					
4	Flemington	Flemington Oil Mill	-	Teluk Intan, Perak	Certified	05/10/2011	-
		Flemington Estate					
		Bagan Datoh Estate					

		Sabak Bernam Estate					
		Sg. Samak Estate					
5	Seri Intan/Selaba	Seri Intan Oil Mill	-	Teluk Intan, Perak	Certified	03/03/2011	-
		Selaba Oil Mill					
		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					
8	East	East Oil Mill	-	Carey Island, Selangor	Certified	19/05/2011	-
		East Estate					
		Sepang Estate					
		Dusun Durian Estate					
9	West	West Oil Mill	-	Carey Island, Selangor	Certified	19/05/2011	-
		West Estate					

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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 and reported to the CB in March/April 2021.
		Kerdau Estate					
		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, Negeri Sembilan	Certified	19/05/2010	-
		Tanah Merah Estate					
		Bukit Pelandok Estate					
15	Sua Betong	Sua Betong Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	18/02/2014	Siliao Estate has now been merged into Salak Estate and Bradwall Estate.
		Sua Betong 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		Bahau, Negeri Sembilan			Sg. Gemas Estate has now been merged into Sg. Senarut Estate.
		Sg. Senarut Estate					
		Sg. Gemas Estate					
		Kok Foh Estate					
		Bukit Pilah Estate					
		St. Helier Estate					
		Sungai Sabaling Estate					
		Pertang Estate					
17	Kempas	Kempas Oil Mill	-	Jasin, Melaka	Certified	19/05/2010	Serkam Estate, previously from SOU18 (Diamond Jubilee) is now part of SOU 17 (Kempas)
		Kempas Estate					
		Tangkah Estate					
		Kemuning Estate					
18	Diamond Jubilee	Diamond Jubilee Palm Oil Mill	-	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)
		Serkam Estate					
		Diamond Jubilee Estate					
		Bukit Asahan Estate					
19	Pagoh	Pagoh Oil Mill	-	Muar, Johor	Certified	28/1/2014	-
		Pagoh Estate					
		Welch Estate					
		Lanadron Estate					
		Pengkalan Bukit Estate					
20	Chaah	Chaah Oil Mill	-	Chaah, Johor	Certified	18/11/2010	-
		Chaah Estate					
		Sg. Simpang Kiri Estate					

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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 in April 2017. Lian Seng Estate is merged into Bkt Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018.
		Gunung Mas Estate					
		Kempas Klebang Estate					
		Bukit Paloh Estate					
		Yong Peng Estate					
22	Bukut Benut	Bukit Benut Oil Mill	-	Kluang, Johor	Certified	05/11/2011	* SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2018.
		Bukit Benut Estate					
		Lambak Estate					
		CEP Nyior Estate					
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, Johor	Certified	29/3/2011	-
		Sri Pulai Estate					
		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	Layang Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Layang Estate					
		Rasan Estate					
		Belian Estate					

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		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

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							hold. As at 1st Oct 2018, the mill has completed the selling off transaction.
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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 District – Riau	Certified	16/01/2012	-
		Alur Dumai Estate						
2	PT Sajang Heulang	Mustika Mill	-	-	Tanah Bumbu District – South Kalimantan	Certified	03/07/2013	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Mustika Estate						
		KKPA-2 PT.SHE Estate						
		KKPA-3 PT.SHE Estate						
		KKPA-5 PT.SHE Estate						
Pantai Bonati Estate	06/07/2011							
3	PT Ladangrumpun Suburabadi	Angsana Mill	-	-	Tanah Bumbu District – South Kalimantan	Certified	06/07/2021	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Angsana Estate						
		Pantai Bonati Estate						
		Gunung Sari Estate						
		KKPA-1 PT.SHE Estate						
		KKPA-4 PT.SHE Estate						
		Subur Abadi Plasma 1 Estate	TBC	TBC				
4	PT Langgeng Muaramakmur	Bebunga Mill	-	-		Certified	16/03/2012	KKPA & Plasma is not under the management control of Sime Darby
Bebunga Estate								

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

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		Gunung Kemas Estate			Kotabaru District – South Kalimantan			
		Laut Timur Estate						
		Pantai Timur Estate						
		KKPA MBP	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.
10	PT Guthrie Pecconina	Rantau Panjang Mill	-	-	Musu Banyuasin District – South Sumatera	Certified	16/03/2012	Remarks: Land legalisation process for 4152.70 ha is still in process.
		Rantau Panjang Estate						
		Bumi Ayu Estate						
		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 – South Kalimantan	Certified	30/12/2011	
		Rantau Estate						
		Matalok Estate						
		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	11/10/2011 01/04/2014	-
17		Teluk Siak Mill	-	-		Certified	11/10/2011	-

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	PT Intipersada Aneka	Teluk Siak Estate			Pekanbaru, Siak District – Riau			
		Pinang Sebatang Estate						
		Aneka Persada Estate						
18	PT Tamaco Graha Krida	Ungkaya Mill	-	-	Morowali District – Sulawesi Tengah	Certified	10/7/2012	-
		Ungkaya Estate						
		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 – West Kalimantan	Certified	18/10/2010	Land legalisation process for East Est for 5815.64 ha is still in process.
		West Estate						
		East Estate						
		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 Permai /PT Perkasa Subur Sakti	Blang Simpo Mill	-	-	Aceh Tamiang and East Aceh District – Nangroe Aceh Darussalam	Certified	03/05/2013	-
		Tamiang (PT PPP) Estate						
		Batang Ara (PT PSK) Estate						
		Blang Simpo-01 Estate						
		Blang Simpo-02 Estate						
21	PT Natapalma Sandika	Lembiru Mill	-	-	Ketapang District – West Kalimantan	Certified	03/07/2014	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru Mill.
		Lembiru Estate						
		Awatan Estate						

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

SDP - RSPO Certification for Time Bound Plan – Papua New Guinea / Solomon Islands Operations

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name						
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)					

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		Smallholders – MBA East Zone (59)					
		Smallholders – MBE East Zone (37)					
2	Milne Bay Estate (MEB)	Hagita Oil Mill	-	Milne Bay Province, PNG	Certified	15/02/2018	-
		Giligili Estate					
		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 Province, PNG	Certified	19/03/2012	-
		Kara Estate					
		Nalik Estate					
		West Coast Estate					
		Noatsi Estate					
		Madak Estate					
		Smallholders -North Division (615)					
		Smallholders- South Division (868)					
		Smallholders -West Division (309)					
4	Ramu Agricultural Industrial Ltd (RAIL)	Gusap Mill	-	Morobe Province, PNG	Certified	05/08/2010	-
		Gusap East (Gusap) Estate					
		Gusap West (Paddock) 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 Province, PNG	Certified	01/02/2013	-
		Mamba Oil Mill					
		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, PNG	Certified	10/09/2008	-
		Kumbango Oil Mill					
		Kapiura Mill					
		Numundo Mill					

	Waraston Mill					
	Bebere Estate					
	Kumbango Estate					
	Togulo Estate					
	Dami Estate					
	Waisisi Estate					
	Kautu Estate					
	Karaisu 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)					

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		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 Company Limited (MFCL) / Markham Agro Pte Ltd	Erap Mill	-	Markham Farms	Certified	27/3/2020	There is total area NPP: 710.30ha which is currently excluded from the certification scope until the NPP is approved
		Munum Estate					
		Maralumi Estate					
		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 one (1) Critical; two (2) Minor nonconformities and no Opportunity For Improvement raised. The SOU 22 Bukit Benut Palm Oil Mill and Supply Base 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			
NCR Ref #	2220976-202207-M1	Issued Date	08/07/2022
Due Date	06/10/2022	Closure Date	15/09/2022
Indicator & Category (Critical / Minor)	7.2.7 - Critical		
Statement of Nonconformity:	Storage of pesticides and chemical was not implemented as per Standard Operating Procedure established.		
Requirement Reference:	Storage of all pesticides is in accordance with recognised best practices.		
Objective Evidence:	Noted during the site visit at the general store of Bukit Benut Estate, it was found that Pesticide, Antracol and Rogor were stored not in line with procedure. Refer chemical safety management procedure dated 09/03/2021 section 6.3.1 (a) "Chemical supplied shall be furnished with a complete and updated SDS", Section 6.4.2 "Containers should preferably be placed on skids or a platform", Section 6.4.3 "Chemicals register should be designed to minimize fire hazard and to prevent leakage in the event of spills and the storage area should be bunded".		
Corrections:	Estate to immediate remove all the chemical inside the general store.		
Root Cause Analysis:	Insufficient of monitoring of chemical due to chemical has been temporary place inside general store without proper tray.		
Corrective Actions:	<ol style="list-style-type: none"> Estate to conduct the chemical training for the worker and the person in-charge for chemical storage. Estate to monitor temporary store of the chemical inside the general store. 		
Assessment Conclusion:	<p>Major NC Verification</p> <p>Noted during site visit at General Store and Chemical Store, sighted that all pesticides (Rogor, Antracol WP 70 and Bayfolan) were stored in the chemical store with tray underneath for spillage control.</p> <p>The Safety Data Sheet were available in English and Bahasa Malaysia at the chemical store. Review the SDS for chemical as follows:</p> <ol style="list-style-type: none"> Antracol WP 70, revision date 07/11/2019 Rogor, revision date 23/11/2021 Bayfolan, revision date 15/07/2019 <p>The estate has conducted chemical handling training for all personnel involve in chemical handling such as field supervisor, store clerk, mandore, general workers</p>		

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	<p>(chemical mixer) and chemical applicator. Reviewed the training material (Powerpoint Slide), training attendance and training evaluation dated 16/08/2022 and 12/09/2022.</p> <p>Noted during interview with the store clerk, the understanding on the chemical handling is satisfactory.</p> <p>All the corrective action and evidence of implementation were found to be adequate and effectively implemented. The Major NC closed on 15/09/2022.</p>
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Non-conformity			
NCR Ref #	2220976-202207-N1	Issued Date	08/07/2022
Due Date	Next Assessment	Closure Date	Next Assessment
Indicator & Category (Critical / Minor)	6.7.2 - Minor		
Statement of Nonconformity:	The first aid kit and fire extinguisher monitoring was not effectively implemented.		
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:	<p>Bukit Benut Estate</p> <p>Sighted during site visit at the workshop, noted the Brown Antiseptic Liquid (Dettol) was expired on 11/2021. Noted the latest first aid inspection was conducted on 18/06/2022. This shows the inspection was not effectively implemented.</p> <p>Lambak Elais Estate</p> <p>Noted during site visit at the workshop, the fire extinguisher permit was expired on 11/04/2022 while at the chemical store, the fire extinguisher has been depressurize and cannot be use during emergency. The shows the monitoring of fire extinguisher was not effectively implemented.</p>		
Corrections:	<p>Lambak Estate:</p> <p>Estate to immediate replace all expired unit of fire extinguisher with new unit.</p> <p>Bukit Benut Estate:</p> <p>Estate to immediate replace expired Dettol to the new unit.</p>		
Root Cause Analysis:	<p>Lambak Estate:</p> <p>Insufficient monitoring of fire extinguisher.</p> <p>Bukit Benut Estate:</p> <p>Lapses on inspection of first Aid Kits Box in estate.</p>		

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Corrective Actions:	<p>Lambak Estate</p> <ol style="list-style-type: none"> Estate to include information on renewal/ expiry of fire extinguisher in OSH meeting agenda in minute meeting. Estate will conduct monthly inspection of Fire extinguisher by using monitoring and inspection form. Estate to record any renewal of fire extinguisher unit in fire Extinguisher logbook <p>Bukit Benut Estate:</p> <ol style="list-style-type: none"> Estate to conduct refresher First Aid Training by Person-in charge. Estate will conduct monthly First Aid Kits inspection by Person-in charge.
Assessment Conclusion:	The Corrective Action Plan found sufficient to addresses the non-conformity raised. The effectiveness implementation Corrective Action Plan will be verified during next assessment

Non-conformity			
NCR Ref #	2220976-202207-N2	Issued Date	08/07/2022
Due Date	Next Assessment	Closure Date	Next Assessment
Indicator & Category (Critical / Minor)	2.2.2 - Minor		
Statement of Nonconformity:	Demonstration on meeting applicable legal requirements related to salary pay by contracted third parties was insufficient.		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
Objective Evidence:	<p>Reviewed the records of 2 pay slips for contractor (Zaidah Terus Maju Enterprise) workers (I/C No.: 760519-01-xxxx and 980811-01-xxxx) in Bukit Benut Estate for February 2022 until June 2022 found the following issues:</p> <ol style="list-style-type: none"> EPF contribution was not made according to the Employees Provident Fund Act 1991. Number of working days, public holiday and work on rest day was not indicated in the payslips. No evidence on the payment of EIS has been made 		
Corrections:	Estate immediately contacts the contractor for justification for EPF contribution, worker`s contractor agreement includes number of working days, public holiday and work on rest day, and also for payment of EIS.		
Root Cause Analysis:	Lacking on monitoring of contractor worker for EIS, EPF contribution and worker`s contract agreement due inconsistency submission from the contractor.		
Corrective Actions:	1. Estate advises the contractor to include number of working days, public holiday and work on rest day need to be indicate in worker`s contractor agreement.		

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	2. Estate to conduct awareness training for the contractor regrading on EFP, Contract agreement and payment for EIS.
Assessment Conclusion:	The Corrective Action Plan found sufficient to addresses the non-conformity raised. The effectiveness implementation Corrective Action Plan will be verified during next assessment

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	Good commitment from the management to maintain the system.
PF 2	Positive feedbacks from the stakeholders

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2134544-202111-N1	Issued Date	25/11/2021
Due Date	08/07/2022	Closure Date	08/07/2022
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:	<p>Based on the on-site stakeholder consultation with Indonesian workers' representative in Lambak Estate, it was learnt that he had discussed a grievance of his Indonesian co-worker; ID # B9970411 who already due for Check-Out Memo (COM) on 7/11/2021 but unable to travel back home due to unavailability of flight ticket. The workers representative added that the specified worker's grievance who supposed to COM has deepen since his other two colleagues who were due for COM at later date had received their tickets but not him.</p> <p>Trailing of related COM processing records indicated that the application for the said worker's ticket was made since 26/9/2021 and received by Workers' Management Unit (WMU) person in-charge on 18/10/2021 but with no progress yet. Ever since, neither the worker's representative nor the grief worker been informed on the actual progress and/or updates on his ticket by the estate since the issue still raised during the on-site consultation.</p>		

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Corrections:	<ol style="list-style-type: none"> 1. Follow-up email has been sent to WMU person in-charge on 23.11.2021 2. Flight ticket for the said worker has been booked by WMU and flight will be departed on 30.12.2021. <p>The said worker has been consulted on his flight arrangement accordingly.</p>
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Limitation of flight bookings to Jakarta due to flight restrictions to Indonesia in connection with the Covid 19 pandemic and no direct flights to Lombok. 2. COM and Special Pass can only be applied once flight ticket has been booked and confirmed. <p>Estate management has consulted the said worker on the delayed of flight arrangement which is not under estate’s control but the consultation was not recorded accordingly and no acknowledgement recorded from the worker that he understand the process. Furthermore, the follow up consultation was not made periodically (only by worker’s request).</p>
Corrective Actions:	<ol style="list-style-type: none"> 1. Workers are requested to submit their intention for repatriation at least 3 months prior to departure date to avoid delay due to pandemic circumstances. 2. Management to follow-up periodically to WMU on repatriation status. <p>Estate management will conduct periodical consultation for the worker’s facing delayed flight arrangement for repatriation due to pandemic.</p>
Assessment Conclusion:	<p>The Corrective Action Plan found sufficient to addresses the non-conformity raised. The effectiveness implementation Corrective Action Plan will be verified during next assessment.</p> <p><u>ASA 2 1 verification:</u></p> <p>A Standard Operating Manual (SOM) was established and maintained. (Sime Darby Plantation Estate Quality Management System) and 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.</p> <p>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.</p> <p>Grievance channels was stated in the employment contract (Item 21) as follows:-</p> <ul style="list-style-type: none"> - Union representative at operating unit. - Workers helpline at 0162991411 (via whatsapp) and call toll free number 1800819741. - Suara Kami at 1800818771 or sms 01130116031. - Whistleblowing channel at 1800223388 or +60192797553 (08.30 am – 17.30 pm) or email to whistleblowing@simedarbyplantation.com <p>All requests found to be responded within short time by respective recipients. Hence, Minor NC was closed on 5/7/2022.</p>
Effectiveness Closure (for previous audit closed Critical NC):	Not applicable

Opportunity for Improvement	
OFI#	Description
2134544-202111-11	<p>OFI Statement: There was a feedback received from an internal stakeholder in Lambak Estate as following: - Foreign Worker Repatriation Form; Date: 28/9/2021; Name: Syamsul Suaeka; Date arrival: 12/1/2014; Permit expiry date: 7/11/2021; Passport expiry date: 13/8/2023; Passport # B9970411; Proposed destination: Lombok/Mataram; Estimated departure date: 5/11/2021; Actual Departure Date: 5/11/2021; SDP Workforce Management received date: 18/10/2021 The worker had a grievance for not being told or updated on the info of his actual departure date since the previous date (5/11/2021) has passed.</p> <p>Verification / Follow-up actions: The operating units adopt Sime Darby Plantation channel for grievances such as NUPW meetings, stakeholders' complaints and grievances, OPP reports, Social Dialogue, feedbacks from Suara Kami, Whistleblowing and Ulala and others. The estate conducted Social Dialogue on biweekly basis attended by the workers representative. Any issues were recorded in Social Dialogue Action Tracker. All requests found to be responded within short time by respective recipients.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1930317-202007-N1	Minor	7.3.2	23/7/2020	Closed on 09/08/2021
1930317-202007-N2	Minor	7.3.1	23/7/2020	Closed on 09/08/2021
2134544-202111-N1	Minor	4.2.3	25/11/2021	Closed on 08/07/2022
2220976-202207-M1	Critical	7.2.7	08/07/2022	Closed on 15/09/2022
2220976-202207-N1	Minor	6.7.2	08/07/2022	Open
2220976-202207-N2	Minor	2.2.2	08/07/2022	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 SOU 22 Bukit Benut Palm Oil Mill and Supply Base 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

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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		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Governmental Department	Rahmah binti Sapari, Sek. Agama Bukit Benut	Face to face interview
	Norizad Begum binti Aman, Sek. Keb Ladang Bukit Benut	Face to face interview
	Mohd Faisal Abdul Manaf, MPOB Kluang	Face to face interview
NUPW	Mohd Kassim bin D. Mohamed Ali, NUPW Kluang	Face to face interview
	Mohd Nor Hasnizam bin Hasbullah, NUPW Kluang	Face to face interview
Neighbouring Village	Fadzil Maarof, Village Head/Representatives, Kampung Mengkibol	Face to face interview
Contractors	Zulkarnain Suirp, representative, Sim Kim Huat	Face to face interview
	Jogan Raj, Supervisor, Samareddy Enterprise	Face to face interview
	Kalaiselvan a/l Surenthiran, Supervisor, Sakhti Enterprise	Face to face interview
	Thashman a/l Ganesan, LTT Transport Agency	Face to face interview
Shops	Chin Fook Yin, Owner, Sundry Shop	Face to face interview
	Siti Marwah binti Nurung, Owner, canteen	Face to face interview
Workers Representative	<ol style="list-style-type: none"> 1. Mandore 2. Harvester 3. General workers 4. Gender Committee Representative 5. NUPW Representative 	Face to face interview

Stakeholders comment	
1	Feedbacks: School (Sek. Agama Bkt Benut & SK Ladang Bukit Benut)

	<p>School representatives appreciate on the contribution and support given by the estate management. No other issue raised.</p> <p>The management noted with the respond and will continue to contribute on local and community development.</p> <p>Audit Team verification and response: No further action needed</p>
2	<p>Feedbacks: Village Head/Representatives (Kampung Mengkibol)</p> <p>Mr Fadzil Maarof request to clean the drainage near to the village after heavy rain. Most of the time, the drainage clogged with sand/mud and dry leaves that will cause water flow to the villages.</p> <p>The management noted with the respond and will continue to contribute on local and community development. Estates always send workers/contractors to clean the drainage when requested.</p> <p>Audit Team verification and response: No further action needed</p>
3	<p>Feedbacks: NUPW Kluang (Mr. Mohd Kassim & Mohd Nor Hasnizam)</p> <p>NUPW representatives mentioned that frequent communication and consultation with the estate manager has been done directly through meeting and phone call. He also mentioned that high participation from SDP workers with NUPW is very satisfactory. SDP support any activities conducted and persuade any workers to join any Union as per mentioned in their own policy. No other issues raised.</p> <p>The management noted with the respond and will continue good relationship with NUPW</p> <p>Audit Team verification and response: No further action needed</p>
4	<p>Feedbacks: MPOB Kluang (Mohd Faisal Abdul Manaf)</p> <p>No issues raised by MPOB representative. So far, SOU 22 operation does not give any negative impact to smallholders which under MPOB monitoring. No comment on the licensing since all license was issued by MPOB, HQ.</p> <p>The management noted with the respond and will continue good relationship with MPOB</p> <p>Audit Team verification and response: No further action needed</p>
5	<p>Feedbacks: Contractor (Sim Kim Huat, Samareddy Enterprise, Sakhti Enterprise, LTT Transport Agency)</p> <p>Contract agreement detailing all term has been signed by both parties and confirmed that the contractor understand the content of the agreement. Payment has been made normally with period around 7-10 days after invoice submitted. Good relationship and easy to work with Mill and estates management. No other issue raised.</p> <p>The management noted with the respond and will continue good relationship with the contractors</p> <p>Audit Team verification and response: No further action needed</p>
6	<p>Feedbacks:</p>

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	<p>Shop Owner</p> <p>Estate has provided adequate maintenance on the shop building with reasonable rental fees. Domestic waste collected as per schedule. Shop owner give some credit facilities to the workers. No other issues raised.</p> <p>The management noted with the respond and will continue good relationship with the shop owners</p> <p>Audit Team verification and response: No further action needed</p>
7	<p>Feedbacks:</p> <p>Worker</p> <p>Sample of local and foreign workers has been interviewed. As per interview, there are no issues has been raised. Policy and procedure has been communicated to all workers. Salary payment is in line with local regulations. All workers interviewed satisfied with accommodation provided by the company.</p> <p>The management noted with the respond and will continue provide adequate housing and amenities to workers.</p> <p>Audit Team verification and response: No further action needed</p>

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 as the estates have undergone 2nd cycle of replanting.					

