

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (Choose an item.)
- Recertification Assessment (RA 2)
- Extension of Scope

Client Company name (Parent Company): Sime Darby Plantation Berhad
Client company Address: Level 5, Main Block, Plantation Tower, No 2, Jalan PJU 1A/7, Oasis Ara Damansara, 47301 Petaling Jaya, 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: 22/02/2022

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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 5, Main Block, Plantation Tower, No 2, Jalan PJU 1A/7, Oasis Ara Damansara, 47301 Petaling Jaya, 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, 86009 Kluang, Johor, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Haji Anuar bin Zakaria (Mill Manager)	E-mail	kks.bk.benut@simedarbyplantation.com
Telephone	+6013-2086959 (Mill)	Facsimile	N/A

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	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. • 70% continuation from 30% of remote assessment 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 2) <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/hr
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		27/12/2022
MSPO 714131	MSPO Supply Chain Certification: 2018		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° 56' 00" N	103° 20' 28" E
Bukit Benut Estate	KM 12, Jalan Mengkibol, 86009 Kluang, Johor	1° 54' 42" N	103° 21' 54" E
CEP Niyor Estate	Ladang CEP Niyor 86009 Kluang, Johor	1° 54' 30" N	103° 16' 22" E
Lambak Estate	Ladang Lambak/Elais 86009 Kluang, Johor	1° 58' 43" N	103° 19' 08" E

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	90.60
CEP Niyor Estate	1,880.68	6.11	68.40	1,955.19	96.19
Lambak Estate*	3,344.72	2.65	392.79	3,740.16	89.43
Total	7,762.10	32.94	700.09	8,495.13	91.37

Note: *Reduction of planted area for Lambak Elais Estate due to GPS re-survey on April 2021.

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bukit Benut Estate	84.11	861.03	1,030.98	447.14	113.44	2,452.59	84.11
CEP Niyor Estate	152.05	588.50	656.75	483.38	-	1,728.63	152.05

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Lambak Estate	409.16	840.64	1,974.25	31.56	89.11	2,935.56	409.16
Total (ha)	645.32	2,290.17	3,661.98	962.08	202.55	7,116.78	645.32

Note: *Only Mature area is considered as production area

7. Summary of Certified Tonnage of FFB (Own Certified Scope)

Estate / Smallholders	Tonnage / year			
	Estimated last year (Oct 20 – Sep 21)	Actual (Jul 20 – Jun 21)		Forecast (Oct 21 – Sep 22)
		Previous license period (Jul 20 – Sep 20)	Current license period (Oct 20 – Jun 21)	
Bukit Benut Estate	51,982.71	17,562.69	28,614.93	52,570.80
CEP Niyor Estate	28,800.00	-	3,063.01	-
Lambak Estate	66,649.18	21,048.86	32,293.28	69,502.49
Total	147,431.89	38,611.56	63,971.22	122,073.29

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

8. Summary of Certified Tonnage of FFB (from other certified unit(s))

Estate / Smallholders	Tonnage / year			
	Estimated last year (Oct 20 – Sep 21)	Actual (Jul 20 – Jun 21)		Forecast (Oct 21 – Sep 22)
		Previous license period (Jul 20 – Sep 20)	Current license period (Oct 20 – Jun 21)	
Cenas Estate ₁		1,723.62	430.32	
Tun Dr Ismail Estate ₁		40.76	27.34	
CEP Rengam Estate ₂		-	1,724.10	
Bukit Paloh Estate ₃		-	340.25	
Kempas Klebang Estate ₃		-	161.89	
Total		1,764.38	2,683.90	

Note:

1. Estates are under Ulu Remis Palm Oil Mill & Supply Base Certification Unit RSPO Certificate # CU-RSPO-863077; Certificate validity period: 11/04/2021 until 10/04/2026
2. Estates are under Hadapan Palm Oil Mill & Supply Base Certification Unit RSPO Certificate # RSPO 739013; Certificate validity period: 29/05/2021 until 28/03/2026
3. Estates are under Gunung Mas Palm Oil Mill & Supply Base Certification Unit RSPO Certificate # CU-RSPO-863078; Certificate validity period: 19/05/2020 until 18/05/2025

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Oct 20 – Sep 21)	Actual (Jul 20 – Jun 21)		Forecast (Oct 21 – Sep 22)
		Previous license period (Jul 20 – Sep 20)	Current license period (Oct 20 – Jun 21)	
N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A		N/A

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-20	12,363.90	-	12,363.90
2	Aug-20	11,412.05	-	11,412.05
3	Sep-20	9,400.26	-	9,400.26
4	Oct-20	5,864.71	-	5,864.71
5	Nov-20	9,177.18	-	9,177.18
6	Dec-20	8,923.26	-	8,923.26
7	Jan-21	6,947.71	-	6,947.71
8	Feb-21	6,753.96	-	6,753.96
9	Mar-21	8,992.15	-	8,992.15
10	Apr-21	9,105.97	-	9,105.97
11	May-21	8,916.85	-	8,916.85
12	Jun-21	9,173.05	-	9,173.05
TOTAL		107,031.05	-	107,031.05

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (Oct 20 – Sep 21)	Actual (Jul 20 – Jun 21)		Forecast (Oct 21 – Sep 22)
	Previous license period (Jul 20 – Sep 20)	Current license period (Oct 20 – Jun 21)	
FFB	FFB		FFB
147,431.89	33,176.21	73,854.84	122,073.29
CPO (OER: 21.00 %)	CPO (OER: 20.60 %)		CPO (OER: 21.11 %)
30,960.70	6,900.65	15,149.13	25,769.67

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PK (KER: 4.50 %)	PK (KER: 4.67 %)		PK (KER:5.50 %)
6,634.44	1,549.33	3,449.02	6,714.03
Note: -			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Jul-20	2,291.40	513.88
2	Aug-20	2,298.37	517.13
3	Sep-20	2,310.88	518.32
4	Oct-20	1,649.70	400.18
5	Nov-20	2,316.89	511.65
6	Dec-20	1,919.28	436.82
7	Jan-21	1,198.06	268.58
8	Feb-21	1,299.45	313.08
9	Mar-21	1,398.97	311.82
10	Apr-21	1,854.76	405.19
11	May-21	1,832.84	417.52
12	Jun-21	1,679.18	384.18
TOTAL		22,049.78	4,998.35

11. Summary of Actual Volume sold					
Current License period (Oct 2020 – Jun 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	7,840.39	-	-	-	7,840.39
PK (MT)	897.92	-	-	-	897.92
Credits	-	-	-	-	-
Previous License period (Jul 2020 – Sep 2020)					
CPO (MT)	8,086.47	-	-	-	8,086.47
PK (MT)	1,919.61	-	-	-	1,919.61
Credits	-	-	-	-	-
Note: Conventional is RSPO certified material but sold as non-RSPO.					

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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	A	TR-a0c86f44-2988	211.83	-
2	A	TR-4a98b048-0fbd	211.83	-
3	A	TR-90a91359-9969	268.61	-
4	A	TR-ef599ab1-2b81	268.61	-
5	A	TR-5a2eecf3-fd77	500	-
6	A	TR-67f6691f-432c	500	-
7	B	TR-1150dfec-c65b	39.28	-
8	B	TR-6188b0b5-9acb	39.37	-
9	B	TR-64ab8b3f-bb10	39.45	-
10	B	TR-3572d433-7c10	40.92	-
11	B	TR-05985ea2-c86d	38.93	-
12	B	TR-72efb7b9-aff4	39.34	-
13	B	TR-2c34c63c-083c	40.55	-
14	B	TR-2862f39b-61f5	40.17	-
15	B	TR-cd09f205-72a6	35.72	-
16	B	TR-ad4a3b8b-e5d7	3.98	-
17	B	TR-4bd7a50a-2810	38.23	-
18	B	TR-5d9653cc-670f	38.78	-
19	B	TR-5b3377a0-26dd	39.32	-
20	B	TR-a529e122-154a	39.89	-
21	B	TR-7286120b-2b1e	36.99	-
22	B	TR-963b8021-a0c2	39.73	-
23	B	TR-9199ae76-6483	40.17	-
24	B	TR-16a08583-7021	39.44	-
25	B	TR-dc107325-0f5d	38.79	-
26	A	TR-ae88cb2-7e81	500	-
27	A	TR-05585276-4e33	500	-
28	B	TR-6505e49c-7db8	39.26	-
29	B	TR-96ef72c0-eeb2	39.91	-
30	B	TR-888f7063-d7c2	39.53	-
31	B	TR-9323e8eb-a9e7	41.65	-

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32	B	TR-0d022ff4-9832	32.47	-
33	B	TR-c422fbba-2dc2	8.49	-
34	B	TR-d1686bc9-2217	39.98	-
35	B	TR-1e6b01ef-4a2a	39.41	-
36	B	TR-b6ce1edb-6ff5	370.47	-
37	B	TR-6a7a64ce-d95a	414.12	-
38	B	TR-e9a08241-699d	39.36	-
39	B	TR-a38b1844-313f	39.61	-
40	B	TR-6146b2af-b6df	470.02	-
41	C	TR-e56c3f76-4dcf	470.02	-
42	B	TR-db9a0461-a762	38.64	-
43	C	TR-8e67bcbc-8ab9	38.82	-
44	C	TR-a1696450-8474	39.76	-
45	C	TR-9f6fe0bc-234b	38.22	-
46	C	TR-8eee222e-6880	32.42	-
47	C	TR-3cfe1c3b-8f71	6.91	-
48	B	TR-6392c672-54d0	38.6	-
49	B	TR-60f26b82-ea0d	39.12	-
50	B	TR-c7689e9e-25bc	39.66	-
51	B	TR-e2ca9c4b-ea79	39.66	-
52	B	TR-56fe8d4d-bce5	390.9	-
53	B	TR-b8b76648-e528	41.31	-
54	B	TR-4d42ba02-082d	109.1	-
55	B	TR-57ac44ff-49d1	500	-
56	B	TR-23ec97d9-90e4	477.28	-
57	B	TR-92afd95e-365e	194.77	-
58	B	TR-594fed4b-1836	460.58	-
59	B	TR-e3610c01-62d2	414.96	-
60	B	TR-8b5ab20e-609d	21.21	-
61	B	TR-2c3ac71e-1d9b	182.75	-
62	C	TR-1a960701-e0a9	19.35	-
63	C	TR-0ae25d37-2c5d	132.65	-
64	C	TR-304de8a5-2186	500	-
65	C	TR-261cb7ea-c1b3	139.85	-

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66	C	TR-e1889f4f-0fbb	77.62	-
67	C	TR-4f66f972-6836	78.3	-
68	B	TR-58d7241a-031f	139.85	-
69	B	TR-cfcac8dc-4971	77.62	-
70	B	TR-afcd712b-b686	78.3	-
71	C	TR-99771b26-3289	47.68	-
72	C	TR-8478d161-5621	79.11	-
73	C	TR-17623fe6-8772	78.07	-
74	C	TR-92f15c26-02e8	79.98	-
75	C	TR-30b58c3f-6c22	77.9	-
76	C	TR-4b081be8-b63b	78.3	-
77	C	TR-e9283d10-9b70	58.96	-
78	B	TR-4b4301d0-e25c	47.68	-
79	B	TR-3c49d5c7-ca6e	79.11	-
80	B	TR-26eb3835-9e22	78.07	-
81	B	TR-18066284-a0e8	79.98	-
82	B	TR-7b564a45-6261	77.9	-
83	B	TR-0b7a06fa-985d	78.3	-
84	B	TR-7c1bce34-64b3	58.96	-
85	C	TR-d95fe7e7-47bf	78.3	-
86	C	TR-1890a8dc-e51d	30.95	-
87	B	TR-fe1ff202-a9df	78.3	-
88	B	TR-5d99e00c-5a75	30.95	-
89	C	TR-b2beaa87-a9fa	40.58	-
90	C	TR-3317b377-f066	78.9	-
91	C	TR-eddf2e27-265c	76.68	-
92	C	TR-6533012f-3b26	119.37	-
93	C	TR-65a20815-a102	195.32	-
94	C	TR-ed3fca5e-1e64	39.23	-
95	C	TR-0828912d-a9e7	117.73	-
96	C	TR-89cd1dcc-3775	79.87	-
97	C	TR-3f8d577b-edde	78.15	-
98	C	TR-762b5d87-0c74	39.23	-
99	C	TR-3d1bacd1-feca	40	-

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100	C	TR-ae26347e-d4c2	38.91	-
101	C	TR-5d41cf1b-b0e4	75.73	-
102	C	TR-783ed440-0f15	30.23	-
103	C	TR-e4e5b054-b7ce	38.71	-
104	C	TR-2cab190f-5b46	78.79	-
105	C	TR-a9fae24e-3a50	38.98	-
106	C	TR-4667f6b2-a788	118.05	-
107	C	TR-3400613c-e2f4	77.97	-
108	C	TR-83ff0895-ca9e	39.35	-
109	C	TR-49f77ff2-eba2	116.94	-
110	C	TR-ddf42647-5de1	78.24	-
111	C	TR-3fd2f9b5-2209	41.17	-
112	C	TR-f0a2cf8d-48f1	38.75	-
113	C	TR-8bc4d725-ec06	79.96	-
114	C	TR-4ee78a45-4f64	39.04	-
115	C	TR-3476a98c-ac59	40.31	-
116	C	TR-1e8d0030-9ea6	80.79	-
117	C	TR-7381f8fe-3c76	37.41	-
118	C	TR-f820446f-a374	39.61	-
119	C	TR-c06339be-80f2	39.67	-
120	C	TR-f3fa266f-c8da	118.76	-
121	C	TR-aec1fd15-66b6	79.03	-
122	C	TR-9c0b88b5-b198	79.17	-
123	C	TR-5e640551-eda2	38.92	-
124	C	TR-b62cdd7b-6a27	117.16	-
125	C	TR-25570cb6-05f6	77.56	-
126	C	TR-a603ad38-c517	80.06	-
127	C	TR-a6db8931-363c	77.05	-
128	C	TR-f949c605-21cf	78.36	-
129	C	TR-ab58cc17-3b8f	79.88	-
130	C	TR-02431631-1efd	38.73	-
131	B	TR-7935b567-f603	78.27	-
132	B	TR-ba8d79f1-614f	78.27	-
133	B	TR-eda03238-6a8d	39.49	-

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134	B	TR-9204e6d4-a9eb	39.72	-
135	B	TR-c01e0fc9-e1ab	39.53	-
136	B	TR-7ef08d38-726f	39.52	-
137	B	TR-330c9f79-7ec6	41.17	-
138	B	TR-1c1db8cf-0f8c	235	-
139	B	TR-6fa68a43-1eed	120.63	-
140	B	TR-be81030d-a8fb	121.55	-
141	B	TR-d7d9cc7c-5a15	81.85	-
142	B	TR-279cee7c-43cf	77.33	-
143	B	TR-aff143c9-41b3	41.34	-
144	B	TR-d52a8d33-3999	119.37	-
145	A	TR-4b9aa7f8-c9fd	41.22	-
146	B	TR-cfb4d969-2d83	75.34	-
147	B	TR-929dacd0-9a36	39.96	-
148	B	TR-e19f694e-2306	123.59	-
149	C	TR-fd2b41d3-a19a	154.68	-
150	C	TR-218bb9df-aafb	39.74	-
151	D	TR-150ba6d4-5bff	-	300
152	D	TR-d42e554c-1990	-	120
153	D	TR-50d678a9-3122	-	150
154	D	TR-6f508fdb-f7a9	-	350
155	D	TR-9006e9a5-d21d	-	400
156	D	TR-0ea8227e-ee8a	-	330
157	D	TR-dfea19b5-31cc	-	17.53
158	D	TR-1c5c6448-3c14	-	550
159	D	TR-aa3a02ca-225f	-	100
160	D	TR-2294c84b-a414	-	500
TOTAL			15,926.86	2,817.53

11B. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
Nil	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A

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Note: -

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
Nil	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 (mt)
Nil	N/A	N/A	N/A
TOTAL			N/A

Note: -

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year (Oct 20 – Sep 21)			Actual (Jul 20 – Sep 21)			Forecast (Oct 21 – Sep 22)		
	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	

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period (Jul 20 – Sep 21)						
Credits				N/A	N/A	N/A
Physical	N/A	N/A	N/A			

