

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
 Annual Surveillance Assessment (1_3)
 Recertification Assessment (Choose an item.)
 Extension of Scope

Client Company name (Parent Company): SIME DARBY PLANTATION BERHAD
Client company Address: Level 5, Main Block, Plantation Tower 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia
Certification Unit: Strategic Operating Unit (SOU 19) Pagoh Palm Oil Mill and Supply Base Location of Certification Unit: Lot 2159, Ladang Pagoh, Mukim Jalan Bakri 84309 Muar, Johor, Malaysia
Date of Final Report: 28 February 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 2, Jalan PJU 1A/7 47301, Ara Damansara, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU 19) – Pagoh Palm Oil Mill		
Location / Address	Lot 2159, Ladang Pagoh, Mukim Jalan Bakri 84309 Muar, Johor, Malaysia		
Website	www.simedarbyplantation.com		
Management Representative	Shylaja Devi Vasudevan Nair Tn. Mohd Fadzil Bin Hasbullah	E-mail	shylaja.vasudevan@simedarbyplantation.com
Telephone	+603-78484379 +606-9857427	Facsimile	+603 7848 4363

2. Certification Information			
Certificate Number	RSPO 600305	Certificate Start Date	28/01/2019
Date of First Certification	28/01/2014	Certificate Expiry Date	27/01/2024
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	The objective of the assessment was to conduct an annual surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by Pagoh POM and Supply Base's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives.		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	45 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 682037	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services (M) Sdn Bhd	27/12/2022
MSPO 685822	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3	BSI Services (M) Sdn Bhd	27/12/2022
MSPO 714136	MSPO Supply Chain Certification 2018	BSI Services (M) Sdn Bhd	04/09/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Pagoh Palm Oil Mill	Lot 2159, Ladang Pagoh, Mukim Jalan Bakri 84309 Muar, Johor.	2° 04' 40.62" N	102° 43' 07.30" E
Pagoh Estate	Lot 2159, Ladang Pagoh, Mukim Jalan Bakri 84309 Muar, Johor.	2° 04' 40.62" N	102° 43' 07.30" E
Lanadron Estate	Panchor 84500 Muar, Johor	2° 10' 48.70" N	102° 44' 04.00" E
Pengkalan Bukit Estate	Mukim Jalan Bakri 84309 Muar, Johor	2° 07' 29.80" N	102° 44' 32.00" 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
Pengkalan Bukit Estate	2,977.41	2.87	147.94	3,128.22	95.18
Lanadron Estate	1,694.02	19.41	251.01	1,964.44	80.96
Pagoh Estate	1,988.02	9.10	328.81	2,325.93	85.47
Total	6,659.45	31.38	727.76	7,418.59	

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		

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Pengkalan Bukit Estate	538.24	1,033.76	1,312.82	92.59	-	2,439.17	538.24
Lanadron Estate	221.81	613.02	742.19	40.00	77.00	1,472.21	221.81
Pagoh Estate	616.56	695.13	445.65	230.68	0.00	1,371.46	616.56
Total (ha)	1,376.61	2,341.91	2,500.66	363.27	77.00	5,282.84	1,376.61

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Jan 2021 – Dec 2021) (mt)	Actual (Oct 2020 – Sept 2021) (mt)		Forecast (Jan 2022 - Dec 2022) (mt)
		Previous license period (Oct 2020 - Dec 2020)	Current license period (Jan 2021 - Sep 2021)	
Pengkalan Bukit Estate	51,599.09	10,360.32	29,873.37	55,000.00
Lanadron Estate	44,441.87	7,084.45	23,518.39	50,070.00
Pagoh Estate	36,492.17	7,908.47	20,020.04	40,600.00
Total	132,533.13	98,765.04		145,670.00

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Jan 2021 – Dec 2021) (mt)	Actual (Oct 2020 – Sept 2021) (mt)		Forecast (Jan 2022 - Dec 2022) (mt)
		Previous license period (Oct 2020 - Dec 2020)	Current license period (Jan 2021 - Sep 2021)	
Tangkah		-	348.81	
Welch		73.12	18.44	
Muar River		119.52		
Total		559.89		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Jan 2021 – Dec 2021) (mt)	Actual (Oct 2020 – Sept 2021) (mt)		Forecast (Jan 2022 - Dec 2022) (mt)
		Previous license period (Oct 2020 - Dec 2020)	Current license period (Jan 2021 - Sep 2021)	
BP REALTY & PLT		-	80.36	

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ENG HUAT LATEX CONCENTRATE SDN		1,134.96	8,043.48	
GAN ESTATE		650.24	2,101.59	
IMPRESSIVE TRANSFORMS SDN BHD		127.44	14.98	
KOP MT GRISEK LEDANG		511.12	867.05	
PERTANIAN MELAKA		234.80	595.43	
SIN CHIN JOO SDN BHD		2,555.04	7,835.19	
TIONG OIL PALM		1,327.37	150.63	
KELAPA SAWIT TAI		1,774.39	3,608.96	
MARAK TEGUH		4.17	-	
Total			31,617.20	

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	Oct-20	10,148.25	2,165.84	12,314.09
2	Nov-20	8,377.33	3,076.22	11,453.55
3	Dec-20	7,020.30	3,077.47	10,097.77
4	Jan-21	5,901.81	1,157.05	7,058.86
5	Feb-21	7,369.21	1,145.47	8,514.68
6	Mar-21	10,007.45	1,993.41	12,000.86
7	Apr-21	10,367.70	2,563.47	12,931.17
8	May-21	9,271.47	3,413.56	12,685.03
9	Jun-21	9,034.23	3,962.46	12,996.69
10	Jul-21	6,481.21	2,515.11	8,996.32
11	Aug-21	6,700.52	2,768.76	9,469.28
12	Sep-21	8,645.45	3,778.38	12,423.83
	TOTAL	99,324.93	31,617.20	130,942.13

10. Summary of Certified Tonnage (not applicable for ISS)		
Estimated last year	Actual	Forecast

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(Jan 2021 – Dec 2021)	(Oct 2020 – Sept 2021)		(Jan 2022 - Dec 2022)
FFB	FFB		FFB
132,533.13 mt	<i>Previous license period</i> (Oct 2020 - Dec 2020)	<i>Current license period</i> (Jan 2021 - Sep 2021)	145,670.00 mt
	25,545.88mt	73,779.05 mt	
	99,324.93 mt		
CPO (OER: 20.00%)	CPO (OER: 20.65%)		CPO (OER: 21.83%)
26,506.63 mt	5,234.54 mt	15,684.16 mt	31,800.00 mt
	20,918.70 mt		
PK (KER: 5.20%)	PK (KER: 5.20%)		PK (KER: 5.33%)
6,891.72 mt	1,317.86 mt	3,899.70 mt	7,760.00 mt
	5,217.56 mt		

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Oct-20	2,172.05	534.42
2	Nov-20	1,686.41	440.71
3	Dec-20	1,376.08	342.73
4	Jan-21	1,113.23	274.92
5	Feb-21	1,542.84	389.52
6	Mar-21	1,962.94	526.31
7	Apr-21	2,090.41	574.2
8	May-21	1,940.71	489.48
9	Jun-21	1,914.40	446.43
10	Jul-21	1,892.08	324.66
11	Aug-21	1,407.06	383.29
12	Sep-21	1,820.49	490.89
TOTAL		20,918.70	5,217.56

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11. Summary of Actual Volume sold					
Current License period (Oct 2020 - Dec 2020)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	-	-	-	693.00	693.00
PK (MT)	300.00	-	-		300.00
Credits	-	-	-	-	-
Previous License period (Jan 2021 - Sep 2021)					
CPO (MT)	1,755.29	-	-	13,470.41	15,225.70
PK (MT)	1,964.46	-	-	2,553.10	4,517.56
Credits	-	-	-	-	-

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)
	A	TR-1e70f3a6-766e		300.00
	B	TR-df368f57-bcf6		100.00
		TR-1f13c015-78cb		20.78
		TR-94805c56-db77		144.98
		TR-38284215-9248		120.00
		TR-54bf6aa3-ed9c		12.09
		TR-72699d0a-05d7		250.00
		TR-3836c2b2-c177		100.00
		TR-b7f3ac4c-1cda		100.00
		TR-b5c75638-c015		118.22
		TR-7884b57b-b205		124.47
		TR-07430f4e-aaa2		120.20
		TR-ef4d9a4b-91e4		132.48
		TR-efd32383-cd4e		275.2
		TR-8a0a54d7-9c34		112.88
		TR-acf7bf1d-a0e6		120
		TR-c49e262d-911f		113.16
	C	TR-b60439aa-a815	138.65	
		TR-1355fcce-3783	250	

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	TR-e4697f15-d903	150	
	TR-7db3a31c-6374	200	
	TR-7fe5203e-1b77	237.43	
	TR-4db99340-0472	250	
	TR-c8de8f1b-d0cd	250	
	TR-650a19bf-2ef2	279.11	
TOTAL		1,755.29	2264.46

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			
TOTAL				

11C. Records of CPO & PK Sold as conventional since the last audit (if any)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	AA	10,030.42	-	
2	BB	3,445.16	-	
3	CC	687.73	-	
4	DD	-	550.00	
5	EE	-	1,000.12	
6	FF	-	233.20	
7	GG	-	553.00	
8	HH	-	216.78	
TOTAL		14,163.31	2,553.10	

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	Nil	Nil
TOTAL			

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12. Independent Smallholders Certified Tonnage / Volume									
	Estimated last year (Jan 2021 – Dec 2021)			Actual (Oct 2020 – Sept 2021)			Forecast (Jan 2022 - Dec 2022)		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			Nil			Nil			Nil
IS-CSPO	Nil	Nil		Nil	Nil		Nil	Nil	
IS-CSPKO	Nil	Nil		Nil	Nil		Nil	Nil	
IS-CSPKE	Nil	Nil		Nil	Nil		Nil	Nil	

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period (Jan 2021 - Sep 2021)						
Credits				Nil	Nil	Nil
Physical	Nil	Nil	Nil			

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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 **11-14/10/2021**. The audit programme is included as Section 2.3

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

The Critical NC close out on-site assessment was conducted on **7/1/2022**. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Pagoh POM	√	√	√	√	√
Pagoh Estate	√	√	√	√	√
Pengkalan Bukit Estate	√	√	√	√	√
Lanadron Estate	√	√	√	√	√

Tentative Date of Next Visit: October 3, 2022 - October 6, 2022

Total Number of Mandays: 12 mandays

2.2 BSI Assessment Team

Name	Role	Competency
Muhamad Naqiuddin Mazeli	Team Leader	<p>Education: Bachelor Science Horticulture, UPM</p> <p>Work Experience: 11 years working experience in oil palm plantation industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company.</p> <p>Training attended: ISO 9001: 2015 LA Training(2019), ISO 14001: 2015 LA Training (2018), ISO 45001: 2018 LA Training (2018), HCV & HCS Training (2019), RSPO P&C LA Training(2018), MSPO LA Training (2018), SMETA Training (2021)</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, Smallholders inclusion, legal requirements, environment, RSPO supply chain and HCV.</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English Language.</p>
Muhammad Fadzli Masran	Team Member	<p>Education:</p>

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		<p>He holds Bachelor Degree in Forestry Science, graduated from University Putra Malaysia</p> <p>Work Experience:</p> <p>He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO 9001 and ISO 14001 at Kulim Plantations.</p> <p>Training attended:</p> <p>He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course in April 2018, endorsed RSPO Lead Auditor Course in July 2018, MSPO Lead Auditor Course in October 2018, endorsed RSPO Supply Chain Certification training course in January 2019, MSPO Supply Chain Certification System (SCCS) Auditor training Course (MPOCC Endorsed), CQI and IRCA Certified ISO 9001:2015 Lead Auditor Training Course in April 2019, HCV and GIS Training in November 2019 and SMETA Requirements Training in April 2021.</p> <p>Aspect covered in this audit:</p> <p>During this assessment, he assessed on the aspects of Occupation Health Safety requirement, HIRARC, training, management plan, good agriculture practice, GHG and RSPO supply chain requirements.</p> <p>Language proficiency:</p> <p>Fluent in in both verbal/written Bahasa Malaysia and English Language.</p>
Mohamed Hidhir	Team Member	<p>Education:</p> <p>Bachelor Degree in Chemical Engineering, National University of Malaysia</p> <p>Work Experience:</p> <p>He has 7 years working experience in palm oil industry specially on palm oil milling for 5 years. He also has the experience as auditor for several standard including ISO 9001, 14001. OHSAS 18001, MSPO and RSPO in his previous certification body.</p> <p>Training attended:</p> <p>ISO 9001: 2015 LA Training(2012), ISO 14001: 2015 LA Training (2013), ISO 45001: 2018 LA Training (2012), RSPO P&C LA Training(2013), MSPO LA Training (2014), SMETA Training (2021)</p> <p>Aspect covered in this audit:</p> <p>During this assessment, he assessed on the aspects of legal, social and stakeholder engagement requirements.</p> <p>Language proficiency:</p> <p>Fluent in in both verbal/written Bahasa Malaysia and English Language.</p>