Previous land owner / user comment	
	Feedbacks: N/A
	Audit Team verification and response: N/A


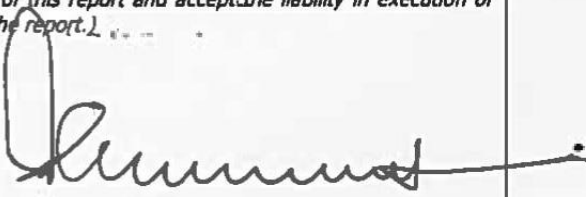
3.5 Impartiality and conflict of interest

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

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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 SOU 22 Bukit Benut Palm Oil Mill and Supply Base 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 SOU 22 Bukit Benut Palm Oil Mill and Supply Base is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Muhammad Fadzli b. Masran	Name: Zulkifli bin Mohammed Hashim
Company Name: BSI Services (M) Sdn. Bhd.	Company Name: Sime Darby Plantation Berhad (Ladang Bukit Benut)
Title: Client Manager	Title: Manager
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 29/10/2022	Date: 29/10/2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Documents that are specified in the RSPO P&C are made available to the public.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Documents specified for mill and all estates within SOU 22 Certification Unit made available as per sample as following:</p> <ul style="list-style-type: none"> - Land titles/user rights - Occupational health and safety plans - Plans and impact assessments relating to environmental and social impacts - HCV documentation - Pollution prevention and reduction plans - Details of complaints and grievances - Continuous improvement plans - Public summary of certification assessment report - Group Sustainability Policy - Record of contributions to community development 	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Information relating to land titles, safety and health plans, pollution prevention plans, and annual report are available at the estate and accessible to relevant stakeholders upon request. Sustainability policies were displayed in various locations including the main notice boards of the estates and muster ground notice boards for employees and visitors to view. In addition, Sime Darby Plantation group company's website also accessible with public information such as The Sustainability Report and Group Annual report is available. Procedure</p>	Complied

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		for complaints and grievances available via website link: http://www.simedarbyplantation.com/Sustainability . Interview conducted on-site with sampled internal and external stakeholders confirmed that the information provided in appropriate languages and accessible to them.	
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	SOU 22 maintained all requests of information records as well as records of general request by stakeholders. Sighted a sample housing repair requests latest dated on 31/5/2022 by workers occupying house # EST 154 B. Repair request was resolved on 10/6/2022.	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 -	Consultation and communication procedure documented as the Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 for handling communication regarding social issues. Additionally, there's Mill Quality Management System Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). Procedures were briefed to external stakeholders during the consultation meeting and to all workers during workers meeting and assembly sessions from time to time. Bukit Benut Estate's nominated person in-charge for social issues is Mr. Zainal Abidin bin Ahmad; Senior Assistant Manager as per letter of appointment dated 10/3/2021. Lambak Estate's nominated person in-charge for social issues is Mr. Mohammad Zakwan bin Jamaludin; Assistant Manager as per letter of appointment dated 10/1/2022. SOU 22 level stakeholder consultation meeting was conducted on 18/4/2022 at Bukit Benut Estate.	Complied
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.	The latest Stakeholders Lists for all operating units within SOU 22 sighted available as updated in January 2022. Information of	Complied

	<p>- Minor compliance -</p>	<p>stakeholders’ details available included person in charge, address, e-mail and contact number for various stakeholders’ category among internal and external stakeholders including local communities, authorities, vendors and neighbours etc.</p>	
<p>Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
<p>1.2.1</p>	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>SOU 22 has implemented policy on code of ethical conduct and integrity (Code of Business Conduct - COBC) which covered all operations in the plantation operation. Briefing session was given to all workers of audited operating units.</p> <p>Latest briefing was conducted by management to workers of Bukit Benut POM on 02/03/2022 and Bukit Benut Estate on 18/04/2022, 24/05/2022 and 27/05/2022 for newly join workers and 16/04/2022 for existing workers and Lambak Estate on 11/01/2022.</p> <p>For labour agent and contractors, Sime Darby has applied its Vendor COBC (30 May 2018), It includes the Fair Business practices-ensuring that we promote fair business practices and compete in an ethical manner, labour & human rights, ethics & management practices.</p> <p>The Vendor Integrity Pledge verified available for sample Bukit Benut Estate contractors as following:</p> <ul style="list-style-type: none"> - Thiagarajan A/L Chellappan – EFB Transport/Tractor/Trailer Rental, Contract No: 9001005573 - Zaidah Binti Md Salikh – Grass Cutting (Zaidah Terus Maju Enterprise – Contract Grass Cutting, Contract No: 9001021927 - Sivanathan A/L M. Baskaran – EFB Transport/EFB Application/Tractor/Trailer Rental, Contract No: 900100555 <p>For Lambak Eleais Estate, contract verified as following:</p> <ul style="list-style-type: none"> - AVN Brothers – Rental of Backhoe, Contract No: 9001005379. 	<p>Complied</p>

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		<ul style="list-style-type: none"> - Leok Brothers Sdn. Bhd (Hiring Machinery for Contract Works) Contract period: 01/03/2022 – 28/02/2023)). <p>For Bukit Benut POM: Contractor: Samareddy Enterprise, Scope of Work: Transport of Palm Oil Mill Effluent (POME) verified as per Adhoc Contract for the Transportation of POME from Bukit Benut POM to Bukit Benut Estate (Fields: 95, 95A, 97A, 97B, 02A, 07C) dated 31/05/2022, Contract period: 01/06/2022 – 30/09/2022</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Monitoring included the internal audit conducted by Regional SQM internal auditors for SOU 22. Latest internal audit was conducted on 23-25/5/2022 found no issues in the implementation of the policy and overall ethical business practice.</p>	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>SOU 22 continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and GSQM sustainability team. SOU 22 had obtained and renewed license and permits as required by the law.</p> <p>Among others the licenses/permit viewed were;</p>	Complied

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			Bkt Benut Estate	
			Permit/license	validity
		1	License Air receiver, JH PMT 22514	08/07/2023
		2	MPOB license no: 522307-00-2000	31/07/2077
		3	Permit storage diesel 9000, J 003074	10/08/2023
		4	JTK -MAPA circular - Deduction wages	Eff 01/06/18
			Lambak Estate	
		1	License Air receiver, JH PMT 11573	Pending DOSH
		2	License Air receiver, JH PMT 13852	Pending DOSH
		3	MPOB license no: 518641-00-2000	28/02/2023
		4	KPDNKK J002383 - permit diesel 15000 L	28/07/2023
		5	Metrology Corporation ref B 1931277	Eff 01/09/2021
		6	JTK - MAPA circular - Deduction wages	Eff 01/06/18
			Bukit Benut Palm Oil Mill	
		1	MPOB license: 528154-00-4000	31/03/2023
		2	Water tube boiler JH PMD 940	23/04/2023
		3	Steam receiver PMT 43561	23/04/2023
		4	Steriliser no 1 JH PMT 1959	23/04/2023
		5	Steriliser no 2 JH PMT 1960	23/04/2023
		7	Air Compressor JH PMT 2917	23/04/2023

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6	Air Receiver JH PMT 89779	23/04/2023
7	Air Receiver JH PMT 83598	23/04/2023
7	Air Receiver JH PMT 14290	23/04/2023
8	Lesen Pemasangan Bekalan Elektrik 001935	EC approval
9	DOE Jadual Pematuhan - ref 0747	30/06/2023
5	Metrology Corporation ref D 053804	Eff 29/11/21

Factory and Machinery Act 1967 –

The following competency requirements were verified:

	Competent person	No of personnel.
1	Steam engineer	1 st grade – 1
2	Engine Driver (BHC)	1 - 2 nd grade
3	Boilermen	3-1 st grade
4	AESP (Authorised Entrant and Standby Person for Confined Space)	3 competent persons
5	AGT (Authorised Gas Tester and Entry Supervisor for Confined Space)	2 competent persons
6	Electrical Chargemen ref 09393	One A4 Chargemen

EQ (Prescribed Premise) Crude Palm Oil Regulations 1977

- a) Requirement in "Jadual Pematuhan"
- b) License no 004747 valid 30/06/2023 at 25mt/hr
- c) Discharge method – land application – water course
- d) Scheduled waste (CePSWaM): Tg Ahmad NurAiman ref 04729

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		<p>e) Effluent treatment system (CePPOMETS) Feb 2020 .currently being processed to attend refresher course - Md Zubair Mat Zani</p> <p><i>Air Monitoring</i></p> <p>a) Black smoke – The smoke density indicator alarm for boiler no.1 was functioning during site review at BBPOM.</p> <p>b) Particulate – Stack sampling was carried out on quarterly basis.</p> <p>c) Noted that monitoring was conducted on (at 12.0%) CO2.</p> <table border="1" data-bbox="1182 667 1886 762"> <thead> <tr> <th>Boiler no</th> <th>Date</th> <th>Dust concentration</th> <th>EQA std</th> </tr> </thead> <tbody> <tr> <td>JH PMD 940</td> <td>30/05/22</td> <td>11.65 mg/m3</td> <td>150 mg/m3</td> </tr> </tbody> </table> <p><i>Ambient Air Quality Monitoring</i></p> <table border="1" data-bbox="1200 852 1881 948"> <thead> <tr> <th></th> <th>Date</th> <th>Total suspended particulate</th> <th>MAAQ std</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>28/01/22</td> <td>35 ug/m3</td> <td>260 ug/m3</td> </tr> </tbody> </table> <p>The stack sampling was carried out by <i>Spectrum Laboratories Sdn Bhd</i>. The mill has installed ESP commissioned in Jan 2020. FFB allowable max processed by the mill in 2021 under MPOB licence no 528154-00-4000 is 120000 mt. The total actual processed from Jan - Dec 2021 is 101936 mt concluding compliance to the licence requirement.</p>	Boiler no	Date	Dust concentration	EQA std	JH PMD 940	30/05/22	11.65 mg/m3	150 mg/m3		Date	Total suspended particulate	MAAQ std	1	28/01/22	35 ug/m3	260 ug/m3	
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2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p>The CU continued to implement and maintain the established documented system for identifying, accessing, tracking and monitoring of compliance with the legal requirements that were applicable to them.</p> <p>a) Each estate and mill had its own Legal and Other Requirements Register (LORR) and were being evaluated individually annually for compliance. The legal registers were updated by the person in-</p>	Complied																

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		<p>charge and approved by the respective managers. Recent update on June 2022.</p> <p>b) The GSQM Department is responsible to track changes and the information was disseminated to all its plantations and Mill department. Among the applicable legal and included in the legal register are</p> <ul style="list-style-type: none"> - Pesticides Act 1974 and Regulations, - Environmental Quality Act 1974 and Regulations, - Factories and Machinery Act 1967 and Regulations, - Occupational Safety and Health Act 1994, - Employment Act 1955, Aboriginal Peoples Act 1954, - Labour Act 1955 - Children & Young Person (Employment) Act 2010 - Industrial Relations Act 1967, - Children and Young Persons (Employment) Act 1966 - MPOB Regulations (Licensing) 2005. - Min retirement age Act 2012 - Passport Act 1996 - Uniform Building By-Laws 1984 <p>c) The latest legal register update by GSQM is listed below;</p> <table border="1" data-bbox="1182 1136 1904 1396"> <thead> <tr> <th></th> <th>Rev date</th> <th>Title</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>17/12/19</td> <td>Arms Act 1960</td> <td>Newly added</td> </tr> <tr> <td>2</td> <td>17/12/19</td> <td>Aux Police Regulations 1970</td> <td>Revision</td> </tr> <tr> <td>3</td> <td>18/05/20</td> <td>Perintah Kaw Pergerakan 2020</td> <td>Newly added</td> </tr> <tr> <td>4</td> <td>18/05/20</td> <td>Akta Pencegahan/Pengawalan Penyakit Berjangkit</td> <td>Newly added</td> </tr> </tbody> </table>		Rev date	Title	Remarks	1	17/12/19	Arms Act 1960	Newly added	2	17/12/19	Aux Police Regulations 1970	Revision	3	18/05/20	Perintah Kaw Pergerakan 2020	Newly added	4	18/05/20	Akta Pencegahan/Pengawalan Penyakit Berjangkit	Newly added	
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2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>The Estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the estate, during the field inspection confirmed that they were clearly marked and maintained. All the physical markers/boundary stones along the legal boundaries between was visibly available</p> <table border="1"> <thead> <tr> <th></th> <th>Estate</th> <th>Boundary</th> <th>Neighbouring</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bkt Benut</td> <td>P2010C</td> <td>IOI - Unijaya Estate</td> </tr> <tr> <td>2</td> <td>Bkt Benut</td> <td>P2011B</td> <td>S/holder-Thai C Shing</td> </tr> <tr> <td>1</td> <td>Lambak E</td> <td>PR2020A</td> <td>Ldg Sg Kluang</td> </tr> <tr> <td>2</td> <td>Lambak E</td> <td>P2016B</td> <td>IOI Unijaya Estate</td> </tr> <tr> <td>3</td> <td>Lambak E</td> <td>P2007A</td> <td>Smallholder</td> </tr> </tbody> </table>		Estate	Boundary	Neighbouring	1	Bkt Benut	P2010C	IOI - Unijaya Estate	2	Bkt Benut	P2011B	S/holder-Thai C Shing	1	Lambak E	PR2020A	Ldg Sg Kluang	2	Lambak E	P2016B	IOI Unijaya Estate	3	Lambak E	P2007A	Smallholder	Complied
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<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>																											
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>The CU has maintained a list of all contracted parties and documented in List of Stakeholder as parts of their stakeholders includes internal such as;</p> <p>a) employee and workers union and</p> <p>b) external stakeholders i.e</p>	Complied																								

		<ul style="list-style-type: none"> - FFB suppliers - local community heads / government agencies. - Contractors / Suppliers - NGO / Interested parties. 	
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>The following contract was sighted and verified. The management maintained list of documentation monitoring for the compliance to the legal requirement i.e vendor integrity / workers employment agreement / payslip / PPE issuance / tenancy agreement / payment for work on rest day/PH.</p> <ul style="list-style-type: none"> a) Bukit Benut Estate - Syarikat Sin Kim Huat) until 31/12/22 which contained terms such as legal compliance, ensure valid working permit, covered by SOCSO and paid as per employment requirements. b) Lambak Elaseis - Hayati Enterprise has signed a pledge on VCOBC in ensuring compliance with labor and human rights, EHS, Ethics and management practices, all applicable laws related to bribery and integrity with Lambak Estate and complying with requirements of RSPO and SCCS. The job involving hiring machinery with the estate. c) Lambak Estate - Sakhti Enterprise has signed a pledge on VCOBC in ensuring compliance with labor and human rights, EHS, Ethics and management practices, all applicable laws related to bribery and integrity with the estate and complying with requirements of RSPO and SCCS. d) Bukit Benut Estate has signed an agreement for rental of excavator, back hoe, tractor and trailer with AVN Brothers on 01/01/22. The contractor and supplies shall comply with OSH and environmental legal requirements, RSPO/SCCS, comply with Vendor's VCOBC pledge 	Non-compliance

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		<p>e) Bukit Benut Estate - Leok Brothers replanting contractor till completion of replanting works.</p> <p>f) Bukit Benut Palm Oil Mill - Samareddy Enterprise Transportation of POME from mill to Bukit Benut Estate.</p> <p>The contractors shall ensure workers have valid work permit for non-Malaysian, SOCSO/EPF paid, Workmen Compensation Insurance, reporting any accident and paid any other payments due for workers, OSH and environmental legal requirements, RSPO/SCCS, comply with Vendor’s VCOBC pledge.</p> <p>Reviewed the records of 2 pay slips for contractor (Zaidah Terus Maju Enterprise) workers (I/C No.: 760519-01-xxxx and 980811-01-xxxx) in Bukit Benut Estate for February 2022 until June 2022 found the following issues:</p> <ol style="list-style-type: none"> 1. EPF contribution was not made according to the Employees Provident Fund Act 1991. 2. Number of working days, public holiday and work on rest day was not indicated in the payslips. 3. No evidence on the payment of EIS has been made <p>This shows that demonstration on meeting applicable legal requirements related to salary pay by contracted third parties was insufficient.</p>	
2.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>The contract signed with contractors as sighted in Bukit Benut Estate, Lambak Estate and Bukit Benut POM with contractors, therein have included under clause 5.8 abolishment of child labour & protecting the rights of children available in the Vendor COBC and Human Rights Charter protecting the rights of children.</p>	Complied
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			

2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder • One or more supporting documents for claims • Valid MPOB license <p>- Critical (Major) compliance -</p>	<p>The Bukit Benut POM received FFB from supply base estate within SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Suppliers list that included information on geo-location of FFB origins, valid MPOB license, evidence of the ownership status or the right/claim to the land</p>	Complied
2.3.2	<p>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.</p> <p>- Minor compliance -</p>	<p>The mill received FFB from supply base estate within SOU 22 and FFB diversion from other certified SOU. The FFB suppliers were listed in the Bukit Benut POM FFB Supplier list.</p>	Complied
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The business plan for the mill is reflected in the form of annual budget (MPLAN) and the projection for 5 years prepared as guidance for future planning. The business plan contains production CPO, OER, and KER, utilization rate and CAPEX.</p> <p>The business or management plan for the estates were presented in the form of annual budget (MPLAN) with 4 years projection (2023 – 2026). The annual budget contains the crop projection and the finance allocation for field operation and administrations. The management has their monthly progress report and regular meetings to monitor the expenditure to ensure the budget is not overrun.</p>	Complied

<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -</p>	<p>The replanting programs until 2026 were sighted for the estates. This program is reviewed once a year (latest being Jan 2022) and is incorporated in their annual financial budget. The replanting program until year 2026 is as follows: All figures in ha otherwise stated.</p> <table border="1" data-bbox="1182 520 1912 660"> <thead> <tr> <th>Estate</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Bkt Benut Estate</td> <td>0</td> <td>144.69</td> <td>85.78</td> <td>114.98</td> <td>104.69</td> </tr> <tr> <td>Lambak Estate</td> <td>89.11</td> <td>84.40</td> <td>69.56</td> <td>226.87</td> <td>110.97</td> </tr> </tbody> </table>	Estate	2022	2023	2024	2025	2026	Bkt Benut Estate	0	144.69	85.78	114.98	104.69	Lambak Estate	89.11	84.40	69.56	226.87	110.97	<p>Complied</p>										
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<p>3.1.3</p>	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -</p>	<p>There were meetings to discuss on issues related to sustainability status and compliance held by the estates and the mill. The minutes of meeting was established for all relevant meeting. Among others the agenda discussed were:</p> <ul style="list-style-type: none"> a) Internal audit findings b) Stakeholders feedback, c) complaint and grievance d) Status of preventive and corrective actions e) Changes that could affect the management system f) Recommendation for improvement <table border="1" data-bbox="1144 1072 1774 1396"> <thead> <tr> <th></th> <th>Estate/Mill</th> <th>Date of meeting</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bkt Benut P Oil Mill</td> <td>17/06/2022</td> <td>12</td> </tr> <tr> <td>-</td> <td>Bkt Benut P Oil Mill</td> <td>30/06/2021</td> <td>12</td> </tr> <tr> <td>2</td> <td>Bkt Benut Estate</td> <td>28/05/2022</td> <td>15</td> </tr> <tr> <td>-</td> <td>Bkt Benut Estate</td> <td>16/07/2021</td> <td>15</td> </tr> <tr> <td>3</td> <td>Lambak E Estate</td> <td>29/06/2022</td> <td>13</td> </tr> <tr> <td>-</td> <td>Lambak E Estate</td> <td>16/07/2021</td> <td>13</td> </tr> </tbody> </table>		Estate/Mill	Date of meeting	Attendees	1	Bkt Benut P Oil Mill	17/06/2022	12	-	Bkt Benut P Oil Mill	30/06/2021	12	2	Bkt Benut Estate	28/05/2022	15	-	Bkt Benut Estate	16/07/2021	15	3	Lambak E Estate	29/06/2022	13	-	Lambak E Estate	16/07/2021	13	<p>Complied</p>
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<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>		
<p>3.2.1</p>	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>In consideration to of environmental and social impact, the operating units has established continuous improvement plan. Reviewed the sampled established FY 2022 as follows:</p> <p>Estate</p> <ol style="list-style-type: none"> 1. To reduce rat baiting labour operation cost by placement of 5 baits per palm and no replacement round 2. To reduce manuring cost for mature by maximize mechanise manuring application area using Carabao and MFTA machine 3. To reduce circle raking cost/ha for mature field by convert blowing at flat/ undulating area to M3R machine 4. To reduce P&D spraying cost/ha for immature area by convert CKS spraying to P2P drone spray 5. To reduce use of pesticides by planting beneficial plant. 6. To increase spraying productivity by implementation of Geo Spraying 7. To reduce usage of chemical and total rounds of spraying by using Alion <p>Palm Oil Mill</p> <ol style="list-style-type: none"> 1. To monitor time cooking at fertiliser and the flow of condensate through the visually checking and cleaning of strainer inside for each units biweekly 2. To restreaming back steriliser condensate water to system 3. To clean up and use back all leather glove that within good condition
		<p>Complied</p>