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: Nicholas Cheong (Nicholas.Cheong@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 22 – 25 November 2021. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on as following:

https://rspo.org/uploads/default/pnc/RSPO_Public_Notification_Recertification_Sime_Darby_SOU_22_Bukit_Benut_POM_Supply_Base_English.pdf

Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24th March 2020. The remote audit was conducted on 9 & 11 August 2021

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

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

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

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

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of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)
Bukit Benut Palm Oil Mill	✓	✓	✓	✓	✓
Bukit Benut Estate	✓	✓	✓	✓	✓
CEP Niyor Estate	✓	✓	✓	✓	✓
Lambak Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: August 1, 2022 - August 5, 2022

Total Number of Mandays: 12

2.2 BSI Assessment Team

Name	Role	Competency
Hafriazhar Mohd. Mokhtar (HMM)	Team Leader	<p>Education: Bachelor of Engineering (Hons.) Chemical Engineering, UTM.</p> <p>Work Experience: Near 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 environments ranging from construction, plantation and mining before shifted into auditing. In short, his career began as Environmental Officer (2002-2003) in construction, Mill Engineer (2003-2008) in plantation, Project Control Engineer (2008-2011) in mining and Auditor/Client Manager (2011-present) in certifications auditing.</p> <p>Training attended: Social Auditing & SMETA Training (2021), ISO 45001 LA Training (2018), MSPO LA Training (2017), RSPO SCCS LA Training (2016), RSPO P&C LA Training (2015), ISO 9001 LA Training (2013), ISO 50001 LA Training (2012), ISO 14001 LA Training (2011).</p> <p>Aspect covered in this audit: During this assessment, he covered Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal</p>

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		<p>Requirements, land & Legal issue and RSPO Supply Chain, General Custody of Chain, Rules on Market Communications & Claims.</p> <p>Language proficiency: Bahasa Malaysia and English.</p>
<p>Yusof Khairan Nizar Ahmad Tarmizi (YKN)</p>	<p>Team Member</p>	<p>Education: Certificate of Safety and Health Officer-Malaysian Insurance Institute (2003). Bachelor of Corporate Administration (Hons)-MARA University of Technology, Malaysia (2003), Master of Science in Occupational Safety and Health Management-Northern University of Malaysia (2011).</p> <p>Work Experience: Experience in managing, consulting, training and auditing Quality, Environmental, Occupational Safety and Health Management Systems such as ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, OHSAS 18001:2007, MS1722:2011 since 1996. Contract Trainer of OSH & Environmental Legal & Other Requirements Lead Auditors course for SIRIM Training Services Sdn Bhd & NIOSH Certification Sdn Bhd. Contract Auditor for Quality, Environmental, Occupational Safety and Health Management System and Malaysia Sustainable Palm Oil (MSPO). OSH, Legal and Environmental Auditor for TUV Rheinland Malaysia RSPO Principles & Criteria. Contract SIRIM QAS International Auditor (2006). Department of Occupational Safety and Health Malaysia (DOSH) Registered Safety and Health Officer (2003-2006). Approved Human Resources Development Fund (HRDF) Trainer (since 2011). Also appointed as Assessor for Prime Minister’s Hibiscus Award involving assessment for oil and gas companies, plantations industries, manufacturing, utilities, cleaning and transportations services (since 2003). MPOCC Registered Peer Reviewer.</p> <p>Training attended: Successfully attended course ISO 9001:2000 IRCA/IATC A Lead Auditor Training-International Management & Technology Limited (Kuala Lumpur), ISO 14001:2004 IEMA Approved EMS Advanced Lead Auditor Training Course-Aspects Moody Certification Ltd (UK). OH&SMS IRCA Certified Lead Auditor Training Course-Moody International (KL). MS 1722 Lead Auditor Training- NIOSH Certification (KL) and RSPO – TUV Rheinland (Indonesia). MSPO Auditing – SGS (Malaysia). RSPO P&C 2018 Lead Auditor Course – Checkmark Training. Also attended the Quality & Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment – For Bodied Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality Malaysia, ISO/IEC 17021. MSPO Peer Reviewer Training (MPOCC).</p> <p>Aspect covered in this audit: During the assessment, he covered Economic management plan, mill best practices, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV, Occupation Health Safety requirement, HIRARC, Environment responsibility, training, environment impact assessment and management plan and RSPO supply chain requirements.</p> <p>Language proficiency: Bahasa Malaysia and English.</p>
<p>Dr. Suhaili Sahari</p>	<p>Peer Reviewer</p>	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato’ Mohd Muda.</p>

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		<p>Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Lead Auditor and Internal Auditor 2. ASI reviewer training 3. Safety and Health 4. ISO 14001:2015 Standard 5. RSPO Standards: RSPO P&C 2018 MY-NI 2019 6. MSPO Standards : MS 2530 : 2013 part 1, 2 , 3 and 4 7. Problem Solving Technique : 8 D, ICC, QCC, Systematic PS 8. HACCP MS 1480:2019 9. GAP Standard : Global GAP, Euru GAP
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Accompanying Persons:

Name	Role
Nil	N/A

3.3 Assessment Plan

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

On-site (70%) audit plan:

Date	Time	Subjects	HMM	YKN
Sunday, 21/11/2021	PM	Audit Team Travelling	✓	✓
Monday, 22/11/2021 Day 1 Lambak Estate	9:00 AM – 9:30 AM	Opening meeting <ul style="list-style-type: none"> • Opening presentation by audit team leader • Confirmation of assessment scope and finalize audit plan 	✓	✓
	9:30 AM – 1:00 PM	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.	✓	✓

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Date	Time	Subjects	HMM	YKN
	10:30 AM – 11:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	✓	-
	1:00 PM – 2:00 PM	Lunch break	✓	✓
	2:00 PM – 4:30 PM	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.)	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> Auditors discussion Day 1 Interim Closing Briefing 	✓	✓
Tuesday, 23/11/2021 Day 2 Bukit Benut Palm Oil Mill	9:00 AM – 1:00 PM	Plant visit: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, lab, weighbridge, and palm product storage area etc.	✓	✓
	10:30 AM – 11:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	✓	-
	1:00 PM – 2:00 PM	Lunch break	✓	✓
	2:00 PM – 4:30 PM	Document Review P1 – P7: SOPs, review on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, RSPO SCC general requirements, supply chain for CPO mill, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> Auditors discussion Day 2 Interim Closing Briefing 	✓	✓
Wednesday, 24/11/2021 Day 3 CEP Niyor Estate	9:30 AM – 1:00 PM	Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓
	10:30 AM – 11:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	✓	-

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Date	Time	Subjects	HMM	YKN
	1:00 PM – 2:00 PM	Lunch break	✓	✓
	2:00 PM – 4:30 PM	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.)	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> Auditors discussion Day 3 Interim Closing Briefing 	✓	✓
Thursday, 25/11/2021 Day 4 Bukit Benut Estate	9:30 AM – 1:00 PM	Field visit: Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	✓	✓
	10:30 AM – 11:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	✓	-
	1:00 PM – 2:00 PM	Lunch break	✓	✓
	2:00 PM – 4:30 PM	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.)	✓	✓
	4:30 PM – 5:00 PM	<ul style="list-style-type: none"> Auditors discussion Interim Closing Briefing (Bukit Benut Estate) 	✓	✓
	5:00 PM – 5:30 PM	<ul style="list-style-type: none"> Closing meeting Presentation of findings and recommendation 	✓	✓

Remote (30%) audit plan:

Date	Time	Subjects	HMM	YKN	ICT Planned
Thursday, 5/8/2021	4:00 PM – 4:30 PM	<ul style="list-style-type: none"> Online teleconference trial/test call between client and BSI auditors Communication on document preparation for remote/ICT audit 	✓	✓	MS Teams Teleconference
Monday, 9/8/2021 CEP Niyor Estate	9:00 AM – 9:20 AM	Opening meeting <ul style="list-style-type: none"> Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan 	✓	✓	MS Teams Teleconference

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Date	Time	Subjects	HMM	YKN	ICT Planned
9:20 AM – 12:40 PM	9:20 AM – 10:20 AM	Assessment and documentation review on: Good agriculture practice, legal requirements, OHS and continual improvement	-	✓	MS Teams Teleconference & WhatsApp
	10:20 AM – 10:30 AM	10-minutes break	✓	✓	
	10:30 AM – 11:30 PM	Assessment and documentation review on: Social aspects, legal requirements, employees' welfare and stakeholder management	✓	-	MS Teams Teleconference & WhatsApp
	11:30 AM – 11:40 AM	10-minutes break	✓	✓	
	11:40 AM – 12:40 PM	Assessment and documentation review on: Good agriculture practice, legal requirements, environment, HCV and continual improvement	-	✓	MS Teams Teleconference & WhatsApp
	12:40 PM – 1:40 PM	Lunch break	✓	✓	
Bukit Benut POM 1:40 PM – 5:00 PM	1:40 PM – 2:40 PM	Assessment and documentation review on: Mill practices, legal requirements, OHS, continual improvement and Supply Chain requirements	-	✓	MS Teams Teleconference & WhatsApp
	2:40 PM – 2:50 PM	10-minutes break	✓	✓	
	2:50 PM – 3:50 PM	Assessment and documentation review on: Social aspects, legal requirements, employees' welfare, stakeholder management and Supply Chain requirements	✓	-	MS Teams Teleconference & WhatsApp
	3.50 PM – 4:00 PM	10-minutes break	✓	✓	
	4:00 PM – 5:00 PM	Assessment and documentation review on: Mill best practices, legal requirements, environment, GHG and continual improvement	-	✓	MS Teams Teleconference & WhatsApp
	5:00 PM – 5:20 PM	Day 1 closing/interim briefing	✓	✓	MS Teams Teleconference & WhatsApp

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Date	Time	Subjects	HMM	YKN	ICT Planned
Wednesday , 11/8/2021 Lambak Estate 9:00 AM – 12:20 PM	9:00 AM – 10:00 AM	Assessment and documentation review on: Good agriculture practice, legal requirements, OHS and continual improvement	-	✓	MS Teams Teleconference & WhatsApp
	10:00 AM – 10:10 AM	10-minutes break	✓	✓	
	10:10 AM – 11:10 AM	Assessment and documentation review on: Social aspects, legal requirements, employees' welfare and stakeholder management	✓	-	MS Teams Teleconference & WhatsApp
	11.10 AM – 11:20 AM	10-minutes break	✓	✓	
	11:20 AM – 12:20 PM	Assessment and documentation review on: Good agriculture practice, legal requirements, environment, HCV and continual improvement	-	✓	MS Teams Teleconference & WhatsApp
	12:20 PM – 1:20 PM	Lunch break	✓	✓	
Bukit Benut Estate 1:20 PM – 4:40 PM	1:20 PM – 2:20 PM	Assessment and documentation review on: Good agriculture practice, legal requirements, OHS and continual improvement	-	✓	MS Teams Teleconference & WhatsApp
	2:20 PM – 2:30 PM	10-minutes break	✓	✓	
	2:30 PM – 3:30 PM	Assessment and documentation review on: Social aspects, legal requirements, employees' welfare and stakeholder management	✓	-	MS Teams Teleconference & WhatsApp
	3.30 PM – 3:40 PM	10-minutes break	✓	✓	
	3:40 PM – 4:40 PM	Assessment and documentation review on: Good agriculture practice, legal requirements, environment, HCV and continual improvement	-	✓	MS Teams Teleconference & WhatsApp
	4:40 PM – 5:10 PM	Closing meeting	✓	✓	MS Teams Teleconference & WhatsApp

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>Yes. Sime Darby Plantation Berhad TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. 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): http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</p>	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	<p>Yes. Generally all estates and mills excepted stated below or in the TBP are certified with RSPO.</p> <p>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.</p> <p>In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently Sime Darby Plantation Berhad have no control in the management.</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
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Although there are deviation has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.	Complied
Have there been any changes to the time-bound plan since the last audit (both new	Yes.	Complied

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<p>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.</p> <p>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>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/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</p> <p>ACOP 2019 has been cross-referenced as below: www.rspo.org/members/29</p>	
<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</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>

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of the plan? If yes a Major non-compliance shall be raised		
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<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-planting-procedure/public-consultations/sime-darby-plantation-berhad-nbpol-poliamba-limited 2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-a-subsiary-of-sime-darby-plantation-bhd-guadalcanal-plain-palm-oil-ltd 3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-ramu-agri-industries-ltd 4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd-ramu-agri-industries-limited 5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-oil-ltd-higaturu-oil-palms 6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO website https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-poliamba-limited-lamawan-png 7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO website https://rspo.org/certification/new-planting-procedure/public-consultations/nbpol-poliamba-limited-lamendauen-png 	Complied

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	<p>8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-planting-procedure/public-consultations/new-britain-palm-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-planting-procedure/public-consultations/new-britain-palm-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-planting-procedure/public-consultations/new-britain-palm-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-planting-procedure/public-consultations/sime-darby-liberia-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-planting-procedure/public-consultations/sime-darby-liberia-plantation-inc.-new-planting-assessment-1</p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-planting-procedure/public-consultations/sime-darby-liberia-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 per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of 14/07/2021, 10 LUCAs were approved with 0 conservation liability and remaining 9 are still pending from RSPO.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with</p>	<p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all</p>	<p>Complied</p>

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RSPO P&C criterion 4.2	management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.	
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 between July 2020 – August 2020. 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	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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

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	-
		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. 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	-
		Kempas Estate					
		Tangkah Estate					
		Kemuning Estate					
18	Diamond Jubilee	Diamond Jubilee Palm Oil Mill	-	Jasin, Melaka	Certified	05/10/2011	-
		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 Elaeis 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	Lavang Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Lavang 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

							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	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Bebunga Estate						
		Sungai Cengal Estate						
		Bakau Estate						
		KKPA LMR						

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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	-		Kotabaru District – South Kalimantan	Certified	05/07/2011	-
		Gunung Aru Estate						
		Gunung Kemasan Estate						
		Laut Timur Estate						
		Pantai Timur Estate						

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		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						
		Betung Estate						
		Sekayu Estate					01/04/2014	
12	PT Indotruba Tengah	Sekunyir Mill	-	-	Seruyan and West Kotawaringin District – Central Kalimantan	Certified	23/11/2010	-
		Sekunyir						
		Seruyan Estate						

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13	PT Swadaya Andika	Selabak Mill	-	-	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.
		Selabak Estate						
		Randi Estate						
		Sangkoh Estate						
		Lanting Estate						
14	PT Bina Sains Cemerlang	Sungai Pinang Mill	-	-	Musi Rawas District – South Sumatera	Certified	11/09/2012	Remarks: Land legalisation process for 308.35 ha is still in process.
		Sungai Pinang Estate	-					
		Bukit Pinang Estate						
15	PT Teguh Sempurna	Pemantang Mill	-	-	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	05/07/2011	-
		Pemantang Estate	-					
		Kawan Batu Estate						
		Hatan Tiring Estate						
		Batang Garing Estate						
16	PT Bhumireksa Nusa Sejati	Teluk Bakau Mill	-	-	Indra Giri Hilir District – Riau	Certified	11/10/2011	-
		Teluk Bakau Estate						
		Nusa Lestari Estate						
		Nusa Perkasa Estate						
		Mandah Mill						
		Mandah Estate						
		Rotan Semelur Estate						
	01/04/2014							
17	PT Intipersada Aneka	Teluk Siak Mill	-	-	Pekanbaru, Siak District – Riau	Certified	11/10/2011	-
		Teluk Siak Estate						
		Pinang Sebatang Estate						
		Aneka Persada Estate						

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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 – Nanggroe 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 Sandika Natapalma	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							
		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		

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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	
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)					
		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					

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		Kara Estate		New Ireland Province, PNG			
		Nalik Estate					
		West Coast Estate					
		Noatsi Estate					
		Madak Estate					
		Smallholders -North Division (615)					
		Smallholders- South Division (868)					
		Smallholders -West Division (309)					
4	Ramu Agricultural 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				
		Karausu Estate				
		Moroa Estate				
		Bilomi Estate				
		Loata Estate				
		Haella Estate				
		Garu Estate				
		Daliavu Estate				

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		Sapuri Estate					
		Malilimi Estate					
		Rigula Estate					
		Numundo Estate					
		Navarai / Karato ME /KDC EU Estate					
		Volupai / Lotomgam / Natupi / Goruru Estate					
		Lolokoru Estate					
		Ove Estate					
		Tamare Estate					
		Smallholders LSS Mosa (1822)					
		Smallholders VOP East (1817)					
		Smallholders VOP Central (1964)					
		Smallholders VOP West (1279)					
		Smallholders LSS Kapiura (551)					
		Smallholders VOP Kapiura (850)					
		Smallholder Kaulong / Akami / Pushiki / Repamira / Sakapei					
7	Markham Farms 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 was one (1) Minor nonconformity and one (1) Opportunity For Improvement raised. The Sime Darby Plantations SOU 22 Bukit Benut Palm Oil Mill & 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 below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2134544-202111-N1	Date Issued	25/11/2021
Due Date	Next assessment	Date of nonconformity Closure	Open
Clause & 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>		
Corrections:	<p>1) Follow-up email has been sent to WMU person in-charge on 23.11.2021</p> <p>2) Flight ticket for the said worker has been booked by WMU and flight will be departed on 30.12.2021.</p> <p>The said worker has been consulted on his flight arrangement accordingly.</p>		
Root Cause Analysis:	<p>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.</p> <p>2) COM and Special Pass can only be applied once flight ticket has been booked and confirmed.</p> <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</p>		

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	understand the process. Furthermore, the follow up consultation was not made periodically (only by worker’s request).
Corrective Actions:	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. Estate management will conduct periodical consultation for the worker’s facing delayed flight arrangement for repatriation due to pandemic.
Assessment Conclusion:	CAP has been accepted. Evidence of implementation and the CAP effectiveness to address the Minor NC to be verified during next assessment.