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Accompanying Persons:

Name	Role
Nil	

1.3 Assessment Plan

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

Date	Time	Subjects	MNM	MHZ	MFM
Sunday 10/10/2021	p.m.	Auditors travel to Muar and check in at hotel.	✓	✓	✓
Monday 11/10/2021	0830-0900	Opening meeting: <ul style="list-style-type: none"> • Opening presentation by audit team leader • Confirmation of assessment scope and finalize audit plan (including stakeholder's consultation) 	✓	✓	✓
	0900-1300	Pagoh Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓
	1300-1400	Lunch break			
	1400-1630	Pagoh Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓
	1630-1700	Interim closing briefing			
Tuesday 12/10/2021	0900-1300	Pagoh POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, supply chain related, etc.	✓	✓	✓
	1000-1200	Stakeholder consultations: Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-
	1300-1400	Lunch break			
	1400-1630	Pagoh POM	✓	✓	✓

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		Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, supply chain etc.			
	1630-1700	Interim closing briefing			
Wednesday 13/10/2021	0900-1300	Lanadron Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓
	1000-1200	Stakeholder consultations: Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-
	1300-1400	Lunch break			
	1400-1630	Lanadron Bukit Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓
	1630-1700	Interim closing briefing			
Thursday 14/10/2021	0900-1300	Pengkalan Bukit Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Scheduled waste management, worker housing, clinic, Landfill, etc.	✓	✓	✓
	1000-1200	Stakeholder consultations: Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-
	1300-1400	Lunch break			
	1400-1600	Pengkalan Bukit Estate 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	✓	✓	✓

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		representatives, new planting, CIP and implementation etc.).			
	1600-1630	Audit team discussion & preparation for closing meeting	✓	✓	✓
	1630-1700	Closing meeting	✓	✓	✓

Major NCR Closure Plan

Date	Time	Subjects	MN
Thursday, 6/1/2022		Travel from KL to Kluang and check in Anika Hotel.	✓
Friday, 7/1/2022	0830-0900	Pengkalan Bukit Estate: Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation). 	✓
	0900-1130	Pengkalan Bukit estate & Lanadron estate: Verification on previous Major NC. Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence	✓
	1130-1230	Closing	✓

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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. SDP 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>As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p> <p>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. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1st Oct 2018, the mill has completed the selling off transaction.</p> <p>In Indonesia, PT Mitral Austral Sejahtera was sold and currently SDP 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.	No. There is no new acquisitions as at latest TBP 2021.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Although there are deviation has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	<p>Yes.</p> <p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties was sold and currently Sime Darby Plantation Berhad have no control in the</p>	Complied

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	<p>management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: www.rspo.org/certification/public-announcement</p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations. ACOP 2020 has been cross-referenced as below: www.rspo.org/members/29</p>	
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	Although there lapses has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as these 2 assets were disposed.	Complied
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.	New plantings within Sime Darby Plantation Berhad that have completed NPP notification 1. NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/certification/new-	Complied

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	<p>plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited</p> <p>2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-a-subsiary-of-sime-darby-plantationbhd-guadalcanal-plain-palm-oil-ltd</p> <p>3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd</p> <p>4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-ramu-agri-industries-limited</p> <p>5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-higaturu-oil-palms</p> <p>6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO Website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamawan-png</p> <p>7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO Website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamendauen-png</p> <p>8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-roka-mini-estate</p> <p>9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate</p> <p>10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-</p>	
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	<p>britainpalm-oil-limited-higaturu-oil-palm</p> <p>11. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc-new-planting-assessment</p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment1</p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment</p> <p>Management units for 11 – 13 above were disposed.</p>	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as both sites was disposed. 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 RSPO P&C criterion 4.2</p>	<p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>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</p>	<p>Complied</p>

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<p>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.</p>	<p>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.</p> <p>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.</p>	Complied
<p>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?</p>	<p>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.</p>	Complied
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company</p>	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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

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Approved Time Bound Plan

SDP - RSPO Certification for Time Bound Plan - Malaysia Operations

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

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		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					

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		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

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							hold. As at 1st Oct 2018, the mill has completed the selling off transaction.
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SDP - RSPO Certification for Time Bound Plan - Indonesia Operations

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

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	PT Langgeng Muaramakmur	Bebunga Estate			Kotabaru District – South Kalimantan			KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Sungai Cengal Estate						
		Bakau Estate						
		KKPA LMR	TBC	TBC		TBC	TBC	
5	PT Kridatama Lancar	Sukamandang Mill	-	-	Seruyan and East–Kotawaringin District Central Kalimantan	Certified	05/07/2011	-
		Sukamandang Estate						
		Sapiri Estate						
		Barasdanum Estate						
		Kuala Kuayan Estate						
6	PT Bahari Gembira Ria	Ladang Panjang Mill	-		Muaro Jambi District - Jambi	Certified	09/07/2012	Only Division 3 is certified (1,202 Ha). Total Areas of Division 1 and 2 (1,796.19 ha) HGU still in process
		Ladang Panjang Estate						
		Plasma BGR 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.
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		Gunung Aru Mill	-			Certified	05/07/2011	-

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	PT Bersama Sejahtera Sakti	Gunung Aru Estate			Kotabaru District – South Kalimantan			
		Gunung Kemasan Estate						
		Laut Timur Estate						
		Pantai Timur Estate						
		KKPA MBP	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
10	PT Guthrie Pecconina	Rantau Panjang Mill	-	-	Musi 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	

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12	PT Indotruba Tengah	Sekunyir Mill	-	-	Seruyan and West Kotawaringin District – Central Kalimantan	Certified	23/11/2010	-
		Sekunyir						
		Seruyan Estate						
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		Teluk Siak Mill	-	-		Certified	11/10/2011	-

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	PT Aneka Intipersada	Teluk Siak Estate Pinang Sebatang Estate Aneka Persada Estate			Pekanbaru, Siak District – Riau			
18	PT Tamaco Graha Krida	Ungkaya Mill Ungkaya Estate Plasma TGK Estate	- TBC	- TBC	Morowali District – Sulawesi Tengah	Certified TBC	10/7/2012 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 West Estate East Estate East* Estate /Sei Mawang Estate East Plasma Estate West Plasma Estate	- 2023 -	- -	Sanggau District –West Kalimantan	Certified - Certified	18/10/2010 18/7/2016	Land legalisation process for East Est for 5815.64 ha is still in process. Land legalisation for Sei Mawang is still in process -
20	PT Padang Palma Permai /PT Perkasa Subur Sakti	Blang Simpo Mill Tamiang (PT PPP) Estate Batang Ara (PT PSK) Estate Blang Simpo-01 Estate Blang Simpo-02 Estate	- -	-	Aceh Tamiang and East Aceh District – Nangroe Aceh Darussalam	Certified	03/05/2013	-
21	PT Sandika Natapalma	Lembiru Mill Lembiru Estate Awatan Estate	-	-	Ketapang District – West Kalimantan	Certified	03/07/2014	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru Mill.

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

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

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)					

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		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	Poliamba (POL)	Poliamba Oil Mill	-	New Ireland Province, PNG	Certified	19/03/2012	-
		Kara Estate					
		Nalik Estate					
		West Coast Estate					
		Noatsi Estate					
		Madak Estate					
		Smallholders -North Division (615)					
		Smallholders- South Division (868)					
		Smallholders -West Division (309)					
4	Ramu Agricultural Industrial Ltd (RAIL)	Gusap Mill	-	Morobe Province, PNG	Certified	05/08/2010	-
		Gusap East (Gusap) Estate					

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		Gusap West (Paddox) Estate					
		Surinam Estate					
		Dumpu Estate					
		Ngaru Estate					
		J Estate (Jephcott) Estate					
		Smallholders - Madang VOPs (71)					
		Smallholders - Morobe VOPs (253)					
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	-	Oro Bay 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					

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

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		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					

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3.3 Details of Nonconformities

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

During this Assessment there were *One* (1) Critical; *Two* (2) Minor nonconformities and no Opportunity For Improvement raised. The Pagoh Palm Oil Mill and Supply Base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2117642-202110-M1	Date Issued	13/10/2021
Due Date	27/1/2022	Date of nonconformity Closure	7/1/2022
Clause & Category (Critical / Minor)	2.2.2 Major (C)		
Statement of Nonconformity:	Evidence of legal due diligence of contracted third parties were not effectively demonstrated.		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
Objective Evidence:	<p>Lanadron Estate Clause 12: Notice of termination of contract; (a) four weeks' notice if the employee has been so employed for less than two years on the date on which the notice is given;</p> <p>(b) six weeks' notice if he has been so employed for two years or more but less than five years on such date;</p> <p>(c) eight weeks' notice if he has been so employed for five years or more on such date:</p> <p>i) 3 months of notice period, for contract period of 3 (three) years stated in the employment contract dated 1/3/2021 between Gunalabur (M) Sdn Bhd and signed by employee, ID no. XX06XX-01-5XXX.</p> <p>ii) 3 months of notice period, for contract period of 1 (one) year stated in the employment contract signed dated 1/1/2021 between Kim Soon Lee Transporter Sdn Bhd and signed by employee, Ubaidullah Bin Ismail.</p> <p>Clause 7: More favourable conditions of service under the Act to prevail; term or condition of service which is less favourable to an employee than a term of condition of service prescribed by this Act or any regulations,</p> <p>i) Stated in the employment contract, "Gaji akan diberikan mengikut Jumlah Gaji Minima yang ditetapkan oleh Kerajaan Malaysia." No specific rates written either the employee is under daily/piece rated package or monthly rated in the contract. Further verified in the pay slip, the given salary is RM1500 for all workers. No evidence of attendance provided to match the salary received by the workers.</p>		

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	<p>Refer to contract between Kim Soon Lee Transporter Sdn Bhd and the employee dated 1/1/2021. No evidence of acceptance from employee in the said contract.</p> <p>ii) Stated in the employment contract, "Gaji akan diberikan mengikut Jumlah Gaji Minima yang ditetapkan oleh Kerajaan Malaysia." No specific Assessment Report. Page 13 of 21 rates written either the employee is under daily/piece rated package or monthly rated in the contract. No evidence of attendance provided to match the salary received by the workers. Further verified in the pay slip, the given salary is RM2,000. Refer to contract between Gunalabur (M) Sdn Bhd and the employee dated 1/3/2021.</p> <p>Pengkalan Bukit Estate Based on contract between Ng Sah Leng and employee with ID no. XX12XX-01-5XXX signed dated 1/1/21, day rate given is RM95 per day, OT at RM 10 per hour. If the employee work more than 26 days in a month, the 27th day will be paid with additional 1.5 days rate of pay. RM200 allowance also will be added if the employee work for more than 26 days. Further trailed on the pay slip and attendance record in January and March 2021, the following issues were observed;</p> <p>i) January 2021 pay slip – Day rate RM90 x 21.50 working days = RM1,935 with SOCSO deduction (Form 8A January 2021) RM 43.90. The salary was not paid correctly based on contract. Total contribution for SOCSO is RM 43.90 which based on RM1900-RM2000 salary range for the said month.</p> <p>ii) March 2021 pay slip – Day rate RM95 x 27 working days = RM2,565. SOCSO deduction (Form 8A March 2021) RM 57.40. The salary was not paid correctly based on contract. Total contribution for SOCSO is RM 57.40 which based on RM2,500-RM2,600 salary range for the said month.</p>
<p>Corrections:</p>	<p>Lanadron Estate</p> <ol style="list-style-type: none"> Contractors was informed on the clause at notice of termination. Amendment in contractor agreement has been demanded. <p>Pengkalan Bukit:</p> <ol style="list-style-type: none"> Meeting between management & contractor have been made on 23rd October 2021 on the highlighted issue. Contractors acknowledged & agreed to reimburse any shortage of payment & SOCSO contribution.
<p>Root Cause Analysis:</p>	<p>There is no PIC to monitor & checking the details of the employment terms in contractors' agreement to its' workers.</p>
<p>Corrective Actions:</p>	<p>Lanadron Estate</p> <ol style="list-style-type: none"> Sr Assistant was assigned to monitor and checking the employment contract terms and conditions are according to Employment Act 1955. Contractor compliance audit will be covered in Internal audit conducted by Regional SQM or HQ
<p>Assessment Conclusion:</p>	<p>Verification for close NC:</p> <p>Lanadron Estate</p> <p>Kim Soon Lee Transport Sdn Bhd have new contract with workers 80XXXX-01-5023 dated 1/12/2021 already stated min wages RM 1500 as per verification.</p> <p>Guna Labur already stated min wages RM 2500 as per verification under employment contract with their worker dated 1/12/2021</p>