		<ol style="list-style-type: none"> 4. To proper record and tracking the usage of hydraulic and lubrication oil for each machineries 5. To give support for worker that conducted event or festival celebration 6. Locate proper oil trap to avoid the chemical from laboratory go into monsoon drain. 	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>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.</p> <p>- Minor Compliance -</p>	RSPO metrics template submitted was verified its data to be reflective of raw data sources from each operating units.	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>The mill processing system is documented in the Sustainability Plantation Management System MQMS/SQM/08 v 1 dated 01/11/2008 which includes;</p> <ol style="list-style-type: none"> a) The mill SOP, b) The Mill Quality Management Manual v.1 2008/MQMS/QMM/08. <p>These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from;</p> <ol style="list-style-type: none"> a) the reception, sterilization, threshing, pressing, b) clarification, depericarping (nut polishing) station, 	Complied

		<p>c) effluent, laboratory, workshop, dispatches etc. In addition, there are also manuals available within the industry and MPOB that are used as guidelines.</p> <p>The standard operation procedure for the estates / mill operations is available which is prepared on Group basis. There are levels of the documentation identified as follows;</p> <ul style="list-style-type: none"> a) Level 1 Estate quality management system standard operation manual b) Level 2 EQMS quality management manual c) Level 3 standard operating procedure d) Level 4 work instruction e) Level 5 records. <p>Amendments are made should there be requirement to suit the local issues/situation. There were also updated procedure under SOP for water analysis and RSPO SCCS procedure:</p> <ul style="list-style-type: none"> a) SPMS, Appendix 7: SOP for water quality monitoring, issue 2, dated 01/06/2016. b) SOP for sampling guideline; Water and Waste water Sampling Guideline, issue 1, dated 01/06/2016. c) RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15, version 2, issue 2, dated Oct 2016. 	
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<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -</p>	<p>The Region Office, Advisory Department, Performance Monitoring Unit, Quality Management Unit (GSQM) inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Other mechanism as described below.</p> <table border="1" data-bbox="1160 539 1957 1310"> <tr> <td></td> <td>Estates</td> <td></td> </tr> <tr> <td></td> <td>Areas</td> <td>Action/Activities</td> </tr> <tr> <td rowspan="3">1</td> <td rowspan="3">Daily</td> <td>Supervision by field staff/Assist/Manager</td> </tr> <tr> <td>Report of daily activities/costings/variation</td> </tr> <tr> <td>SDDS - digital supervision</td> </tr> <tr> <td rowspan="6">2</td> <td rowspan="6">Schedule</td> <td>Quarterly ESH meeting</td> </tr> <tr> <td>PMU visits on field activities</td> </tr> <tr> <td>Internal audits by GCAD / RSQM</td> </tr> <tr> <td>Internal audits are conducted by SQM Malaysia to assess compliance to the standard operating procedures and legal aspects.</td> </tr> <tr> <td>External audit RSPO /MSPO</td> </tr> <tr> <td>GM visits / Agronomist visits</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">Medical /health</td> <td>Monthly check by HA/MA</td> </tr> <tr> <td>Annual medical surveillance.</td> </tr> </table> <p data-bbox="1160 1353 1957 1394">Bkt Benut POM</p>		Estates			Areas	Action/Activities	1	Daily	Supervision by field staff/Assist/Manager	Report of daily activities/costings/variation	SDDS - digital supervision	2	Schedule	Quarterly ESH meeting	PMU visits on field activities	Internal audits by GCAD / RSQM	Internal audits are conducted by SQM Malaysia to assess compliance to the standard operating procedures and legal aspects.	External audit RSPO /MSPO	GM visits / Agronomist visits	3	Medical /health	Monthly check by HA/MA	Annual medical surveillance.	<p>Complied</p>
	Estates																									
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		Areas	Action/Activities		
		1	Daily	Supervision by field staff/Assist/Manager Report of daily activities/costings/variation	
		2	Schedule	Quarterly ESH meeting Internal audits by GCAD / RSQM dated 23/05/22 External audit RSPO /MSPO annually RGM/RCE visits with report covers on the OER, KER, oil and kernel losses, mill throughput, FFB processed, plant and machinery upkeep, CPO and kernel quality, cost of production and compliance to legal and regulation.	
		3	Annual	Medical surveillance	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	Operating units visited maintained all records of monitoring and available for review. There are several levels of records beginning from the field/mill supervisors to executives and the Managers. The Mill Regional Engineer and RCEO /General Manager Region are accountable to monitor the estates compliance towards the SOP, budget and productivity.		Complied	
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.					
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 -	There are no new plantings or operations within SOU 22. Environmental Environmental Impact assessments relating to environmental impacts based on documents as following:		Complied	

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- a) Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register
- b) Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI
- c) Appendix 5.4.1d - Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-02/EIE.

There is no change of current practices required to mitigate negative effects based on identified impacts for both the mill and estates. However the mill and estates have conducted periodical review on the aspects and impacts identified and evaluated as registered.

The mill and estates has continuously implemented its annual programs that were established as part of its individual Pollution Prevention Plan. Managers and Assistant Managers of mill and estate were identified as person-in-charge of the programs which were established upon review of the aspect and impact register. It was observed that the reviewing and updating on the registers were made annually if there's no any new activity within respective sites.

	Estates	Projects - Details
1	LLE - Social	NEST refurbishment June 22 - RM14K
2	LLE - Social	New workers quarters 18 units RM900K - 2023
3	BBE Operation	Mechanization FFB collection CARABOU
4	LLE Operation	Mechanization Spraying - ASP - RM26K
5	LLE Operation	Landsurf - FFB collection 8 units - RM 112K

	Bukit Benut Mill	
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		<table border="1" data-bbox="1176 363 1926 502"> <tr> <td>1</td> <td>Environment</td> <td>Roofing / Bunding of EFB storage area</td> </tr> <tr> <td>2</td> <td>Environment</td> <td>CEMS - RM2M-July 2022 reduce effluent solid</td> </tr> <tr> <td>3</td> <td>Environment</td> <td>Sludge Oil Recovery - RM900K - July 2022</td> </tr> </table> <p>Social</p> <p>For existing operations, the operating unit of SOU 22 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:</p> <ul style="list-style-type: none"> - Workers’ Housing Condition/Living Improvement - Workers’ Working Condition - External stakeholders feedbacks <p>Improvements conducted by individual operating units within SOU 22 including housing improvement programs, minimum wages achievement monitoring and community contribution programs.</p>	1	Environment	Roofing / Bunding of EFB storage area	2	Environment	CEMS - RM2M-July 2022 reduce effluent solid	3	Environment	Sludge Oil Recovery - RM900K - July 2022	
1	Environment	Roofing / Bunding of EFB storage area										
2	Environment	CEMS - RM2M-July 2022 reduce effluent solid										
3	Environment	Sludge Oil Recovery - RM900K - July 2022										
3.4.2	<p>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.</p> <p>- Minor Compliance -</p>	<p>Environmental</p> <p>The aspect and impact analysis for all the mill/estate operations are documented and revised annually recent being Jan 2022. In the comprehensive report, the study of aspect and impact are aimed to;</p> <ul style="list-style-type: none"> a) Plan to avoid negative impact and to promote positive impacts. b) Reduction disposal of waste taking into consideration of social responsibilities. c) Plan to reduce pollution and release of GHG d) Development and implementations. <p>The aspect and impact covered the following activities/operations among others;</p>	Complied									

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	Estates		Estates
	Activities		Activities
1	Poisoning VOP/ woodies	7	Vehicle maintenance
2	Circle spraying	8	EFB application
3	Mngmnt empty containers	9	Fertilizer storage/application
4	Rat baiting	10	Grass slashing
5	Diesel Reception	11	Chemicals storage
6	Triple rinsing	12	Grading of FFB
	B Benut Palm Oil Mill		B Benut Palm Oil Mill
	Activities		Activities
1	Effluent treatment	7	EFB storage
2	Engine room operations	8	Laboratory
3	Boiler operations	9	Workshop operations
4	CPO storage	10	Sterilization
5	Diesel Reception/storage	11	Chemicals storage
6	Triple rinsing	12	Scheduled wastes storage

Social

Previous social impact assessment was conducted on 16th to 19th May 2016 as per documented Social Impact Assessment (SIA) Report SOU 22 Bukit Benut For existing operations, the operating unit of SOU 22 documented the continual improvement plan for social in the Social

		<p>Management Plan. Identified main social aspects and impacts from SIA considered in the plan including the following categories:</p> <ul style="list-style-type: none"> - Workers’ Housing Condition/Living Improvement - Workers’ Working Condition - External stakeholders feedbacks <p>Improvements conducted by individual operating units within SOU 22 including housing improvement programs, minimum wages achievement monitoring and community contribution programs.</p> <p>Review conducted with participation by external stakeholders during SOU 22 level stakeholder consultation meeting conducted on 18/4/2022 at Bukit Benut Estate.</p>	
<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Environmental</p> <p>Environmental Action Plan available for each units were available having information i.e. issues, management plan, PIC and time frame. The input are gathered from the meeting minutes</p> <ul style="list-style-type: none"> a) Gender Committee, NUPW, b) Safety Meeting, c) Complaint & Request from internal & external stakeholders and muster briefing). d) The activities involved discussion with the estate management, sighting the documentation, observation on sites and surrounding, and interview with stakeholders adjacent to the conversion areas. e) The assessment covered the aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control. 	<p>Complied</p>

		<p>f) Interviews were conducted with stakeholders to obtain feedback on the impact of replanting activities on their daily lives.</p> <p>Social</p> <p>Social management action plan established based on identified issue from social impact assessment conducted with consultation with stakeholders as following:</p> <ul style="list-style-type: none"> - Bukit Benut Estate SIA Action Plan: Review date 18/4/2022 - Lambak Estate SIA Action Plan: Review date 18/4/2022 <p>Among latest actions to be taken including following:</p> <ul style="list-style-type: none"> - Workers housing septic tank desludging: 2 house per month - Re-opening of Nursery for Estate Toddlers (NEST) in Lambak Estate for all workers with toddlers - Continuous road grading and repair work for main road towards smallholder area in Bukit Benut Estate 	
<p>Criterion 3.5: A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and available as follows:</p> <ul style="list-style-type: none"> a) SOPP Workforce Management Unit, WMU/LR-SOPP/JAN2016/R1 which provides the procedures for recruitment, selection and hiring. It includes steps to be taken to ensure foreign applicants with criminal record are filtered out. b) Hiring and selection of local workers, Doc No. 01-11-19 which details out the procedure of fill up job application forms, screening, interview, and medical check-up. c) Employment contracts (for foreign workers) and letters of job offer (for local workers) document the termination procedures 	<p>Complied</p>

		<p>d) Letters of job offer (for local workers) on retirement. Foreign workers is not subjected to retirement process because their employment would be dependent upon issuance of their annual work permits by the Immigration Department.</p> <p>e) Promotion is stipulated under SOP Doc No. SDP/HRUM/2020/SOP01 dated 1 Jan 2020.</p> <p>The procedures were briefed to the workers during their induction course, and also during muster briefings.</p>	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>There is evidence that the employment procedures for local and foreign workers enumerated under Indicator 3.5.1 are being implemented, and employment records are maintained. All local applications are preceded with a job application form, relevant qualifications and certificates, job interview, records of medical check-up, and the issuance of letter of job offer. Sighted during the audits were employment records of the following workers:</p> <p>Bukit Benut samples:</p> <ul style="list-style-type: none"> - Emp. ID # 017766; F; General Worker; Date joined: 5/5/2009 - Emp. ID # 017800; F; Field Worker; Date joined: 15/11/1999 - Emp. ID # 157527; M; Field Mandore; Date joined: 6/1/2020 - Emp. ID # 163831; M; General Worker; Date joined: 21/6/2021 - Emp. ID # 165366; F; General Worker; Date joined: 2/10/2021 - Emp. ID # 167001; M; General Worker; Date joined: 3/1/2022 - Emp. ID # 090232; M; FFB Carrier; Date joined: 27/4/2013 - Emp. ID # 155621; M; LF Collector; Date joined: 18/10/2019 - Emp. ID # 157133; M; FFB Cutter; Date joined: 14/12/2019 - Emp. ID # 155371; M; FFB Cutter; Date joined: 8/10/2019 - Emp. ID # 096853; M; Field Worker; Date joined: 19/10/2013 	Complied

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		<ul style="list-style-type: none"> - Emp. ID # 136523; M; FFB Carrier; Date joined: 24/8/2017 <p>Lambak Estate samples:</p> <ul style="list-style-type: none"> - Emp. ID # 018155; F; General Worker; Date joined: 11/1/2002 - Emp. ID # 018230; M; Field Worker; Date joined: 1/11/1999 - Emp. ID # 018330; F; General Worker; Date joined: 1/12/1996 - Emp. ID # 037186; F; General Worker; Date joined: 1/1/2010 - Emp. ID # 062956; M; FFB Cutter; Date joined: 4/3/2010 - Emp. ID # 107362; M; FFB Cutter; Date joined: 12/11/2014 - Emp. ID # 109056; M; FFB Carrier; Date joined: 10/12/2014 - Emp. ID # 128633; M; LF Collector; Date joined: 1/12/2016 - Emp. ID # 138781; M; FFB Cutter; Date joined: 15/12/2017 - Emp. ID # 148724; M; FFB Cutter; Date joined: 2/3/2019 - Emp. ID # 154466; M; Field Worker; Date joined: 13/9/2019 - Emp. ID # 160048; F; General Worker; Date joined: 1/10/2020 - Emp. ID # 166698; M; General Worker; Date joined: 22/12/2021 <p>Bukit Benut POM samples:</p> <ul style="list-style-type: none"> - Emp. ID # 017507; F; General Worker; Date joined: 2/9/1997 - Emp. ID # 017516; M; Shift Worker; Date joined: 21/7/2003 - Emp. ID # 107291; F; General Worker; Date joined: 3/11/2014 - Emp. ID # 136372; M; Shift Worker; Date joined: 4/9/2017 - Emp. ID # 157092; M; General Worker; Date joined: 16/12/2019 - Emp. ID # 161644; F; General Worker; Date joined: 1/1/2021 - Emp. ID # 163634; F; General Worker; Date joined: 1/7/2021 	
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		- Emp. ID # 164954; M; Shift Worker; Date joined: 1/9/2021 - Emp. ID # 166529; M; Workshop; Date joined: 6/12/2021	
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby has established the Upstream Malaysia Health, Safety and Environment (HSE) Policy Statement signed by the CEO, Upstream Malaysia dated 01/06/2020.</p> <p>In the Policy Statement stated the commitment to provide safe and healthy workplace and operating in an environmentally responsible manner at all their operation in Malaysia</p> <p>The policy was communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the mill and estate.</p> <p>Sime Darby has established SOP for HIRARC. Refer Estate Quality Management System, Level 2: Standard Operating Manual, Subsection 5.4: Planning, Appendix 5.4.1a Hazard Identification, Risk Assessment and Risk Control (HIRARC) Procedure ver. 1 Year 2008, issue no. 1 dated 1/4/2008.</p> <p>The operating units has conducted assessment for risk covers all main operations and support operations. The HIRARC was reviewed at minimum once a year or when accident occur or changes on the operation.</p> <p>Reviewed the risk assessment as follows:</p> <p>Bukit Benut Estate</p> <ol style="list-style-type: none"> 1. Latest Chemical Health Risk Assessment was conducted on 22/06/2020 by assessor with DOSH reg. no. HQ/15/ASS/00/363. Refer report no. HQ/15/ASS/00/363-2020-147. The estate has conducted additional Chemical Health Risk Assessment on 	Complied

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		<p>02/03/2022 by same assessor. Refer report no. HQ/15/ASS/00/363-2020-036.</p> <ol style="list-style-type: none"> 2. HIRARC review was conducted few times in 2022 due to accident occurrence. Reviewed the latest HIRARC review for harvesting operation conducted on 25/05/2022 due to accident occur on 24/05/2022 and Manuring Semi-Mech on 31/03/2022 for accident occur on 30/03/2022. 3. Noise Risk Assessment was conducted on 02/09/2020. Refer report ref. no. HQ/LPROYKPEB/21/00325. As per recommendation, audiometric test to be conducted on annually basis. Latest audiometric test was conducted on 09/08/2021. Base on the results 7 workers were required to be examined by OHD. The workers were sent for examination on 10/12/2021. 2 out of 7 workers examined were found with hearing impairment and JKPP 7 were submitted to DOSH on 03/02/2022. <p>Lambak Elais Estate</p> <ol style="list-style-type: none"> 1. Latest Chemical Health Risk Assessment was conducted on 22/06/2020 by assessor with DOSH reg. no. HQ/15/ASS/00/363. Refer report no. HQ/15/ASS/00/363-2020-148. The estate has conducted additional Chemical Health Risk Assessment on 02/03/2022 by same assessor. Refer report no. HQ/15/ASS/00/363-2020-037. 2. Noise Risk Assessment was conducted on 07/09/2020. Refer report ref. no. HQ/LPROYKPEB/21/00326. 00325. As per recommendation, audiometric test to be conducted on annually basis. Latest audiometric test was conducted on 09/08/2021. Base on the results 9 workers were required to be examined by OHD. The workers were sent for examination on 10/12/2021. 2 	
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		<p>out of 7 workers examined were found with hearing impairment and JKPP 7 were submitted to DOSH on 03/02/2022.</p> <p>3. HIRARC review was conducted few times in 2022 due to accident occurrence. Reviewed the latest HIRARC review for workshop operation conducted on weeding on 01/06/2022 for accident occur on 10/05/2022.</p> <p>Bukit Benut POM</p> <p>1. HIRARC was reviewed at minimum once a year and when accident occur in the mill. Latest review due to accident was conducted 24/12/2021 for production storage operation due to accident occur on 20/12/2021. Latest review for the year was conducted on 31/12/2021.</p> <p>2. Noise risk assessment was conducted on 13 – 14/10/2020 by assessor with reg. no. HQ/16/PEB/00/158. Refer report no. HQ/LPROYKPEB/21/00291.</p>	
<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>The operating units has established and monitored Occupational Safety and Health Plan 2022. The plans includes OSH Policy, Risk Assessment (HIRARC Review), OSH training, Incident Reporting, Emergency Preparedness and Response, Chemical Safety Management, workplace Inspection, Awareness and Competency Training and DOSH Visit and Audit. The management plan was monitored on quarterly basis and reviewed and annually basis. reviewed the monitoring and implementation of the management plan as follows:</p> <p>Bukit Benut Estate</p> <p>1. The estate conducted first aid kit monitoring on monthly basis recorded in the First Aid Kit Checklist. Reviewed the monitoring records for January - June 2022</p>	<p>Complied</p>

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		<ol style="list-style-type: none"> 2. Latest fire drill training was conducted on 17/06/2022. The training was conducted in conjunction with Kluang Fire Department. 3. The estate conducted workplace inspection on quarterly basis prior to safety and health committee meeting. Reviewed the workplace inspection dated 21/01/2022 and 22/04/2022. <p>Lambak Elais Estate</p> <ol style="list-style-type: none"> 1. The estate conducted safety and health committee meeting on quarterly basis. Reviewed the minutes meeting dated 30/06/2022, 30/05/2022 and 29/03/2022. 2. The estate monitor the contractors in safety and health performance on monthly basis. Reviewed the monitoring records for the month of June, May, April and March 2022. 3. The estate conducted first aid kit monitoring on monthly basis recorded in the First Aid Kit Checklist. Reviewed the monitoring records for April - June 2022. Noted during the field visit, the first aid items in the box was adequate and no expired items found. <p>Bukit Benut POM</p> <ol style="list-style-type: none"> 1. Annual audiometric test was conducted on 08/11/2021. From 79 workers sent for test, 14 workers were found with abnormal results and recommended to be referred to OHD. The OHD examination was conducted on 10/03/2022. 2. Annual medical surveillance was conducted on 12 - 14/04/2022 by OHD with reg. no. HQ/08/DOC/00/468. 18 workers who are expose with n-Hexane and chromium metals and inorganic compound were send to examinations and found fit to work at 	
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		<p>current work station. Refer report no. MS 2022/KKS Bukit Benut/MS-April 2022.</p> <p>3. Annual examination and testing of Local Exhaust Ventilation was conducted on 14/03/2022 by Hygiene Tech with reg. no. HQ/21/JHII/00/00042. Refer report no. HQ/21/JHII/00/00042 – 2022/021.</p>	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(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 RSPO P&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>All operating units within SOU 22 established and documented a training plan base on training need analysis conducted on annual basis. Sighted Training Schedule 2022 which covers all job designation including the contractors.</p> <p>No scheme smallholders and out-growers within SOU 22.</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The operating units maintained the training records conducted. Reviewed the training records as follows:</p> <p>Bukit Benut Estate</p> <ol style="list-style-type: none"> 1. Fire drill training dated 17/06/2022 2. Machine operator safety briefing dated 15/06/2022 3. Contract driver (EFB), PPE and SOP training dated 11/06/2022 4. First aid training dated 09/06/2022 5. Machine specialist induction briefing dated 27/05/2022 6. Induction course to newly joined workers dated 18/04/2022, 24 and 27/05/2022 7. Benjoni application (mulching) training dated 23/05/2022 8. Palm planting training dated 17/05/2022 9. ASP Sprayer (machine Specialist) calibration training dated 25/04/2022 	Complied