Opportunity for Improvements	
OFI #	Description
2134544-202111-11	The established Waste Management Plan FY 2021 can be further enhanced by clearly explain the action for segregation and recycling of domestic and household inorganic waste, plastics bottles from being dispose at Landfill in CEP Niyor Estate.

Positive Findings	
PF #	Description
1	Good cooperation among the team.
2	Good document retrieval.
3	Positive feedbacks from interviewed external stakeholders.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1930317-202007-N1	Date Issued	23/7/2020
Due Date	Next assessment	Date of nonconformity Closure	9/8/2021
Clause & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	The understanding of the disposal materials into the landfill was not fully understood to comply with the Operational Control Procedure for Landfill Management In Estate (SD/SDP/PSQM(ESH)203-EN7) dated 13th march 2017		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	Lambak Estate – During the site visit to the landfill it was sighted that there were several motor oil containers (2T/4T Oil) disposed in the domestic waste landfill.		

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Corrections:	Estate has removed the empty motor oil containers (2T/4T Oil) from the landfill and store it in the scheduled waste store and will dispose accordingly together with other scheduled wastes.
Root Cause Analysis:	The issue happened due to empty motor oil containers (2T/4T Oil) was not generated from estate’s operation activity hence estate did not pick that up as part of estate’s operation generated waste or scheduled waste in their waste monitoring. The waste possibly generated by outsider/workers at linesite area. Linesite inspection did not cover on the monitoring of waste that should not be generated in the linesite area
Corrective Actions:	Estate will conduct briefing on waste management to all the workers and contractors which includes to inform them what type of waste should not be generated at linesite. Estate also will include checking on wastes that should not be generated at linesite area in the weekly linesite inspection.
Assessment Conclusion:	<p>Verification conducted during partial remote RAV 2 indicated the following:</p> <ul style="list-style-type: none"> - Photographic evidence of cleared landfill pit with signboard - Records of work area inspection in landfill dated 6/11/2020, 13/11/2020 & 20/11/2020 - Records of workers training of waste management dated 15/1/2021 - Records of sample latest SW409 disposal by SS Setia Teknologi Enterprise dated 10/2/2021 <p>The evidences sighted found adequate and effectively implemented. Thus, the Minor NC closed on 9/8/2021.</p>

Non-conformity			
NCR Ref #	1930317-202007-N2	Date Issued	23/7/2020
Due Date	Next assessment	Date of nonconformity Closure	9/8/2021
Clause & Category (Critical / Minor)	3.4.3 (Minor)		
Statement of Nonconformity:	The monitoring of the Pollution Controlled Device effectiveness and Waste Management Plan 2020 was not effectively implemented.		
Requirement Reference:	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		
Objective Evidence:	<p>CEP Niyor Estate:</p> <p>During the site visit to the workshop it was sighted that the Pollution Controlled Device (Oil Trap) was not able trap the oil from the parts washing area as per Waste Management Plan 2020 action plan in for workshop.</p>		
Corrections:	Estate to clean up the traces of oil found at the oil trap.		
Root Cause Analysis:	Due to rainy season, excessive water has overflown from the oil trap and caused traces of oil to flow at last compartment of the oil trap. Monitoring of oil trap was also found not adequately done on regular basis.		
Corrective Actions:	Weekly monitoring will be done by estate’s foreman to ensure the oil trap at workshop area is working efficiently.		

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Assessment Conclusion:	<p>Verification conducted during partial remote RAV 2 indicated the following:</p> <ul style="list-style-type: none"> - Photographic evidence of cleared oil trap which functioned properly - Sample Oil Trap Inspection Records dated 6/7/2021, 14/7/2021, 22/7/2021, 27/7/2021, 4/8/2021 & 9/8/2021 indicated good condition of oil trap. <p>The evidences sighted found adequate and effectively implemented. Thus, the Minor NC closed on 9/8/2021.</p>
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Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement:</p> <p>Implementation of workers' housing (line site) weekly inspection within operating units using the "Housing Complex/Nest/Community Hall Inspections" form could be further improved its consistency of information reported to reflect actual conditions and/or situation of whole or specific area/building/house within the operating units.</p> <p>Verification / Follow-up actions:</p> <p>The mill and estates within SOU 22 established the Employee Welfare Committee (EWC) as a team to represent and conduct the housing inspection based on area assigned to designated representative as per sample Housing Inspector appointment letter for Bukit Benut Estate dated 1/9/2021; Hussien Bin Mohd. Dali; Field Staff. Sighted sample weekly housing and facilities inspections conducted as following:</p> <ul style="list-style-type: none"> - Lambak Estate: Visiting Medical Officer; Ellar Estate; Date: 1/1/1996 - Lambak Estate latest housing inspection date: 19/11/2021 - CEP Niyor Estate latest housing inspection date: 21/11/2021 - CEP Niyor Estate latest VMO visit date: 20/11/2021 by Dr. Helen Tan Kwai; Klinik Renggam - Bukit Benut Estate latest VMO visit date: 24/11/2021 by Dr. Helen Tan Kwai; Klinik Renggam; Creche visit date: 13/10/2021
OFI 2	<p>OFI Statement:</p> <p>Potential social aspects/issues related to housing/living conditions based on results of implementation of workers' housing (line site) weekly inspection could be alternative inputs to Social Impact Assessment to be managed better in absence of any grievance and/or complaints from workers themselves</p> <p>Verification / Follow-up actions:</p> <p>No new planting in all estates within SOU 22. 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 - Improvements conducted by individual operating units within SOU 22 including housing improvement programs, minimum wages achievement monitoring and community contribution programs.

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1359037M1	Major	2.1.1	29/7/2016	Closed out on 5/9/2016
1359037M2	Major	4.6.11	29/7/2016	Closed out on 5/9/2016
1359037M3	Major	6.5.2	29/7/2016	Closed out on 5/9/2016
1359037M4	Major	5.3.3	29/7/2016	Closed out on 5/9/2016
1359037M5	Major	SCC D2.2	29/7/2016	Closed out on 5/9/2016
1359037N1	Minor	2.1.2	29/7/2016	Closed out on 21/7/2017
1359037N2	Minor	4.6.10	29/7/2016	Closed out on 21/7/2017
1359037N3	Minor	4.7.6	29/7/2016	Closed out on 21/7/2017
1503698-201707-N1	Minor	6.5.3	21/7/2017	Closed out on 6/7/2018
1503698-201707-N2	Minor	6.9.3	21/7/2017	Closed out on 6/7/2018
1503698-201707-N3	Minor	5.1.2	21/7/2017	Closed out on 6/7/2018
1503698-201707-N4	Minor	4.7.3	21/7/2017	Closed out on 6/7/2018
1503698-201707-N5	Minor	4.7.5	21/7/2017	Closed out on 6/7/2018
1655429-201807-M1	Major	4.3.1	6/7/2018	Closed out on 26/8/2018
1655429-201807-N1	Minor	2.1.3	6/7/2018	Upgraded to Major NC
1655429-201807-N2	Minor	4.2.3	6/7/2018	Closed out on 03/08/2019
1655429-201807-N3	Minor	4.6.10	6/7/2018	Closed out on 03/08/2019
1805554-201903-M1	Major	4.4.2	3/8/2019	Closed on 2/10/2019
1805554-201903-M2	Major	2.1.3	3/8/2019	Closed on 2/10/2019
1805554-201903-M3	Major	RSPO SCCS D 4.2	3/8/2019	Closed on 2/10/2019
1805554-201903-N1	Minor	4.7.3	3/8/2019	Closed on 23/7/2020
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	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 Sime Darby Plantations SOU 22 Bukit Benut Palm Oil Mill & 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

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stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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

Stakeholders contacted		
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)
Visiting Medical Officer (VMO)	Klinik Rengam	Face to face interview
Gender committee representative	- Chief Clerk - Creche Ayah	Face to face interview
Spare part supplier	Syarikat Sim Kim Huat	Face to face interview
Estate contractor	- AVN Brothers - Eng Hup Heng Majujaya Enterprise	Face to face interview
Mill Mandore	Mill NUPW representative	Face to face interview
Estate FFB transporter	Samareddy Enterprise	Face to face interview
Mill contractor	Kewaja	Face to face interview
Village/Community representatives	- Kampung Sri Ampangan - Kampung Melayu Niyor - Kampung Pisang - SJKT CEP Niyor	Face to face interview
Weighbridge clerk	New mother	Face to face interview
Estate Mandore	Estate NUPW representative	Face to face interview
Estate Clinic	Medical Assistant	Face to face interview
Branch Secretary	NUPW Kluang	Face to face interview

All consulted stakeholders provided positive feedbacks except for the following:

Stakeholders comment	
1	<p>Feedbacks: Foreign workers' representatives</p> <p>There was a feedback received from an internal stakeholder in Lambak Estate as following:</p> <ul style="list-style-type: none"> - 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 <p>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>

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	<p>Audit Team verification and response: Trailing of documentations were made and a finding has been raised in indicator 4.2.3 below.</p>
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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.					


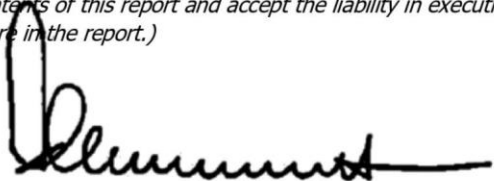
Previous land owner / user comment	
Nil	Feedbacks: N/A
	Audit Team verification and response: N/A

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.

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 Sime Darby Plantations SOU 22 Bukit Benut Palm Oil Mill & 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 Sime Darby Plantations SOU 22 Bukit Benut Palm Oil Mill & Supply Base is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Hafriazhar Mohd. Mokhtar	Name: Zulkifli bin Mohammed Hashim
Company Name: BSI Services Malaysia Sdn. Bhd.	Company Name: Sime Darby Plantation Berhad
Title: Lead Auditor	Title: Manager (SOU 22 Chairman)
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 31/12/2021	Date: 03/01/2022

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>Interview conducted on-site with sampled internal and external stakeholders confirmed that the information provided in appropriate languages and accessible to them.</p> <p>There was a feedback received from an internal stakeholder in Lambak Estate as following:</p> <ul style="list-style-type: none"> - Foreign Worker Repatriation Form; Date: 28/9/2021; Name: Syamsul Suaeka; Date arrival: 12/1/2014; Permit expiry date: 	Complied

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		<p>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</p> <p>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. Trailing of documentations were made and a finding has been raised in indicator 4.2.3 below.</p>	
1.1.3	<p>(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p>SOU 22 maintained records of request for information and responses as per sample sighted as following:</p> <ul style="list-style-type: none"> - Bukit Benut Estate Kampung Sri Ampangan requests dated 22/6/2021 - Bukit Benut Estate Sekolah Agama Ladang Bukit Benut requests dated 23/6/2021 - Bukit Benut Estate SK Ladang Bukit Benut requests dated 23/6/2021 - Lambak Estate workers' housing repair requests dated 23/1/2021 - CEP Niyor Estate Kluang Veterinary Service Office requests dated 17/3/2021 - CEP Niyor Estate Niyor Police Post request dated 11/1/2021 <p>All requests found to be responded within short time by respective recipients.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -</p>	<p>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</p>	Complied

		<p>Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>Procedures were briefed to external stakeholders during the consultation meeting and to all workers during workers meeting and assembly sessions from time to time.</p> <p>The person in charge for communication and consultation for Bukit Benut POM is Mr. Ahmad Akhmal Bin Anuar, Assistant Mill Manager as per appointment letter dated 1/1/2021, for Bukit Benut Estate is Ms. Nur Nadiah Hani Binti Mohmad Natni, Assistant Manager as per letter dated 30/12/2020, for Lambak Estate is Mr. Muhammad Zakwan Bin Jamaluddin, Assistant Manager as per letter dated 1/6/2021 and for CEP Niyor Estate is Mr. Azlan Bin Mustafa, Assistant Manager as per letter dated 2/1/2021.</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>The latest Stakeholders Lists for all operating units within SOU 22 sighted available as updated on July 2021. Information of 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>	Complied
<p>Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
1.2.1	<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 and Bukit Benut Estate on 7/4/2021, Lambak Estate on 26/3/2021 and CEP Niyor Estate on 27/7/2021.</p>	Complied

		<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 sighted available for sampled Bukit Benut Estate contractor Zaidah Terus Maju Enterprose; Grass Cutting Memorandum of Agreement (MOA) Date: 1/1/2021 and for sampled Bukit Benut POM contractor Samareddy Enterprise; POME Transport MOA date: 1/1/2020.</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> <p>- Minor compliance -</p>	<p>Monitoring included the internal audit conducted by Regional SQM internal auditors for SOU 22. Latest internal audit was conducted on 12-16/7/2021 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> <p>- Critical (Major) compliance -</p>	<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. Among others the licenses/permit viewed were;</p> <p>All Estates and mill established and maintained a Legal and Other Requirements Register (LORR) that was reviewed on in FY 2021 and results indicated 100% compliance as approved by each Managers. Below were evidences of compliance as sampled.</p> <p>CEP Niyor Estate</p>	Complied

		<p>a) License Air compressor JH PMT 82460 16/5/21 requested online on 19/03/21 but due to MCO DOSH Officer not able to come for inspection.</p> <p>b) Permit for Storage Diesel 15,000 L ref J 038210 valid till 17/8/21 (Regulation 9(2) Control of Supplies Regulations 1974).</p> <p>c) MPOB license No.: 508445102000 valid till 31/3/22</p> <p>d) Permit Salary Deduction: Serial No.: JTK PP3/29/0144 started from 01/12/98 (Under Sect. 24 labour Act 1955)</p> <p>Bukit Benut POM</p> <p>a) MPOB license: 528154-00-4000 31/3/22</p> <p>b) Fire Certificate valid till 13/04/22</p> <p>c) Fume Hood in Lab Written Approval or Notification to DOE.</p> <p>d) Audiometric Test was conducted for 33 employees in 2020.</p> <p>e) Air Compressor PMT 149140 valid till 06/01/22</p> <p>Bukit Benut Estate</p> <p>a) Diesel (9,000 Lit) Petrol (1,000 Lit) Storage Permit J000977 from KPDNKK valid till 28/07/23</p> <p>b) MPOB License No. 522307002000 valid till 20/07/21 (BLESS Renewal available)</p> <p>c) Air Compressor JH PMT22514 valid till 28/03/22</p> <p>d) Air Compressor JH 13852 valid till 02/05/22</p> <p>Lambak Estate</p> <p>a) MPOB License No. 518641002000 valid till 28/02/22</p>	
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		<p>b) Diesel (17,000 Lit) Petrol (40 Lit) Storage Permit J002383 from KPDNKK valid till 28/07/23 (BLESS Renewal available).</p>	
<p>2.1.2</p>	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations. - Minor compliance -</p>	<p>The SOU 22 estates and mill 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-charge and approved by the respective managers. Recently update on July 2021.</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 and Regulations • 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. • Minimum Retirement Age Act 2012 	<p>Complied</p>