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	<p>Lanadron appointment letter for Mohd Nor Helmi Bin Ismail as incharge for sustainability certification of management system dated 1/11/2021 available for verification</p> <p>Briefing to contractor regarding to clause on Min wages been conducted on 26/11/2021. Attended by Gunalabur (M) Sdn Bhd and Kim Soon lee Transport Sdn Bhd. This briefing conducted by Sharifah Sharina (SQM).</p> <p>Pengkalan Bukit Estate</p> <p>Appointment letter for Mohd Azizi Bin Abd Rahim (Sr Assistant) as incharge on Sustainability Certification of Management system dated 16/10/2021.</p> <p>Briefing with Ng Sah Leng conducted on 23/10/2021 to ensure the contractor understand regarding to Min wages, SOCSO requirement.</p> <p>From the record verification, the contractor (Ng Sah Leng) already reimbursed the wages from previous month, the total RM 213.75 have been paid dated 1/12/2021. As per verification on Nov Payslip 2021, the payment was according to employment contract dated 1/1/2021 as per below:-</p> <p>RM 95 x 24 days = total 2280.</p> <p>As per verification on SOCSO on November 2021 (Borang 8A) total contribution was</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Employer</th> <th style="width: 33%;">Employee</th> <th style="width: 33%;">Total contribution</th> </tr> </thead> <tbody> <tr> <td>RM 39.35</td> <td>RM 11.25</td> <td>RM 50.60</td> </tr> </tbody> </table> <p>Therefore the Major NC was close on 7/1/2022.</p>	Employer	Employee	Total contribution	RM 39.35	RM 11.25	RM 50.60
Employer	Employee	Total contribution					
RM 39.35	RM 11.25	RM 50.60					

Non-conformity			
NCR Ref #	2117642-202110-N1	Date Issued	13/10/2021
Due Date	Next Assessment	Date of nonconformity Closure	"Open"
Clause & Category (Critical / Minor)	7.3.1 (Minor)		
Statement of Nonconformity:	Found the waste management plan inadequately documented and implemented		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance		
Objective Evidence:	Sighted some waste such as used PPE contaminated with oil was not identified in waste management plan dated 9/1/2021 in Pagoh estate. Reviewed latest disposal record for clinical waste in Lanadron Estate was conducted on 26/8/2021 by license contractor, not accordance to waste management plan dated 3/1/2021 where supposedly disposed by VMO. The sand and saw dust contaminated with oil/chemical was sighted during site visit was not identified in waste management plan dated 18/7/2021 for Pengkalan Bukit Estate		
Corrections:	Lanadron Estate, Pengkalan Bukit and Pagoh Estate		

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	1. The waste management plan has been revised according to each operating units.
Root Cause Analysis:	Lanadron Estate, Pengkalan Bukit & Pagoh 1. The generic waste management plan was established without checking the details of the management plan 2. Lack of monitoring and identification of waste in management plan
Corrective Actions:	1. PIC to review management plan on monthly basis 2. Internal audit to verify the management plan
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.

Non-conformity			
NCR Ref #	2117642-202110-N2	Date Issued	13/10/2021
Due Date	Next Assessment	Date of nonconformity Closure	"Open"
Clause & Category (Critical / Minor)	3.3.3 (Minor)		
Statement of Nonconformity:	The implementation of recommendation control measure stated in the Noise Risk Assessment was inadequate		
Requirement Reference:	Records of monitoring and any actions taken are maintained and available.		
Objective Evidence:	Pengkalan Bukit Estate The estate has conducted Noise Risk Assessment on 03/08/2021. In the recommendation control measure stated to install signage with the words "HEARING PROTECTION ZONE" at water pump house. Noted during site visit, no signage was installed.		
Corrections:	To install signages as per recommended in NRA		
Root Cause Analysis:	Monitoring of warning signage at water pump house not covered in routine inspection.		
Corrective Actions:	To include the checking of availability of signage at water pump house during workplace inspection by safety and health committee.		
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

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Positive Findings	
PF #	Description
PF 1	Good commitment and corporation from the management.
PF 2	Well maintained labour quarters at the mill and all estates.
PF 3	Positive feedbacks from internal and external stakeholders.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1964604-202010-M1	Clause & Category (Critical (Major) / Minor)	7.2.10 (Critical)
Date Issued	16/10/2020	Due Date	13/01/2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	23/11/2020
Statement Nonconformity:	Annual Medical Surveillance was not conducted in accordance with the Chemical Health Risk Assessment Action Plan.		
Requirement Reference:	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.		
Objective Evidence:	<p>Based on the revised CHRA Report, dated 04th June 2020 by Assessor Dosh Reg: HQ/15/ASS/00/63, Continue to carry out medical surveillance programme by a registered OHD due to the employees exposed or likely exposed to chemicals hazardous to health and the chemical used are concluded as having significant risk for work units: a) Premix (All Chemicals), d) Line Site Fogging (Malathion & Sumithion), e) Workshop (Manganese) – Welder. The medical surveillance programme should be conducted at intervals if not more than twelve months or at such shorter intervals as determined by the OHD.</p> <p>As for Pagoh Estate, it was identified that there were 10 workers (Welders, Line-site Fogging & Pre-Mixers) that should be sent for medical surveillance at intervals of not more than 12 months. Medical Surveillance was conducted for these workers on 8th October 2020, 20 months after the previous medical surveillance (21st January 2019). The results have yet to be obtained by the operating unit.</p>		
Corrections:	The management has arranged for medical surveillance for employees as per recommendation in revised CHRA on 08.10.2020		
Root Cause Analysis:	Lack of monitoring on the Medical Surveillance Program that was to be conducted at intervals not more than 12 months. The miscommunication of the management to wait for revised CHRA instead of taking action based on recommendation by existing CHRA.		
Corrective Actions:	<ul style="list-style-type: none"> • Medical Surveillance Program is planned within 12 months in management plan. • To ensure the implementation/monitoring of the program is in accordance to the management plan. 		

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Assessment Conclusion:	<p>Major NC Verification Assessment</p> <ol style="list-style-type: none"> 1) The medical surveillance program was successfully conducted on 08.10.2020 by U.N.I Clinic for 10 workers from Pagoh Estate. The Organophosphate and Manganese Test conducted for the workers were available in the Medical Surveillance Report dated 11.10.2020. 9 workers were declared fit to work with no traces of organophosphate or manganese in the samples. One worker was stated as suspected organophosphate poisoning and has been put under medical removal protection. All other result of biological exposure monitoring were within normal limit. 2) The worker suspected with organophosphate poisoning was sent for re-medical test on 12.11.2020. The test result was not available yet during the verification audit. Meanwhile the worker has been removed from chemical related jobs and sent for other job. The letter provided to the workers and the workers staff dated 22.10.2020 was verified. 3) The CHRA Action Plan 2020-2025 was available and verified undersigned by the Assistant Manager of Pagoh Estate. <p>As the evidence provided were in accordance with the approved corrective action plan, thus the Major NC was successfully closed on 23/11/2020.</p>
ASA1_3 Verification	<p>All estates conducted annual medical surveillance for chemical handlers as per CHRA report recommendations.</p> <p>Pagoh Estate</p> <ol style="list-style-type: none"> 1. Latest medical surveillance was conducted on 18 and 24/08/2021 by OHD with reg. no. HQ/19/DOC/00/00374 involving 51 workers as per recommendation reports from CHRA reports dated August 2020. <p>Lanadron Estate</p> <ol style="list-style-type: none"> 1. The estate conducted medical screening for all the sprayers on monthly basis during VMO visits. Reviewed the VMO visit records dated 26/08/2021 and 22/09/2021. 2. Latest medical surveillance was conducted on 05 and 06/10/2021 for 15 chemical handlers. The results has yet to be received by the estate. <p>The CAP was effectively implemented. Thus, the major non-conformity is remain closed.</p>

Non-conformity			
NCR Ref #	1964604-202010-N1	Clause & Category (Critical (Major) / Minor)	2.2.2 (Minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	13/10/2021
Statement Nonconformity:	of	The contractor is not adhering to Pekeliling Majikan Bil 3 Tahun 2018, Akta Keselamatan Sosial Pekerja 1969, Peralihan Pampasan Kemalangan Pekerja Asing Daripada Skim Pampasan Pekerja Asing (SPPA), Jabtan Tenaga Kerja Kepada Skim Bencana Kerja Perkeso (SBKP).	
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.		

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	Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.
Objective Evidence:	In Pengkalan Bukit Estate, there is no employer contribution for SOCSO for foreign worker (passport no: C5726483 worked for Hayati Enterprise Sdn Bhd) for month of July, Aug and Sept 2020. This is not complying with Pekeliling Majikan Bil 3 Tahun 2018, Akta Keselamatan Sosial Pekerja 1969, Peralihan Pampasan Kemalangan Pekerja Asing Daripada Skim Pampasan Pekerja Asing (SPPA), Jabatan Tenaga Kerja Kepada Skim Bencana Kerja Perkeso (SBKP).
Corrections:	1) The management has communicated the legal requirements to the said contractor through email on the EIS contribution to its employees. 2) The contractor has registered the said employee for EIS. The first SOCSO contribution will take effect on October 2020.
Root Cause Analysis:	1) Hayati Ent has lack of awareness on the compliance of legal requirements.
Corrective Actions:	1) The payslip of third party contractor will be monitored on a monthly basis to check on the legal requirements. 2) To check during internal audit on all legal compliances by third party.
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.
ASA1_3 Verification	NC has been escalated to Major NC. Please refer under indicator 2.2.2 (Major)

Non-conformity			
NCR Ref #	1964604-202010-N2	Clause & Category (Critical (Major) / Minor)	7.11.3 (Minor)
Closed (Yes / No)	Yes	Date of nonconformity Closure	13/10/2021
Statement Nonconformity:	of	Some of the adjacent stakeholders has yet to be engaged on fire prevention and control measures.	
Requirement Reference:	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.		
Objective Evidence:	<p>SOU 19 had conducted a discussion on fire prevention and control measures through a stakeholders meeting on 16 July 2020 at Ladang Pengkalan Bukit covering all the operating units of SOU 19. However, based on the samples, the following adjacent stakeholders have yet to be engaged.</p> <p>Lanadron Estate:</p> <ul style="list-style-type: none"> • Tn. Khairunnasir Bin Md Zim, Pej. Penghulu Mukim. Jorak/Panchor • Tn. Lukman Bin Haji Hassan, Kg. Brohol • En. Mohd Khalid Bin Mohammad, Kg. Seri Tanjung,Panchor <p>Pengkalan Bukit:</p> <ul style="list-style-type: none"> • Hor Lee Estate <p>Pagoh Estate:</p>		