		<ul style="list-style-type: none"> 10. MTFA/CAROBABO refresher training dated 22/04/2022 11. Security SOP, Company Policy, ILO training dated 16/04/2022 12. Gender committee, policy and grievance channels (OPP) training dated 16/04/2022 13. Interpump training dated 24/03/2022 14. Wage deduction training dated 22/03/2022 15. Bagworm census training dated 19/02/2022 Lambak Elais Estate 1. Scheduled waste briefing dated 27/06/2022 2. SD Reinforcement briefing dated 10/03/2022 3. Race to green and grievance's channel briefing dated 18/11/2021 4. Manuring SOP training dated 26/05/2022 5. ILO indicators, grivances channel and legal requirement to contractors channel briefing dated 11/01/2022 6. Tall palm allowance briefing dated 16/03/2022 7. Sexual haressement briefing dated 11/03/2022 8. HIRARC harvesting training dated 08/01/2022 9. HIRARC for spraying using Interpump training dated 04/01/2022 10. ASP Sprayer (machine Specialist) training dated 07/01/2022 11. Safety at work place and PPE awareness training dated 27/06/2022 12. Sprayer training dated 02/06/2022 13. Preventive maintenance vehicle training dated 28/06/2022 14. First aid training dated 19/04/2022 	
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		<p>Bukit Benut POM</p> <ol style="list-style-type: none"> 1. Safety and health committee: Roles and responsible, Risk Management, HIRARC and SOP training dated 18/11/2021 2. First aid kit training dated 06/07/2022 3. Emergency Response team training dated 17/06/2022 4. MAPA collective agreement briefing dated 14 and 18/05/2022 5. HACCP food safety training dated 08/04/2022 6. Sexual harassment and social dialogue reinforcement training dated 24/03/2022 7. ILO and RSPO requirement training dated 02/03/2022 8. ERP and first aid training dated 12/10/2021 9. Scheduled waste, sexual harassment and 5s training dated 16/10/2021 10. Permit to work and LOTO training dated 15/10/2021 11. PPE, RSPO, MSPO, SCCS and Chemical handling training dated 29/06/2022 	
3.7.3	<p>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.</p> <p>- Minor Compliance -</p>	<p>The mill continuously provided training to the personnel involved in SCCS. Reviewed the training records as follows:</p> <ol style="list-style-type: none"> 1. RSPO/MSPO and Supply Chain dated 06/07/2022 2. PPE, RSPO, MSPO, SCCS and Chemical handling training dated 29/06/2022 	Complied
<p>Criterion 3.8: Supply chain requirement for mills (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)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>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</p>	<p>As per Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022 under section Glossary stated the meaning of RSPO Identity preserved as supply chain model assured that the RSPO certified oil palm product delivered to the end user</p>	Complied

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	<p>RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>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.</p>	<p>uniquely identifiable to a single RSPO certified supply base. Refer document no. SD/SDP/GSD/SCCS/0522/01.</p> <p>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.</p>	
3.8.2	<p>Mass Balance Module</p> <p>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.</p>	<p>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.</p>	Complied
3.8.3	<p>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.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. Reviewed the estimated CPO and PK production for period of Jul 2021 - Jun 2022.</p> <p>The actual tonnage of CPO and PK produce during the period since last audit will be recorded in this audit. Reviewed the actual CPO and PK production for the period of Jul 2021 - Jun 2022.</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>RSPO PalmTrace registration was conducted by the Global Trade Marketing Department. All transaction will register in the RSPO PalmTrace.</p> <p>The mill license available at PalmTrace as following:</p> <ul style="list-style-type: none"> - License ID: CB130249 (Active) 	Complied

		<ul style="list-style-type: none"> - Member Name: Bukit Benut Oil Mill - Sime Darby - Member ID: RSPO_PO1000000194 - Member category: Oil Mill - RSPO Membership No.: 1-0008-04-000-00 (Sime Darby Plantation Berhad) 	
3.8.5	<p>Documented procedures</p> <p>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:</p> <ol style="list-style-type: none"> 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. 	<p>Sime Darby Plantation has develop Standard Operating Procedure (SOP) entitled Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022 to ensure the handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. The following subjects were included in the procedure:</p> <ul style="list-style-type: none"> 4.0 Responsibilities 5.0 Control of Documents & Records 6.0 Delivery of FFB from the Estate 7.0 Receiving FFB at the Mill 9.0 Process Monitoring 10.0 Products Despatch 11.0 Non-conforming Products and/ or Documents 12.0 Product Claims 13.0 Outsourced Contractor 14.0 Training 15.0 Reclassification of Mill’s Supply Chain Model 16.0 Production Volume 17.0 Conversion Factors 18.0 Internal Audit 19.0 Complaints 	Complied

		<p>20.0 Management Review</p> <p>The mill management has appointed the Assistants Manager as person responsible to implement Supply Chain certification System in the mill as per appointment letter dated 01/04/2022 signed by the Mill Manager.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>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.</p>	<p>The internal audit was conducted as per Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022 under section 18.0 Internal Audit. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure. Refer SOP ref. no. SD/SDP/PSQM/IAP.</p> <p>Latest Internal Audit was conducted on 23/05/2022 by executive from Group Sustainability Compliance. During the audit 2 non-conformity were raised. The mill has submitted the corrective action and evidence of implementation to auditor team and accepted by the lead auditor on 21/06/2022.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>Addressed in the Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022 under section under section 6.0 Delivery FFB from Estate and 7.0 Receiving FFB at the mill.</p> <p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all FFB received. Records were available at the office for verification.</p> <p>The mill have a system to verify at the weighbridge. Information for RSPO certified FFB were recorded in FFB Consignment notes and weighbridge tickets. Reviewed the sampled delivery off FFB as follows:</p>	Complied

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		<p>Sample of own certified unit FFB received ticket:</p> <table border="1"> <tr> <td data-bbox="1151 403 1541 719"> <ul style="list-style-type: none"> a) Supplier: E-Bukit Benut b) Product ID: FFB A Crop c) Nett weight: 11,360 kg d) Delivery date: 01/12/2021 e) Weighbridge ticket no.: 110227 f) D.O. no.: 12997 g) RSPO certificate no.: RSPO 591229 </td> <td data-bbox="1541 403 1930 719"> <ul style="list-style-type: none"> a) Supplier: E-Bukit Benut b) Product ID: FFB A Crop c) Nett weight: 10,800 kg d) Delivery date: 01/12/2021 e) Weighbridge ticket no.: 110230 f) D.O. no.: 13000 a) RSPO certificate no.: RSPO 591229 </td> </tr> <tr> <td data-bbox="1151 719 1541 1037"> <ul style="list-style-type: none"> a) Supplier: E-Lambak/Elaeis b) Product ID: FFB A Crop c) Nett weight: 12,390 kg d) Delivery date: 01/12/2021 e) Weighbridge ticket no.: 110229 f) D.O. no.: 726 g) RSPO certificate no.: RSPO 591229 </td> <td data-bbox="1541 719 1930 1037"> <ul style="list-style-type: none"> a) Supplier: E-Lambak/Elaeis b) Product ID: FFB A Crop c) Nett weight: 10,790 kg d) Delivery date: 09/10/2021 e) Weighbridge ticket no.: 109174 f) D.O. no.: 207 a) RSPO certificate no.: RSPO 591229 </td> </tr> <tr> <td data-bbox="1151 1037 1541 1342"> <ul style="list-style-type: none"> a) Supplier: E-Bukit Benut b) Product ID: FFB A Crop c) Nett weight: 12,080 kg d) Delivery date: 01/11/2021 e) Weighbridge ticket no.: 109535 f) D.O. no.: 12671 g) RSPO certificate no.: RSPO 591229 </td> <td data-bbox="1541 1037 1930 1342"> <ul style="list-style-type: none"> a) Supplier: E-Lambak/Elaeis b) Product ID: FFB A Crop c) Nett weight: 10,790 kg d) Delivery date: 01/11/2021 e) Weighbridge ticket no.: 109538 f) D.O. no.: 421 g) RSPO certificate no.: RSPO 591229 </td> </tr> </table>	<ul style="list-style-type: none"> a) Supplier: E-Bukit Benut b) Product ID: FFB A Crop c) Nett weight: 11,360 kg d) Delivery date: 01/12/2021 e) Weighbridge ticket no.: 110227 f) D.O. no.: 12997 g) RSPO certificate no.: RSPO 591229 	<ul style="list-style-type: none"> a) Supplier: E-Bukit Benut b) Product ID: FFB A Crop c) Nett weight: 10,800 kg d) Delivery date: 01/12/2021 e) Weighbridge ticket no.: 110230 f) D.O. no.: 13000 a) RSPO certificate no.: RSPO 591229 	<ul style="list-style-type: none"> a) Supplier: E-Lambak/Elaeis b) Product ID: FFB A Crop c) Nett weight: 12,390 kg d) Delivery date: 01/12/2021 e) Weighbridge ticket no.: 110229 f) D.O. no.: 726 g) RSPO certificate no.: RSPO 591229 	<ul style="list-style-type: none"> a) Supplier: E-Lambak/Elaeis b) Product ID: FFB A Crop c) Nett weight: 10,790 kg d) Delivery date: 09/10/2021 e) Weighbridge ticket no.: 109174 f) D.O. no.: 207 a) RSPO certificate no.: RSPO 591229 	<ul style="list-style-type: none"> a) Supplier: E-Bukit Benut b) Product ID: FFB A Crop c) Nett weight: 12,080 kg d) Delivery date: 01/11/2021 e) Weighbridge ticket no.: 109535 f) D.O. no.: 12671 g) RSPO certificate no.: RSPO 591229 	<ul style="list-style-type: none"> a) Supplier: E-Lambak/Elaeis b) Product ID: FFB A Crop c) Nett weight: 10,790 kg d) Delivery date: 01/11/2021 e) Weighbridge ticket no.: 109538 f) D.O. no.: 421 g) RSPO certificate no.: RSPO 591229 	
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<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>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):</p> <ul style="list-style-type: none"> 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. 	<p>Sampled of the sales and goods out delivery records as below:</p> <p>CSPO</p> <ul style="list-style-type: none"> a. The name and address of the buyer: SDO Trading Hedging b. The name and address of the seller: Bukit Benut POM c. The loading or shipment / delivery date: 01/12/2021 d. The date on which the documents were issued: 01/12/2021 e. RSPO certificate number: RSPO 591229 f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): RSPO CPO-IP g. The quantity of the products delivered: 37,910 kg h. Any related transport documentation: Weighbridge Ticket no. 009936 i. A unique identification number: Contract Ref.: S/PSD/2111/CPO0037A <ul style="list-style-type: none"> 1. The name and address of the buyer: SDO Trading Hedging 2. The name and address of the seller: Bukit Benut POM 3. The loading or shipment / delivery date: 16/12/2021 4. The date on which the documents were issued: 16/12/2021 5. RSPO certificate number: RSPO 591229 6. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): RSPO CPO-IP 7. The quantity of the products delivered: 39,730 kg 8. Any related transport documentation: Weighbridge Ticket no. 009965 	<p>Complied</p>
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		<p>a. A unique identification number: Contract Ref.: S/PSD/2111/CPO0049B and S/PSD/2111/CPO0049C</p> <p>CSPK</p> <p>a. The name and address of the buyer: SDP Nuri KCP b. The name and address of the seller: Bukit Benut POM c. The loading or shipment / delivery date: 01/11/2021 d. The date on which the documents were issued: 01/11/2021 e. RSPO certificate number: RSPO 591229 f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Palm Kernel – RSPO IP g. The quantity of the products delivered: 39,920 kg h. Any related transport documentation: Weighbridge Ticket no. 009847 i. A unique identification number: Contract Ref.: S/C-PSD/2109/PK0094</p> <p>1. The name and address of the buyer: SDP Nuri KCP 2. The name and address of the seller: Bukit Benut POM 3. The loading or shipment / delivery date: 01/12/2021 4. The date on which the documents were issued: 01/12/2021 5. RSPO certificate number: RSPO 591229 6. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Palm Kernel – RSPO IP 7. The quantity of the products delivered: 40,950 kg</p>	
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		<p>8. Any related transport documentation: Weighbridge Ticket no. 009938</p> <p>9. A unique identification number: Contract Ref.: S/C-PSD/2111/PK0112</p>	
3.8.9	<p>Outsourcing Activities</p> <p>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</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>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 that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>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.</p>	<p>As per Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022 under section 13.0: Outsourced Contractors.</p> <p>In the SOP under subsection 13.1 stated that CPO Mill cannot outsourced processing activities like refining or crushing.</p> <p>The mill has listed the outsource contractors in the List of Stakeholders for SCCS 2022. For the mill, the outsourcing activity was only involve CPO transportation.</p> <p>Reviewed the contracts between The Sime Darby Plantation Bhd. with Teo Tuan Kwee Sdn. Bhd. dated 12/12/2020. Refer letter of award no. T/SDPB/PEN/CPO/0720/003.</p>	Complied
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>Stated in the contracts between The Sime Darby Plantation Bhd. with Teo Tuan Kwee Sdn. Bhd. dated 12/12/2020. Refer letter of award no. T/SDPB/PEN/CPO/0720/003.under section 5. The Transporter's</p>	Complied

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		undertakings, obligations and covenants under subsection. (a) General Obligations, Covenants and Undertakings	
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.	Stated in the contracts between The Sime Darby Plantation Bhd. with Teo Tuan Kwee Sdn. Bhd. dated 12/12/2020. Refer letter of award no. T/SDPB/PEN/CPO/0720/003.under section 5. The Transporter's undertakings, obligations and covenants under subsection. (d) Roundtable on Sustainable Palm Oil (RSPO) and Malaysian Sustainable Palm Oil (MSPO) Supply Chain Certification Standards.	Complied
3.8.12	<p>Record keeping</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>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.</p> <p>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.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three</p>	<p>i. Sime Darby has established Standard Operating Procedure to maintain all records of evidence on the implementation of SCCS. The SOP was documented in Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022 under section under section 5.0: Control of Documents and Records.</p> <p>ii. As stated in SOP for Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022 under section under section 5.0: Control of Documents and Records, all traceability records should be maintained at minimum period of 3 years.</p> <p>iii. Bukit Benut POM receives and process only certified FFB. Therefore, it uses the Identity Preserve supply chain system and module.</p> <p>iv.</p> <p>a. Bukit Benut POM has established the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>b. All volumes of certified CPO and PK that were delivered were deducted from the material accounting system according to</p>	Complied

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	(3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.	conversion ratios of OER and KER as per sample records of Mill production report January 2021 – December 2021 and January 2022 – June 2022. c. Positive stock deliveries maintained through the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. No short selling made by East POM. As at 30/06/2022 surplus of stock available after despatched recorded at 640.71 ton for CPO and 43.01 ton for PK.	
3.8.13	<p>Extraction Rate</p> <p>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.</p>	<p>Addressed in the Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022 under section under section 17.0 Conversion Factor.</p> <p>Extraction rates were derived from actual production output that were measured daily by the mill and recorded in the daily production report. Actual rates for the period since last audit were available in the Mill production report January 2021 – December 2021 and January 2022 – June 2022.</p> <p>Volume estimates for next period were based on historical extractions and FFB projection from estates.</p>	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Extraction rates updated daily based on actual measurement of production output. Projected rates were based on historical extractions and FFB projection from estates.	Complied
3.8.15	<p>Processing</p> <p>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.</p>	<p>Addressed in the Sustainable Supply Chain and Traceability for Upstream Malaysia ver. 01, dated May 2022 under section under section 7.0 receiving FFB at the mill and 9.0 Process Monitoring.</p> <p>Bukit Benut POM received only certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of</p>	Complied

		certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	
3.8.16	<p>Registration of Transactions</p> <p>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 dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>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.</p>	<p>Based on the downloaded transactions register from the certification unit's Palmtrace, the company was able to demonstrate that it has been registering its transactions in the Palmtrace accordingly.</p> <p>Based on the announcement (transaction) summary, all the registrations were found to be in order.</p>	Complied
3.8.17	<p>Claims</p> <p>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.</p>	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Bukit Benut POM and verified through document and site review (website notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.).	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p> <p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p> <p>d. State the member's history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p>	No off-product claim made by Bukit Benut POM and verified through document and site review (website notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.).	Complied

	Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	No off-product claim made by Bukit Benut POM and verified through document and site review (website notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.).	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	No off-product claim made by Bukit Benut POM and verified through document and site review (website notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.).	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by Bukit Benut POM as verified through documentations and websites.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Bukit Benut POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the	Bukit Benut POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not Applicable

	<p>product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
<p>MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES</p>			
<p>Certified oil palm content (IP)</p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>Oil palm content is 100% CPO and claim as RSPO IP-certified.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>Oil palm content is 100% CPO and claim as RSPO IP-certified. All infeed material (FFB) is RSPO certified.</p>	<p>Complied</p>
<p>Labelling and trademark (IP)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <p>a. RSPO trademark which includes the tag ‘CERTIFIED’ or</p> <p>b. RSPO trademark which includes the tag ‘This product contains certified sustainable palm oil’. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the ‘statement’. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</p>	<p>No labelling and trademark logo were used.</p>	<p>Complied</p>

Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>Bukit Benut POM is producing crude palm product and does not involved in any labelling of end product.</p>	Complied
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation has established Group Sustainability & Quality Policy Statement dated 02/12/2019 approved by Group Managing Director where the company is respecting, upholding & no exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC) last revised 2020.</p> <p>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</p>	Complied

		<p>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.</p> <p>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. Training was conducted 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.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment in their operations.</p> <p>- Minor compliance -</p>	<p>Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the mill and estates within SOU 22 do not instigate violence or use any form of harassment in their operations.</p>	Complied
<p>Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
4.2.1	<p>(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 whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the records of complaints and grievances no issue of whistleblowing that requires anonymity of complainants and/or grievance parties. Interview conducted with internal stakeholders among workers and relevant external stakeholders also confirmed the information.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>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).</p> <p>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.</p>	Complied

		<p>Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing.</p>	
<p>4.2.3</p>	<p>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.</p> <p>- Minor compliance -</p>	<p>A Standard Operating Manual (SOM) was established and maintained. (Sime Darby Plantation Estate Quality Management System) and 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.</p> <p>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.</p> <p>Grievance channels was stated in the employment contract (Item 21) as follows:-</p> <ul style="list-style-type: none"> - Union representative at operating unit. - Workers helpline at 0162991411 (via whatsapp) and call toll free number 1800819741. - Suara Kami at 1800818771 or sms 01130116031. - Whistleblowing channel at 1800223388 or +60192797553 (08.30 am – 17.30 pm) or email to whistleblowing@simedarbyplantation.com <p>All requests found to be responded within short time by respective recipients.</p> <p>Verified during the audit were complaint received from workers about house defects via the OPP system. The defects were rectified usually within 48 hours of complaints being lodged, and upon completion, acknowledgement by the respective complainants.</p>	<p>Complied</p>

4.2.4	<p>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.</p> <p>- Minor compliance -</p>	<p>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. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow.</p>	Complied
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p>- Minor compliance -</p>	<p>Contributions made as per sample as following:</p> <ul style="list-style-type: none"> - Repair of septic tank cover in SRA Ladang Bukit Benut; Date: April 2022 by Bukit Benut Estate - Food contribution to villagers affected with Covid-19 in July 2021 by all estates and mill - Vehicle for temple use provided by Lambak Eleais Estate - Ihya' Ramadhan Program for SK Bukit Benut in April 2022 by Bukit Benut POM - Donation to villagers affected to Covid-19 at Kampung Sri Ampangan in June 2021 by Bukit Benut POM <p>Donation to Asnaf people on 27/04/2022 by Bukit Benut POM</p>	Complied
<p>Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
4.4.1	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	<p>Bukit Benut POM located within Bukit Benut Estate Lot # 1708; Area: 612.4907 ha; Land title # 90182; District: Kluang, Sub-district: Mukim Rengam.</p> <p>Bukit Benut Estate hold a total of 30 land titles as per sample sighted as following:</p> <ul style="list-style-type: none"> - Title # 98998; Lot # 873; Area: 195.969 ha; District: Kluang; Sub-district: Mukim Rengam 	Complied

		<ul style="list-style-type: none"> - Title # 94406; Lot # 2942; Area: 2.5646 ha; District: Kluang; Sub-district: Mukim Kluang <p>Lambak Estate hold a total of 20 land titles as per sample sighted as following:</p> <ul style="list-style-type: none"> - Title # 88696; Lot # 1046; Area: 0.827 ha; District: Kluang; Sub-district: Mukim Kluang - Title # 94877; Lot # 3136; Area: 11.9002 ha; District: Kluang; Sub-district: Mukim Kluang <p>CEP Niyor Estate hold a total of 21 land titles as per sample sighted as following:</p> <ul style="list-style-type: none"> - Title # 325902; Lot # 1754; Area: 3.5157 ha; District: Kluang; Sub-district: Mukim Niyor <p>Title # 82565; Lot # 2218; Area: 793.5873 ha; District: Kluang; Sub-district: Mukim Niyor</p>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No issues of land dispute issue occurs in all estates within SOU 22 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 22 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 22 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 22 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 -	Boundary maps available for all estates within SOU 22 clearly demarcating estate area with location and coordinate of boundary stone and pegs. Sighted sample Boundary Stone Maps as following: Bukit Benut Estate's Bukit Benut & Tambuku Division; Prepared by R&D Plantation Research & Advisory Precision Agriculture (EIM); Date: 29/1/2020.	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 22 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 22 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 22 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	No new planting and issues of customary land occurs in all estates within SOU 22 that requires FPIC process since the last audit.	Not Applicable

	- Critical (Major) compliance -	Consultation with relevant stakeholders conducted on-site confirmed the information.	
4.5.2	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	No new planting and issues of customary land occurs in all estates within SOU 22 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.3	<p>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.</p> <p>- Minor compliance -</p>	No new planting and issues of customary land occurs in all estates within SOU 22 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.4	<p>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.</p> <p>- Minor compliance -</p>	No new planting and issues of customary land occurs in all estates within SOU 22 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.5	<p>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.</p>	No new planting and issues of customary land occurs in all estates within SOU 22 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable

	- Minor compliance -		
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 22 that requires FPIC process 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 22 that requires FPIC process 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 22 that requires FPIC process 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 22 that requires FPIC process 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 22 that requires FPIC process 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.	No new planting and issues of customary land occurs in all estates within SOU 22 that requires FPIC process since the last audit.	Not Applicable