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		<ul style="list-style-type: none"> • Passport Act 1996 • Uniform Building By-Laws 1984 • Arms Act 1960 <p>Newly added such as Auxiliary Police Regulations 1970, Restriction Movement Order 2020, Control of Infectious Disease Act 1988.</p>	
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 CEP Niyor, Lambak, Bukit Benut) have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 3 estates, 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>	Complied
<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>As sampled found estates in SOU22 have listed and maintain all contracted parties and documented in List of Stakeholder as parts of their stakeholders includes internal such as employee and workers union and external stakeholders such as FFB suppliers, local community heads, government agencies.</p> <p>a) CEP Niyor Estate: July 2021 b) Bukit Benut POM: FY 2021 c) Lambak Estate: FY 2021 d) Bukit Benut Estate: FY 2021</p>	Complied
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>a) All contracted parties/vendors were required to signed Vendor Integrity Pledge (VIP) and to comply with all applicable laws and regulations related anti-bribery, fraud and corruption and Vendor Code of Business Conduct (VCOBC) such as labour and Human Rights. Signed by Leoks Brothers, RSKP Brothers & Sakhti Enterprise) with CEP Niyor Estate.</p>	Complied

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	<p>- Minor compliance -</p>	<ul style="list-style-type: none"> b) Sampled Contract Agreement with Back Hoe (NCM 5008) Contractor (Sakhti Enterprise) until 31/10/21 which contained terms such as legal compliance, ensure valid working permit, covered by SOCSO and paid as per employment requirements. c) 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 Lambak Estate. d) 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 Lambak Estate and complying with requirements of RSPO and SCCS. e) Bukit Benut Estate has signed an agreement for rental of excavator, back hoe, tractor and trailer with AVN Brothers on 01/01/21. The contractor and supplies shall comply with OSH and environmental legal requirements, RSPO/SCCS, comply with Vendor's VCOBC pledge f) Sighted another signed contract agreement for grass cutting job with Zaidah Terus Maju Enterprise on 31/12/20 with Bukit Benut Estate The contractor 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>2.2.3</p>	<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>The contract signed with contractors is sighted in CEP Niyor Estate, Bukit Benut Estate, Lambak Estate and Bukit Benut POM with contractors, sighted clause 5.8 abolishment of child labour &</p>	<p>Complied</p>

	- Minor compliance -	protecting the rights of children available in the Vendor COBC and Human Rights Charter protecting the rights of children.	
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
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>	The Bukit Benut POM received FFB from sister estates from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Supplier 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.	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 Indicator 2.3.1.</p> <p>- Minor compliance -</p>	The mill received FFB from sister estate from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Supplier list.	Complied
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
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>	Available Business Management Plan, a 5 years plan for CEP Niyor Estates, Lambak Estate, Bukit Benut Estate and Bukit Benut POM as sighted. Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. Sighted the annual budget FY 2020 and business plan FY 2021 – FY 2025	Complied
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	Estates in SOU 22 (Niyor Estates, Lambak Estate, Bukit Benut Estate) have long range replanting program until FY 2026. Replanting planned for the palm older than 25 years, non-	Complied

		performance field (yield) and Ganoderma infected palm. Observed the replanting program for the next financial year as follows:	
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake. - Minor compliance -	Sime Darby Plantation Berhad has develop Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019, Section 20.0 where management review will be reviewed annually. As sighted from Minutes of Mangement Review conducted in FY 2021, individual estates and mill has done them on 04/08/21 at CEP Niyor Estate, 30/07/21 at Bukit Benut POM, 03/08/21 at Lambak Estate and 16/07/21 at Bukit Benut Estate.	Complied
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.			
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -	SOU22 established individually the Social and Environment Improvement Plans based on the consideration of main social and environmental impact issues of concern that have been raised. With actions to be implemented, designated responsibilities and time frame of action. Amongst all, generally established action by mill and estates for continuous improvement FY2021 as sampled contained: <ul style="list-style-type: none"> - Spraying, manuring and rat baiting application reduction - Optimizing utilization and usage of non-renewable and renewable energy - Reduction of pesticides and reducing total number of spraying. - Workers' Housing Condition/Living Improvement - Workers' Working Condition - External stakeholders feedbacks 	Complied

		Improvements conducted by individual operating units within SOU 22 including housing improvement programs, minimum wages achievement monitoring and community contribution programs.	
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. - Minor Compliance -</p>	RSPO metrics template for SOU 22 made available for verification found to be consistent with evidence sighted.	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. - Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has established a Standard Operation Procedure for the estates / mill operations. There are levels of the documentation identified as follows:</p> <ul style="list-style-type: none"> • Level 1 Estate Quality Management System Standard Operation Manual • Level 2 EQMS Quality Management Manual • Level 3 Standard Operating Procedure • Level 4 Work Instruction • Level 5 Records. <p>CEP Niyor Estate found having a Masterlist of Documents that included SOPs for consistent operation.</p>	Complied

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3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>It was found that the Plantation Advisory Department has not conducted any visit to CEP Niyor Estate due to MCO restriction for 2020 and 2021 as part of performance monitoring to ensure compliance against company policy and procedure with regards to operation of estate. Available a Plantation Advisor Report for Lambak Estate No. STR/SOU 22/LEE/21/01/2021. Visited on 16-18/03/21.</p> <p>Another mechanism was through Internal audits by GCAD / RSQM that was conducted in FY 2021.</p>	Complied
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Available Internal Audit Report for FY 2021 for SOU 22 as document dated 21/07/21. The Mill Advisor (MA) and Plantation Advisor (PA) are accountable to monitor the estates compliance towards the SOP, Budget and Productivity as evidences of report established and kept by individual estates and mill.</p>	Complied
<p>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.</p>			
3.4.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting in all estates within SOU 22. 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>	Complied

		<p>Sampled Environmental Aspects and Impacts Identification and Assessment conducted for existing operation by SOU22 as below: CEP Niyor Estate: Serial No. EIA/2021 Aspect: Discharge to land with load impact of Fuel container and rags with impact categorized as 5 (Land Contamination), 6 (Unpleasant Working Env.) Legal: EQ (Scheduled Waste) Regulations 2005. Approved by Senior Manager on 05/01/21. Bukit Benut POM Serial No. EIA/2020/008-1 Environmental Aspect and Impact Identification FY 2020 was conducted as sampled for Operation of electrostatic precipitator (ESP).</p> <p>Lambak Estate: Serial No. EIA/2021 Activity: Store cleaning Aspect: Dust release with environmental load of Dust with impact categorized as Air Pollution, Water Pollution and Unpleasant Condition. Legal: Environmental Quality (Clean Air) Regulations 2014. Activity: Loose Fruit loading. Aspect: Fuel Consumption with environmental load of diesel with impact categorized as Depletion of natural resources. Legal: Nil.</p>	
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<p>3.4.2</p>	<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>No new planting in all estates within SOU 22. 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> <p>Environmental Management Plan FY 2021 was established for all estates (CEP Niyor, Lambak, Bukit Benut) and Bukit Benut POM as documents provided.</p>	<p>Complied</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>No new planting in all estates within SOU 22. 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> <p>Sampled in Bukit Benut POM the implementation and monitoring of Environmental Management Plan.</p>	<p>Complied</p>

		<p>Workshop: Comply with S/W Regulations with actions and progress until Quarter 2 recorded.</p> <p>Landfill: Ensure proper management as required by SOP with action and progress until Quarter 2.</p> <p>Mill operation:</p> <ul style="list-style-type: none"> • Reduce black smoke emission to air with actions and progress until Quarter 2. • Reduce risk of POME discharge to waterways with actions and progress until Quarter 2. • Reduce massive land contamination at landfill area with actions and progress until Quarter 2. <p>CEP Niyor has established Pollution Prevention Plan FY 2021</p> <p>Replanting Activity:</p> <ul style="list-style-type: none"> • Minimize soil erosion during replanting with actions and progress until Quarter 2. • To prevent destruction of riparian with actions and progress until Quarter 2. <p>Spraying Activity: Ensure activity not polluting environment with actions and progress till Quarter 2.</p> <p>Landfill: Ensure proper landfill management as per SOP with actions and progress until Quarter 2.</p> <p>Lambak Estate has established Environmental Management Plan FY 2021</p> <ul style="list-style-type: none"> • Leakage of herbicides/pesticides during chemical mixing and washing into outside land with action and ongoing progress as stated. 	
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		<ul style="list-style-type: none"> Maximizing recycling and minimizing waste or by-products generation with actions and ongoing progress as stated. Waste management with actions and ongoing progress as stated. 	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<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 as the SOP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liason and recruitment, documentation and processing (Doc no: WMU/DP SOPP/JAN2016/R1), workforce management centre (WMC) Sua Betong, Careline and estate are available upon request.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Employment procedures are well implemented with records well maintained as per information reported in indicator 6.1.1 to 6.6.2 below.</p>	Complied
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>Sampled found in CEP Niyor Estate, Hazard Identification, Risk Assessment and Risk Control (Hirarc) was conducted.</p> <p>Bukit Benut POM has reviewed the Hirarc as evidence from Hirarc/EIA Review Meeting FY 2021 done on 30/07/21. The review included activities of Boiler Station (racking work at boiler furnace dated 24/04/21), Workshop Station (using cutting equipment dated 14/07/21).</p> <p>Lambak Estate has reviewed Hirarc 3 times in 2021. Review on transporting worker using motorcycle on 01/02/21 and 17/05/21 and Supervisors travelling in the field on 06/04/21. The review was</p>	Complied

		an update from accidents or changes that was made for all activities in estates and mill.	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>All estates in SOU 22 (CEP Niyor, Bukit Benut and Lambak) and Bukit Benut POM established OSH Plan to address and promoting OSH in operations. Sighted OSH programmes with designated responsibilities, date line and progress of implementation. Among programme included:</p> <ul style="list-style-type: none"> a) Safety and Health Committee meeting. b) Workplace inspection. c) OSH Trainings and Briefings d) ERP Training included drills e) Medical Surveillance f) Audiometric Test and etc. 	Complied
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
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 RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>Available a Training Matrix for CEP Niyor Estate, Lambak Estate, Bukit Benut Estate and Bukit Benut POM for FY2021 as sighted. And a training Plan FY 2021. The matrix defining type of training needed for level of employees in estates and mill. Another document found established is Annual Training Plan that list down all type of training plan to be conducted and the date line of implementation with status and progress monitored.</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>Sighted evidences of training with records kept:</p> <p>Among record of training sighted in CEP Niyor Estate (Photo evidence sighted):</p> <ul style="list-style-type: none"> • Rat Baiting Training conducted on 13/07/21 attended by 10 workers. • Spraying Training on 26/03/21 attended by 9 workers 	Complied

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		<ul style="list-style-type: none"> • Prunning Training on 01/07/21 attended by 18 workers. <p>Lambak Estate</p> <ul style="list-style-type: none"> • Briefing on Human Rights during morning muster (Photo) • Company policies training on 26/03/21. • Frond stacking training on 19/05/21 attended by 19 workers and 21/05/21 attended by 10 workers. Available training evaluation records attached as sampled. • Manuring training was conducted on 08/01/21 attended by 9 workers and available training evaluation form attached. • Chemicals applications training on 09/01/21 attended by 9 sprayer and staff. Available training evaluation form attached. <p>Bukit Benut</p> <ul style="list-style-type: none"> • Training on payslips was conducted on 31/05/21 and attended by 24 workers. • HCV and Biodiversity Training was conducted on 22/06/21. • Harvesting training was conducted on April 2021 <p>Bukit Benut POM</p> <ul style="list-style-type: none"> • COBC, Company Policies Complaint Training was conducted on 29/09/20 attended by 76 workers. • Human Right and Whistleblowing Training was conducted on 18/07/20 attended by 18 workers. • RSPO and SCCS Awareness Training was conducted on 30/09/20 attended by 58 workers 	
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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>RSPO and SCCS Awareness Training was conducted on 30/09/20 attended by 58 workers in Bukit Benut POM. Another training record sighted on SCCS Training for 11 staff of Bukit Benut POM conducted on 23/06/21 by RSQM STR. Training Slides available as sighted.</p>	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 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>As per SOP established and documented in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under Glossary section define the meaning of RSPO Identity preserved as supply chain model assured that the RSPO certified oil palm product delivered to the end user uniquely identifiable ta a single RSPO certified supply base.</p> <p>The mill received FFB from sister estate from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Supplier list.</p>	Complied
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>Bukit Benut POM implemented IP Module for its supply chain. Hence, no non-certified FFB received and processed except for own supply bases FFB and FFB diversion from other certified SOU only.</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</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>	Complied

	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.		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The mill license available at PalmTrace as following: - Member ID: RSPO_PO1000000194 - Member category: Oil Mill - RSPO Membership No.: 1-0008-04-000-00	Complied
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"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 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. The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>Procedure for supply chain has been established and documented in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019. Among the subjects covered in the procedure are:</p> <ul style="list-style-type: none"> Control of documents and records Delivery of FFB from estate Receiving FFB at the mill Process monitoring Products dispatch Non-conforming products and/or documents Products claims xii. Outsourced contractors Training Reclassification of mill's supply chain model Production volume Conversion factors Internal audit 	Complied

		<ul style="list-style-type: none"> • Complaints • Management review 	
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>Sampled Bukit Benut POM as addressed in Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability. Version 02, 2018, Issue No. 05 dated April 2019 stated under section 18.0 Internal Audit. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure. Further refer to SOP No. SD/SDP/PSQM/IAP.</p> <p>Refer to RSPO/MSPO Internal Audit Report for SOU22 dated 15/07/21. Internal audit included Supply Chain requirements was conducted accordingly. Result 3 Major NCRs, 3 Minor NCRs and 11 OFIs were raised, Root causes and corrective actions were properly planned and implemented as sighted in the report.</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>As sampled Bukit Benut POM have a system to verify at the weighbridge. Information for RSPO certified FFB were recorded in FFB Consignment notes and weighbridge tickets. Records verified during the audit as follow:</p> <p>Weight Bridge Ticket No. 107320 Seller: Bukit Benut Estate, Field: 2013A (Tambuku Division) Date: 31/07/31 Lorry No. JSU 8288 Net Weight: 9,930 Kg.</p> <p>FFB Consignment Note No.: 11578 Date: 31/07/21</p>	Complied

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		<p>From: Bukit Benut Estate to Bukit Benut POM. Field: 2013A (Tambuku Division) , Quantity: 9,920 Lorry No. JSU 8828 RSPO Cert. No.: 591229</p> <p>Weight bridge Ticket No.: 103719 Seller: CEP Niyor Estate, Field: 2015B (Ulu Paloh Division) Date: 31/07/21 Lorry No. JSM 9500 Net Weight: 12,110 Kg.</p> <p>Weight Bridge Ticket No.: 21627 From: CEP Niyor Estate to Bukit Benut POM Date: 31/07/21 Field: 2015B (Ulu Paloh Division), Quantity: 12,160 Kg</p>	
<p>3.8.8</p>	<p>Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</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; 	<p>As sampled Delivery Document CSPO Despatch Ticket No. 009075 dated 30/07/21:</p> <ul style="list-style-type: none"> a) The name and address of the buyer: Trading Hedging (TH) Batu 9, Jalan Banting-Klang, Teluk Panglima Garang Industrial Estate, 42500 Teluk Panglima Garang, Selangor. b) The name and address of the seller: Bukit Benut POM c) The loading or shipment / delivery date: 30/07/21 d) The date on which the documents were issued: 30/07/21 e) RSPO certificate number: RSPO 591229 	<p>Complied</p>