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	<ul style="list-style-type: none"> • Koo Seng Hiap • Lim Peng Guat @ Lim Peng Joo • Othman Bin Lembek • Toh Ah Chai @ Tuh Ah Moy • Koh Kong Hoe • How Bon Chon <p>Nonetheless, the list is not exhaustive.</p>
Corrections:	<p>Lanadron & Pagoh</p> <ul style="list-style-type: none"> • To organize fire prevention/fire drill training which includes all stakeholders in FY2021. • To introduce Sime Darby prevention control to stakeholders in particular smallholders on the company ERT team, contact person during emergency, location of hydrant and hot spot identification by Sime Darby Head Quarters. <p>Pengkalan Bukit</p> <ul style="list-style-type: none"> • To communicate to Hor Lee Estate Management on the company fire prevention plan and control measures.
Root Cause Analysis:	<p>Lanadron & Pagoh</p> <p>The mentioned stakeholder was not present during the stakeholder meeting on 16.07.2020 and there was no follow up on their response.</p> <p>Pengkalan Bukit</p> <p>The management of Hor Lee Estate is hardly engaging with Pengkalan Bukit Estate despite the invitation on stakeholder meeting. This is due to the both the owner and caretaker of the estate are based at outstation.</p>
Corrective Actions:	<ul style="list-style-type: none"> • To extend invitation to smallholders for fire drill / stakeholder meeting and monitored for their response / feedback. • To check during internal audit on smallholder's participation in fire drill/ stakeholder meeting.
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.
ASA1_3 Verification	As per verification on site audit, the Sampling in Pengkalan Bukit estate, Lanadron estate and Pagoh estate, During Covid 19 issue, no meeting was allowed to prevent infection thus the management give a Bulletin SD included information regarding to fire prevention to all stakeholder (included Hor Lee estate) dated 3/8/2021. From the invitation and record all stakeholder been received the bulletin as per interview verification and record. Therefore the Minor NC was close on 13/10/2021

Non-conformity			
NCR Ref #	1964604-202010-N3	Clause & Category (Critical (Major) / Minor)	6.7.2 (Minor)
Closed (Yes / No)	No	Date of nonconformity Closure	Open
Statement Nonconformity:	of	The monitoring of the First Aid Box and relevant trainings associated with First Aid Box holders were not effectively implemented.	
Requirement Reference:	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages		

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	(English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.
Objective Evidence:	<p>Pengkalan Bukit Estate</p> <p>The first aid box was sampled for the Spraying Gang, Water Treatment Plant Attendant/Nursery Mandore and Chemical Store. The First Aid boxes were found to be as below:</p> <ol style="list-style-type: none"> 1) The First Aid items in the First Aid Box were insufficient. There were less items in the box compared to the First Aid Items list that was in the box. 2) The First Aid items in the box were not labelled. (Acviflavine Lotion, Analgesic Cream) 3) The First Aid items in the box had no expiry date. (Acviflavine Lotion, Analgesic Cream) 4) Issues and Replenishment were not recorded in the first aid kit. <p>The sampled first aid box holders (Spraying Mandore & Nursery Mandore) were not trained on the procedure to use the first aid box. Sighted the First Aid Training dated 14.07.2020 did not include the sampled first aid kit holders. Interview with the mentioned workers indicated that they were not aware on how to use the items in the First Aid Kit items.</p>
Corrections:	<ol style="list-style-type: none"> 1) Old first aid box from water treatment plant was collected and disposed accordingly to prevent usage of expired items. 2) All items in the first aid box is labelled on numbers as per checklist inside the box for easy identification. 3) The expiry date of each item is written on the first aid box. 4) The movement of the items is recorded on a daily basis including date and quantity of usage and replenishments. 5) Sampled first aiders are briefed on the usage of first aid box. Simple instructions are also provided in the first aid box for easy reference.
Root Cause Analysis:	<ol style="list-style-type: none"> 1) The first aid box at the water treatment plant was replaced without collecting back the old one. The items in the old box was not replenished hence the items was found insufficient. 2) Medical Assistant is unaware of the requirement to label on the item itself. 3) Estate had purchased the item (Acviflavine Lotion, Analgesic Cream) in bulk and distribute into first aid box. The expiry date is at the main container and was not replicated (expiry date) into individual first aid box. 4) Medical assistant was not aware on the SOP for replacing or replenishing the shortage items in the box. 5) The sampled first aider was absent during the refresher training session. Lack of follow up by the MA on the attendance of the first aiders hence no follow up training was conducted to the first aiders.
Corrective Actions:	<ol style="list-style-type: none"> 1) Estate's Medical Assistant to collect and monitor the condition of first aid boxes every 3 months. 2) Estate Senior Assistant to verify on the monitoring record. 3) To regularly train medical assistant on the SOP of First Aid Kit. 4) To check on the implementation of the SOP during internal audits.
Assessment Conclusion:	Corrective action plan has been reviewed and deemed to be satisfactory to address the Minor Nonconformity. Evidence of the CAP will be verified during next assessment.
ASA1_3 Verification	The operating units has also has established an information on the location of first aid box, name and contact no. of the assigned first aider and communicated

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	<p>through briefing, training and displayed on notice board. First aid kit was monitored on timely basis as follows:</p> <ol style="list-style-type: none"> 1. Pagoh POM - First aid monitoring was conducted on monthly basis. Reviewed the monitoring records as to date September 2021 for first aid box no. 03, 05 and 06. 2. Pagoh Estate - First aid monitoring was conducted on monthly basis. Reviewed the monitoring records dated 24/07/2021, 26/08/2021 and 25/09/2021. 3. Lanadron Estate - First aid monitoring was conducted on monthly basis. Reviewed the monitoring records dated 27/07/2021, 03/08/2021, 01/09/2021 and 01/10/2021 4. Pengkalan Bukit Estate - First aid kit inspection was conducted on monthly basis. Reviewed the monitoring records dated 26/08/2021, 27/09/2021 and 07/10/2021. <p>The mill continuously provided training to ensure the competency for the first aider. Sighted the training records as follows:</p> <ol style="list-style-type: none"> 1. Pagoh POM - First Aider training dated 08/10/2021 2. Pagoh Estate - First aid training and snake bite training dated 30/06/2021 3. Lanadron Estate - First aid training dated 07/10/2021 4. Pengkalan Bukit Estate First aid and fire drill training dated 08/07/2021 <p>The CAP was effectively implemented. Thus, the minor non-conformity is effectively closed.</p>
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Opportunity for Improvements	
OFI #	Description
1964604-202010-I1	<p>Indicator: 7.3.1</p> <p>Requirement: A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>Issue: The wastes management plan can be further enhanced by including the management of recyclable wastes from the household and office such as plastic bottles/containers, glass, papers and metal.</p> <p>ASA1_3 Verification: OFI has been upgraded to Minor NC. Please refer 2117642-202110-N1</p>
1964604-202010-I2	<p>Indicator 7.12.2</p> <p>Requirement: HCVs, HCS forests and other conservation areas are identified as follows:</p> <ol style="list-style-type: none"> 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 stakeholder consultation and take into account wider landscape-level considerations.

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	<p>Issue: The awareness on HCV of Pagoh Estate management can be further improved in order to have clearer information in classifying the HCV area. For example, Pagoh Estate has classified the 16.52 Ha of "forest are" (occupied with rubber trees and rattan before) as HCV but classified otherwise in the HCV Re-assessment Report, August 2016.</p> <p>ASA1_3 Verification: As per verification on HCV record and HCV assessment the already declare as conservation set aside, the management treated that area as conservation area. The monitoring also been covered in this area and no issue been raised by stakeholder or any intrusion from outsider and workers thus OFI was close accordingly.</p>
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3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1691857-201809-M1	Critical	4.7.2	12/10/2018	Closed out on 04/01/2019
1691857-201809-M2	Critical	2.1.1	12/10/2018	Closed out on 04/01/2019
1691857-201809-M3	Critical	6.5.2	12/10/2018	Closed out on 04/01/2019
1691857-201809-M4	Critical	4.6.5	12/10/2018	Closed out on 04/01/2019
1691857-201809-N1	Minor	4.8.2	12/10/2018	Closed out on 25/10/2019
1691857-201809-N2	Minor	2.2.2	12/10/2018	Closed out on 25/10/2019
1691857-201809-N3	Minor	4.1.2	12/10/2018	Closed out on 25/10/2019
1691857-201809-N4	Minor	4.1.3	12/10/2018	Closed out on 25/10/2019
1691857-201809-N5	Minor	6.5.4	12/10/2018	Closed out on 25/10/2019
1833344-201906-M1	Critical	4.7.1	25/10/2019	Closed out on 20/01/2020
1833344-201906-M2	Critical	5.3.2	25/10/2019	Closed out on 20/01/2020
1833344-201906-M3	Critical	6.5.1	25/10/2019	Closed out on 20/01/2020
1833344-201906-N1	Minor	6.5.3	25/10/2019	Closed out on 16/10/2020
1833344-201906-N2	Minor	5.6.3	25/10/2019	Closed out on 16/10/2020
1964604-202010-M1	Critical	7.2.10	16/10/2020	Closed out on 23/11/2020
1964604-202010-N1	Minor	2.2.2	16/10/2020	Escalated to Critical
1964604-202010-N2	Minor	7.11.3	16/10/2020	Closed out on 13/10/2021
1964604-202010-N3	Minor	6.7.2	16/10/2020	Closed out on 13/10/2021
2117642-202110-M1	Critical	2.2.2	13/10/2021	Closed out on 7/1/2022
2117642-202110-N1	Minor	7.3.1	13/10/2021	"Open"
2117642-202110-N2	Minor	3.3.3	13/10/2021	"Open"

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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 *Pagoh POM* Certification Unit's environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
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)
Communities	Kg Payang Panjang	Face to face interview
Communities	NUPW Representative	Face to face interview
Internal	Workers Representative by nationalities (Bangladesh, India and Indonesia)	Face to face interview
Contractor	AVN Brothers, Ng Sah Leng, Lotus Two Engineering	Face to face interview
Internal	Gender Committee	Face to face interview

Stakeholders comment	
1	<p>Feedbacks:</p> <p><u>Local Community Head (Kg Payang Panjang)</u></p> <p>Good cooperation given by the Pagoh POM's management team in support of any social activities with Kg Payang Panjang. The local community head has raised a question with regards to monetary contribution and is there any limit for the contribution.</p> <p>Management Response</p> <p>Any monetary contribution is subject to approval by HQ. The request must be formal and in writing to the management.</p> <p>Audit Team Findings:</p> <p>Noted on the explanation. No further information.</p>
2	<p>Feedbacks:</p> <p><u>NUPW Representatives</u></p>

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	<p>They informed that no pending issue during the time of audit. They will discuss with the management if there is any issue reported. Workers are paying in accordance with Minimum Wage Order 2020.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No further information.</p>
3	<p>Issues: <u>Workers Representative by nationalities (Bangladesh, India and Indonesia)</u></p> <p>The workers are satisfied with the management and they informed that their wages have achieved Minimum Wage Order 2020. They are aware of the complaint procedure. No discrimination from the management.</p> <p>Management Responses: The management will ensure comply to legal requirements and respect all the workers without discrimination.</p> <p>Audit Team Findings: No other issue.</p>
4	<p>Feedbacks: <u>Contractors (AVN Brothers, Ng Sah Leng, Lotus Two Engineering)</u></p> <p>There is no late payment issue from Estate to contractors. Agreement is valid and signed by both parties. Contractor workers' pay slip were kept in office. As for the VISA/work permit issue for foreign worker (FW), contractor having a problem in getting the VISA/work permit on time. Sime Darby Plantation only allowed FW with approved VISA/work permit in the premise.</p> <p>Management Responses: Noted on the information. On the VISA/work permit issue, the management continue to adhere Sime Darby's policies and procedures for foreign workers recruitment process.</p> <p>Audit Team Findings: No further information.</p>
5	<p>Feedbacks: <u>Gender Committee</u></p> <p>No sexual harassment case reported. New mother's need assessment was conducted concurrently during the gender committee meeting. Meeting and activities were actively conducted and participated by the members.</p> <p>Management Responses: Noted on the information.</p> <p>Audit Team Findings: No further information.</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
Nil					
All the estates in SOU Pagoh currently in second planting cycle.					