	- Minor compliance -	Consultation with relevant stakeholders conducted on-site confirmed the information.	
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 -	No new planting and issues of customary land occurs in all estates within SOU 22 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
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 22 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -	No new planting and issues of customary land occurs in all estates within SOU 22 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
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 22 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
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.	No new planting and issues of customary land occurs in all estates within SOU 22 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable

	- Minor compliance -		
4.8.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	No new planting and issues of customary land occurs in all estates within SOU 22 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.8.3	<p>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)</p> <p>- Minor compliance -</p>	No new planting and issues of customary land occurs in all estates within SOU 22 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.8.4	<p>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).</p> <p>- Minor compliance -</p>	No new planting and issues of customary land occurs in all estates within SOU 22 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
5.1.2	<p>(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).</p>	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable

	- Critical (Major) compliance -		
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 were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
5.1.4	(C) 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. - Critical (Major) compliance -	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
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 -	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
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 -	There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Not Applicable
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 were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.	Complied

5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>There were no smallholders crop received or processed by the mill hence criteria 5.1 is not applicable.</p>	<p>Not Applicable</p>																
<p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>																			
5.2.1	<p>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.</p> <p>- Minor compliance -</p>	<p>Bukit Benut Palm Oil Mill received no FFB from the scheme smallholders. However consultation are made normally through meeting e.g. Meeting with stakeholders and FFB suppliers incorporated in the stakeholder meeting. Smallholders as local community were invited to attend the stakeholder meeting for briefing on matters related to MSPO and RSPO certifications particularly on crop quality and field standards.</p> <table border="1" data-bbox="1144 804 1765 991"> <thead> <tr> <th></th> <th>Estate / Mill</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bkt Benut POM</td> <td>18/04/22</td> <td>07/04/21</td> </tr> <tr> <td>2</td> <td>Bkt Benut Estate</td> <td>18/04/22</td> <td>07/04/21</td> </tr> <tr> <td>3</td> <td>Lambak E Estate</td> <td>18/04/22</td> <td>02/08/21</td> </tr> </tbody> </table>		Estate / Mill	Date	Date	1	Bkt Benut POM	18/04/22	07/04/21	2	Bkt Benut Estate	18/04/22	07/04/21	3	Lambak E Estate	18/04/22	02/08/21	<p>Complied</p>
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5.2.2	<p>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).</p> <p>- Minor compliance -</p>	<p>There were no smallholders crop received or processed by the mill hence criteria 5.2 is not applicable. However cconsultation are made normally through meeting e.g. Meeting with stakeholders and FFB suppliers incorporated in the stakeholder meeting. Smallholders as local community were invited to attend the stakeholder meeting for briefing on matters related to MSPO and RSPO certifications particularly on crop quality and field standards.</p> <table border="1" data-bbox="1200 1267 1749 1351"> <thead> <tr> <th></th> <th>Estate / Mill</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bkt Benut POM</td> <td>18/04/22</td> <td>07/04/21</td> </tr> </tbody> </table>		Estate / Mill	Date	Date	1	Bkt Benut POM	18/04/22	07/04/21	<p>Complied</p>								
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2	Bkt Benut Estate	18/04/22	07/04/21								
3	Lambak E Estate	18/04/22	02/08/21								
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation as a group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 2010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting/FFB.</p> <p>Bukit Benut POM did not receive FFB from the scheme smallholders. Therefore, this indicator is not applicable.</p>	Complied								

5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad as a group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As of current, no scheme smallholders program managed by Bukit Benut POM. Information of Sime Darby Plantation RSG programs available via official website. The mill received no crop from smallholders. The outside crop suppliers being invited in the stakeholders meetings and briefing cum training are made in these sessions. Details as per minutes of meeting with the stakeholders</p>	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>Sime Darby Plantation as a group has developed responsible sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the FFB and CPO are sourced from identified, legal and responsible sources. Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.</p> <p>As of current, no group smallholders program is managed by Bukit Benut POM. Information of Sime Darby Plantation RSG programs are available via SDP website.</p>	Complied
<p>Principle 6: Respect workers' rights and conditions</p>			
<p>Criterion 6.1: Any form of discrimination is prohibited.</p>			
6.1.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 22 has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2nd December 2019. The policy shall be guided by the commitments spelt out in the Company's in Human Rights Charter (HRC) where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.</p>	Complied

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6.1.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Records of employments and interview conducted on-site with sampled internal and external stakeholders confirmed that the workers and groups including local communities, women, and migrant workers have not been discriminated against.</p>	Complied
6.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>No discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed from job vacancy advertisement and sample recruitment sighted.</p>	Complied
6.1.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Pregnancy testing was conducted only for women employee involved in chemical handling work to ensure no pregnant women working with the risk of chemical exposure. All women employees involved in chemical handling work within SOU 22 underwent Urine Pregnancy Test (UPT) conducted by respective estate’s Hospital Assistant upon request only.</p>	Complied
6.1.5	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>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 and through Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. It explained the types of gender-based violence & grievance procedures. Meetings were conducted quarterly according to the handbook. Gender Committee were established by the mill and estates management.</p> <p>The latest meeting were conducted as per SOU 22 level Gender Committee Meeting dated on 27/6/2022. Bukit Benut Estate Gender Committee 2nd meeting 2022 dated on 16/4/2022. Lambak Estate Gender Committee meeting 2022 dated on 24/6/2022.</p> <p>No sexual harassment case been reported since the last audit.</p>	Complied

<p>6.1.6</p>	<p>There is evidence of equal pay for the same work scope. - Minor compliance -</p>	<p>Sighted the job description of each workers mention the same regardless of skin colour, religion, race and caste. Evidence of equal pay sighted based on passports & work permit, work agreement, payslip, attendance & checkroll and Socso 8A form of August 2021, January 2022 and March 2022 for sample female and male employees as following:</p> <p>Bukit Benut samples:</p> <ul style="list-style-type: none"> - Emp. ID # 017766; F; General Worker; Date joined: 5/5/2009 - Emp. ID # 017800; F; Field Worker; Date joined: 15/11/1999 - Emp. ID # 157527; M; Field Mandore; Date joined: 6/1/2020 - Emp. ID # 163831; M; General Worker; Date joined: 21/6/2021 - Emp. ID # 165366; F; General Worker; Date joined: 2/10/2021 - Emp. ID # 167001; M; General Worker; Date joined: 3/1/2022 - Emp. ID # 090232; M; FFB Carrier; Date joined: 27/4/2013 - Emp. ID # 155621; M; LF Collector; Date joined: 18/10/2019 - Emp. ID # 157133; M; FFB Cutter; Date joined: 14/12/2019 - Emp. ID # 155371; M; FFB Cutter; Date joined: 8/10/2019 - Emp. ID # 096853; M; Field Worker; Date joined: 19/10/2013 - Emp. ID # 136523; M; FFB Carrier; Date joined: 24/8/2017 <p>Lambak Estate samples:</p> <ul style="list-style-type: none"> - Emp. ID # 018155; F; General Worker; Date joined: 11/1/2002 - Emp. ID # 018230; M; Field Worker; Date joined: 1/11/1999 - Emp. ID # 018330; F; General Worker; Date joined: 1/12/1996 - Emp. ID # 037186; F; General Worker; Date joined: 1/1/2010 - Emp. ID # 062956; M; FFB Cutter; Date joined: 4/3/2010 	<p>Complied</p>
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		<ul style="list-style-type: none"> - Emp. ID # 107362; M; FFB Cutter; Date joined: 12/11/2014 - Emp. ID # 109056; M; FFB Carrier; Date joined: 10/12/2014 - Emp. ID # 128633; M; LF Collector; Date joined: 1/12/2016 - Emp. ID # 138781; M; FFB Cutter; Date joined: 15/12/2017 - Emp. ID # 148724; M; FFB Cutter; Date joined: 2/3/2019 - Emp. ID # 154466; M; Field Worker; Date joined: 13/9/2019 - Emp. ID # 160048; F; General Worker; Date joined: 1/10/2020 - Emp. ID # 166698; M; General Worker; Date joined: 22/12/2021 <p>Bukit Benut POM samples:</p> <ul style="list-style-type: none"> - Emp. ID # 017507; F; General Worker; Date joined: 2/9/1997 - Emp. ID # 017516; M; Shift Worker; Date joined: 21/7/2003 - Emp. ID # 107291; F; General Worker; Date joined: 3/11/2014 - Emp. ID # 136372; M; Shift Worker; Date joined: 4/9/2017 - Emp. ID # 157092; M; General Worker; Date joined: 16/12/2019 - Emp. ID # 161644; F; General Worker; Date joined: 1/1/2021 - Emp. ID # 163634; F; General Worker; Date joined: 1/7/2021 - Emp. ID # 164954; M; Shift Worker; Date joined: 1/9/2021 - Emp. ID # 166529; M; Workshop; Date joined: 6/12/2021 	
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>All the workers are under direct employment and some electrical works are under contractor workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary and etc. as per employment contract in compliance with permits as following:</p>	Complied

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		<ul style="list-style-type: none"> - JTKSM Overtime Limit Permit Ref. # BHG.PU/9/134 JLD 9 (11); Date: 27/3/2017 - JTKSM Salary Deduction Permit Ref. # JTKS(E)6/115 Jld 36-20 (2); Date: 30/5/2018 for PTPTN & Tabung Haji deductions - JTKSM Salary Deduction Permit Ref. # JTKS(E)6/115 Jld 36-20 (2); Date: 30/5/2018 for Electrical bills deductions <p>Sample explanation sighted for Bukit Benut POM that conducted Briefing of Collective Agreement MAPA dated on 14/5/2022 and 18/5/2022.</p>	
6.2.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>As per Inter-Office Mail from Sime Darby Plantation’s Head, HR Upstream to Senior Managers/Managers Estate & Mill for all Northern Region, Central East Region, Central West Region on Implementation of Revised Workers’ Contracts and Register of Maternity Leave and Allowances; Date: 3/12/2019.</p> <p>Employment contracts and offer letters for local workers and foreign workers is available. Pay and conditions are documented and achieved the Minimum Wage Order 2022. Sampled of employment contracts confirmed that terms and conditions are clearly outlined as per collective agreement and Employment Act 1955 which have been signed by the worker.</p>	Complied
6.2.3	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.1.6 above.</p> <p>Records shown all relevant legal compliance requirements were met by SOU 22.</p>	Complied
6.2.4	<p>(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</p>	<p>Housing provision to all workers were monitored through weekly inspection by person in-charge of accommodation (PIOA), bi-weekly inspection by employee welfare representative (EWR) and quarterly inspection by employee welfare committee (EWC) personnel.</p>	Complied

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	<p>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.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Inspection results recorded in Housing Complex/ NEST/Community Hall Weekly Inspections (PIOA) and Housing Complex/NEST/Community Hall Inspection (EWC). Latest inspection was conducted as following:</p> <ul style="list-style-type: none"> - Bukit Benut Estate; Date: 20/6/2022 - Lambak Estate; Date: 1/7/2022 	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>The mill and estates within SOU 22 ensured affordable food for its employee through canteen food price monitoring as part of terms and conditions in the sample Tenancy Agreement between Sime Darby Plantation Berhad Lambak/Elais Estate and Kedai Runcit Dinesh & Vamesh dated on 1/1/2019 for period until 31/12/2022.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>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).</p> <p><i>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.</i></p> <p>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</p>	<p>SOU 22 conducted the Prevailing Wage Assessment and calculated individual local and foreign workers current salary including non-monetary benefit given average mill and estate Local Workers RM: 1,692.39; Foreign Workers: RM1,673.23. Prevailing Wage Assessment conducted by department of Group Sustainability & Quality Management (GSQM) personnel of Sime Darby Plantation.</p>	Complied

	<p>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.</p> <p><i>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). 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).</i></p> <p>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:</p> <ul style="list-style-type: none"> • 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. <p>- Minor compliance -</p>		
<p>6.2.7</p>	<p>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.</p> <p>- Minor compliance -</p>	<p>Employment 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 22.</p>	<p>Complied</p>
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			

<p>6.3.1</p>	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>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:</p> <ul style="list-style-type: none"> - Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. - Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. <p>Company respects the rights of all personnel to form and join trade unions of their choice to bargain collectively and the workers have their freedom to join the NUPW/MAPA union.</p> <p>Explanation to workers were made by management via training conducted 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. including freedom of association and right to collective bargaining.</p>	<p>Complied</p>
<p>6.3.2</p>	<p>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.</p> <p>- Minor compliance -</p>	<p>The mill and estates within SOU 22 established the Employee Welfare Committee as operating unit level collective bargaining medium. Sighted the sample meeting records as following:</p> <ul style="list-style-type: none"> - Bukit Benut Estate NUPW representative with management meeting dated on 15/6/2022 as per minutes of meeting and NUPW Kluang acknowledgement letter ref. # NUPW/JSB/E/8/2022; Date: 16/6/2022. - Lambak Estate NUPW meeting date: 15/4/2022 - Bukit Benut POM NUPW meeting date: 1/7/2022. 	<p>Complied</p>

6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Interview with workers union representatives (NUPW Chairman & NUPW Secretary) confirmed that they were independently elected as the NUPW by all members of NUPW among mill and estate workers via an election without interference by the management.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>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.</p> <p>- Minor compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>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:</p> <ul style="list-style-type: none"> - Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination. - Respecting Freedom of Association: We respect the rights of employees to join and form organisations of their own choice and to bargain collectively. - 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. - 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. - 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. 	Complied

		<ul style="list-style-type: none"> - Protecting the Rights of Vulnerable People: We respect the rights of vulnerable people such as marginalised groups, persons of different abilities and refugees. - 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. <p>Verification of workers master list confirmed that there is no child labour hired.</p> <p>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.</p>	
6.4.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>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).</p>	Complied
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the interview and employees master lists data, no young person below 18 years old employed within all operating units within SOU 22.</p>	Complied
6.4.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Interview conducted on-site with sampled internal and external stakeholders confirmed that the information on no child labour policy and the negative effects of child labour were provided in appropriate languages and accessible to them.</p> <p>Records of communication also available as per Vendor Integrity Pledge sighted available for sampled Bukit Benut Estate contractor Zaidah Terus Maju Enterprise; Grass Cutting Memorandum of Agreement (MOA) Date: 1/1/2021 and for sampled Bukit Benut POM</p>	Complied

		contractor Samareddy Enterprise; POME Transport MOA date: 1/1/2020.	
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>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:</p> <ul style="list-style-type: none"> - 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. <p>The policy was communicated through the Gender Committee meeting conducted quarterly.</p>	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 22 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.</p>	Complied
6.5.3	<p>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.</p> <p>- Minor compliance -</p>	<p>As verified during on-site interview with relevant stakeholders, management of mill and estates within SOU 22 conducted the assessment of new mothers in consultation with new mothers and taken actions to address their needs as per identified as per sample of Bukit Benut Estate's new mothers assessment was conducted on</p>	Complied

		20/1/2022 by gender committee personal identifying 3 new mothers within female employees of Bukit Benut Estate.	
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. - Minor compliance -	Interview conducted on-site with sampled internal stakeholders among all workforce confirmed that the information on grievance mechanism, which respects anonymity and protects complainants where requested, is established and communicated to them. No grievance issues that requires the implementation of the mechanism occurs in all operating units within SOU 22 since the last audit.	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All workers have entered into employment voluntarily and the following are prohibited: <ul style="list-style-type: none"> Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) Charging the workers for recruitment fees. Contract substitution Involuntary overtime Lack of freedom of workers to resign Penalty for termination of employment Debt bondage Withholding of wages - Critical (Major) compliance -	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and available as follows: <ol style="list-style-type: none"> SOPP Workforce Management Unit, WMU/LR-SOPP/JAN2016/R1 which provides the procedures for recruitment, selection and hiring. It includes steps to be taken to ensure foreign applicants with criminal record are filtered out. Hiring and selection of local workers, Doc No. 01-11-19 which details out the procedure of fill up job application forms, screening, interview, and medical check-up. Employment contracts (for foreign workers) and letters of job offer (for local workers) document the termination procedures Letters of job offer (for local workers) on retirement. Foreign workers is not subjected to retirement process because their employment would be dependent upon issuance of their annual work permits by the Immigration Department. Promotion is stipulated under SOP Doc No. SDP/HRUM/2020/SOP01 dated 1 Jan 2020. 	Complied

		<p>The procedures were briefed to the workers during their induction course, and also during muster briefings.</p> <p>The recruitment cost were declared by the labour agent from source country for the applicable fees. Sampled for Tenaga Kerja Indonesia (TKI) Kepada Agensi (PL) Dan Sponsor (PL) for Indonesia effective date on 01/06/2017 (IDR 6,150,000) and Amozza Travels for India (INR 50,000) for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent.</p> <p>The workers keep their own passport and no passport retained by the management. They can access to the passport freely.</p> <p>There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia and India was same with the employment contract signed between worker and estate/mill.</p> <p>Overtime was given voluntarily. Sighted the overtime request form where employer offer work to worker after working hour/rest day/public holiday.</p> <p>The termination of service clearly stated that the termination of employment if:</p> <ol style="list-style-type: none"> 1. The company is not satisfied with your performance 2. You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term. 3. You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime. 4. You have breached any express or implied terms of your employment. 5. Fail medical examination based on FOMEMA result. 6. Involved in any act that will affect the reputation of the company. 	
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6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 22 has implemented a Sime Darby's Human Rights Charter on where they committed as below:</p> <ul style="list-style-type: none"> - Providing equal opportunity - Respecting freedom of association - Eradicating any form of exploitation - Ensuring favourable working conditions - Enhancing Safety and Health <p>They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights. For e.g.: All the workers have provided with induction training in Sua Betong Estate or based estate during their arrival to Malaysia.</p>	Complied
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>The respective Manager in Operating Unit in SOU 22 has been appointed as Person Responsible / Chairman for Safety and Health in the estate as per appointment letter.</p> <p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/ Mill Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, workplace inspection, and training.</p> <p>The Manager for respective operating units has been appointed as Person Responsible / Chairman for Safety and Health in the estate as</p>	Complied

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		<p>per appointment letter signed by the Regional General Manager dated 01/01/2022.</p> <p>Bukit Benut Estate The estate conducted safety and health committee meeting on quarterly basis. Reviewed the minutes meeting dated 27/06/2022, 26/04/2022 and 04/02/2022.</p> <p>Lambak Elais Estate The estate conducted safety and health committee meeting on quarterly basis. Reviewed the minutes meeting dated 30/06/2022, 30/05/2022 and 29/03/2022.</p> <p>Bukit Benut Estate The estate conducted safety and health committee meeting on quarterly basis. Reviewed the minutes meeting dated 27/05/2022 and 25/02/2022.</p>	
<p>6.7.2</p>	<p>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.</p> <p>- Minor compliance -</p>	<p>Accident of emergency procedure is presented in Mill Quality Management System Standard Operation manual (MQMS SOM) dated November 1st, 2008. Flowchart of emergency handling was presented in Appendix 5.5.3.3.</p> <p>The operating units maintain the records of accidents including JKKP 6 forms reported to DOE, medical leaves certificates, accidents investigations reports and HIRARC review. The accidents occurrence were reported to the Headquarters through Rapid 4 systems and DOSH by submitting the JKKP 6 form through MyKKP system.</p>	<p>Non-compliance</p>

		<p>The operating units provided first aid box and placed at designated places in the mill or hold by the appointed trained first aider such as mandore.</p> <p>The operating units continuously provided training to the workers on emergency and first aid. Latest training was conducted as per criteria 3.7.2.</p> <p>Bukit Benut Estate</p> <p>The estate maintain the records for accident occur in the estate. Reviewed the JKKP 6 and accident investigation report for accident occur on 23/05/2022. The accident submitted was submitted to DOSH as per letter dated 13/06/2022.</p> <p>The estate provide first aid kit at designated workplace and handled by trained first aider. First aid kit inspection was conducted by the Hospital Assistant on monthly basis. Reviewed the first aid kit inspection records for the month of January – June 2022. Sighted during site visit at the workshop, noted the Brown Antiseptic Liquid (Dettol) was expired on 08/2021. Noted the latest first aid inspection was conducted on 18/06/2022. This shows the inspection was not effectively implemented.</p> <p>Lambak Elais Estate</p> <p>The estate maintain the records for accident occur in the estate. Reviewed the JKKP 6 and accident investigation report for accident occur on 10/05/2022. The accident submitted was submitted to DOSH on 20/05/2022. Refer JKKP 6 form with ref. no. JH/SKEM/22/05430.</p> <p>The estate provide first aid kit at designated workplace and handled by trained first aider. First aid kit inspection was conducted by the Hospital Assistant on monthly basis.</p>	
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		<p>The estate provided fire extinguisher at designated places in the estates. Noted during interview with the workers, the understanding on how to use fire extinguisher was satisfactory. Noted during site visit at the workshop, the fire extinguisher permit was expired on 11/04/2022 while at the chemical store, the fire extinguisher has been depressurize and cannot be use during emergency. The shows the monitoring of fire extinguisher was not effectively implemented.</p> <p>Bukit Benut POM</p> <p>The mill maintain the records for accident occur in the estate. Reviewed the JKPP 6 and accident investigation report for accident occur on 01/07/2021. The accident submitted was submitted to DOSH on 07/07/2021.</p> <p>The estate provide first aid kit at designated workplace and handled by trained first aider. First aid kit inspection was conducted by the Hospital Assistant on monthly basis. Reviewed the inspection records dated 30/06/2022, 20/05/2022, 18/04/2022 and 28/03/2022.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The mill and estates visited provided appropriate PPE to all workers according to the job type. The PPE given as per CHRA report, HIRARC and Pictorial Safety Standard (PSS) dated 17/3/2008.</p> <p>All workers in the operating units have been provided with appropriate personal protective equipment (PPE), which is provided by the management free of charge.</p> <p>During the field visit to the Spraying Gang, Harvesting Gang and Manuring Gang and visit to the stores of the estate and mill, it was sighted that all required appropriate PPEs were worn by the personals.</p> <p>The estates has well maintained facilities for the workers to sanitise themselves prior to returning home from work. The showers were all in good working condition. Interview with workers indicated that they</p>	Complied