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	<ul style="list-style-type: none"> e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<ul style="list-style-type: none"> 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: 39560 kg (Nett Weight) h) Any related transport documentation: DO No.: 6642, PO No.: 389066 i) A unique identification number: Contract Ref.: S/PSD/2107/CPO00708 <p>Sampled Delivery Document CSPK Despatch Ticket No. 009656 dated 06/07/21:</p> <ul style="list-style-type: none"> a) The name and address of the buyer: SDO Carey KCP- SDP NURI KCP (NK) Kernel Crushing Plant Pulau Carey, 2266, East Estate, Carey Island, Kuala Langat, Selangor. b) The name and address of the seller: Bukit Benut POM c) The loading or shipment / delivery date: 06/07/21 d) The date on which the documents were issued: 1/7/2020 e) RSPO certificate number: 591229 f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): RSPO-IP g) The quantity of the products delivered: 28660 kg (Nett Weight) h) Any related transport documentation: DO No.: 2322, PO No.: 54377 i) A unique identification number: Contract Ref.: S/D-PSD/2106/PK0121B 	
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<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 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. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. 	<p>No outsource activity dealing with milling activities. In SOP for Sustainability Supply Chain and Traceability, Version 02, Issue No. 05 dated April 2019, Section 13.0 Outsourced Contractors stated that CPO Mill cannot outsourced processing activities like refining or crushing.</p> <p>As sampled in the contract agreement between The Sime Darby Plantation Bhd. with Teo Tuan Kwee Sdn. Bhd for transportation of CPO in Peninsular Malaysia, dated 12/12/20. Name and contact details were maintained by Bukit Benut POM as sampled. The contract will be expiring on 30/12/23</p>	<p>Complied</p>
<p>3.8.10</p>	<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 contract agreement between The Sime Darby Plantation Bhd. with Teo Tuan Kwee Sdn. Bhd. dated 26/7/2021, mentioned the site has legal ownership of all input material to be included in outsourced processes as per Annexure 5, RSPO Supply Chain Certification Standard.</p>	<p>Complied</p>

3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The outsource parties remain unchanged since last surveillance assessment.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> 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. 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. 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. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> 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. 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. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock. 	<ul style="list-style-type: none"> i) Sime Darby has established Standard Operating Procedure to maintain all records of evidence on the implementation of MSPO SCCS. The SOP was documented in Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records. ii) As stated in SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records all traceability records should be maintained at minimum period of 3 years. iii) Bukit Benut POM receives and process only certified FFB. Therefore, it uses the Identity Preserve supply chain system and module. iv) 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. <ul style="list-style-type: none"> b. All volumes of certified CPO and PK that were delivered were deducted from the material accounting system according to conversion ratios of OER and KER as per sample records of Mill production report Jun 2020 – Jul 2021 and FFB summary Jun 2020 – Jul 2021. 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 Bukit Benut POM. 	Complied

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 Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 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 Jun 2020 – Jul 2021.</p> <p>Volume estimates for next period were based on historical extractions and FFB projection from estates.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Extraction rates updated daily based on actual measurement of production output. Projected rates were based on historical extractions and FFB projection from estates.</p>	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 Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 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 certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.</p>	Complied
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</p>	<p>i) Based on the downloaded transactions register from the certification unit's Palmtrace, the company was able to</p>	Complied

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	<p>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>demonstrate that it has been registering its transactions in the Palmtrace accordingly.</p> <p>ii) Based on the announcement (transaction) summary, all the registrations were found to be in order as per sample as following:</p> <ul style="list-style-type: none"> - Palmtrace transaction # TR-4a98b048-0fbd; CPO volume: 211.83 mt - Palmtrace transaction # TR-90a91359-9969; CPO volume: 268.61 mt 	
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>	<p>RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.</p>	Complied
General corporate communications			
4.1	<p>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.</p>	<p>Not applicable as there was no off-product claim made by Bukit Benut POM and verified through document (business card, shipping documentation sampled). Thus, indicator (4.1-4.4) are not applicable</p>	Not Applicable
4.2	<p>In corporate communications a member is allowed to:</p> <ol style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. 	<p>Not applicable as no off-product claim made by Bukit Benut POM as to date.</p>	Not Applicable

	Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by Bukit Benut POM as to date.	Not Applicable
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as no off-product claim made by Bukit Benut POM as to date.	Not Applicable
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.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e. product/commodity with SCC model (CPO/Palm Kernel RSPO IP) and RSPO certificate number; RSPO 591229.	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 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	Bukit Benut POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not Applicable

	<p>that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification. For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>Bukit Benut POM is not under distributor or wholesaler category. Thus, this requirement is not applicable</p>	<p>Not Applicable</p>
Business to consumer communication			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.</p>	<p>Not applicable as no evidence sighted that business to consumer communication on product specific claim made Bukit Benut POM and only producing crude and unfinished product.</p>	<p>Not Applicable</p>
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	<p>Not applicable as no evidence sighted that business to consumer communication on product specific claim made Bukit Benut POM and only producing crude and unfinished product.</p>	<p>Not Applicable</p>
6.3	<p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p>	<p>Not applicable as no evidence sighted that business to consumer communication on product specific claim made Bukit Benut POM and only producing crude and unfinished product.</p>	<p>Not Applicable</p>
6.4	<p>Business to consumer communication shall not include information about the claimant's RSPO membership status.</p>	<p>Not applicable as no evidence sighted that business to consumer communication on product specific claim made Bukit Benut POM and only producing crude and unfinished product.</p>	<p>Not Applicable</p>

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

MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES

Certified oil palm content (IP)

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	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	The CPO & PK produced from Bukit Benut POM is 100% RSPO IP certified.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	The CPO & PK produced from Bukit Benut POM is 100% RSPO IP certified.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	The CPO & PK produced from Bukit Benut POM is 100% RSPO IP certified.	Complied
Labelling and trademark (IP)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • 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. 	Bukit Benut POM is producing crude palm product and does not involved in any labelling of end product.	Complied
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 	Bukit Benut POM is producing crude palm product and does not involved in any labelling of end product.	Complied

	<ul style="list-style-type: none"> • 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>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<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>SOU 22 has implemented the Sime Darby’s Human Rights Charter where they committed to recognizing the role of Human Rights Defenders in accordance to the United Nations declaration on Human Rights Defender.</p> <p>Awareness and training to all workers in order for them to understand their responsibility in respect of human rights were conducted by Bukit Benut POM and Bukit Benut Estate on 7/4/2021, Lambak Estate on 26/3/2021 and CEP Niyor Estate on 27/7/2021.</p>	<p>Complied</p>
<p>4.1.2</p>	<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>	<p>Complied</p>
<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>			

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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 whistle-blowers, 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 whistle-blowing 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> <p>Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing.</p>	Complied
4.2.3	<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>Neither any complaints nor land dispute occurred in the SOU 22 Certification Unit since the last audit. Notwithstanding, 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</p>	Non-compliance

		<p>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 grievance 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> <p>This indicated that the unit of certification does not 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>Hence, a Minor NC has been raised on the matter.</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: Bukit Benut POM:</p> <ul style="list-style-type: none"> - Gotong-royong perumahan; Date: 4/2/2021 - Bi-monthly rice contribution to all workers - Gotong-royong Masjid Jamek; Date: 11/4/2021 - Chicken giveaway to workers for Hari Raya Aidilfitri; Date: 12/5/2021 - Meat & lemang giveaway to workers for Hari Raya Aidiladha; Date: 19/7/2021 	Complied

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		<ul style="list-style-type: none"> - Food basket to local community (Kg Sri Ampangan) affected by COVID-19 MCO; July 2021 <p>CEP Niyor Estate:</p> <ul style="list-style-type: none"> - Food basket to local community (Kg. Melayu Niyor) affected by COVID-19 MCO; 17/8/2021 <p>Bukit Benut Estate:</p> <ul style="list-style-type: none"> - Food basket to local community (Kg. Pisang, Kg. Sungai Rambai & Kg. Bukit Keremoyang) affected by COVID-19 MCO; July 2021 	
<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>			
<p>4.4.1</p>	<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 - 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>	<p>Complied</p>

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		<ul style="list-style-type: none"> - Title # 325902; Lot # 1754; Area: 3.5157 ha; District: Kluang; Sub-district: Mukim Niyor - Title # 82565; Lot # 2218; Area: 793.5873 ha; District: Kluang; Sub-district: Mukim Niyor 	
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).	Boundary maps available for all estates within SOU 22 clearly demarcating estate area with location and coordinate of boundary stone and pegs.	Complied

	- Critical (Major) compliance -	There is no land dispute recorded since last audit. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	
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. - 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
4.5.2	(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	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

	access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -		
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - 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
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process. - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 22 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 22 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Not Applicable
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 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	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

	under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	Consultation with relevant stakeholders conducted on-site confirmed the information.	
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. - 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
4.6.4	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

<p>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.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -</p>	<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.</p>	Not Applicable
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -</p>	<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.</p>	Not Applicable
4.7.3	<p>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 -</p>	<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.</p>	Not Applicable
<p>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.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -</p>	<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.</p>	Not Applicable
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</p>	<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.</p>	Not Applicable

	certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -		
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	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	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	No new planting and issues of customary land occurs in all estates within SOU 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	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary by Region. The mill received FFB from sister estate within SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Supplier list. No external or non-certified FFB received by Bukit Benut POM.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	The mill received FFB from sister estate from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Supplier list. No external or non-certified FFB received by Bukit Benut POM.	Not Applicable
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.	The mill received FFB from sister estate from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in	Not Applicable

	- Critical (Major) compliance -	the Bukit Benut POM FFB Supplier list. No external or non-certified FFB received by Bukit Benut POM.	
5.1.4	<p>(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.</p> <p>- Critical (Major) compliance -</p>	The mill received FFB from sister estate from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Supplier list. No external or non-certified FFB received by Bukit Benut POM.	Not Applicable
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	The mill received FFB from sister estate from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Supplier list. No external or non-certified FFB received by Bukit Benut POM.	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	The mill received FFB from sister estate from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Supplier list. No external or non-certified FFB received by Bukit Benut POM.	Complied
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	Weighbridge stamping conducted on 1/12/2020 by Teras Integrasi Sdn. Bhd. with authorization by the Calibration Officer of De Metrology Sdn. Bhd. Sighted calibration serial # B829135386 and safety sticker no. DE18 002581.	Complied
5.1.8	<p>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.</p> <p>- Minor compliance -</p>	The mill received FFB from sister estate from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Supplier list. No external or non-certified FFB received by Bukit Benut POM.	Not Applicable

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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>Addressed in Standard Operation Manual; Date: 1/11/2008 that documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2) for grievance handling.</p> <p>No independent smallholders within Bukit Benut POM certification unit.</p>	Complied
<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>The mill received FFB from sister estate from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Supplier list. No external or non-certified FFB received by Bukit Benut POM.</p>	Not Applicable
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>The mill received FFB from sister estate from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Supplier list. No external or non-certified FFB received by Bukit Benut POM.</p>	Not Applicable
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>The mill received FFB from sister estate from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Supplier list. No external or non-certified FFB received by Bukit Benut POM.</p>	Not Applicable
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>The mill received FFB from sister estate from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in the Bukit Benut POM FFB Supplier list. No external or non-certified FFB received by Bukit Benut POM.</p>	Not Applicable
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p>	<p>The mill received FFB from sister estate from SOU 22 and FFB diversion from other certified SOU. The FFB supplier were listed in</p>	Not Applicable

	- Minor compliance -	the Bukit Benut POM FFB Supplier list. No external or non-certified FFB received by Bukit Benut POM.	
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
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>	SOU 22 has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2 nd 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.	Complied
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>	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.	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>	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.	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>	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.	Complied

<p>6.1.5</p>	<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. - 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 by Bukit Benut POM and Bukit Benut Estate on 7/4/2021, Lambak Estate on 26/3/2021 and CEP Niyor Estate on 27/7/2021.</p> <p>No sexual harassment case been reported since the last audit.</p>	<p>Complied</p>
<p>6.1.6</p>	<p>There is evidence of equal pay for the same work scope. - 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 during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting.</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 November 2020, February 2021 & March 2021 for sample female and male employees as following:</p> <p>Bukit Benut POM: - Employee # 17507; F; General</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> - Employee # 107291; F; General - Employee # 161644; F; General - Employee # 24988; M; B Shift - Employee # 71901; M; General - Employee # 127679; M; A Shift - Employee # 159933; M; Workshop - Employee # 152129; M; AP <p>Bukit Benut Estate:</p> <ul style="list-style-type: none"> - Employee # 0000017784; F; Field Worker - Employee # 0000017782; F; General Worker - Employee # 0000017801; F; Field Worker - Employee # 0000163831; M; General Worker - Employee # 0000158140; M; Tractor Driver - Employee # 0000143276; M; FFB Cutter - Employee # 0000158005; M; FFB Carrier - Employee # 0000117701; M; Loose Fruit Collector - Employee # 0000109108; M; Field Worker <p>Lambak Estate:</p> <ul style="list-style-type: none"> - Employee # 18334; F; Piece Rated Workers (Op Agrmnt) - Employee # 102809; F; Daily Rated Or General Workers - 160048; Employee # 68477; F; Daily Rated Or General Workers - Employee # 100749; M; Piece Rated Workers (Op Agrmnt) - Employee # 114465; M; Oil Palm Harvesters - Employee # 136361; M; Piece Rated Workers (Op Agrmnt) 	
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		<ul style="list-style-type: none"> - Employee # 109051; M; Oil Palm Harvesters - Employee # 128633; M; Daily Rated Or General Workers <p>CEP Niyor Estate:</p> <ul style="list-style-type: none"> - Employee # 65902; F; General Worker - Employee # 15754; F; Field Worker - Employee # 68477; F; Field Worker - Employee # 147785; F; General Worker - Employee # 15759; M; Tractor Driver - Employee # 82832; M; FFB Cutter - Employee # 149981; M; Pruner - Employee # 117228; M; General Worker - Employee # 120809; M; Field Worker - Employee # 141556; M; General Worker <p>Contractor's workers:</p> <ul style="list-style-type: none"> - RSKP Brothers – 2 workers - Sakhti Enterprise – 1 worker - Samareddy Enterprise - 1 worker - Maniam Transporter – 1 worker - Hayati Enterprise Sdn Bhd – 1 worker - Sivanathan A/L M. Baskaran – 2 workers - AVN Brothers – 2 workers - Zaidah Terus Maju Enterprise – 2 workers 	
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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).

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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> <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 	Complied
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>All workers work agreement were also based on MAPA Circular No. 1/2020; Date: 14/1/2020; Minimum Wages Order 2020 (MWO 2020) where the order provides for the minimum wages rates payable to an employee who works in a place of employment in any City Council or Municipal Council area as specified in the schedule.</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. 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</p>	<p>The mill and estates within SOU 22 established the Employee Welfare Committee (EWC) as a team to represent and conduct the housing inspection based on area assigned to designated</p>	Complied

	<p>or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>representative as per sample Housing Inspector appointment letter for Bukit Benut Estate dated 1/9/2021; Hussen Bin Mohd. Dali; Field Staff. Sighted sample weekly housing and facilities inspections conducted as following:</p> <ul style="list-style-type: none"> - Lambak Estate: Visiting Medical Officer; Ellar Estate; Date: 1/1/1996 - Lambak Estate latest housing inspection date: 19/11/2021 - CEP Niyor Estate latest housing inspection date: 21/11/2021 - CEP Niyor Estate latest VMO visit date: 20/11/2021 by Dr. Helen Tan Kwai; Klinik Renggam - Bukit Benut Estate latest VMO visit date: 24/11/2021 by Dr. Helen Tan Kwai; Klinik Renggam; Creche visit date: 13/10/2021 	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>The mill and estates within SOU 22 ensured affordable food for its employee through canteen food price monitoring as part of terms in the Mill Canteen Tenancy/Rental Agreement as per sample for Bukit Benut Estate dated 1/8/2020 which is valid until 31/7/2022.</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: 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</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: 1,460.63; Foreign Workers: RM1,654.78. Prevailing Wage Assessment conducted by department of Group Sustainability & Quality Management (GSQM) personnel of Sime Darby Plantation.</p>	Complied

<p>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 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</i></p>		
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	<p>may include independent studies by local experts in their respective region or country).</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>		
6.2.7	<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 18.</p>	Complied
<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>			
6.3.1	<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: 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>	Complied

		<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 respect 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 meetings which were latest conducted by Bukit Benut POM and Bukit Benut Estate on 7/4/2021, Lambak Estate on 26/3/2021 and CEP Niyor Estate on 27/7/2021.</p>	
6.3.2	<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 minutes Minutes of Meeting; Bukit Benut POM SOU 22 Union Meeting; Date: 18/11/2021.</p> <p>Minutes of Meeting; CEP Niyor Estate; Date: 15/2/2021</p> <p>Minutes of Meeting; Bukit Benut Estate; Date: 9/4/2021</p>	Complied
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>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p>	Complied