Previous land owner / user comment	
	<p>Feedbacks: Nil</p> <p>Audit Team verification and response: Not applicable as Sime Darby acquired (freehold and leased) all the land directly from the state government. All the estates in SOU Pagoh currently in second planting cycle.</p>

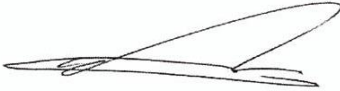

3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Pagoh Palm Oil Mill and Supply Base has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Pagoh Palm Oil Mill and Supply Base is certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Muhamad Naquiddin Mazeli	Name: SENIN B. SUMIRIN
Company Name: BSI Services (M) Sdn Bhd	Company Name: SIME BAKRY PLANTATION MERKAS
Title: Lead Auditor	Title: MANAGER
Signature: 	Signature: <p><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></p> <p style="text-align: center;">LADANG PENGKALAN BUKIT</p>  <p style="text-align: center;">..... Senin Bin Sumirin Manager</p>
Date: 24/1/2022	Date: 25/1/2022

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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> <p>- Critical (Major) compliance -</p>	<p>Documents required for all unit of certification available at Pagoh POM Certification Unit. Among the documents sighted were:</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 <p>There also certain document in Sime Darby web at Reports, Policies and Statements Sime Darby Plantation</p>	Complied
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>SOU 19 has conducted combined meeting with the stakeholders to share any new information on RSPO certification, environmental, social, safety and legal requirement applied to all operating units. All the stakeholders have raised issues and discussed with the</p>	Complied

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		<p>management during the meeting. Sighted the latest minutes meeting conducted for the whole SOU 19 as mentioned in the stakeholder minute of meeting dated 16.07.2020. They also provide the stakeholder the Buletin dated October 2021</p>	
<p>1.1.3</p>	<p>(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p>Request by stakeholders conducted through stakeholders meeting, visitor books, letter and forms. The mill and estates maintain the records of all request and response. Sighted the records of request from the stakeholders as follows:</p> <p>Department of environment (DOE) Inputs from DOE’s field citation report dated 12/2/2021, update related Continuous Emission System (CEMS) malfunction has yet to be provided by Pagoh POM management team.</p> <p>Response: For the time being, manual monitoring using Ringelman film/chart recorded in the check sheet and reported to DOE on monthly basis.</p> <p>TEMIS (M) Sdn Bhd The contractor has requested to use copy of original passport while doing work in the premise.</p> <p>Response: Verification process will be done prior to entry by mill security personnel.</p> <p>Pengkalan Bukit Estate Site NUPW representative – Housing repair issue (roofing and bathroom), grass cutting round and compound upkeep.</p>	<p>Complied</p>

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		Response: Roofing and bathroom repair is still on going and will be completed by phase. Other than house repair work, set of mattress and bed frame provided to workers as part of improvement for workers accommodation.	
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative. - Critical (Major) compliance -	The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues. This has been communicated to workers during muster briefing and for external stakeholders via bulletin. Latest bulletin communication was done on 6th October 2021. Any responses and comments to be replied by 7th October 2021 and recorded as stakeholder’s input for improvement.	Complied
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	The latest stakeholders list updated as at 01 January 2021. Stakeholder’s details available included person in charge, address, e-mail and contact number.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	Sime Darby Plantation Berhad has implemented Code of Business Conduct where the company implemented the attitude of fair, integrity and ethic during any business process. The company is strictly prohibited to have any bribery related in the business processes. The policy was developed in Bahasa Malaysia and English. The latest Group Sustainability & Quality Policy Statement also includes the clause ‘promoting good governance and transparency: abiding by the Group Policies & Authorities (GPA) and the Code of	Complied

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		<p>Business Conduct (COBC) signed by Group Managing Director on 02/12/2019.</p> <p>The policy has been briefed to the workers during morning briefing. Besides, policies were briefed to stakeholders during the stakeholder meeting. COBC training was done on 10/7/2021 at Pagoh Estate.</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>Sime Darby Plantation has established the Vendor Integrity Pledge and Vendor COBC as a due diligence for external parties engaged by Operating Units. Sighted sampled as below:</p> <ul style="list-style-type: none"> i. Diyana Trading & Services signed on 3/2/2021 ii. Ng Sah Leng signed on 7/1/2021 	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 19 had continued to comply with the legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and SQM sustainability team. SOU 19 had obtained and renewed license and permits as required by the law. Among others the licenses/permit viewed were:</p> <p><u>Pagoh POM</u></p> <ul style="list-style-type: none"> 1. DOE license no. 002366 and compliance scheduled no. AS(B)J31/152/000/090 Jilid 5 (08) valid till 30/06/2022 2. MPOB license no. 565809104000 valid till 31/10/2022 3. Fire certificate no. JBPM: JH/7/561/2020 valid till 21/10/2021. The application for renewal has been done and inspection by Fire Department was conducted on 07/10/2021. 4. Private installation license no. 005325/2021 valid till 21/07/2023 	Complied

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		<p>5. Water abstraction license no. 08/A/Muar/020 valid till 31/12/2021</p> <p><u>Pagoh Estate</u></p> <p>1. MPOB License no. 508589902000 for sell and move of FFB valid till 30/04/2022</p> <p>2. MPOB License no. 597369011000 for nursery valid till 30/04/2022</p> <p>3. Diesel storage permit no. J002849 valid till 02/08/2024</p> <p>4. Water abstraction license no. 06/A/Muar/011 valid till 31/12/2021</p> <p>5. Air compressor permit no. PMT-JH/21 142177 valid till 18/08/2022</p> <p><u>Lanadron Estate</u></p> <p>1. MPOB License no. 522273002000 for sell and move of FFB valid till 30/07/2022</p> <p>2. Diesel storage permit no. J002808 valid till 17/06/2024</p> <p>3. Water abstraction license no. 07/A/Muar/071 valid till 31/12/2021</p> <p>4. Air compressor permit no. PMT-JH/20 119162 and PMT-JH/20 119161 valid till 02/12/2021</p> <p><u>Pengkalan Bukit Estate</u></p> <p>1. MPOB License no. 518941002000 for sell and move of FFB valid till 30/04/2022</p> <p>2. MPOB License no. 620445011000 for nursery valid till 31/08/2022</p> <p>3. Water abstraction license no. 07/A/Muar/121, 07/A/Muar/119 and 07/A/Muar/120 valid till 31/12/2021</p>	
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		<p>4. Air compressor permit no. PMT-JH/20 126653 valid till 25/02/2022</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>Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008. A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU 19. GSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p>Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office.</p> <p>The estate has established Legal Other Requirements Register (LORR). Reviewed the latest updated FY 2021. Among the latest updated as follows:</p> <ol style="list-style-type: none"> 1. Road Transport Act 1987 2. Fire Services (Fire certificate)(Amendment) regulation 2020 3. Fire Services (Designated Premise) Order 2020 4. Prevention and Control of Infectious Disease Act 1988 (Act 342) 5. Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Act 2001 6. Malaysian Anti-Corruption Commission 2009 7. Whistle Blowing Protection Act 2010 	<p>Complied</p>

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		8. Prevention and Control of Infectious Diseases (Measure Within The Infected Local Areas) (no.3) 2021	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	Legal boundaries was clearly demarcated with security trenches and red and white pole. Pagoh POM The mill was located in the Pagoh Estate. Mill boundary was demarcated with fences. Paloh Estate Sighted the boundary demarcation with security demarcation trenches and red and white pole at P19A adjacent with smallholders (Abu Bakar and Dul Salam). Lanadron Estate Sighted the boundary demarcation with security trenches and red and white pole at P07N adjacent with smallholders. Pengkalan Bukit Estate Sighted the boundary demarcated with security trenches at field P08C adjacent with Kampung Tengah, Paya Redan and field P12A adjacent with smallholders.	Complied
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	All OU in SOU 19 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, contractors, transporters and government department.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.	Evidence of legal due diligence of contracted third parties was not effectively demonstrated as per following objective evidences: Lanadron Estate	Non-compliance

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	<p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p>Clause 12: Notice of termination of contract;</p> <p>(a) four weeks' notice if the employee has been so employed for less than two years on the date on which the notice is given;</p> <p>(b) six weeks' notice if he has been so employed for two years or more but less than five years on such date;</p> <p>(c) eight weeks' notice if he has been so employed for five years or more on such date:</p> <p>i) 3 months of notice period, for contract period of 3 (three) years stated in the employment contract dated 1/3/2021 between Gunalabur (M) Sdn Bhd and signed by employee, ID no. XX06XX-01-5XXX.</p> <p>ii) 3 months of notice period, for contract period of 1 (one) year stated in the employment contract signed dated 1/1/2021 between Kim Soon Lee Transporter Sdn Bhd and signed by employee, Ubaidullah Bin Ismail.</p> <p>Clause 7: More favourable conditions of service under the Act to prevail;</p> <p>term or condition of service which is less favourable to an employee than a term of condition of service prescribed by this Act or any regulations,</p> <p>i) Stated in the employment contract, "Gaji akan diberikan mengikut Jumlah Gaji Minima yang ditetapkan oleh Kerajaan Malaysia." No specific rates written either the employee is under daily/piece rated package or monthly rated in the contract. Further verified in the pay slip, the given salary is RM1500 for all workers. No evidence of attendance provided to match the salary received by the workers. Refer to contract between Kim Soon Lee Transporter Sdn Bhd and</p>	
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		<p>the employee dated 1/1/2021. No evidence of acceptance from employee in the said contract.</p> <p>ii) Stated in the employment contract, "Gaji akan diberikan mengikut Jumlah Gaji Minima yang ditetapkan oleh Kerajaan Malaysia." No specific rates written either the employee is under daily/piece rated package or monthly rated in the contract. No evidence of attendance provided to match the salary received by the workers. Further verified in the pay slip, the given salary is RM2,000. Refer to contract between Gunalabur (M) Sdn Bhd and the employee dated 1/3/2021.</p> <p>Pengkalan Bukit Estate</p> <p>Based on contract between Ng Sah Leng and employee with ID no. XX12XX-01-5XXX signed dated 1/1/21, day rate given is RM95 per day, OT at RM 10 per hour. If the employee work more than 26 days in a month, the 27th day will be paid with additional 1.5 days rate of pay. RM200 allowance also will be added if the employee work for more than 26 days. Further trailed on the pay slip and attendance record in January and March 2021, the following issues were observed;</p> <p>i) January 2021 pay slip – Day rate RM90 x 21.50 working days = RM1,935 with SOCSO deduction (Form 8A January 2021) RM 43.90. The salary was not paid correctly based on contract. Total contribution for SOCSO is RM 43.90 which based on RM1900-RM2000 salary range for the said month.</p> <p>ii) March 2021 pay slip – Day rate RM95 x 27 working days = RM2,565. SOCSO deduction (Form 8A March 2021) RM 57.40. The salary was not paid correctly based on contract. Total contribution</p>	
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		<p>for SOCSO is RM 57.40 which based on RM2,500-RM2,600 salary range for the said month.</p> <p>Thus, a major NC was raised due to recurrence of NC on the same indicator.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>Specific clause on disallowing child, forced and trafficked labour documented in Vendor Integrity Pledge (VIP) and Vendor Code of Business Conduct (VCOBC) under section 5.8: Abolishment of child labour and protecting the rights of children.</p> <p>The contractor are required to understand and signed the VIP and VCOBC together with the contract agreements. Reviewed the contracts agreements, VIP and VCOBC between Sime Darby and FFB Supply and contractors as follows:</p> <p>Pagoh POM</p> <ol style="list-style-type: none"> 1. Sime Darby Plantation Berhad with Tiong Oil Palm Sdn. Bhd, agreement no. P/P/1220/FFB02594L 2. Sime Darby Plantation Berhad with Kelapa Sawit Tai Hwa Sdn. Bhd, agreement no. P/P/1220/FFB02595L <p>Pagoh Estate</p> <ol style="list-style-type: none"> 1. Sime Darby Plantation Berhad (Pagoh Estate) with MTJJ Enterprise dated 01/02/2021 2. Sime Darby Plantation Berhad (Pagoh Estate) with Ng Sah Leng dated 01/01/2021 <p>Lanadron Estate</p> <ol style="list-style-type: none"> 1. Sime Darby Plantation Berhad with Diyana Trading and Services Sdn. Bhd. dated 01/09/2021 2. Sime Darby Plantation Berhad (Lanadron Estate) with SM Angkut Enterprise dated 01/09/2021 <p>Pengkalan Bukit Estate</p>	Complied