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		were all well aware that they have to sanitise themselves before returning home due to the hazard.													
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 -	Medical care is provided to all the employees. Reviewed on workers profile records found that all workers are covered by the accident insurances. Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Reviewed the form 8A, "Jadual Caruman" for the month of August 2021, October 2021 and January 2022.	Complied												
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2021 as reported to DOSH as follows: <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Bukit Benut POM</td> <td style="text-align: center;">1</td> <td style="text-align: center;">28</td> </tr> <tr> <td>Bukit Benut estate</td> <td style="text-align: center;">3</td> <td style="text-align: center;">79</td> </tr> <tr> <td>Lambak Elais Estate</td> <td style="text-align: center;">7</td> <td style="text-align: center;">99</td> </tr> </tbody> </table>	Operating units	Accident Cases	LTA	Bukit Benut POM	1	28	Bukit Benut estate	3	79	Lambak Elais Estate	7	99	Complied
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Principle 7: Protect, conserve and enhance ecosystems and the environment															
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.															
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no	Complied												

		<p>outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators.</p> <p>The estates has established IPM program. The plan was reviewed on annually basis. among the IPM plant established:</p> <p>Bukit Benut Estate</p> <table border="1" data-bbox="1137 549 1957 1023"> <thead> <tr> <th>Pest</th> <th>IPM</th> </tr> </thead> <tbody> <tr> <td>Rhinoceros Beetle (RB)</td> <td>Chemical spraying using Cypermethrin</td> </tr> <tr> <td>Bagworms</td> <td>Planting beneficial plant at bagworm prone area Upkeep current beneficial plant bed</td> </tr> <tr> <td>Rats</td> <td>Rat baiting using 2nd generation baits Increase barn owl box ratio to 1:5 ha</td> </tr> <tr> <td>Ganoderma</td> <td>Carry out ganoderma census Mounding to infected palm but productive Deboling, ploughing and harrowing of infected area</td> </tr> </tbody> </table> <p>Reviewed the implementation of the plan as follows:</p> <ol style="list-style-type: none"> 1. FY 2022, 2 rat baiting campaign was conducted. 1st campaign was conducted in Jan – Feb 2022 2. FY 2021, latest barn owl census was conducted in August 2021. Reviewed records the census records for with occupancy recorded at 14.73%. <p>Lambak Elais Estate</p> <table border="1" data-bbox="1137 1291 1957 1335"> <thead> <tr> <th>Pest</th> <th>IPM</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> </tr> </tbody> </table>	Pest	IPM	Rhinoceros Beetle (RB)	Chemical spraying using Cypermethrin	Bagworms	Planting beneficial plant at bagworm prone area Upkeep current beneficial plant bed	Rats	Rat baiting using 2 nd generation baits Increase barn owl box ratio to 1:5 ha	Ganoderma	Carry out ganoderma census Mounding to infected palm but productive Deboling, ploughing and harrowing of infected area	Pest	IPM			
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		<table border="1"> <tr> <td>Rhinoceros Beetle (RB)</td> <td>Spray at fortnightly interval Immature area <2 years</td> </tr> <tr> <td>Bagworms</td> <td>Census exceed threshold level to initiate chemical spray Spray and trunk injection technique</td> </tr> <tr> <td>Rats</td> <td>Rat baiting campaign on 6 monthly interval</td> </tr> </table> <p>Reviewed the implementation of the plan as follows:</p> <ol style="list-style-type: none"> 1. Bagworm census conducted if there is any presence of bagworm in the estate. Latest review was conducted in June 2022. 2. The estate barn owl box ratio per ha was recorded at 1:10 ha. FY 2022, latest barn owl census was conducted in May 2022. Reviewed records the census records for with occupancy recorded at 69%%. 	Rhinoceros Beetle (RB)	Spray at fortnightly interval Immature area <2 years	Bagworms	Census exceed threshold level to initiate chemical spray Spray and trunk injection technique	Rats	Rat baiting campaign on 6 monthly interval	
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7.1.2	<p>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.</p> <p>- Minor compliance -</p>	<p>This is not practiced in the estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.</p> <p>In SOU 22, 3 plant species were used for IPM such as <i>Tunera subulata</i>, <i>Cassia cobanensis</i>, and <i>Antigonan leptopus</i>.</p>	Complied						
7.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>No evidence and records of fire usage for pest control at all estate visited.</p> <p>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:</p> <p>"We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:</p>	Complied						

		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.”	
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>All pesticides used were those officially registered under the Pesticide Act 1974. The CH confined usage to only class II, class III & class IV pesticides.</p> <p>a) No illegal agrochemicals (stated by local and international laws) paraquat was used in the CH estates.</p> <p>b) The usage of the agrochemicals was based on the Agricultural Reference Manual (ARM) Section 15 and 16, SOP and in the Pictorial Safety Standard Book where written justifications had been provided for various fields operations.</p> <p>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.</p> <p>d) Purchases of pesticides are made on a centralized arrangement via Regional Office thus a control by the organization.</p>	Complied
7.2.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>The estates had records to show the types of pesticides used with active ingredients and their LD50 and where these pesticides had been used, the total quantity, number of applications and active ingredients (ai) per ha.</p> <p>a) Pesticides are used only when justified and areas used are recorded in bin cards, program sheets, chemical register, field-cost books and in progress reports. Records of pesticides used were available and verified.</p>	Complied

		<p>b) All pesticides used were those officially registered under the Pesticide Act 1974. The CU had used only class II ,class III & class IV pesticides.</p> <p>c) No illegal agrochemicals (stated by local and international laws) in particular paraquat were used in their estates.</p> <table border="1" data-bbox="1153 558 1899 837"> <thead> <tr> <th></th> <th>a.i./ha - B Benut</th> <th>unit</th> <th>2020</th> <th>2021</th> <th>2022 (June)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Cypermethrin 5.5EC</td> <td>Lit/ha</td> <td>0.033</td> <td>0.0041</td> <td>0.0014</td> </tr> <tr> <td>2</td> <td>Glyphosate</td> <td>Lit/ha</td> <td>1.855</td> <td>1.4995</td> <td>0.6920</td> </tr> <tr> <td>3</td> <td>triclopyr/b/ethylester</td> <td>Lit/ha</td> <td>0.026</td> <td>0.0401</td> <td>0.0176</td> </tr> <tr> <td>4</td> <td>Glufosinate/amm</td> <td>Lit/ha</td> <td>0.056</td> <td>-</td> <td>0.0062</td> </tr> <tr> <td>5</td> <td>metsulfuron-methyl</td> <td>Kg/ha</td> <td>0.021</td> <td>0.0211</td> <td>0.0210</td> </tr> </tbody> </table> <table border="1" data-bbox="1153 885 1899 1117"> <thead> <tr> <th></th> <th>a.i./ha - Lambak E</th> <th>unit</th> <th>2020</th> <th>2021</th> <th>2022 (May)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Cypermethrin 5.5EC</td> <td>Lit/ha</td> <td>0.5400</td> <td>0.3200</td> <td>0.0400</td> </tr> <tr> <td>2</td> <td>Glyphosate</td> <td>Lit/ha</td> <td>1.7400</td> <td>1.8500</td> <td>0.4000</td> </tr> <tr> <td>3</td> <td>Glufosinate/amm</td> <td>Lit/ha</td> <td>0.5600</td> <td>0.4100</td> <td>0.1700</td> </tr> <tr> <td>4</td> <td>metsulfuron-methyl</td> <td>kg/ha</td> <td>0.0900</td> <td>0.0900</td> <td>0.0200</td> </tr> </tbody> </table> <p>Variation of chemical usage are attributed to sizes of immature areas, rainfall pattern and the regeneration growth of weeds in different type of soil series. Explanatory notes for the usage variation was provided in the assessment.</p>		a.i./ha - B Benut	unit	2020	2021	2022 (June)	1	Cypermethrin 5.5EC	Lit/ha	0.033	0.0041	0.0014	2	Glyphosate	Lit/ha	1.855	1.4995	0.6920	3	triclopyr/b/ethylester	Lit/ha	0.026	0.0401	0.0176	4	Glufosinate/amm	Lit/ha	0.056	-	0.0062	5	metsulfuron-methyl	Kg/ha	0.021	0.0211	0.0210		a.i./ha - Lambak E	unit	2020	2021	2022 (May)	1	Cypermethrin 5.5EC	Lit/ha	0.5400	0.3200	0.0400	2	Glyphosate	Lit/ha	1.7400	1.8500	0.4000	3	Glufosinate/amm	Lit/ha	0.5600	0.4100	0.1700	4	metsulfuron-methyl	kg/ha	0.0900	0.0900	0.0200	
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7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	During the audit, it was observed and recorded that SOU 22 Estates had not use chemicals categorized as World Health Organization	Complied																																																																		

	- Critical (Major) compliance -	(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.	
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 22 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

<p>7.2.5</p>	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> 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. <p>- Minor compliance -</p>	<p>The 2 estates in the SOU 22 confined usage of pesticides which are were officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A) and in accordance with USECHH Regulations 2000.</p> <ul style="list-style-type: none"> a) The review of the chemical register concluded that all pesticides used were of class II, III & class IV. The use of paraquat had been prohibited in all SDP estates. b) There was no evidence of pesticides that are categorized as World Health Organization Class 1A or 1B, or that were listed by the Stockholm or Rotterdam Conventions been used. c) Sighted from records and interviews with workers, staff and estate assistants, concluded that training were held with all precautions being taken and all legal requirements met. Register was updated on 01/01/22. <p>The chemical used in the estates among others as listed below;</p> <table border="1" data-bbox="1160 919 1861 1177"> <thead> <tr> <th></th> <th>Chemical name</th> <th>Class</th> <th></th> <th>Chemical name</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Glyphosate i/prolamine</td> <td>III</td> <td>6</td> <td>Triclopyr butoxy ethyl</td> <td>III</td> </tr> <tr> <td>2</td> <td>Thiram</td> <td>II</td> <td>7</td> <td>Cypermethrin</td> <td>III</td> </tr> <tr> <td>3</td> <td>Glufosinate ammonium</td> <td>III</td> <td>8</td> <td>Canyon 20G</td> <td>IV</td> </tr> <tr> <td>4</td> <td>Metsulfuron Methyl</td> <td>IV</td> <td>9</td> <td>Miracle</td> <td>IV</td> </tr> <tr> <td>5</td> <td>Antracol</td> <td>IV</td> <td>10</td> <td>Bayfolan</td> <td>IV</td> </tr> </tbody> </table>		Chemical name	Class		Chemical name	Class	1	Glyphosate i/prolamine	III	6	Triclopyr butoxy ethyl	III	2	Thiram	II	7	Cypermethrin	III	3	Glufosinate ammonium	III	8	Canyon 20G	IV	4	Metsulfuron Methyl	IV	9	Miracle	IV	5	Antracol	IV	10	Bayfolan	IV	<p>Complied</p>
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<p>7.2.6</p>	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Records showed that pesticides were handled, used and applied by trained persons and as per the SDS of the product.</p> <p>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.</p> <p>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.</p> <p>c) The training included the safety aspects and usage of PPE when handling with pesticides. Records of training are shown in 3.7.2 and verified.</p> <p>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.</p> <p>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.</p> <p>f) Training in relation to pesticides & chemical handling among others as shown below.</p> <table border="1" data-bbox="1160 1098 1877 1332"> <thead> <tr> <th></th> <th>Subject</th> <th>B Benut</th> <th>Lambak E</th> <th>BBPOM</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SOP Weeding / HIRARC</td> <td>24/03/22</td> <td>02/6/22</td> <td>-</td> </tr> <tr> <td>2</td> <td>Spraying SOP / CDA</td> <td>08/01/22</td> <td>18/11/21</td> <td>-</td> </tr> <tr> <td>3</td> <td>First Aid - Chemical ERP</td> <td>27/10/21</td> <td>19/07/21</td> <td>29/6/22</td> </tr> <tr> <td>4</td> <td>Chemical spraying/handling</td> <td>25/04/22</td> <td>27/06/22</td> <td>29/6/22</td> </tr> </tbody> </table>		Subject	B Benut	Lambak E	BBPOM	1	SOP Weeding / HIRARC	24/03/22	02/6/22	-	2	Spraying SOP / CDA	08/01/22	18/11/21	-	3	First Aid - Chemical ERP	27/10/21	19/07/21	29/6/22	4	Chemical spraying/handling	25/04/22	27/06/22	29/6/22	<p>Complied</p>
	Subject	B Benut	Lambak E	BBPOM																								
1	SOP Weeding / HIRARC	24/03/22	02/6/22	-																								
2	Spraying SOP / CDA	08/01/22	18/11/21	-																								
3	First Aid - Chemical ERP	27/10/21	19/07/21	29/6/22																								
4	Chemical spraying/handling	25/04/22	27/06/22	29/6/22																								

7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>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).</p> <ul style="list-style-type: none"> a) Records of purchase, storage and use were maintained. b) All store buildings were equipped with exhaust fans with the door secured. c) Only authorized personnel are assigned to handle the chemicals. d) All the chemicals were segregated in storage accordingly. <p>Empty pesticides containers were triple rinsed, holes punched and stored separately in the scheduled wastes store. Thereafter disposal arrangement will follow accordingly as per procedures at to SW collector Rengkas Maju Sdn Bhd.</p> <p>Noted during the site visit at the general store of Bukit Benut Estate, it was found that Pesticide, Antracol and Rogor were stored not in line with procedure. Refer chemical safety management procedure dated 09/03/2021 section 6.3.1 (a) "Chemical supplied shall be furnished with a complete and updated SDS", Section 6.4.2 "Containers should preferably be placed on skids or a platform", Section 6.4.3 "Chemicals register should be designed to minimize fire hazard and to prevent leakage in the event of spills and the storage area should be bunded".</p>	Complied
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>The procedure SD/SDP/PSQM (ESH)/203-EN1–Scheduled Wastes (Hazardous Waste) Management has been established.</p> <ul style="list-style-type: none"> a) Collection of SW is made by Rengkas Maju Sdn Bhd a licensed vendor registered with DOE. b) The clinical waste SW 404 is disposed to Future Nrg Sdn Bhd c) Empty containers were tripled rinsed, pierced and delivered to a registered recycler company M/s SS Setia Enterprise approved by DOE/Jabatan Pertanian 	Complied

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7.2.9	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Aerial application of agrochemicals is not practiced in SOU 22 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.</p>	Complied																																			
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>The CHRA for the estates and the mill in SOU 22 was conducted with details as shown below.</p> <table border="1" data-bbox="1153 662 1944 847"> <thead> <tr> <th></th> <th>Date</th> <th>Assessor</th> <th>DOSH no</th> </tr> </thead> <tbody> <tr> <td>BBE</td> <td>22/6/20</td> <td>ENV & IH Services</td> <td>HIE/127171-2-166</td> </tr> <tr> <td>BBPOM</td> <td>02/2/19</td> <td>NiSafety Consultancy</td> <td>HQ/15/AS/00/363-036</td> </tr> <tr> <td>LEE</td> <td>02/03/22</td> <td>NiSafety Consultancy</td> <td>HQ/15/AS/00/363-037</td> </tr> </tbody> </table> <p>The recommendation from the CHRA is mainly on the training for operators working in laboratory, ETP, WTP, Boiler, workshop, scheduled waste and chemical store. In addition the assessor recommended medical surveillance be conducted for the categories of employees in the workshop and laboratory and chemicals handlers. Similar CHRA was compiled for the estates with details provided therein. below. The CHRA report among others described requirement of medical surveillance to be made for the listed category of employees.</p> <p>The mmedical surveillance was carried out on in the CU as follows;</p> <table border="1" data-bbox="1162 1222 1935 1361"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Estate</th> <th colspan="5">Employees categories</th> </tr> <tr> <th>Date</th> <th>W/shop/store</th> <th>Fertilizer</th> <th>sprayers</th> <th>WTP</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>B Benut</td> <td>12/7/22</td> <td>3</td> <td>-</td> <td>19</td> <td>-</td> </tr> </tbody> </table>		Date	Assessor	DOSH no	BBE	22/6/20	ENV & IH Services	HIE/127171-2-166	BBPOM	02/2/19	NiSafety Consultancy	HQ/15/AS/00/363-036	LEE	02/03/22	NiSafety Consultancy	HQ/15/AS/00/363-037		Estate	Employees categories					Date	W/shop/store	Fertilizer	sprayers	WTP	1	B Benut	12/7/22	3	-	19	-	Complied
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7.2.11	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	<p>All the estates and mill in the CH complied with procedure and guidelines provided the Standard Operating Procedure adopted by the Organisation whereby;</p> <p>No work with pesticides is given to pregnant or breast-feeding women. <i>Tidak dibenarkan pekerja wanita yang MENGANDUNG / MENYUSUKAN anak membuat kerja-kerja penyemburan)</i></p> <p>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.</p>	Complied																																			
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>																																						

<p>7.3.1</p>	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>SOU 22 Bkt Benut Mill and all the estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2022 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:</p> <table border="1" data-bbox="1137 539 1962 871"> <thead> <tr> <th></th> <th>Receptor</th> <th>Sources</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down</td> </tr> <tr> <td>3</td> <td>Land</td> <td>Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.</td> </tr> </tbody> </table> <p>All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2022. The waste generated from the mill/estates operations as shown below:</p> <table border="1" data-bbox="1144 1031 1955 1321"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries</td> </tr> <tr> <td>2</td> <td>Domestic waste</td> <td>rubbish from the mill/estate complex and employees' quarters</td> </tr> <tr> <td>3</td> <td>Industrial waste</td> <td>Fiber, palm kernel shell, boiler ash, scrap iron</td> </tr> <tr> <td>4</td> <td>Sewage</td> <td>Sewage from housing/office complex</td> </tr> </tbody> </table>		Receptor	Sources	1	Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)- GHG	2	Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down	3	Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.		Type of waste	Details	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries	2	Domestic waste	rubbish from the mill/estate complex and employees' quarters	3	Industrial waste	Fiber, palm kernel shell, boiler ash, scrap iron	4	Sewage	Sewage from housing/office complex	<p>Complied</p>
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7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>In Bukit Benut POM and the estates in SOU 22, procedure SD/SDP/PSQM (ESH)/203-EN1 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <p>a) Management and disposal of wastewater 2022 has been established compiled by Assistant Engineer/Assistants/Staff.</p> <p>b) Waste Management Plan 2022 has been established prepared by QA and verified by the Assistant Engineer/Assistants/Staff.</p> <p>c) Waste Management Plan 2022 has been established in Jan 2022. Based on Environmental Impact Evaluation (file no: SM/5.2/EIE) and Environment Aspect and Impact Identification (file no: SM/5.2/EAI) improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination.</p> <p>d) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.</p> <p>e) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The CU scheduled waste is</p>	Complied												

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disposed to the following vendors registered with DOE. DOE letter of authority was sighted and verified.

Estate	Date	SW 305	SW 404	SW410	SW409	SW306
BBE	17/3/22	-	0.019	-	-	
BBE	19/11/21	-	0.006	-	-	
BBE	07/3/22	0.030	-	0.035	-	
BBE	17/11/21	0.240	-	0.030	-	
LEE	16/03/22	0.070	-	-	-	-
LEE	30/06/22	-	-	0.015	-	-
LLE	30/09/21	0.200	-	-	-	-
LLE	11/04/22	-	0.004	-	-	-

		SW 306	SW 409	SW410	SW409	SW322
BBPOM	17/01/22	0.025	0.0188	0.0887	0.316	0.0411
		SW 324	SW 102	SW410	SW409	SW109
BBPOM	17/01/22	0.0034	0.0300	-	0.2745	0.0346

The CU scheduled waste is disposed to the following vendors registered with DOE.