	<p>- Minor compliance -</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. - 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. 	
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		<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 Enterprose; Grass Cutting Memorandum of Agreement (MOA) Date: 1/1/2021 and for sampled Bukit Benut POM contractor Samareddy Enterprise; POME Transport MOA date: 1/1/2020.</p>	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
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>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p>	Complied

	- Critical (Major) compliance -	<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>	
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 following:</p> <ul style="list-style-type: none"> - Bukit Benut POM new mothers assessment 1/11/2021: Total = 3 new mothers of child < 24 months age; Gender committee meeting date: 11/9/2021 	Complied

		<p>- Bukit Benut Estate new mothers assessment 29/10/2021: Total = 3 new mothers of child < 24 months age; Gender committee meeting date: 17/1/2021</p> <p>No new mothers in CEP Niyor Estate and Lambak Estate.</p>	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>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.</p> <p>No grievance issues that requires the implementation of the mechanism occurs in all operating units within SOU 22 since the last audit.</p>	Complied
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <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 <p>- Critical (Major) compliance -</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 Amoza Travels for India (INR 50000) for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent.</p> <p>Passport was kept by the management voluntarily. There is agreement letter signed by worker and employer on the safekeeping passport at office. If the workers want to obtain the passport for own usage, they can anytime request for it.</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>	Complied

		<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. <p>No penalty, debt bondage and withholding of wages been imposed to worker if they want to resign. This has been confirmed through the interview and employment contract signed.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented. - Critical (Major) compliance -</p>	<p>SOU 22 has implemented a Sime Darby’s Human Rights Charter on where they committed as below:</p> <ol style="list-style-type: none"> a. Providing equal opportunity b. Respecting freedom of association c. Eradicating any form of exploitation d. Ensuring favorable working conditions e. 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</p>	Complied

		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.	
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>S&H Committee meeting was conducted as evidence from Minutes of Meeting conducted on 07/07/21 in CEP Niyor Estate. Available EHS Committee Organization Chart effective July 2021.</p> <p>Bukit Benut POM has conducted SHC Meeting on 29/01/21, 26/03/21, 28/05/21.</p> <p>Bukit Benut Estate has conducted a SHC meeting on 08/04/21, available as sampled OSH Committee Chart FY 2021 approved by Rozdizam b. Kasan (Estate Manager)</p> <p>Sighted from the minutes of meeting sampled the OSH issues and employees welfare has been discussed and considered in the meeting conducted involving employees and employers representatives.</p>	Complied
6.7.2	<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>Sighted Accident of Emergency Procedure for Mill Quality Management System Standard Operation manual (MQMS SOM) dated November 1st, 2008. Flowchart of emergency handling was presented in Appendix 5.5.3.3In Bukit Benut POM Class 4A accident on 12/04/21 involving Mohd Syukri (Boilerman)and Nursaman (Fireman) (4 days MC).</p> <p>Class 3A accident occurred on 01/07/21 involving Rosli b. Mohd Sharip (Workshop Fitter) due to wrong handling of oxygen torch. JKKP 6 was submitted to DOSH on 28/07/21 (6 days MC).</p> <p>Sime Darby Plantation Berhad has established a Standard Operating Procedure of Incidents, Accidents & Non-Conformance Management (SDP/SQM(ESH)/001-2-9), dated 30/05/19, Revision 01.</p>	Complied

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		Bukit Benut Estate has established a list of 1st Aider as 9 staff from various location and function selected and trained. Lambak Estates has established a list of 1st Aid Box Location with PIC responsible to keep and maintain the boxes.	
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>In Bukit Benut Estate sighted a PPE Distribution records issued to Patra Milan (M1805628). Received Apron Rubber Gloves, Mask N95, Goggles, Safety Boots, Respirator Cartridge bewteen22/07/20-22/05/21. Arfan (received Safety Boots, Mask M95, Apron, Rubber Gloves, Cotton Gloves, Goggles, Vest between 22/07/20-22/05/21. Shah Rudin (B4075111) received Safety Boots, Safety Helmet, Vest, Cotton Gloves and Rubber Gloves between 21/01/21-15/07/21.</p> <p>Lambak Estate has established a record book for distribution of PPE to workers. Sighted record of worker named Patra Milan (M1085628) on 22/05/21 issued with rubber shoes and N95 face mask. 11/03/21 issued with goggles and N95 mask. 25/03/21 a rubber boots issued to 8 workers.</p> <p>Bukit Benut POM has keeping a PPE Record book for distribution of PPE to workers as sighted for Raman AL Suppan on 29/03/21 received Safety boots and 01/07/21 again safety boots (Old one torn) and ear plugs. Mohd Nasir b. Mat Saad received safety shoes and ear plugs on 30/06/21. Agus Priyono received safety shoes and ear plugs on 30/06/21</p>	Complied
6.7.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Lambak Estate has made a monthly contribution to SOCSO as sampled in Mac 2021 from SOCSO Form 8A. Number of workers covered 234, amount paid RM 6,946.40. January 2021. Number of workers covered 246, amount paid RM 6,556.50. July 2021. Number of workers covered 209, amount paid RM 7,155.60.</p> <p>Bukit Benut Estate has made a monthly contribution to SOCSO for covering any related work accident. Sampled contribution made in January 2021 from SOCSO Form 8A. Number of workers covered</p>	Complied

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		202, Amount paid RM 4,963.50. March 2021 Number of workers covered 205, Amount paid RM 5,919.40. July 2021 Number or workers covered 199, amount paid RM 6,651.70.	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Lambak Estate has maintained occupational injury and accident recorded in online Incident Statistic established by Sime Darby Plantation Berhad. Sighted statistic from January-December 2020. 2 LTI cases recorded for Total of Mans Hour Worked 691,176 in 2020. CEP Niyor Estate as in HSE Performance Report for Month of June 2021 that included accident in LTI. Bukit Benut Estate and Bukit Benut POM as made a report of accidents and injuries occurred in 2020 and 2021 as sighted from Accident Report raised.	Complied
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 -	Available as sampled IPM Plans for Bukit Benut Estate FY2021. Focus on pest such as Rhinoceros Beetles, Ganoderma sp, Bagworm, Rat. Action included increase barn owl box ratio to 1:5 Ha at all fileds. Planting beneficial plants such as Turnera Subulata, Cassia Cobanensis, Antigonon Leptopus, Euphorbia Heterophylla. Carry out census on rat damage and diseases like Ganoderma. CEP Niyor has establish IPM Plan FY 2021 using biological control such as Rat: Barn Owl box every 5 Ha and calendar baiting, 2 campaign per year. Bagworm: Planting beneficial plant and treatment base on census result above threshold level. Ganoderma: Chipping and deboling effected palm before replanting. Oryctes Beatle: Cover Crop at immature area.	Complied

		Lambak Estate has established IPM Plan FY 2021 ad included 2 programmes Upkeep-Beneficial plant and Barn Owl Box (1 every 5 Ha). Time frame Jan-Dec 2021.	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	Sime Darby Plantation Berhad has a policy of no open burning and all estates practiced zero burning.	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	Sime Darby Plantation Berhad has established a Standard Operating Procedure (SOP) for all agrochemical use as sighted in the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 1/7/2011.	Complied
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided. - Critical (Major) compliance -	Available as sampled a records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. This sighted in Lambak Estate FY 20/21 (July 20-Jun 21) for total planted area 2536.7 Ha. CEP Niyor Estate also sighted maintained a record of pesticides used in FY 20/20. Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. Bukit Benut Estate has a record of pesticides used in FY 20/20. Records	Complied

		of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha.	
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The sampled estates (Lambak, Bukit Benut and CEP Niyor) established Management Plan to reduce chemical usage FY 2021. The mitigation plan include:</p> <p>a) To reduce wastages of chemical spraying to harvesters' path or inter row</p> <p>b) To reduce pesticide usage for immature palm</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	As document such as records of pesticides used, no evidence of prophylactic use of pesticides in the estates as verified during site visit.	Complied
7.2.5	<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> <p>a) Judgment of the threat and verify why this is a major threat</p> <p>b) Why there is no other alternative which can be used</p> <p>c) Which process was applied to verify why there is no other less hazardous alternative</p> <p>d) What is the process to limit the negative impacts of the application</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>	As 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 3.3 Protect and Disclose Environmental Impacts and Minimise Resource Use, stated the aim to minimise their foot print and continuously reduce use of resources through implementation of integrated pest management programs, with no use of paraquat or chemicals classed as hazardous under the WHO 1A. Sime Darby Plantation Berhad will phase out the WHO 1B and those additional chemicals listed in the Stockholm or Rotterdam Conventions. Based on Pesticides records and estates representatives (CEP Niyor Bukit Benut, Lambak Estates) no use of paraquat as it was eliminated accordingly.	Complied
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance</p>	As sampled the sprayers and chemical handlers has been given training regarding chemicals safety and health issue and proper way	Complied

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	<p>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>handling and chemical application and attend monthly medical check-up done by the Medical Assistant.</p> <p>a) Lambak Estate training was conducted on 09/01/21 attended by 9 workers included Sprayers, Field Supervisor, Mandores and Assistant.</p> <p>b) CEP Niyor Estate has conducted training for Sprayers on 26/03/21, Rat Baiting on 13/07/21.</p> <p>c) Bukit Benut Estate has conducted chemical and Spraying Safe Operating Procedure Training in February 2021.</p>	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Site visit at chemicals store and mixing area confirmed that the storage of all pesticides are found generally acceptable with proper recording and training provided to workers.</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>Sime Darby Plantation Berhad has an approval letter from DOE no AS (B) J 91/110/619/069 Jld. 3(37) dated 24/10/2018 that exempted used chemicals container as scheduled waste if tripled rinsed. Sighted the implementation of the triple rinse during site visit at the storage area.</p>	Complied
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>No aerial spray conducted in all estates of SOU 22 as explained by all estates and observed during site visit.</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>As sampled in all estates, they had conducted medical surveillance on annually basis base on CHRA recommendation. Sighted the sample records of medical surveillance conducted as follows:</p>	Complied

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		<p>a) CEP Niyor Estate has conducted by Klinik Rengam (Dr. Halen Tan Kwai/OHD) Group 1 on 31/11/20 (6 workers). Group 2 on 1/12/20 (6 workers).</p> <p>b) Lambak Estate latest medical surveillance for chemical handlers was conducted on 8/10/2020 by certified OHD with Reg. no. HQ/08/DOC/00/597. 28 workers were sent for surveillance and found fit to work as chemical handlers</p>	
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>The estates sampled prohibited all confirmed pregnant and breast-feeding woman to work with pesticides as verified during site visit.</p>	Complied
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<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>As sampled in CEP Niyor Estate found available an Environmental Management Plan FY 2021 consist of Waste Management Plan covering domestic, industrial, scheduled waste and Recyclable categories., Action required with designated responsibilities and monitoring status were updated and included.</p> <p>In Lambak Estate available Waste Management Action Plan FY 2021. Type of waste included domestic, industrial, scheduled waste and Recyclable, clinical waste categories. Included action to be taken and PIC assigned. Approved by Ahmad Syarifuddin Zakaria (Estate Manager).</p> <p>Waste management Plan was also established at Bukit Benut Estate for FY2021. Type of waste included domestic, industrial, scheduled waste and Recyclable, clinical waste categories. Included action to be taken and PIC assigned. Approved by Rodzidam Kasan (Estate Manager).</p> <p>However, the established Waste Management Plan FY 2021 can be further enhanced by clearly explain the action for segregation and</p>	OFI

		recycling of domestic and household inorganic waste, plastics bottles from being dispose at Landfill in CEP Niyor Estate. Hence, an OFI has been raised on the matter.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	Sime Darby Plantation Berhad has established a Procedure such as Scheduled Wastes (Hazardous Waste) Management SD/SDP/PSQM (ESH)/203-EN1), Operational Control Procedure for Landfill Management In Estate (SD/SDP/PSQM(ESH)203-EN7) dated 13/03/17 applicable for all estates and Bukit Benut POM in SOU 22 as verified during site visit particularly at landfills and workers housing area.	Complied
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	Sime Darby Plantations Berhad has established a policy of No Open Burning. As so, all estates practiced zero burning. In the replanting activity a clear procedure of felling, chipping and left to decompose practised.	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	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	Sime Darby Plantation Berhad has established a Standard Operation Procedure (SOP) for taking Soil Samples, Issue No. 01, dated 01/08/19. As part of requirements for RSPO certification soil samples have to be taken as a means to assess the current and long-term state of the soil ecosystem under oil palm cultivation. The soil sampling and analysis exercise of each estate shall be carried out at least every 5 years was carried out as evidence from evidence sighted in CEP Niyor Estate, Lambak Estate and Bukit Benut Estate by Chemist II. The soil samples analyzed for the following: <ul style="list-style-type: none"> • Soil pH • Organic • Total Nitrogen (N) • Total and Available P 	Complied

		<ul style="list-style-type: none"> Exchangeable Bases: Potassium (K), Magnesium (Mg) and Calcium (Ca) 															
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>As per company SOP, the soil sampling analysis carried at 5 years interval.</p> <p>a) CEP Niyor Estate soil sampling was conducted in 19/11/2018 as per Report No. S2/2019 dated 2/1/2019.</p> <p>b) Bukit Benut Estate Latest soil sampling was conducted in 13/2/2019 as per report no. S35/2019 dated 5/4/2019.</p> <p>c) Lambak Estate available a Soil Sampling done by Chief Chemist II as Soil Analysis and Test Report No. S43/2019. For 27 soils samples received on 25/03/19.</p>	Complied														
7.4.3	<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>Available a record of EFB received from Bukit Benut POM and application in Lambak Estate in June 2021 at Field 2021A.</p>	Complied														
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>The fertiliser application was conducted as per recommendation by agronomist base on foliar sampling conducted. Monitoring was conducted by heads of Performance Monitoring Unit. CEP Niyor Estate and Bukit Benut Estate received 2021/2022 Fertilizer Programme for mature and immature fields in 2021/2022 Agronomic & Fertilizer Recommendations Report – Oil Palm prepared by Chief Agronomist, Southern Region. Available as sample a fertilizer Application for 1st half of 2021 in Lambak Estate.</p> <table border="1"> <thead> <tr> <th>Fertilizer Type</th> <th>Division</th> <th>Ha</th> <th>MT</th> </tr> </thead> <tbody> <tr> <td rowspan="3">AC</td> <td>Elseis</td> <td>1007.97</td> <td>225.80</td> </tr> <tr> <td>Central</td> <td>1041.45</td> <td>228.46</td> </tr> <tr> <td>Ellar</td> <td>600.31</td> <td>139.02</td> </tr> </tbody> </table>	Fertilizer Type	Division	Ha	MT	AC	Elseis	1007.97	225.80	Central	1041.45	228.46	Ellar	600.31	139.02	Complied
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MOP	Elseis	1007.97	197.71
	Central	1041.45	194.54
	Ellar	600.31	103.76
Kieserite	Elseis	813.88	124.01
	Central	820.10	123.19
	Ellar	401.84	62.52

CEP Niyor has maintain and kept a 2021/2022 Fertilizer Programme for matured and immature estate. Recommended fertilizer as stated in the programme:

Matured Filed (CEP Niyor-525 Ha, Ulu Paloh-877.28 Ha, Talisman-421.32 Ha)

Fertilizer Rate (kg/palm)					
Jul-Aug 21	Sep 21		Feb-Mac 21		Apr 22
NKC1	Borate	RP	AC	MOP	Kieserite
12.5:30	(48%B2O3)	(28%P2O5)	(25%N)	(62%K2O)	(27%MgO)

Immature Filed (CEP Niyor-38.1 Ha)