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		1. Sime Darby Plantation Berhad (Pengkalan Bukit Estate) with Kim Soon Lee Transport Sdn. Bhd dated 01/01/2021	
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>	<p>There was only 10 third party direct sourced FFB send to Pagoh POM as per below:-</p> <p>BP Realty & Plantation Sdn Bhd Impressive Transform Sdn Bhd Koperasi Membeli Tanah Grisek Ledang Berhad Marak Teguh – PPLK Pagoh Kelapa Sawit Tai Hwa Sdn Bhd Tiong Oil Palm Sdn Bhd Gan Estate Contractor Sdn Bhd Sin Chin Joo Sdn Bhd Syarikat Pembangunan Pertanian Eng Huat Latex Concentrate Sdn Bhd</p> <p>From the Responsible Sourcing Guideline, the information on geo location of FFB origin, the ownership of land, MPOB license was available on site for verification as per sampling below:-</p> <p>Impressive Transform Sdn Bhd MPOB license 566403002000 valid until 30/11/2021 for 208.16 ha Pembangunan Pertanian Melaka Sdn Bhd MPOB license 504225102000 valid until 31/07/2022 for 783.9 ha</p>	Complied

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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>	<p>There were 4 indirectly sourced FFB and the mill is in the process of collecting the info described in 2.3.1. Sampling on one of the indirect source as per below record:-</p> <p>Eng Huat Latex Concentrate Sdn Bhd MPOB license 505907315000 valid until 30/4/2022 as traders From the verification, all data was available in Mill.</p>	Complied
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>SOU 19 has continued its commitment to long term sustainability and improvements through a capital expenditure program. The management has forecasted 5 years business plan from FY 2021 – 2025.</p> <p>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 2021 and business plan FY 2021 – FY 2025</p> <p>In the 5 years business plan include items as follows:</p> <ul style="list-style-type: none"> a. Palm oil mill <ul style="list-style-type: none"> i. Mill intake – FFB input ii. Production of CPO iii. Production of PK iv. Total Palm Oil Extraction v. Total Palm Kernel Extraction vi. Mill cost b. Oil Palm Estate 	Complied

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		<ul style="list-style-type: none"> i. Total crop projection and yield potential ii. Activity direct cost <ul style="list-style-type: none"> a. Mature upkeep b. Manuring c. Harvesting and collection d. Transportation e. Nursery iii. Estate administration <ul style="list-style-type: none"> a. Admin Cost iv. Labour overhead v. Road and bridges vi. Cost of production. <p>The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2025) and well documented upon request.</p>																			
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>	<p>SOU 19 have long range replanting program until FY 2026. Replanting planned for the palm older than 25 years, non-performance field (yield) and ganoderma infected palm.</p> <p>Long range replanting program for SOU 19 for the next 5 years as follows:</p> <table border="1" data-bbox="1137 1177 1926 1327"> <thead> <tr> <th>Estate</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Pagoh Estate</td> <td>0.00</td> <td>139.45</td> <td>0.00</td> <td>147.33</td> <td>0.00</td> </tr> <tr> <td>Lanadron Estate</td> <td>0.00</td> <td>0.00</td> <td>43.75</td> <td>58.94</td> <td>99.70</td> </tr> </tbody> </table>	Estate	2022	2023	2024	2025	2026	Pagoh Estate	0.00	139.45	0.00	147.33	0.00	Lanadron Estate	0.00	0.00	43.75	58.94	99.70	Complied
Estate	2022	2023	2024	2025	2026																
Pagoh Estate	0.00	139.45	0.00	147.33	0.00																
Lanadron Estate	0.00	0.00	43.75	58.94	99.70																

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		Pengkalan Bukit Estate	165.08	208.04	206.33	77.21	123.02	
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 has established SOP on Management Review documented in SOM, Section 5, and Management responsibility version 2, issued in 2015. Management review was conducted on annually basis by Operating Unit as per SOP established. Latest management review meeting was conducted at each operating units as follows:					Complied	
		Operating Unit		Date				
		Pagoh POM		07/08/2021				
		Pagoh Estate		31/07/2021				
		Lanadron Estate		06/09/2021				
		Pengkalan Bukit Estate		06/09/2021				
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 -	The estate and mill have established the main social and environment improvement plans as stated in the Social Impact Assessment Plan and Environmental Management Plan. The Action plan have been developed based on the areas and issues of concern that have been raised. The estate and mill have established the main social and environment improvement plans as stated in the Social Impact Assessment Plan and Environmental Management Plan. The Action plan have been developed based on the areas and issues of concern that have been raised. Social Improvement Plan developed as per the following:					Complied	

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		<ol style="list-style-type: none"> 1. Review of social impacts and to implement plans to mitigate the negative impacts and promote the positive ones. 2. Compliance to SOP and legal requirements regarding to social. 3. To contribute to local communities' development. 4. To response on the issues discussed during the various avenues (Stakeholder Meeting, OSH Meeting, Trade Union Meeting, Complaint Book) 5. Allocation of budget for government/SAJ water supply, worker's quarters upgrading (roofing/toilet/bathroom/) 6. Accommodation upgrades (bedstead/mattress/fan/wardrobe) 7. Upgrading of accommodation and quarters for "Project Lokal" ; initiative to promote more local to work with the company. 	
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>- Minor Compliance -</p>	<p>The record of RSPO template was available and verified as per verification on estate and Mill record such as fertiliser bin card, JKKP record, grievances record and etc.</p>	Complied
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>SOP was established for the Estates. Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual, Sustainability Plantation Management System and EQMS (Estate Quality Management System) were distributed to all operating units under SOU 19 as a guidance document to conduct estate operation. The estates also holds the Safety Work Procedure. The SOP covers land preparation, planting material, upkeep, harvesting, FFB transportation and etc.</p> <p>Palm Mill holds two SOPs: sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP</p>	Complied

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		<p>and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill.</p> <p>For Health, Safety and Environment, both mill and estates, Sime Darby has issued Health, Safety and Environment (HSE) Management System and Standard Operating Procedures.</p> <p>Sime Darby continuously updated the SOP established. Among the updated SOP FY 2021 as follows:</p> <ol style="list-style-type: none"> 1. UM HSE Management System Manual, UM/HSE/MS/01 2. First Aid in Workplace Procedure, UM/HSE/OCP/01 3. Safety Harvesting Procedure, UM/HSE/OCP/02 4. Personal Protective Equipment Procedure, UM/HSE/OCP/03 5. Chemical Safety Management Procedure, UM/HSE/OCP/04 6. Permit to Work (PTW) Procedure, UM/HSE/OCP/05 7. OSH Risk Management Procedure, UM/HSE/SE/01 <p>Sime Darby has established a system to monitor the mill operation. The visited the operating units on timely basis. Their reports covers on all aspect of operation.</p>	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	Sime Darby Plantation has established mechanism to check the effective implementation of the procedure. Among the mechanism such as Mill/Plantation Advisor Visit, Performance Monitoring Visit, SORA/SCRA visit, Agronomist visit and Internal Audit.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	The operating units maintain all the records of monitoring and actions taken for all issues raised during the visit. Reviewed the monitoring records as follows: <ol style="list-style-type: none">1. RSPO and MSPO Internal Audit report SOU 19 for Pagoh POM 06/08/2021	Non-compliance

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		<p>2. Structured Oil Recovery Assessment (SORA) report for Pagoh POM for visit conducted on 08 – 11/02/2021 and 05 – 09/07/2021</p> <p>3. Performance Monitoring visit for Pagoh Estate dated 16/02/2021</p> <p>4. RSPO and MSPO Internal Audit report SOU 19 for Pagoh Estate 03/08/2021</p> <p>5. Performance Monitoring visit for Lanadron Estate dated 13/07/2021</p> <p>The estate has conducted noise risk assessment on 03/08/2021. In the recommendation controlled measure stated to install signage with the words "HEARING PROTECTION ZONE" at water pump house. During the site visit, it was noted that no signage was installed. Thus, noncompliance been raised.</p>	
<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>			
<p>3.4.1</p>	<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>There is no new planting at Lanadron Estate, Pengkalan Bukit Estate. Nonetheless, the assessment of environmental impact of its existing activities is documented in the following documents:</p> <p>Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; Register</p> <p>Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR-01/EAI</p> <p>Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009; MR- 02/EIE</p>	<p>Complied</p>

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		<p>The Social Impact Assessment (SIA) Report for SOU 19 dated 05-08 May 2015. The report includes both positive and negative impact and its recommendation. Additionally, addendum SIA was made available for replanting at Lanadron Estate dated 28/9/2021. This addendum report is meant to identify and evaluate impacts (positive & negative) due replanting.</p>	
<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. - Minor Compliance -</p>	<p>Environmental Impact Assessment already updated in Lanadron estate on June 2021. Environment Aspect and Impact Identification for various activities-construction work, compound, dispensary, field, harvesting and collection, main entrance, pest and disease control, petrol and diesel, power station, replanting, road, schedule waste store, workshop. After the EAI is completed, the Environmental Impact Evaluation is conducted to evaluate the impact severity using a format (Environmental Impact Evaluation Form). There are 3 classifications of impact established in order to justify the action plan (mitigations) required i.e.: Methodology of assessment is based on interview at workstation for harvesters, sprayers, union representatives, gender committee, contractor, supplier, local community, neighbouring estate, government & School. The secondary data collection – document review/file checking also been made.</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. - Critical (Major) compliance -</p>	<p>From the management plan in Pagoh estate for HCV dated Oct 2021, they conducted the HCV monitoring monthly and per verification the record of monitoring was available dated 1/10/2021 and 27/9/2021.</p>	<p>Complied</p>

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		<p>There is no new planting in SOU 19 (Pagoh POM Certification Unit). Sighted the Social Action Plan for 2021 based on the SIA and issues raised through the gender committee, internal and external communication as the input for the SIA development.</p> <p>Examples seen as per below:</p> <p>NUPW site representative (Pengkalan Bukit Estate) Housing repair issue (roofing and bathroom), grass cutting round and compound upkeep.</p> <p>Action – Roofing and bathroom repair is still on going and will be completed by phase. Other than house repair work, set of mattress and bed frame provided to workers as part of improvement for workers accommodation.</p> <p>Department of environment (DOE) – Pagoh POM Inputs from DOE’s field citation report dated 12/2/2021, update related Continuous Emission System (CEMS) malfunction has yet to be provided by Pagoh POM management team.</p> <p>Action: For the time being, manual monitoring using Ringelman film/chart recorded in the check sheet and reported to DOE on monthly basis.</p> <p>TEMIS (M) Sdn Bhd – Pagoh POM The contractor has requested to use copy of original passport while doing work in the premise. Action: Verification process will be done prior to entry by mill security personnel.</p>	
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Criterion 3.5: A system for managing human resources is in place.