Estate	Date	SW Buyers/Vendor
Bkt Benut	April 2023	Rengkas Maju Sdn Bhd
All (clinical)	Dec 2022	Future Nrg Sdn Bhd
BB POM	Jan 2023	Kualiti Alam Sdn Bhd

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		<table border="1" data-bbox="1167 368 1854 408"> <tr> <td>Lambak E</td> <td>April 2023</td> <td>Perniagaan Saudara Baru</td> </tr> </table> <p>Clinical waste are despatch to Kualiti Alam Bhd other SW are disposed to Perniagaan Saudara Baru / Rengkas Maju Sdn Bhd. Empty containers were despatched to licensed buyer namely SS Setia Enterprise Baru registered with Jabatan Pertanian DOE dated 07/12/2015. Records of despatches sighted as follows;</p> <table border="1" data-bbox="1167 603 1928 743"> <thead> <tr> <th></th> <th>Estate</th> <th>Date</th> <th>20 L container</th> <th>Empty Bags</th> <th>Ally Bottle</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Lambak E</td> <td>16/04/22</td> <td>66 units</td> <td>2560 kg</td> <td>10 kg</td> </tr> <tr> <td>2</td> <td>Lambak E</td> <td>20//11/21</td> <td>250 units</td> <td>67 pieces</td> <td>71 kg</td> </tr> </tbody> </table> <p>Domestic waste for the operating units in SOU 22 was disposed as follows;</p> <table border="1" data-bbox="1167 826 1883 1015"> <thead> <tr> <th></th> <th>Estate</th> <th>Disposal site</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bkt Benut</td> <td>MDSR Landfill</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>2</td> <td>BBPOM</td> <td>MDSR Landfill</td> <td>Collection 2/3 x week</td> </tr> <tr> <td>3</td> <td>Lambak E</td> <td>P07B - Internal</td> <td>Collection 2/3 x week</td> </tr> </tbody> </table>	Lambak E	April 2023	Perniagaan Saudara Baru		Estate	Date	20 L container	Empty Bags	Ally Bottle	1	Lambak E	16/04/22	66 units	2560 kg	10 kg	2	Lambak E	20//11/21	250 units	67 pieces	71 kg		Estate	Disposal site	Remarks	1	Bkt Benut	MDSR Landfill	Collection 2/3 x week	2	BBPOM	MDSR Landfill	Collection 2/3 x week	3	Lambak E	P07B - Internal	Collection 2/3 x week	
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7.3.3	<p>The unit of certification does not use open fire for waste disposal. - Minor compliance -</p>	<p>There was no land preparation in SOU 22 Mill and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ul style="list-style-type: none"> a) EQMS-SOP-SectionB2 - Under felling/clearing & land preparation b) Carbon Policy <p>SDP has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied																																					

Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield.</p> <p>The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents;</p> <p>a) EQMS chapter B8 - Leguminous Cover Crops b) EQMS chapter B14 – Manuring c) ARM Section 8 – Manuring</p>	Complied
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Plant Nutrition and Protection Unit (PNU) prepare the annual fertilizer recommendation base leaf analysis result. Leaf analysis show the nutrient level was used as the guidance for the recommendation.</p> <p>As per company SOP, the soil sampling analysis carried at 5 years interval.</p> <p>The leaf analysis and soil analysis report was made available for review.</p> <p>Bukit Benut Estate Latest Soil sampling was conducted on 13/02/2019. Refer test report no. S35/2019 dated 05/04/2019.</p> <p>Latest leaf sampling was conducted on 21/09/2021 – 13/10/2021. The leaf nutrient report was included in the Bukit Benut Estate 2022 Agronomic & Fertiliser Recommendation Report – Oil Palm dated 15/03/2021.</p> <p>Lambak Elais Estate Latest Soil sampling was conducted on 25/03/2019. Refer test report no. S43/2019 dated 19/04/2019.</p>	Complied

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		<p>Latest leaf sampling was conducted on 28/10/2021 – 30/11/2021 as per communication email dated 25/10/2021.</p>																						
<p>7.4.3</p>	<p>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.</p> <p>- Minor compliance -</p>	<p>Nutrient recycling strategy is in place and includes use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. The strategy as follows:</p> <ol style="list-style-type: none"> 1. EFB applied at selected fields at the estates. 2. Fibre and POM were use as compost material. 3. Palm residues after planting were left in the biomass row to decompose. <p>Sighted the sampled records for EFB disposal as follows:</p> <table border="1" data-bbox="1137 743 1957 1091"> <thead> <tr> <th>Month</th> <th>Bukit Benut estate</th> <th>Lambak Elais Estate</th> </tr> </thead> <tbody> <tr> <td>Jan 2022</td> <td>872.42</td> <td>0.00</td> </tr> <tr> <td>Feb 2022</td> <td>972.19</td> <td>0.00</td> </tr> <tr> <td>Mar 2022</td> <td>1144.99</td> <td>0.00</td> </tr> <tr> <td>Apr 2022</td> <td>1371.44</td> <td>0.00</td> </tr> <tr> <td>May 2022</td> <td>1023.39</td> <td>0.00</td> </tr> <tr> <td>Jun 2022</td> <td>1547.59</td> <td>0.00</td> </tr> </tbody> </table>	Month	Bukit Benut estate	Lambak Elais Estate	Jan 2022	872.42	0.00	Feb 2022	972.19	0.00	Mar 2022	1144.99	0.00	Apr 2022	1371.44	0.00	May 2022	1023.39	0.00	Jun 2022	1547.59	0.00	<p>Complied</p>
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<p>7.4.4</p>	<p>Records of fertiliser inputs are maintained. - Minor compliance -</p>	<p>The estate maintain the records of manuring application as per recommendation by the agronomist. Observed application records as per agronomist recommendation: Bukit Benut Estate</p> <table border="1" data-bbox="1137 523 1928 775"> <tr> <td> <p>Month program: Jan - Feb 2022 Field: 2010A Ha program: 71.88 ha Type: NKC 1 Rate/palm: 3.50 kg/palm Month completed: Feb 2022</p> </td> <td> <p>Month program: Apr 2022 Field: 02B Ha program: 61.58 ha Type: NKC 1 Rate/palm: 1.00 kg/palm Month completed: May 2022</p> </td> </tr> </table> <p>Lambak Elais Estate</p> <table border="1" data-bbox="1137 842 1928 1126"> <tr> <td> <p>Month program: Aug – Sep 2021 Field: 2010A Ellar Div. Ha program: 86.13 ha Type: NKC 1 Rate/palm: 4.00 kg/palm Month completed: Feb 2022</p> </td> <td> <p>Month program: Aug – Sep 2021 Field: 2007 Ellar Div. Ha program: 86.153.323 ha Type: NKC 1 Rate/palm: 4.00 kg/palm Month completed: Feb 2022</p> </td> </tr> </table>	<p>Month program: Jan - Feb 2022 Field: 2010A Ha program: 71.88 ha Type: NKC 1 Rate/palm: 3.50 kg/palm Month completed: Feb 2022</p>	<p>Month program: Apr 2022 Field: 02B Ha program: 61.58 ha Type: NKC 1 Rate/palm: 1.00 kg/palm Month completed: May 2022</p>	<p>Month program: Aug – Sep 2021 Field: 2010A Ellar Div. Ha program: 86.13 ha Type: NKC 1 Rate/palm: 4.00 kg/palm Month completed: Feb 2022</p>	<p>Month program: Aug – Sep 2021 Field: 2007 Ellar Div. Ha program: 86.153.323 ha Type: NKC 1 Rate/palm: 4.00 kg/palm Month completed: Feb 2022</p>	<p>Complied</p>
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<p>Criterion 7.5: Practices minimise and control erosion and degradation of soils.</p>							
<p>7.5.1</p>	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -</p>	<p>Soil series map were available for all estates prepared by the R&D-Precision Agriculture Unit. No fragile soils identified in all estates in SOU 22. Soil Identified as follows:</p> <table border="1" data-bbox="1137 1305 1928 1358"> <thead> <tr> <th>Estate</th> <th>Soil Series</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Estate	Soil Series			<p>Complied</p>
Estate	Soil Series						

		Bukit Benut Estate	Rengam (59.86%), Bukit Lunchu (31.41%), Jerangau (8.73%)																													
		Lambat Estate	Rengam (71.69%), Local Alluvium (23.64%), Beserah (3.07%), Lambak (1.22%), Jerangau (0.38%)																													
7.5.2	<p>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.</p> <p>- Minor compliance -</p>	<p>Sime Darby has established Slope and River Protection Policy signed by the Managing Director dated 15/1/2015. In the policy clearly stated that:</p> <ol style="list-style-type: none"> 1. Slope of >25° must be excluded from any new planting development and replanting program. 2. Slope of <25°, the existing crop and vegetation shall be maintained accordingly. 3. Planting terraces had been constructed where slope >10°. Fields are established with cover crops such as mucuna and soft grasses and ferns. <p>The slope maps were provided by the R&D Precision Agriculture Unit with details as follows:</p> <table border="1" data-bbox="1189 1034 1895 1383"> <thead> <tr> <th>No</th> <th>Topography</th> <th>Bkt Benut</th> <th>Lambak</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0° - 2°</td> <td>9.04</td> <td>14.92</td> </tr> <tr> <td>2</td> <td>2° - 6°</td> <td>44.37</td> <td>50.99</td> </tr> <tr> <td>3</td> <td>6° - 12°</td> <td>35.98</td> <td>25.49</td> </tr> <tr> <td>4</td> <td>12° - 20°</td> <td>9.97</td> <td>5.80</td> </tr> <tr> <td>5</td> <td>20° - 25°</td> <td>0.64</td> <td>1.46</td> </tr> <tr> <td>6</td> <td>> 25°</td> <td>0.04</td> <td>0.60</td> </tr> </tbody> </table>		No	Topography	Bkt Benut	Lambak	1	0° - 2°	9.04	14.92	2	2° - 6°	44.37	50.99	3	6° - 12°	35.98	25.49	4	12° - 20°	9.97	5.80	5	20° - 25°	0.64	1.46	6	> 25°	0.04	0.60	Complied
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7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting conducted at all estates visited.			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 into plans and 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 and topography map available for estate visited. No fragile soil categorized in the estates visited as per soil map issued by R&D Precision Agriculture Unit. As sighted in estates visited, the estate have taken into account the land terrain, drainage and road systems in planning the 2021 replanting.			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 -	Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 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 -	As per slope map prepared by R&D-TTAS Precision Agriculture Unit, topography information at estates visited as follows: <table border="1"> <thead> <tr> <th>No</th> <th>Topography</th> <th>Bkt Benut</th> <th>Lambak</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0° - 2°</td> <td>9.04</td> <td>14.92</td> </tr> <tr> <td>2</td> <td>2° - 6°</td> <td>44.37</td> <td>50.99</td> </tr> </tbody> </table>			No	Topography	Bkt Benut	Lambak	1	0° - 2°	9.04	14.92	2	2° - 6°	44.37	50.99	Complied
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				Total	100%	100%			
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 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 -	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 22. The entire estates of SOU 22 had no new planting program during the audit period and forthcoming as recorded.					Complied		
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 -	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 22. The entire estates of SOU 22 had no new planting program during the audit period and forthcoming as recorded.					Complied		
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 22. The entire estates of SOU 22 had no new planting program during the audit period and forthcoming as recorded.					Complied		
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 22. The entire estates of SOU 22 had no new planting program during the audit period and forthcoming as recorded.					Complied		
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.	There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 22. The entire estates of SOU 22 had no new planting program during the audit period and forthcoming as recorded.					Complied		

	<p>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 rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p> <p>- Critical (Major) compliance -</p>		
7.7.6	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 22. The entire estates of SOU 22 had no new planting program during the audit period and forthcoming as recorded.</p>	Complied
7.7.7	<p>(C) 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 Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2019) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>There is no peat soil or soil categorized as marginal or fragile soil at the estates in SOU 22. The entire estates of SOU 22 had no new planting program during the audit period and forthcoming as recorded.</p>	Complied
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			

7.8.1	<p>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:</p> <ul style="list-style-type: none"> 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. <p>- Minor compliance -</p>	<p>SOU 22 Mill /estates had established its Water Management Plan for year 2022 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <ul style="list-style-type: none"> a) Implementation of rain water harvest, b) Construction of water gate and scheduled water pumping for effective management of field drains and field water level. c) daily monitoring of bund / scheduled maintenance d) Establishment of <i>mucuna bracteata</i> to prevent erosion, e) Side drain at field road to control water, frond stacking, f) Enhancement of ground vegetation at bare ground area. <p>The water sources are as shown below:</p> <table border="1" data-bbox="1137 842 1955 1361"> <thead> <tr> <th></th> <th>Water sources</th> <th>Usage</th> <th>Monitoring & measurement</th> <th>Freq</th> <th>PIC</th> <th>Review status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SAJ</td> <td>Purchased for domestic consumption</td> <td>Monitoring water supply</td> <td>Monthly</td> <td>AM Mgr</td> <td>Liaison with Authority</td> </tr> <tr> <td>2</td> <td>Rain water</td> <td>Domestic use Workshop Chemical mixing</td> <td>Rain fall data</td> <td>On-going</td> <td>AM Mgr</td> <td>Water harvesting for general washing</td> </tr> <tr> <td>3</td> <td>Water tank</td> <td>Emergency water supply</td> <td>-</td> <td>-</td> <td>AM Mgr</td> <td>Request water supply from other estates</td> </tr> </tbody> </table>		Water sources	Usage	Monitoring & measurement	Freq	PIC	Review status	1	SAJ	Purchased for domestic consumption	Monitoring water supply	Monthly	AM Mgr	Liaison with Authority	2	Rain water	Domestic use Workshop Chemical mixing	Rain fall data	On-going	AM Mgr	Water harvesting for general washing	3	Water tank	Emergency water supply	-	-	AM Mgr	Request water supply from other estates	Complied
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		<p>The contingency plan during water shortage</p> <table border="1"> <thead> <tr> <th data-bbox="1137 440 1173 523"></th> <th data-bbox="1173 440 1312 523">Area/ incident</th> <th data-bbox="1312 440 1715 523">Action steps</th> <th data-bbox="1715 440 1827 523">PIC</th> <th data-bbox="1827 440 1957 523">Status</th> </tr> </thead> <tbody> <tr> <td data-bbox="1137 523 1173 801">1</td> <td data-bbox="1173 523 1312 801">Water shortage/ prolonged dry season</td> <td data-bbox="1312 523 1715 801"> To obtain water from local authority /estate catchment To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP </td> <td data-bbox="1715 523 1827 801">Manager AM/Mill Engineer</td> <td data-bbox="1827 523 1957 801">As and when required</td> </tr> <tr> <td data-bbox="1137 801 1173 1043">2</td> <td data-bbox="1173 801 1312 1043">Severe water pollution/ Contamination</td> <td data-bbox="1312 801 1715 1043"> To obtain water from local authority To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP </td> <td data-bbox="1715 801 1827 1043">Manager AM//Mill Engineer</td> <td data-bbox="1827 801 1957 1043">As and when required</td> </tr> </tbody> </table> <p>The Estates had implemented water managements plans which covered:</p> <ul style="list-style-type: none"> a) Water shortage contingencies b) Water pollution prevention c) Reduce wastage d) Identification & management of waste waters e) Monitoring rainfall f) Regular water quality analysis. 		Area/ incident	Action steps	PIC	Status	1	Water shortage/ prolonged dry season	To obtain water from local authority /estate catchment To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP	Manager AM/Mill Engineer	As and when required	2	Severe water pollution/ Contamination	To obtain water from local authority To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP	Manager AM//Mill Engineer	As and when required	
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Water management plan reviewed annually. The management plan was sighted and verified. The water reduction plan is shown below;

	Issues/Areas	Action Steps	PIC	Status
1	Rain water collection	Large containers are to be placed at strategic locations to collect rain water The rainwater shall be recycled for washing heavy machinery	AM/Field staff	On-going
2	Leakage on plumbing system	Frequent inspection to detect leakage Fix any leakage	AM/Field staff	On-going
3	Water compartmentalization	To conserve level of soil moisture To minimize water stress during dry season	AM/Field staff	On-going
4	Handling of chemicals	To recycle water spillage while mixing of chemical at mixing area	AM/Field staff	On-going
5	education	Avoid excessive usage during cleaning Close pipe to prevent water dripping	AM/Field staff	On-going
5	Re-streaming	Re stream from sterilizer condensate pit for dilution	Mill engineer	On-going
6	Water saving in nursery	To cease watering if rainfall recorded 8mm	AM/field staff	As necessary

The Mill Identification & Management of Waste Water				
	location	Waste water produced	Treatment/containment	Reuse/recycle/disposal method
1	Processing stations	Clarification condensate Sterilizer condensate Hydro cyclone condensate Mill floor cleaning water	Oil recovery/ETP	Recover into system
2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain
	Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain
3	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain
4	Lab	Cleaning water	Process drain	Monsoon drain
5	Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.

<p>7.8.2</p>	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The buffer zones established are as follows:</p> <table border="1" data-bbox="1189 694 1816 975"> <thead> <tr> <th>No</th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the PSQM Unit with latest revision dated on Dec 2015. During the field visit there was no spraying activities or signs left in such an area. The buffer zones identified at the estates are as follows:</p> <table border="1" data-bbox="1164 1171 1800 1265"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Buffer zone area</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bkt Benut</td> <td>Sg Melantai</td> </tr> </tbody> </table> <table border="1" data-bbox="1164 1289 1859 1380"> <thead> <tr> <th></th> <th>OU</th> <th>HCV Area</th> <th>Ha</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bkt Benut Estate</td> <td>River Reserve Sg Melantai</td> <td>15.00</td> <td>4</td> </tr> </tbody> </table>	No	River width	Buffer zone	1	> 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters	No	Estate	Buffer zone area	1	Bkt Benut	Sg Melantai		OU	HCV Area	Ha	HCV	1	Bkt Benut Estate	River Reserve Sg Melantai	15.00	4	<p>Complied</p>
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2	Bkt Benut Estate	Pond	4.75	4
3	Bkt Benut Estate	Water Catchment	4.42	4
4	Lambak Elaeis	Pond	0.30	4
5	Lambak Elaeis	Natural Pond	1.97	4
6	Lambak Elaeis	Water Catchment	0.38	4

Samples are taken from the mill and estates for detection of any pollution arising from the mill and estates activities. Water samples from the intake point are taken for phosphate and nitrate analysis for detection of fertilizer application effect to the water courses. Extracted record of both the estates with details below;

Among others management plan taken:

- a) Regular inspection at buffer/HCV areas
- b) Monitor water from surrounding areas
- c) Track, measure and report all activities around river
- d) Train and educate workers.

Water sampling was taken quarterly to test against the industrial effluent water analysis and pesticide analysis. Among others parameters as shown below:

The sampling sites taken at Sg Melantai 4x/year. There were no issues on the water quality for the sampling points for the sample taken in 11/3/2022 and 03/12/2021. The mill takes samples 4x/year for analysis of raw water treatment analysis of pH, TDS turbidity, Chloride and Aluminium content. Results dated 19/05/22 were sighted and verified. Another analysis for detection of contamination located at mill entrance and rear are taken monthly basis. Results for samples dated 19/05 was sighted and verified.

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		<table border="1"> <thead> <tr> <th></th> <th>parameter</th> <th>Standard</th> <th></th> <th>Parameter</th> <th>standard</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>6-9</td> <td>4</td> <td>SS</td> <td>50</td> </tr> <tr> <td>2</td> <td>BOD</td> <td>3</td> <td>5</td> <td>AN</td> <td>0.3</td> </tr> <tr> <td>3</td> <td>COD</td> <td>25</td> <td>6</td> <td>DO</td> <td>5-7</td> </tr> </tbody> </table>		parameter	Standard		Parameter	standard	1	pH	6-9	4	SS	50	2	BOD	3	5	AN	0.3	3	COD	25	6	DO	5-7																									
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7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>Based on "<i>Compliance Schedule</i>" BBPOM disposed effluent on watercourse (Sg Melantai) via land drainage in Bkt Benut Estate. Sighted quarterly report has been submitted to DOE by quarterly basis. Latest submission for to DOE on 16/3/2020 for period Jan to Mac 2022. Among others the indicators were:</p> <table border="1"> <thead> <tr> <th>No</th> <th>April-Dec 20</th> <th>STD</th> <th>20/1/22</th> <th>23/2/22</th> <th>08/3/22</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>pH</td> <td>5-9</td> <td>8.30</td> <td>8.30</td> <td>8.20</td> </tr> <tr> <td>2</td> <td>BOD mg/l</td> <td>2500</td> <td>525</td> <td>316</td> <td>301</td> </tr> <tr> <td>3</td> <td>A Nitrogen</td> <td>0-150</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>4</td> <td>Total N</td> <td>0-200</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>5</td> <td>Oil & Grease</td> <td>0-50</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>6</td> <td>T Solids</td> <td>-</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>7</td> <td>S Solids</td> <td>-</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table> <p>All parameters tested complied with regulatory standards.</p>	No	April-Dec 20	STD	20/1/22	23/2/22	08/3/22	1	pH	5-9	8.30	8.30	8.20	2	BOD mg/l	2500	525	316	301	3	A Nitrogen	0-150	0.00	0.00	0.00	4	Total N	0-200	0.00	0.00	0.00	5	Oil & Grease	0-50	0.00	0.00	0.00	6	T Solids	-	0.00	0.00	0.00	7	S Solids	-	0.00	0.00	0.00	Complied
No	April-Dec 20	STD	20/1/22	23/2/22	08/3/22																																														
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7	S Solids	-	0.00	0.00	0.00																																														
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill processing water are obtained from the SAJ and water catchment adjacent to the mill complex. The water usage monitoring</p>	Complied																																																

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is made on a monthly basis with the latest recording detailed sampled (water usage per MT in 2021 of fresh fruit bunches (FFB) below;

No	Month	Water	FFB /mt	Water /FFB
1	Jan	8095	6826	1.19
2	Feb	7780	6744	1.15
3	Mac	10192	9021	1.13
4	Apr	10033	9155	1.10
5	May	9419	8492	1.11
6	Jun	10916	9520	1.15
7	July	10905	8762	1.12
8	Aug	12058	11053	1.09
9	Sep	9117	8323	1.10
10	Oct	7857	6947	1.13
11	Nov	8999	8099	1.12
12	Dec	9131	8042	1.12
		114507	101936	

A slightly higher water usage noted, due to the proportionate reduction in volume of FFB being processed. There were variations of performance. Probable factors are linked to rainy days, significant boiler water rinsing/discharging for maintenance etc

Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised

<p>7.9.1</p>	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -</p>	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2022. The document was reviewed/updated on Jan 2022. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1" data-bbox="1155 576 1921 1062"> <thead> <tr> <th></th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Backhoe tractor</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel</td> </tr> <tr> <td>2</td> <td>Van / Supervisor y vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.</td> </tr> <tr> <td>3</td> <td>Electrical supply</td> <td>To reduce reliance on gen-sets for power supply</td> <td>Utilization of TNB sources</td> </tr> </tbody> </table> <p>The utilization of fossil fuel in 2021 is being monitored with records shown below:</p> <table border="1" data-bbox="1160 1177 1890 1362"> <thead> <tr> <th>Mth</th> <th>BBE</th> <th>LEE</th> <th>BBPOM</th> <th>Mth</th> <th>BBE</th> <th>LEE</th> <th>BBPOM</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>2.24</td> <td>1.56</td> <td>0.88</td> <td>Jun</td> <td>1.29</td> <td>1.06</td> <td>1.40</td> </tr> <tr> <td>Feb</td> <td>2,66</td> <td>2.05</td> <td>0.89</td> <td>July</td> <td>1.46</td> <td>1.07</td> <td>1.36</td> </tr> <tr> <td>Mac</td> <td>1.41</td> <td>1.26</td> <td>1.55</td> <td>Aug</td> <td>1.26</td> <td>1.28</td> <td>1.80</td> </tr> </tbody> </table>		Target	Objective	Action plan	1	Backhoe tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To ensure the vehicle engine is turn off during idle time To record vehicle activity which consume fuel	2	Van / Supervisor y vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	To record vehicle activity in order to eliminate waste activity which consume fuel. To turn off vehicle engine during idle time.	3	Electrical supply	To reduce reliance on gen-sets for power supply	Utilization of TNB sources	Mth	BBE	LEE	BBPOM	Mth	BBE	LEE	BBPOM	Jan	2.24	1.56	0.88	Jun	1.29	1.06	1.40	Feb	2,66	2.05	0.89	July	1.46	1.07	1.36	Mac	1.41	1.26	1.55	Aug	1.26	1.28	1.80	<p>Complied</p>
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Apr	1.74	1.01	1.09	Sep	1.28	1.74	2.16
May	1.77	1.10	1.60	Oct	1.19	1.85	1.59
Jun	1.29	0.88	1.44	Nov	1.53	1.37	1.59

The estates and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running.