Fertilizer Rate (kg/palm)	
Aug 21	Sep 21
COMP 45	RP

		(12:12:17:2)	(28%P2O5)		
		Immature Field (Ulu-Paloh-57.11 Ha)			
		Fertilizer Rate (kg/palm)			
		Aug 21	Nov 21	Feb 22	
		COMP 45	COMP 45	Borate COMP 45 Kieserite	
		(12.12:17:2)	(12:12:17:2)	(48%B2O3) (12:12:17:2)(27%MgO)	
Criterion 7.5: Practices minimise and control erosion and degradation of soils.					
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -	Available a Soil Maps for all estates (CEP Niyor, Bukit Benut Lambak) were sampled and sighted There were no other problem soils (e.g. podzols and acid sulphate soils) on SOU 22 except for a small area of peat soil in CEP Niyor Estate of 11.91 ha.			Complied
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -	Sime Darby Plantation Berhad particularly in all estates of SOU 22 have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by Slope & River Protection Policy, Buffer Zone & 25-degree Slope, Land Preparation for Terracing in ARM Manual.			Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	As sampled no new planting and slope above 25 degrees in all estates in SOU 22 and in line with commitment by in the "Slope and River Protection" signed by the CEO dated Jan 2015 stating the following among others; "Slope of >25 degree to be excluded from any new plantation development and replanting program.			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	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>A Soil Maps for all estates (CEP Niyor, Bukit Benut Lambak) were sampled and sighted for Bukit Benut and Tambuku Division done in May 2020 (Soil series: Bukit Lanchu 31.41%, Jerangau 8.73%, Rengam 59.86%). CEP Niyor Estate done in April 2019 (Among soil series: Batu Lapan, Bukit Temiang, Bungor, Rengam and etc). Elaeis, Central and Ellar Division done in June 2012 (Mostly Rengam 55.68%, Rengam Shallow 12.01%, Local Alluvium I 16.37%, Beserah Lambak 6.30% and others.</p>	Complied
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>As sampled there was no peat soil or soil categorized as marginal or fragile soil at Lambak and Bukit Benut Estate. Estate new planting area. Only small area of peat soil in CEP Niyor Estate of 11.91 ha.</p>	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>Soil surveys are done and available in a soil map at all estates. Topographic contour map is also available which are both used to manage the drainage and road works in the estates.</p>	Complied
<p>Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting on peat regardless of depth after 15 November 2018. There is peat soil of 11.91 Ha field no P13D situated in the Talisman Division Bukit Benut Estate planted before the said date.</p>	Complied
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>PROCEDURAL NOTE:</p> <p>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).</p> <p>- Minor compliance -</p>	<p>The peat soil of 11.91 Ha field No. P13D situated in the Talisman Division Bukit Benut Estate planted before 15 November 2018.</p>	Complied

7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -</p>	<p>Peat subsidence (11.91 Ha) monitoring / reading are taken quarterly and recorded in Bukit Benut Estate. There are no changes in the subsidence level as reported and recorded.</p>	Complied
7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has established a manual for all estates and mill in SOU 22 in managing water and ground cover management programme in the Sime Darby Agricultural Reference Manual as sighted (Water Management in Coastal and Peat Lands) dated 01/07/11. As under Section 7.8.1. explained that individual estates and mill had their respective water management plan mainly to monitor among others the following:</p> <ul style="list-style-type: none"> a) Monitor the quality of main water inlet/outlet for pollutants from estate's operations. b) Contingency during water shortage. c) Monitor the usage of fresh water on monthly basis. d) Reuse/recycle waste water. 	Complied
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or 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>There is peat soil of 11.91 Ha field no P13D situated in the Talisman Division Bukit Benut Estate. Other SOP in relevant to the management of OP in peat soil is illustrated in STR-PNP-GRONOMY-01/2017-18. The oil palm planted in this field is 2013 at current 8 years old. Taking into consideration of 25 years retention of palm the next replanting is only scheduled in 17 years' time. Tentatively in 2038.</p>	Complied

	- Critical (Major) compliance -		
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>	SOP in relevant to the management of operation in peat soil is illustrated in STR-PNP-GRONOMY-01/2017-18. Among best practices and action included subsidence of peat surface, rate of peat subsidence gives indirect indication of generous gas emissions and method to install peat subsidence pole and monitor peat subsidence.	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>	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 SOP for operation in peat soil is illustrated in STR-PNP-GRONOMY-01/2017-18.	Complied
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
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> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>The Water management Plan FY2021 for CEP Niyor Estate, Bukit Benut Estate, Lambak Estate and Bukit Benut POM found established and sampled with Identification and management of Waste water for Financial Year 2021 approved by Estates and Mill Manager.</p> <p>A Water Management Plan/Contingency Plan During Water Crisis 2021 was established for managing issues in Bukit Benut POM:</p> <ul style="list-style-type: none"> • Water Shortage/Dry Spell • Severe Water Pollution/Contamination • Treatment and Containment of Waste water Produced from Processes. 	Complied

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7.8.2	<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 (CEP Niyor, Bukit Benut and Lambak) adopted the existing Sima Darby Plantation Berhad 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.</p> <p>The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014).</p>	Complied																														
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>Bukit Benut POM treated the effluent discharged to watercourse (Sg Melantai) through land drainage in Bukit Benut Estate. Sighted monthly water sampling and analysis report at in front and back of the mill as tested on 21/01/21, 11/03/21, 01/07/21 showing compliance with the limit required by DOE:</p> <table border="1" data-bbox="1137 821 1921 1321"> <thead> <tr> <th>No.</th> <th>Parameters</th> <th>Jan</th> <th>Mac</th> <th>Jul</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>pH (25°C)</td> <td>6.9 (A) 6.8 (B)</td> <td>6.7 (A) 6.5 (B)</td> <td>6.5 (A) 6.3 (B)</td> </tr> <tr> <td>2.</td> <td>BOD (mg/L)</td> <td>1 (A) 4 (B)</td> <td>3 (A) 4 (B)</td> <td>4 (A) 3 (B)</td> </tr> <tr> <td>3.</td> <td>A. Nitrogen (mg/L)</td> <td><1 (A) <1 (B)</td> <td><1 (A) 1 (B)</td> <td><1 (A) <1 (B)</td> </tr> <tr> <td>4.</td> <td>T. Nitrogen (mg/L)</td> <td>1 (A) 1 (B)</td> <td>2 (A) 2 (A)</td> <td>6 (A) 7 (A)</td> </tr> <tr> <td>5.</td> <td>Suspended Solid (mg/L)</td> <td>14 (A) 16 (B)</td> <td>4 (A) 2 (B)</td> <td>14 (A) 34 (B)</td> </tr> </tbody> </table>	No.	Parameters	Jan	Mac	Jul	1.	pH (25°C)	6.9 (A) 6.8 (B)	6.7 (A) 6.5 (B)	6.5 (A) 6.3 (B)	2.	BOD (mg/L)	1 (A) 4 (B)	3 (A) 4 (B)	4 (A) 3 (B)	3.	A. Nitrogen (mg/L)	<1 (A) <1 (B)	<1 (A) 1 (B)	<1 (A) <1 (B)	4.	T. Nitrogen (mg/L)	1 (A) 1 (B)	2 (A) 2 (A)	6 (A) 7 (A)	5.	Suspended Solid (mg/L)	14 (A) 16 (B)	4 (A) 2 (B)	14 (A) 34 (B)	Complied
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>Below are water consumption per tonne FFB monitored and recorded for FY 2021:</p> <table border="1" data-bbox="1178 691 1883 1366"> <thead> <tr> <th rowspan="2">MONTH</th> <th>FFB Processed</th> <th>Water Consumption</th> <th>Water Consumption</th> </tr> <tr> <th>Metric Ton (MT)</th> <th>Meter³ (M³)</th> <th>M³/MT (FFB)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>6,825.525</td><td>8,095.03</td><td>1.19</td></tr> <tr><td>Feb</td><td>6,743.63</td><td>7,780.08</td><td>1.15</td></tr> <tr><td>Mac</td><td>9,031.499</td><td>10,192.01</td><td>1.13</td></tr> <tr><td>Apr</td><td>9,155.696</td><td>10,033.06</td><td>1.10</td></tr> <tr><td>May</td><td>8,492.171</td><td>9,419.99</td><td>1.11</td></tr> <tr><td>Jun</td><td>9,520.166</td><td>10,916.10</td><td>1.15</td></tr> <tr><td>Jul</td><td>9,761.82</td><td>10,905.66</td><td>1.12</td></tr> <tr><td>Aug</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>Sep</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>Oct</td><td>-</td><td>-</td><td>-</td></tr> </tbody> </table>	MONTH	FFB Processed	Water Consumption	Water Consumption	Metric Ton (MT)	Meter ³ (M ³)	M ³ /MT (FFB)	Jan	6,825.525	8,095.03	1.19	Feb	6,743.63	7,780.08	1.15	Mac	9,031.499	10,192.01	1.13	Apr	9,155.696	10,033.06	1.10	May	8,492.171	9,419.99	1.11	Jun	9,520.166	10,916.10	1.15	Jul	9,761.82	10,905.66	1.12	Aug	-	-	-	Sep	-	-	-	Oct	-	-	-	Complied
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			Nov	-	-	-
			Dec	-	-	-
			Total	59,530.51	67,341.93	1.13

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

7.9.1	<p>A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.</p> <p>- Minor compliance -</p>	<p>Bukit Benut POM</p> <p>Available as sampled in Energy Management Plan FY 2021 stated plan to minimize consumption of fuel for mill operation. 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 2020/21 identified in the following. Below are result of monitoring of Diesel Consumption in FY 2021:</p> <table border="1" data-bbox="1160 813 1897 1391"> <thead> <tr> <th rowspan="2">MONTH</th> <th>FFB Processed</th> <th>Diesel Consumption</th> <th>Diesel Consumption</th> </tr> <tr> <th>Metric Ton (MT)</th> <th>Litres (L)</th> <th>L/MT (FFB)</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>6,825.525</td> <td>60.00</td> <td>0.88</td> </tr> <tr> <td>Feb</td> <td>6,743.63</td> <td>60.00</td> <td>0.89</td> </tr> <tr> <td>Mac</td> <td>9,031.499</td> <td>140.00</td> <td>1.55</td> </tr> <tr> <td>Apr</td> <td>9,155.696</td> <td>100.00</td> <td>1.09</td> </tr> <tr> <td>May</td> <td>8,492.171</td> <td>136.00</td> <td>1.60</td> </tr> <tr> <td>Jun</td> <td>9,520.166</td> <td>137</td> <td>1.44</td> </tr> <tr> <td>Jul</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Aug</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>	MONTH	FFB Processed	Diesel Consumption	Diesel Consumption	Metric Ton (MT)	Litres (L)	L/MT (FFB)	Jan	6,825.525	60.00	0.88	Feb	6,743.63	60.00	0.89	Mac	9,031.499	140.00	1.55	Apr	9,155.696	100.00	1.09	May	8,492.171	136.00	1.60	Jun	9,520.166	137	1.44	Jul	-	-	-	Aug	-	-	-	Complied
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Sep	-	-	-
Oct	-	-	-
Nov	-	-	-
Dec	-	-	-
Total	49,768.69	633.00	1.27

Lambak Estate has monitored Diesel consumption for FY 2020:

MONTH	Diesel Consumption (L)	Quantity of Diesel/Ha	Quantity of Diesel/Ton FFB
Jan	10,696	3.16	1.59
Feb	9,323	2.75	1.55
Mac	8,825	2.60	1.63
Apr	8,673	2.56	1.90
May	7,514	2.22	1.78
Jun	7,220	2.13	1.68
Jul	6,249	1.84	1.66
Aug	6,582	1.94	2.05
Sep	5,526	1.63	1.26
Oct	7,742	2.29	1.60
Nov	8,525	2.52	1.64
Dec	8,239	2.43	1.64

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Total	95,114.00	28.07	19.98
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CEP Niyor Estate has monitored Diesel consumption for FY 2020:

MONTH	Diesel Consumption (L)	Quantity of Diesel/Ha	Quantity of Diesel/Ton FFB
Jan	4,108	2.30	2.37
Feb	4,564	2.56	1.81
Mac	3,733	2.09	1.46
Apr	3,301	1.85	1.34
May	3,435	1.98	1.68
Jun	4,112	2.38	1.47
Jul	4,180	2.42	1.76
Aug	5,014	2.90	1.86
Sep	4,755	2.75	1.83
Oct	5,070	2.93	2.46
Nov	4,554	2.63	2.51
Dec	4,307	3.06	2.49

Bukit Benut Estate has monitored Diesel consumption for FY 2020:

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		MONTH	Diesel Consumption (L)	Quantity of Diesel/Ha	Quantity of Diesel/Ton FFB	
		Jan	5377	1.59	1.03	
		Feb	4685	1.38	1.88	
		Mac	2868	0.85	0.54	
		Apr	3357	0.99	0.64	
		May	3271	0.97	0.78	
		Jun	4327	1.28	0.96	
		Jul	4488	1.32	1.16	
		Aug	4605	1.36	0.94	
		Sep	3827	1.13	0.77	
		Oct	5118	1.51	1.02	
		Nov	5139	1.52	0.99	
		Dec	4734	1.40	0.94	
<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>Bukit Benut POM and 3 Estates (CEP Niyor, Bukit Benut and Lambak Estates) had identified and monitored emission of greenhouse gas (GHG) from their operations such as emission from their operations and reported in 2020 for Bukit Benut POM and supply base calculated using the PalmGHG Calculator version 4.0.1.</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>As verified in the Palm GHG Summary Report for date in 2020 for Bukit Benut POM and 3 Estates in SOU 22 had calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1.</p> <p>There was no new planting and conversion of forested and non-forested area in 2020 in SOU2.</p> <p>The report among others included the following;</p> <ul style="list-style-type: none"> • Land use classification analysis • Carbon stock estimation • Identification & estimation of major potential sources GHG emission. • Land use classification analysis LUCA • Carbon stock value 	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Bukit Benut POM and estates in SOU 22 has identified significant environmental pollutants through assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. Environmental Aspects and Impacts Identification and Assessment Register were maintained associated with their operations. Environmental Improvement Action Plan 2021, Energy Management plan 2021 were established, implemented and monitored as sighted earlier.</p>	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.</p> <p>- Critical (Major) compliance -</p>	<p>Sime Darby Plantation Berhad has established a Zero Burning Policy particularly in new planting and replanting activities. Refer to:</p> <p>a) EQMS-SOP-Section B2 - Under felling/clearing & land preparation.</p>	Complied

		b) Carbon Policy of Sime Darby Plantation Berhad which stated a policy of no open burning.	
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	As sampled and verified during on-site visit, there is no fire used in all estates operation in SOU 22.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Briefing to SOU 22 stakeholders was organized as evidence of letter and attendance list dated 07/04/21 (Organized at Bukit Benut Estate), with highlighting of no burning practices and prevention use of fire in plantation activities.	Complied
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	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document. - Critical (Major) compliance -	The audit findings have confirmed that no new planting in Lambak Estate and no effect to the present HCV and primary forest There were no HCV areas within the situated with the affected areas. 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. The assessment concluded with recommendations that incorporated basic conservation planning principles for consideration into management regimes of preserving the HCV and conservation areas.	Complied
7.12.2	(C) HCVs, HCS forests and other conservation areas are identified as follows: 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. 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	The audit findings have confirmed that there is no new planting affecting present HCV and primary forest Hence the current HCV assessment of the estates remains valid. The recent HCV assessment for the entire SOU 22 covering all the Bukit Benut Palm Oil Mill and 3 Estates (CEP Niyor, Lambak, and Bukit Benut) was performed in December 2015 by the PSQM Department, Sime Darby Plantation Berhad.	Complied

	<p>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). - Critical (Major) compliance -</p>		
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). - Critical (Major) compliance -</p>	<p>As sampled and auditee has confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in SOU 22 estates. Lambak Estate has established HCV Plan with evidence of monitoring Pond (Field 95C), Natural Pond (Field P09C/Housing Complex), Water Catchment Area (Near Office). These are dates of monitoring records done on 6/01/21, 07/02/21, 22/03/21, 11/04/21, 22/05/21, 10/06/21, 06/07/21.</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. - Minor compliance -</p>	<p>There was no effected 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.</p>	Complied
7.12.6	<p>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</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.</p>	Complied

	<p>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.</p> <p>- Minor compliance -</p>		
7.12.7	<p>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.</p> <p>- Minor 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</p>	<p>Complied</p>
7.12.8	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>As verified and the auditee has confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in all estates within SOU 22.</p>	<p>Complied</p>

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2020 for Bukit Benut Palm Oil Mill 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 2020 for Bukit Benut Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.28
PKO	1.28

Extraction	%
OER	20.57
KER	4.64

Production	t/yr
FFB Process	114,000.74
CPO Produced	23,453.28
PKO Produced	5,294.29

Land Use	Ha
OP Planted Area	16,454.29
OP Planted on peat	11.91
Conservation (forested)	-
Conservation (non-forested)	-
Total	16,454.29