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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>The Human Resource Department in HQ has established Hiring of Local Workers procedure (Doc. No.: 01-12-19) dated 01/12/2019 and Workforce Management Unit Liaison & Recruitment procedure (WMU/LR-SOPP/MARCH2016, Rev. 0 dated 30/03/2016) to explain the recruitment processes for both local and foreign workers. The recruitment of foreign workers will be carried out by the HQ through appointed agents in respective countries.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Application form, employment interview assessment form, medical check-up report and employment contract was sighted for new recruited employees. The latest recruitment of workers in Pagoh Palm Oil Mill was on 27th September 2021. A copied of identification card was kept as record. Interviewed with the clerk confirmed that if there is any job vacancy available, they will publish a job vacancy advertisement/flyer at the places nearby the villages. Other method of advertisement in social media such as Pagoh Facebook page was made available as well.</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>Sime Darby has established the Upstream Malaysia Health, Safety and Environment (HSE) Policy Statement signed by the CEO, Upstream Malaysia dated 1/6/2020.</p> <p>In the Policy Statement stated the commitment to provide safe and healthy workplace and operating in an environmentally responsible manner at all their operation in Malaysia</p> <p>The policy has been communicated to the workers through induction training for new workers, morning briefing and displayed at various notice board within the mill and estate.</p> <p>Sime Darby has established SOP for HIRARC. Refer Estate Quality Management System, Level 2: Standard Operating Manual, Subsection 5.4: Planning, Appendix 5.4.1a Hazard Identification,</p>	Complied

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		<p>Risk Assessment and Risk Control (HIRARC) Procedure ver. 1 Year 2008, issue no. 1 dated 1/4/2008.</p> <p>SOU 19 has conducted assessment for risk on all the operations and documented in Hazard Identification, Risk Assessment, and Risk Control (HIRARC) and chemical Hazard Risk Assessment. The assessment cover all main operations and support operations. The HIRARC was reviewed at minimum once a year, if accident occur or changes on the operation.</p> <p>The latest HIRARC review was conducted as follows:</p> <table border="1" data-bbox="1153 678 1921 1295"> <thead> <tr> <th data-bbox="1153 678 1451 726">Operating Unit</th> <th data-bbox="1451 678 1921 726">Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="1153 726 1451 917">Pagoh POM</td> <td data-bbox="1451 726 1921 917">13/01/2021 on Handling big/heavy motor due to accident occur on 08/01/2021 29/09/2021 on FFB Grading due to accident occur on 20/09/2021</td> </tr> <tr> <td data-bbox="1153 917 1451 1029">Pagoh Estate</td> <td data-bbox="1451 917 1921 1029">21/06/2021 on Workshop for Vehicles repairs and maintenance due to accident occur on 18/06/2021</td> </tr> <tr> <td data-bbox="1153 1029 1451 1220">Lanadron Estate</td> <td data-bbox="1451 1029 1921 1220">01/04/2021 on Gardener – cleaning housing for accident occur on 25/03/2021 11/08/2021 on frond stacker for accident occur 06/08/2021</td> </tr> <tr> <td data-bbox="1153 1220 1451 1295">Pengkalan Bukit Estate</td> <td data-bbox="1451 1220 1921 1295">20/09/2021 on collection operation for accident occur on 12/09/2021</td> </tr> </tbody> </table>	Operating Unit	Date	Pagoh POM	13/01/2021 on Handling big/heavy motor due to accident occur on 08/01/2021 29/09/2021 on FFB Grading due to accident occur on 20/09/2021	Pagoh Estate	21/06/2021 on Workshop for Vehicles repairs and maintenance due to accident occur on 18/06/2021	Lanadron Estate	01/04/2021 on Gardener – cleaning housing for accident occur on 25/03/2021 11/08/2021 on frond stacker for accident occur 06/08/2021	Pengkalan Bukit Estate	20/09/2021 on collection operation for accident occur on 12/09/2021	
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Pagoh Estate	21/06/2021 on Workshop for Vehicles repairs and maintenance due to accident occur on 18/06/2021												
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Pengkalan Bukit Estate	20/09/2021 on collection operation for accident occur on 12/09/2021												

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			<p>23/08/2021 on cutting of FFB and fronds due to accident occur on 11/08/2021</p> <p>08/03/2021 on manuring due to accident occur on 03/03/2021</p>	
<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>The mill has established Safety and Health plan FY 2021. The plan covers Risk Management, ESH Structure, Incident reporting, ERP, Chemical safety management, contractor safety management, vehicle and machinery management, communication, inspection, health and hygiene monitoring program and awareness and competency training. Reviewed the implementation of the management plan as follows:</p> <p>Pagoh POM</p> <ol style="list-style-type: none"> 1. The mill has conducted Annual Audiometric test for 56 employee on 02/08/2021 by OHD with registration no. HQ/16/DOC/00/454. From the test, 21 employee was found with abnormal audiometric results. Retest was scheduled on 25 – 28/10/2021. 2. The mill has established Emergency Response Team lead by the Mill Manager as Emergency Commander. The mill conducted Emergency Response Plan and fire drill training on annually basis. Latest training was conducted on 04/10/2021 3. The mill conducted Fire System monitoring on quarterly basis. Reviewed the monitoring report dated 30/09/2021, 30/06/2021 and 16/03/2021. 4. The mill conducted workplace inspection on quarterly basis prior to safety and health committee meeting. Reviewed the inspection reports dated 15/04/2021. 	<p>Complied</p>	

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		<p>5. First aid monitoring was conducted on monthly basis. Reviewed the monitoring records as to date September 2021 for first aid box no. 03, 05 and 06.</p> <p>Pagoh Estate</p> <p>1. Latest medical surveillance was conducted on 18 and 24/08/2021 by OHD with reg. no. HQ/19/DOC/00/00374 involving 51 workers as per recommendation reports from CHRA reports dated August 2020.</p> <p>2. Latest Audiometric Test was conducted on 20 to 24/09/2021 by OHD with reg. no. HQ/19/DOC/00/00374 involving 32 workers.</p> <p>3. The estate conducted workplace inspection on quarterly basis prior to the safety and health committee meeting. Reviewed the workplace inspection records dated 29/09/2021 and 08/04/2021.</p> <p>Lanadron Estate</p> <p>1. The estate conducted workplace inspection on quarterly basis prior to safety and health committee meeting. Reviewed the inspection reports dated 09/06/2021.</p> <p>2. The estate conducted medical screening for all the sprayers on monthly basis during VMO visits. Reviewed the VMO visit records dated 26/08/2021 and 22/09/2021.</p> <p>3. To ensure the safety of vehicle and drivers, the vehicle driver conducted vehicle daily inspection before start working. Reviewed the inspection records for tractor no. TM 020, TM 025 and TM 027 for the month of June, July and August 2021.</p> <p>Pengkalan Bukit Estate</p>	
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		<p>1. Annual audiometric test was conducted on 11/10/2021 as per delivery order no. DO-099/2021. The report has yet to be submitted to the estate during the audit.</p> <p>2. Latest annual medical surveillance was conducted by OHD with reg. no. HQ/19/DOC/00/00374 on 08/07/2021 for 20 workers. All workers were found fit to work as chemical handlers.</p> <p>3. Workplace inspection records was conducted on quarterly basis. Reviewed the inspection records score reports for June, July and August 2021.</p> <p>4. First aid kit inspection was conducted on monthly basis. Reviewed the monitoring records dated 26/08/2021, 27/09/2021 and 07/10/2021.</p>	
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units visited has conducted training need analysis for all employee, management and contractors. The need analysis was conducted base on the job designation and training required by the job type.</p> <p>Trainings was identified for management, employee and contractors and programmed throughout FY 2021. The training identified covers the safety and health, environmental and social aspect.</p> <p>Additionally, for contractors, there are 8 trainings such as OHS, discipline and waste management incorporated, and it being briefed before starts any works and recorded in "Permit to Work".</p>	Complied
3.7.2	<p>Records of training are maintained.</p> <p>- Minor Compliance -</p>	<p>The operating units maintained the training records conducted. Reviewed the training records as follows: Pagoh POM</p>	Complied

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		<ol style="list-style-type: none"> 1. SOP and 5S housekeeping for all workstation training dated 20, 22, and 25/01/2021 2. Chemical management, SDS, PPE training dated 22/01/2021 3. LOTO System for process team and First Aid training dated 02/08/2021 4. SCCS training dated 08/10/2021 5. Impactt Worker Helpline briefing dated 09/04/2021 6. Hearing conservation training dated 19/09/2021 7. Oil Room Equipment by Alfa Laval training dated 24/09/2021 8. Emergency Response Plan (Equipment) training dated 10/04/2021 9. SCCS for CPO Transporter training dated 08/10/2021 10. First Aider training dated 08/10/2021 <p>Pagoh Estate</p> <ol style="list-style-type: none"> 1. RSPO and MSPO compliance and safety training dated 06/10/2021 2. Audiometry and safety training dated 08/10/2021 3. Harvesting (SD2 modified ver. 2.0 final) system and safety training dated 17/09/2021 4. Chemical spillage training dated 17/07/2021 5. Interpump maintenance/spraying and safety training dated 17/09/2021 6. Ulula Channel briefing dated 04/09/2021 	
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		<p>7. P&D spraying (using drone) and safety training dated 02/07/2021</p> <p>8. Rat baiting and safety training dated 01/07/2021</p> <p>9. Circle spraying and safety training dated 30/06/2021</p> <p>10. First aid training and snake bite training dated 30/06/2021</p> <p>11. Chemical mixing and safety training dated 19/06/2021</p> <p>Lanadron Estate</p> <p>1. Safety briefing for replanting dated 01/02/2021</p> <p>2. Spraying technique and safety aspect as well as maintenance of Inter Sprayer by Mycrop training dated 18/03/2021</p> <p>3. Harvesting safety and quality control training dated 08/04/2021</p> <p>4. Safety for tractor driver training dated 29/05/2021</p> <p>5. Weighbridge operation and weight variance training dated 24/08/2021</p> <p>6. Fire extinguisher and firefighting training dated 26/08/2021</p> <p>7. New harvesters training dated 15/09/2021</p> <p>8. Spraying technique and safety aspect as well as maintenance of Inter Sprayer by Mycrop training dated 15/09/2021</p> <p>9. First aid training dated 07/10/2021</p> <p>Pengkalan Bukit Estate</p> <p>1. Rhinoceros Beetle spraying method training dated 07/01/2021</p> <p>2. Scheduled waste management training dated 05/05/2021</p> <p>3. IPM (beneficial plan) training dated 17/05/2021</p>	
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		<ol style="list-style-type: none"> 4. EAI/EIE and HIRARC training dated dated 24/05/2021 5. Harvesting Competency (HCTP) training dated 22/06/2021 6. Preventive management and oil spillage kit training dated 06/07/2021 7. First aid and fire drill training dated 08/07/2021 8. Spraying technique, PPE usage, CSDS and emergency contact number training dated 18/07/2021 9. Trunk injection and census training dated 10/08/2021 10. Fire drill training dated 09/09/2021 11. Maintenance, usage of inter pump (chemical) and PPE training dated 17/09/2021 	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>The mill has identified all relevant personnel involve in supply chain system such as Mill Manager, Asst. Mill Manager, QA Supervisor, and Weighbridge Operator.</p> <p>The mill conducted the training need analysis for the personnel identified in SCCS. Latest training was conducted as follows:</p> <ol style="list-style-type: none"> 1. SCCS training dated 08/10/2021 2. SCCS for CPO Transporter training dated 08/10/2021 	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</p>	<p>Pagoh POM uses the Mass Balance Module as it's FFB are sourced from estates and FFB Collection Centres that are certified and uncertified against the RSPO P&C.</p>	Not Applicable

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	<p>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>3.8.2</p>	<p>Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Pagoh POM receives certified FFB and uncertified FFB since June 2019. Therefore, qualifies for the Mass Balance Supply Chain System and module. During the RSPO 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. The list of FFB Suppliers are as below;</p> <p>Certified FFB</p> <table border="1" data-bbox="1151 794 1928 1141"> <tr> <th>Estate</th> <th>SOU</th> </tr> <tr> <td>Pengkalan Bukit Estate</td> <td>SOU 19</td> </tr> <tr> <td>Lanadron Estate</td> <td>SOU 19</td> </tr> <tr> <td>Pagoh Estate</td> <td>SOU 19</td> </tr> <tr> <td>Tangkah Estate</td> <td>SOU 17</td> </tr> <tr> <td>Welch Estate</td> <td>SOU 18</td> </tr> <tr> <td>Muar River Estate</td> <td>SOU 16</td> </tr> </table> <p>Uncertified FFB</p> <table border="1" data-bbox="1151 1273 1928 1396"> <tr> <th>Estate</th> <th>Category</th> </tr> <tr> <td>BP Realty & Plantation Sdn Bhd</td> <td>Traders</td> </tr> </table>	Estate	SOU	Pengkalan Bukit Estate	SOU 19	Lanadron Estate	SOU 19	Pagoh Estate	SOU 19	Tangkah Estate	SOU 17	Welch Estate	SOU 18	Muar River Estate	SOU 16	Estate	Category	BP Realty & Plantation Sdn Bhd	Traders	<p>Complied</p>
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3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.	Complied																		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The registration of PalmTrace is carried out by the GTM Department, HQ. All transaction are registered in the PalmTrace.	Complied																		
3.8.5	Documented procedures	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 to ensure the	Complied																		