Performance variation in view of several factors i.e.

- a) Infrastructure of estates,
- b) Community size / no of gen-sets,
- c) No. of vehicles / age of machine.
- d) Weather interference / crop production volume

There is no opportunity for the estates to capitalize the utilisation of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.

Bkt Benut Mill and SOU22 Estates

A plan for improving the efficiency of the use of fossil fuels is in place incorporated into the Environmental Aspect and Impact activities report for 2019/20 identified in the following

- a) Environmental Aspect Identification Summary FY 2020 reviewed accordingly.
- b) Environmental Impact Evaluation Summary FY 2020 reviewed accordingly.

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		<p>Renewable energy usage & diesel consumption 2019/20 was established and monitored by monthly basis. Among others effort to reduce diesel usage includes the following;</p> <ul style="list-style-type: none"> a) By maintenance of the boiler & machinery to ensure at optimum level, b) to monitor diesel usage, c) provide training to workers regarding reduce fuel and diesel usage for boiler. 	
<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
7.10.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4.0 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was correct.</p>	Complied
7.10.2	<p>(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).</p> <p>- Critical (Major) compliance -</p>	<p>No development within SOU 22 Bukit Benut POM Certification Unit since 2014.</p>	Complied

7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -</p>	<p>Significant pollutants identification was conducted during Environmental Aspect Identification and Environmental Impact Evaluation conducted. Environmental management plan were documented under Environmental Improvement Plan/Pollution Prevention Plan for FY 2022. Implementation of plan is being monitored by appointed person in charge with target of time frame for completion. Among the plan established:</p> <ol style="list-style-type: none"> 1. To ensure furnace draft variance – 50hmg inside furnace for better combustion 2. Frequent cleaning inside furnace area 3. To ensure maintenance of the fibre bar and moving grate are in order 4. To check the condition of the furrow and ensure not overflowing 5. To monitor on the water dispose from the mill storm drain going to the landfill area. 	Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>There was no land preparation of existence or new planting in SOU 22 and Estates by burning ever since SDB practiced zero burning as per the policy in:</p> <ol style="list-style-type: none"> a) EQMS-SOP-SectionB2 - Under felling/clearing & land preparation b) Carbon Policy <p>SDP has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied

7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>This is established in the ERP procedure Kertas Kerja Program Simulasi Kebakaran dated 11/04/2022. Therein containing</p> <ul style="list-style-type: none"> a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill <p>The procedure was formalized by RSQM for use in all operating units in SDP Estates and mills. Training related to fire drill / prevention are conducted annually.</p> <table border="1" data-bbox="1142 734 1691 925"> <thead> <tr> <th></th> <th>Estate / Mill</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bkt Benut POM</td> <td>17/06/22</td> <td>12/10/21</td> </tr> <tr> <td>2</td> <td>Bkt Benut Estate</td> <td>17/02/22</td> <td>-</td> </tr> <tr> <td>3</td> <td>Lambak E Estate</td> <td>25/05/21</td> <td>-</td> </tr> </tbody> </table>		Estate / Mill	Date	Date	1	Bkt Benut POM	17/06/22	12/10/21	2	Bkt Benut Estate	17/02/22	-	3	Lambak E Estate	25/05/21	-	Complied
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<p>7.11.3</p>	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -</p>	<p>Both the estates and the mill in SOU 22 held engagement with the adjacent stakeholders via briefing sessions as stated in ERP procedure Fire Prevention Control Measures Sime Darby Plantation / Kertas Kerja Program Simulasi Kebakaran at respective dates and Fire Prevention and Control Measure. Therein containing</p> <ul style="list-style-type: none"> a) Objective b) Activity and prevention. c) Function of Fire and Rescue Team d) Emergency Evacuation Plan / Drill <p>All stakeholders being briefed in the respective stakeholders meetings. The recent being on the following through correspondence made to all stakeholders informing on the compliance to RSPO/ISCC/MSPO.SCCS in accordance with SDP MQMS/EQMS. This is inclusive on the fire prevention and control measures akin to the earlier session in meetings. There were also cases of non-presence of invitees of the adjacent stakeholders whereby they will be communicated in writing. There was no live consultation in 2020 / 2021 at certain OU due to MCO restriction. BBE and BBPOM had a combined stakeholder meeting in view of the same set of stakeholders members.</p> <table border="1" data-bbox="1200 1061 1715 1337"> <thead> <tr> <th></th> <th>Estate / Mill</th> <th>Date</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bkt Benut POM</td> <td>18/04/22</td> <td>07/04/21</td> </tr> <tr> <td>2</td> <td>Bkt Benut Estate</td> <td>18/04/22</td> <td>07/04/21</td> </tr> <tr> <td>3</td> <td>Lambak E Estate</td> <td>18/04/22</td> <td>02/08/21</td> </tr> </tbody> </table>		Estate / Mill	Date	Date	1	Bkt Benut POM	18/04/22	07/04/21	2	Bkt Benut Estate	18/04/22	07/04/21	3	Lambak E Estate	18/04/22	02/08/21	<p>Complied</p>
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Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<p>(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.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that the new planting (refer 7.3.1 to 7.4.2) have no affect to the present HCV and primary forest There were no HCV areas within the situated with the affected areas. The assessment concluded with recommendations that incorporated basic conservation planning principles for consideration into management regimes of preserving the HCV and conservation areas. The proposed management and monitoring for HCVA possible threats were also recorded.</p>	Complied
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>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.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that the new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest. There were no HCV areas within the situated with the affected areas. The management commenced the project discussion on 08/11/2018 as sighted in the email chronology of events. Hence the current HCV assessment of the estates remains valid. The recent HCV assessment for the entire SOU 22 covering all the 3 estates and the mill was performed in Dec 2015 by the PSQM Methodology is through site observation, interviews, stakeholders consultation and desktop review on available secondary data. The assessment among others covers the following areas;</p> <p>a) Overview of HCV assessment. b) Description of assessment areas. c) Finding and discussion - landscape context - HCV criteria and application to agriculture d) HCV monitoring and management</p>	Complied

7.12.3	<i>Indicator is not applicable in Malaysia context</i>		Not Applicable
7.12.4	<p>(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).</p> <p>- Critical (Major) compliance -</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 22 estates (refer 7.3.1 to 7.4.2). The recent HCV assessment for the entire SOU 22 covering all the 3 estates and the mill was performed in Dec 2015 by the PSQM personnel. Methodology is through site observation, interviews, stakeholders consultation and desktop review on available secondary data. The assessment among others covers the following areas;</p> <ul style="list-style-type: none"> a) Overview of HCV assessment. b) Description of assessment areas. c) Finding and discussion <ul style="list-style-type: none"> - landscape context - HCV criteria and application to agriculture d) HCV monitoring and management <p>Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PA/GM and also personnel from the Sustainability unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any. Highlights if any are discussed during the management review or management meetings subject to the urgency of the situation.</p>	Complied
7.12.5	<p>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.</p> <p>- Minor compliance -</p>	<p>There was no rights of local communities been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas. The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird, presence of wild boar and monkeys occasionally sighted. The</p>	Complied

		appropriate measures that are expected to maintain and/or enhance them were implemented through an action plan reviewed in Jan 2020.	
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 -	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 22 estates (refer 7.3.1 to 7.4.2).	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 -	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 22 estates (refer 7.3.1 to 7.4.2). Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PA/GM and also personnel from the Sustainability unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any.	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 -	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 22 estates (refer 7.3.1 to 7.4.2).	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for **Bukit Benut POM** and supply base was calculated using the PalmGHG Calculator version 4. 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 **Bukit Benut POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.38
PKO	1.38

Extraction	%
OER	20.29
KER	4.67

Production	t/yr
FFB Process	101,929.10
CPO Produced	20,677.04
PKO Produced	4,756.51

Land Use	Ha
OP Planted Area	17,305.12
OP Planted on peat	118.05
Conservation (forested)	0.00
Conservation (non-forested)	0.00
Total	17,423.17

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	54,993.49	0.58	3,933.40	0.53	0.00	0.00	58,926.89	0.58
CO ₂ Emission from fertilizer	5,537.91	0.06	506.85	0.07	0.00	0.00	6,044.76	0.06
NO ₂ Emission	3,229.93	0.03	277.02	0.04	0.00	0.00	3,506.95	0.03
Fuel Consumption	352.56	0.00	18.08	0.00	0.00	0.00	370.64	0.00
Peat Oxidation	22.97	0.00		0.00	0.00	0.00	22.97	0.00
Sink								
Crop Sequestration	-51485.61	-0.54	-3471.22	-0.47	0.00	0.00	-54,956.8	-0.54
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0	0.00
Total	12,651.24	0.13	1264.13	0.17	0.00	0.00	13,915.37	0.14

*Note: Includes both estates and smallholders

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	19,979.83	0.20
Fuel Consumption	4.61	0.00
Grid Electricity Utilization	1,164.28	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	21,148.71	0.21

Summary of Kernel Crusher Emission and Credit (if applicable)

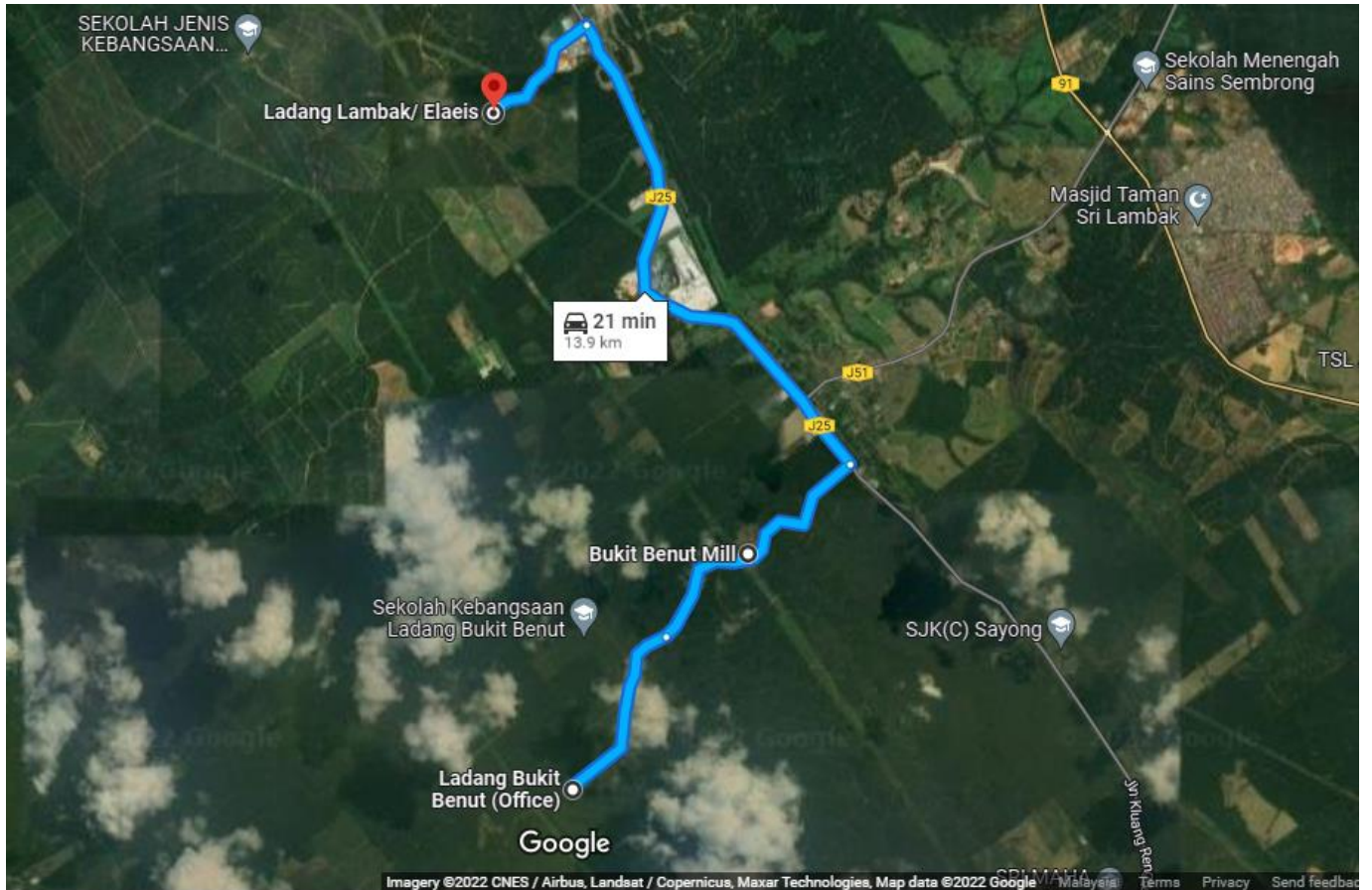
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

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

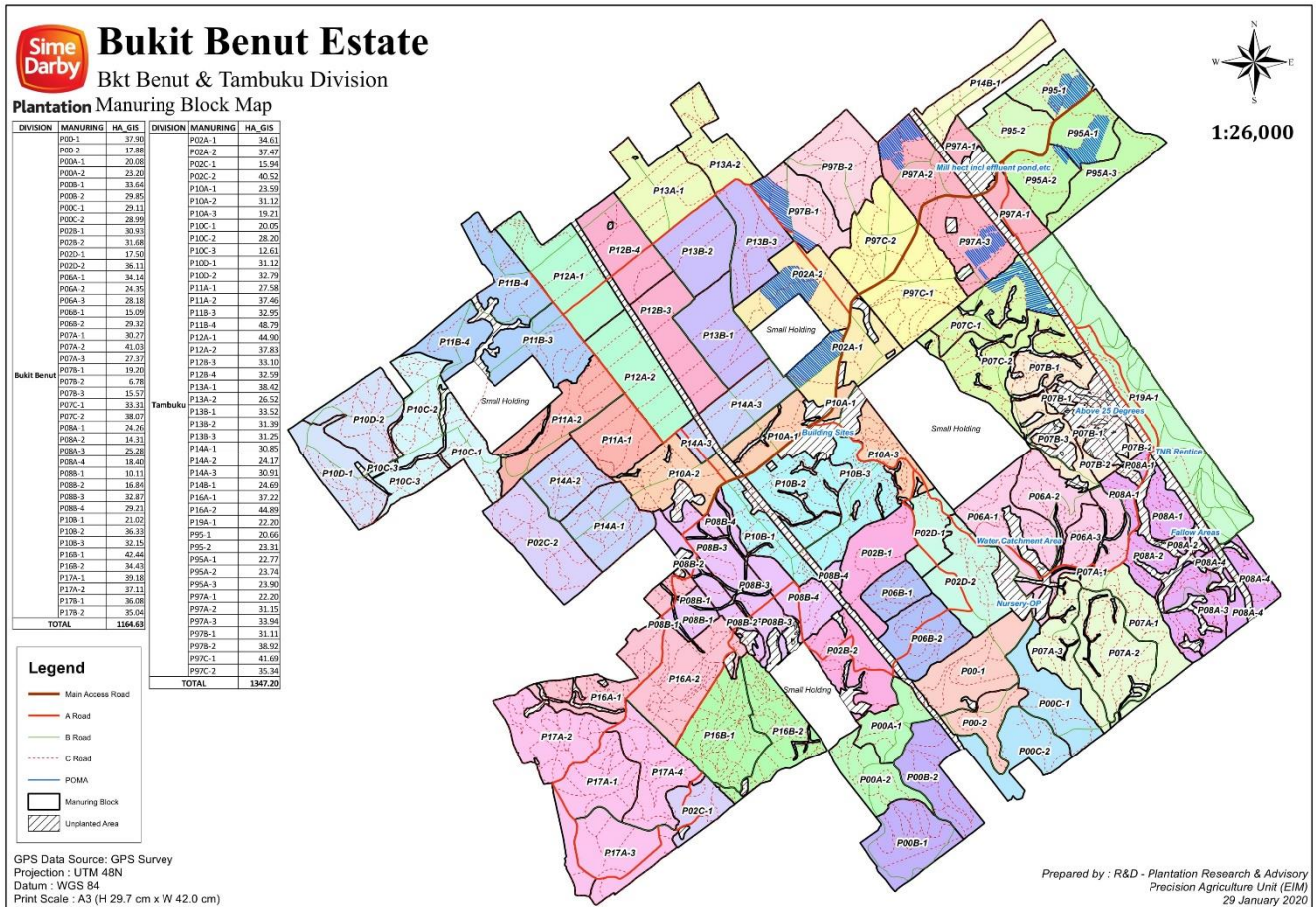
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100.00
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

Appendix C: Location Map of Certification Unit and Supply bases

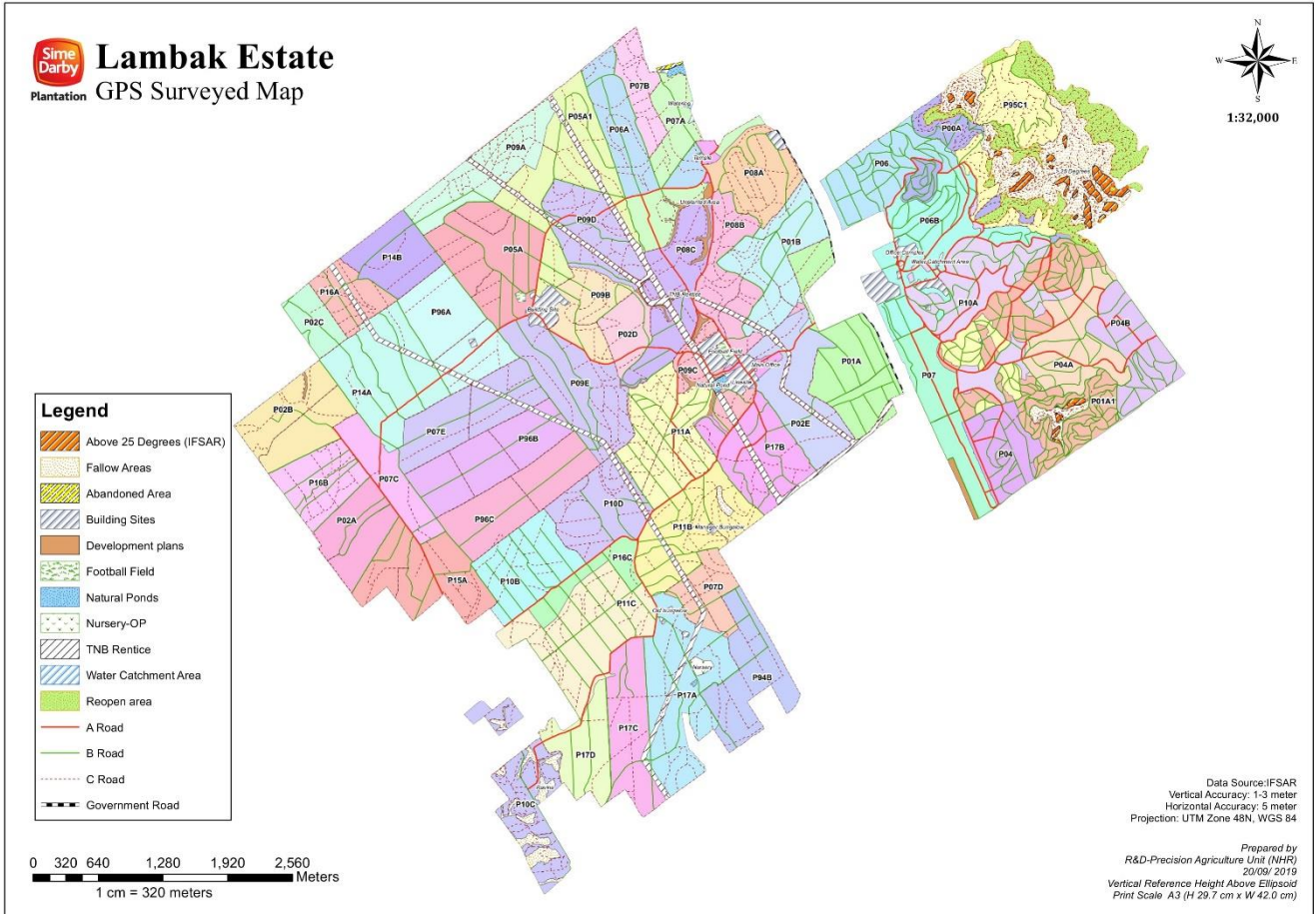


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Appendix D: Estate Field Map



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Appendix E: List of Smallholder Registered and/or sampled

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total					N/A	N/A	N/A		

Note: * are smallholders sampled in this audit.

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