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	26349.25	0.53	34705.89	0.54	0.00	0.00	61055.13	1.07
CO ₂ Emission from fertilizer	1954.48	0.04	2406.71	0.04	0.00	0.00	4361.19	0.08
NO ₂ Emission	1.27	0.00	0.00	0.00	0.00	0.00	1.27	0.00
Fuel Consumption	1070.32	0.02	255.41	0.02	0.00	0.00	2325.72	0.04
Peat Oxidation	171.73	0.00	309.38	0.00	0.00	0.00	481.11	0.00
Sink								
Crop Sequestration	-23913.61	-0.48	-30616.57	-0.48	0.00	0.00	-54530.18	-0.96
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	5642.68	0.11	8060.82	0.13	0.00	0.00	13703.50	0.24

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	22346.08	0.20
Fuel Consumption	2.19	0.00
Grid Electricity Utilization	765.59	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	23113.86	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

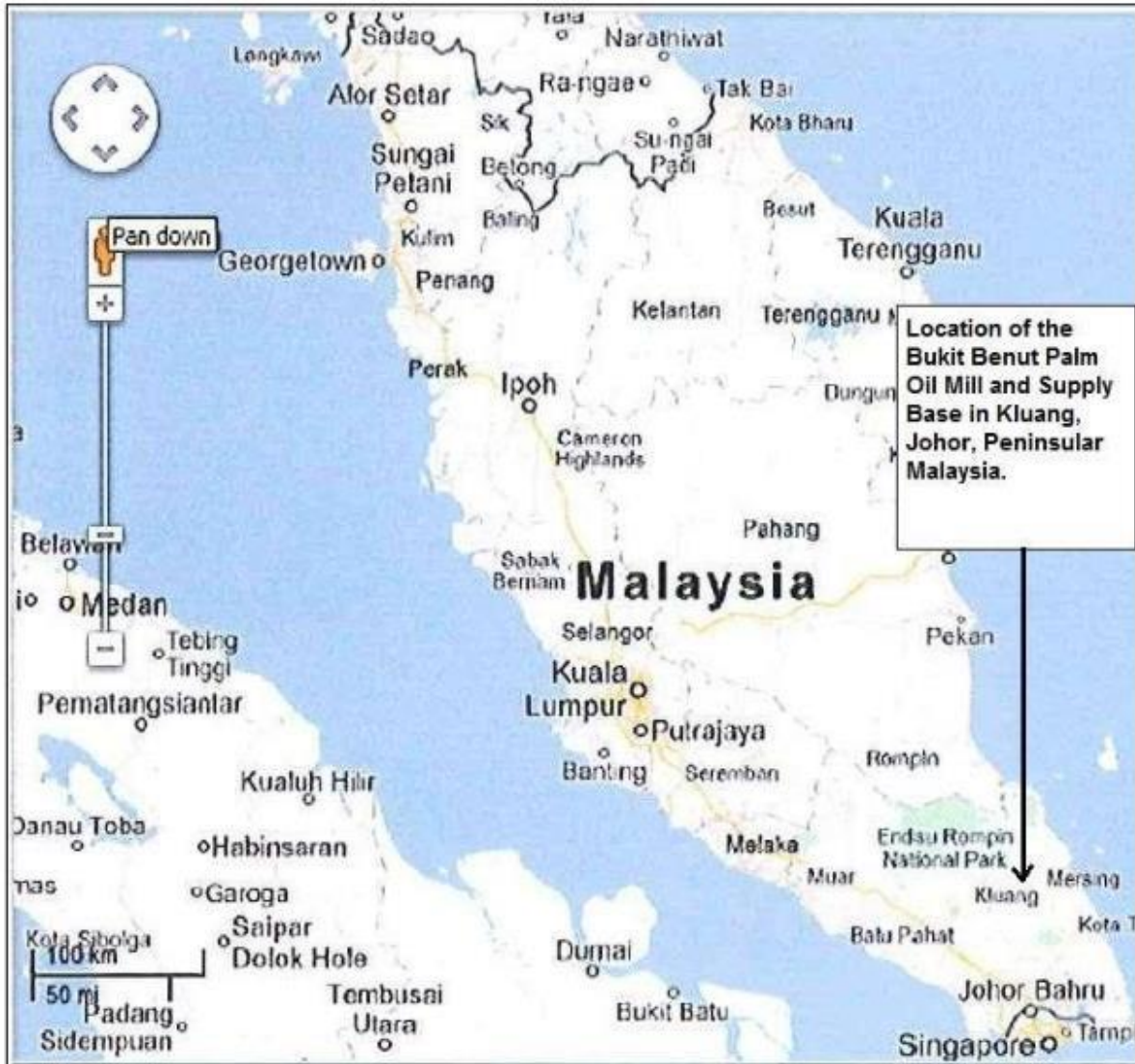
Emissions	tCO ₂ e
PK from own mill	-
PK from other source	-
Fuel Consumptions	-
Total Crusher emissions	-

*This mill has no kernel crusher operation.

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

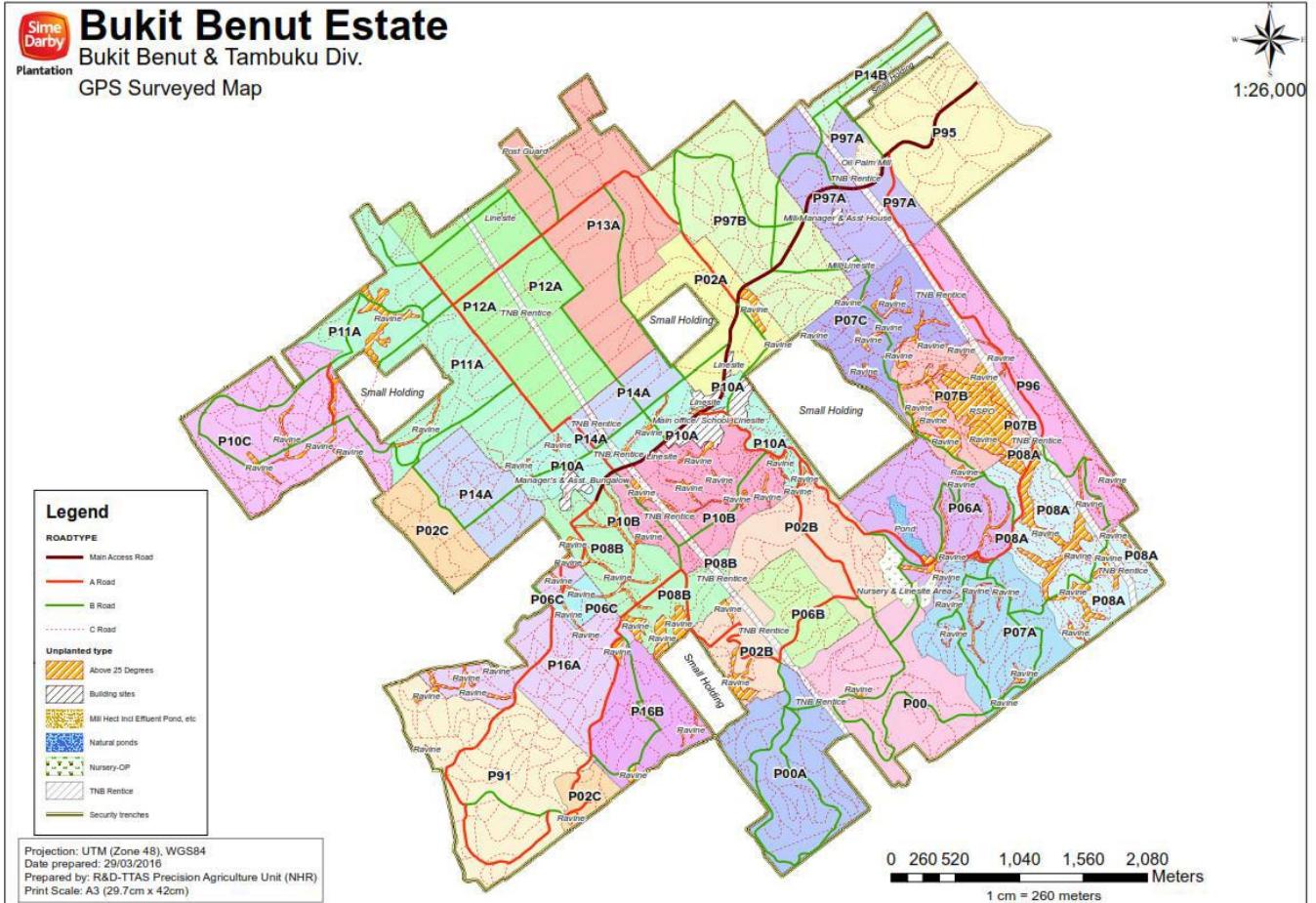
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases

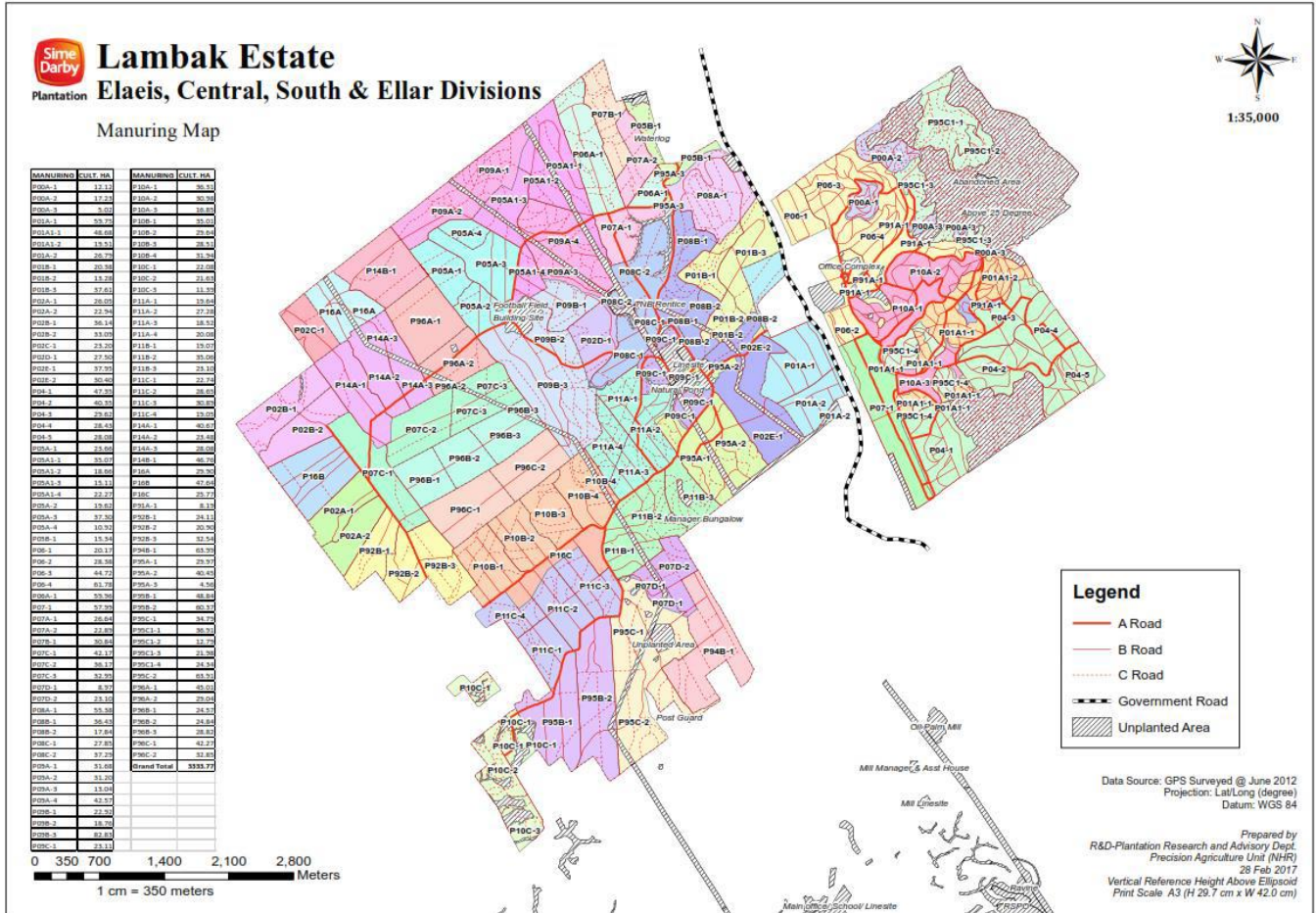


Appendix D: Estate Field Map

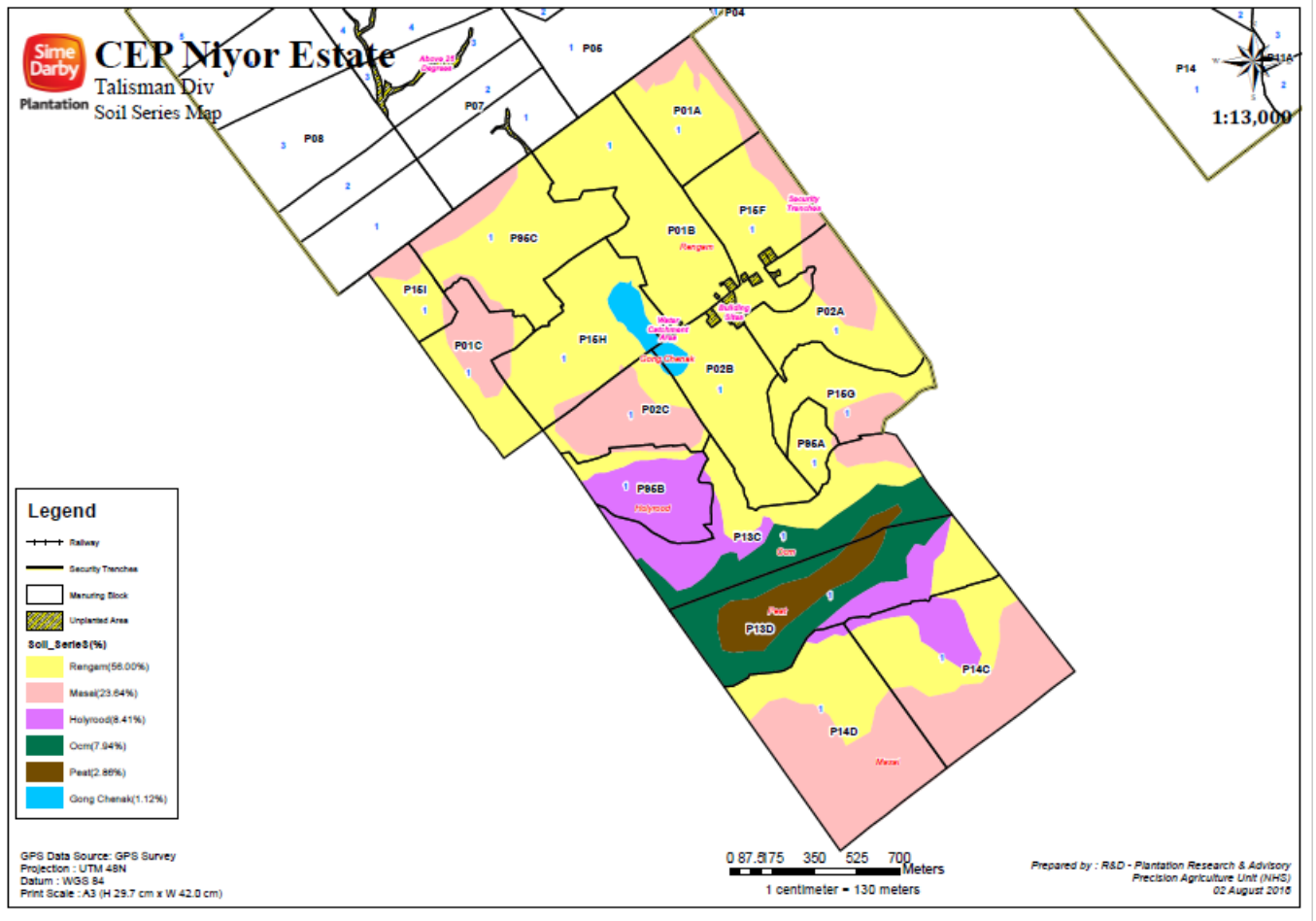
Bukit Benut Estate



Lambak Estate



CEP Niyor Estate



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