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	<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> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>handling of incoming FFB and outgoing CPO and PK are carried out in a proper manner to meet the sustainability requirements for traceability and mass balance. The following subjects were included in the procedure:</p> <ul style="list-style-type: none"> 4.0 Responsibilities 5.0 Control of Documents & Records 6.0 Delivery of FFB from the Estate 7.0 Receiving FFB at the Mill 9.0 Process Monitoring 10.0 Products Despatch 11.0 Non-conforming Products and/ or Documents 12.0 Product Claims 13.0 Outsourced Contractor 14.0 Training 15.0 Reclassification of Mill’s Supply Chain Model 16.0 Production Volume 17.0 Conversion Factors 18.0 Internal Audit 19.0 Complaints 20.0 Management Review 	
<p>3.8.6</p>	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. 	<p>Addressed 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 section 18.0 Internal Audit. Based on the procedure, the internal audit is to be conducted annually as per Internal Audit Procedure. Refer SOP ref. no. SD/SDP/PSQM/IAP.</p>	<p>Complied</p>

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	<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>Latest internal audit was conducted for RSPO P & C MYNI 2019 including Supply Chain Requirements for Mills as per report RSPO and MSPO Internal Audit report SOU 19 for Pagoh POM dated 06/08/2021. 2 major non-conformity regarding supply chain was issued during the assessment and has been closed by the mill on 23 and 24/08/2021.</p> <p>The results of Internal Audit were discussed in the Management Review Meeting as sighted in minutes meeting conducted on 07/08/2021 under section 6.1: Results of Internal Audit.</p>	
<p>3.8.7</p>	<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>The daily records are prepared at the entry point at the weighbridge. When FFB delivered to the mill from the estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill. Daily summary and monthly summary documented for all the certified FFB.</p> <p>The mill received FFB from sister estate with RSPO certified and purchased from the outside FFB supplier. The records of FFB received was recorded in FFB delivery/consignment note, FFB weighbridge ticket and summarize in Mass Balance sheet.</p> <p>The management will inform CB if there is any overproduction of certified tonnage. They aware on the overproduction as per stated in the procedure. Based on last review period, no overproduction recorded.</p> <p>Addressed in the SOP clause 11.0 Non-conforming Products and/or Documents. Based on the procedure, where there is contamination of RSPO certified material during receiving, processing, storage and dispatch, the mill shall downgrade the materials in such order: IP to MB to conventional.</p> <p>Material received with insufficient information shall be treated as non-conforming documents. The documents shall be investigated, verified and corrected in order to allow processing of material. Authorization for release shall be by the mill manager.</p>	<p>Complied</p>

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		<p>E.g. of information available in the mill's weighbridge tickets is as follows:</p> <ol style="list-style-type: none"> 1. Weighbridge ticket no.:158603 FFB delivery note: 103525 Name of estates: Pengkalan Bukit Estate Transporter: Greenvision Trading And Services Sdn Bhd Vehicle no. AEY5030P2 Field/Year of planting: 2016F Date: 31/5/2021 Net weight: 12,690 kg 2. Weighbridge ticket no.:158489 <ul style="list-style-type: none"> ▪ FFB delivery note: 112301 ▪ Name of estates: Lanadron Estate ▪ Vehicle no. JRS2469LE1 ▪ Field/Year of planting: 07N2, 07N2A ▪ Date: 27/5/2021 ▪ Net weight: 13,320 kg 3. Weighbridge ticket no.:157964 <ul style="list-style-type: none"> ▪ FFB delivery note: PE24225 ▪ Name of estates: Pagoh Estate ▪ Vehicle no. JME8245P8 ▪ Field/Year of planting: 2008 ▪ Date: 10/5/2021 ▪ Net weight: 13,010 kg 	
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<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>Pagoh POM ensured the required information is available in document form. Sampled of CPO contract on RSPO trading as per Transaction. Sample Contract: S/C-PSD/2104/CPO0112 dated 24/4/2021 until 27/4/2021 with total 250 MT.</p> <p>Crude Palm Oil The name and address of the buyer: Nuri Edible Oil (NEO) Complex The name and address of the seller: KKS Pagoh, Muar, Johor The loading or shipment/ delivery date: April 2021 e.g. Weighbridge ticket: 013003 The date on which the documents were issued: 24/04/2021 A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Palm Oil (CPO) RSPO MB. The quantity of the products delivered; e.g. 41.10 mt Any related transport documentation; e.g. 110: Teo Tuan Kwee Sdn Bhd Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 600305 A unique identification number: contract no. Available in a few forms e.g. DN no., seal no., etc.</p> <p>Palm Kernel The name and address of the buyer: SDO Carey KCP-SDP Nuri KCP The name and address of the seller: KKS Pagoh, Muar, Johor The loading or shipment/ delivery date: April 2021 e.g. Weighbridge ticket: 012942 The date on which the documents were issued: 02/04/2021</p>	<p>Complied</p>

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		<p>A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Palm Kernel(PK) RSPO MB. The quantity of the products delivered; e.g. 38.63 mt Any related transport documentation; e.g. Sin Tai Seng & Trading Sdn Bhd Supply chain certificate number of the seller; e.g. On weighbridge ticket e.g. RSPO 600305 A unique identification number: contract no. Available in a few forms e.g. DN no., seal no., etc.</p>	
<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. 	<p>Sime Darby has established Standard Operating procedure for outsourced activities as per Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019, Section 13.0: Outsourced Contractors.</p> <p>In the SOP under section 13.1 stated that CPO Mill cannot outsourced processing activities like refining or crushing.</p> <p>For</p> <p>The mill only outsourced the transportation of CPO to the contractors, Teo Tuan Kwee Sdn. Bhd. The contractors was listed stakeholders list.</p> <p>Sighted the contracts between The Sime Darby Plantation Bhd. with CPO transporter Teo Tuan Kwee Sdn. Bhd. as per Letter of award ref. no. T/SDPB/PEN/CPO/0720/003 dated 12/12/2020.</p>	<p>Complied</p>

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	d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	Stated in the contract agreement between The Sime Darby Plantation Bhd. with CPO transporter Teo Tuan Kwee Sdn. Bhd. as per Letter of award ref. no. T/SDPB/PEN/CPO/0720/003 dated 12/12/2020 under section 5. The Transporter’s undertakings, obligations and covenants under subsection.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Stated in the contract agreement between The Sime Darby Plantation Bhd. with CPO transporter Teo Tuan Kwee Sdn. Bhd. as per Letter of award ref. no. T/SDPB/PEN/CPO/0720/003 dated 12/12/2020 under section 5. The Transporter’s undertakings, obligations and covenants under subsection.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p>	<p>Pagoh Palm Oil Mill has established SOP for Sustainable Supply Chain and Traceability, version :2 Issue No:5, Dated April 2019 Pagoh POM ensured the required information is available in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); <p>As spelt out in its supply chain procedure, Clause 5.4, records are to be maintained for a minimum period of three (3 years).</p>	Complied

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	<p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>Pagoh POM is using the Mass Balance module and all the FFB received, processed and CPO & PK dispatch is recorded in dispatch book and balance in the Mass Balance Sheet with 3 monthly accounting period. Based on the Mass Balance sheet, the stock for CPO & PK is positive stock within past 12 months.</p>	
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>The extraction rate for mill is calculated in daily production detail report. Conversion factor of CPO and PK production is depending on the actual OER and KER. Last year's average were 20.64% (OER) & 4.08% (KER).</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>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</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>Pagoh POM is using mass balance module, therefore this clause is not applicable.</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 refineries, crushers, and traders not more than three months after</p>	<p>The registration of PalmTrace is carried out by the Sime Darby's Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Based on the announcement summary, all the registrations were found to be in order.</p>	Complied

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	<p>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>	No RSPO volume sold for other scheme. RSPO certified volume only downgraded to conventional CPO/PK.	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Choose an item.
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No off-product claim made by Pagoh POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul 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>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.</p>	Not applicable as no off-product claim made by Pagoh POM as to date.	Not Applicable
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by Pagoh POM as to date.	Not Applicable

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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 Pagoh 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.	Not applicable as no off-product claim made by Pagoh POM as to date.	Not Applicable
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 MB) and RSPO certificate number.	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 that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	SDPOM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Complied

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Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	No business to consumer communication on product specific claim made Pagoh POM and only producing crude and unfinished product.	Complied
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	No business to consumer communication on product specific claim made Pagoh POM and only producing crude and unfinished product.	Complied
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	No business to consumer communication on product specific claim made Pagoh POM and only producing crude and unfinished product.	Complied
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made Pagoh POM and only producing crude and unfinished product.	Complied
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made Pagoh POM and only producing crude and unfinished product.	Complied
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	No business to consumer communication on product specific claim made Pagoh POM and only producing crude and unfinished product.	Complied
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	No business to consumer communication on product specific claim made Pagoh POM and only producing crude and unfinished product.	Complied
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	No business to consumer communication on product specific claim made Pagoh POM and only producing crude and unfinished product.	Complied

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	<p>undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>The facility declares its MB certified CPO & PK production through mass balance accounting. Based on verification of MB accounting, there was no over declare found.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>Not Applicable as the facility declares its MB certified CPO & PK production through mass balance accounting. Based on verification of MB accounting, there was no over declare found.</p>	<p>Complied</p>
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and 	<p>Pagoh POM is not use RSPO label in its product (CPO & PK). This is confirmed due site visit observation and interview with the mill workers.</p>	<p>Complied</p>

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	<p>outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</p> <ul style="list-style-type: none"> • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p>	<p>Pagoh POM is not use RSPO label in its product (CPO & PK). This is confirmed due site visit observation and interview with the mill workers.</p>	<p>Complied</p>

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	<ul style="list-style-type: none"> Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 		
<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>Sime Darby Plantation has established Group Sustainability & Quality Policy Statement dated 02/12/2019 by Group Managing Director where the company is respecting, upholding & no-exploitation of fundamental human rights. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC). The HRC was last revised on August 2020. They promote the human rights, safeguard democracy and its institutions and not violate the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, they are committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them. Refer to Policy on the Protection of Human Rights Defenders (HRDs) dated 25/03/2020 for more information. Policy on the Protection of HRDs_FINAL.pdf (sime-darbyplantation.com). The policies were communicated to stakeholders during stakeholder meetings. Besides, the briefing of the policies was conducted on 10/7/2021 in Pagoh Estate.</p>	<p>Choose an item.</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>Sime Darby Plantation prohibits any form of harassment in their operation as per the policies above. Interviewed with the workers confirmed that no harassment by the management.</p>	<p>Choose an item.</p>

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<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> <p>Guidance: Dispute resolution mechanisms should be established through open and consensual agreements with relevant affected parties. Complaints should be dealt with by mechanisms such as Joint Consultative Committees (JCC), with gender representation and, where relevant, migrant worker representation. Grievances may be internal (employees) or external. Where a resolution is not found mutually, complaints can be brought to the attention of the RSPO Complaints System. Refer to helpful texts for guidance, such as the Human Rights Commission (HRC) endorsed 'Guiding Principles on Business and Human Rights: Implementing the UN "Protect, Respect and Remedy" Framework', 2011.</p>			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -</p>	<p>Sime Darby Plantation has developed Human Rights Charter last revised 2020 where they believe everyone has the responsibility to promote human rights, safeguard democracy and its institutions and not violate the rights of others. They recognise the important role Human Rights Defenders, whistle blowers, complainants and community spokespersons play by lodging complaints in confidence.</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. - Minor compliance -</p>	<p>Sime Darby Plantation has implemented Flowchart and Procedure on Handling Social Issues, version 1 and dated 01/04/2008. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in https://www.simedarbyplantation.com/corporate/whistleblowing. Besides, the company has implemented "Suara Kami" as a platform for the workers to raise any issue. The workers in Pagoh Palm Oil Mill were briefed on the complaint mechanism during morning muster. Besides, external stakeholders were briefed during the stakeholder meeting. Interviewed with the internal and external stakeholders confirmed that they have been briefed and understood</p>	Complied

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		on the complaint mechanism implemented by the company. On top of "Suara Kami" other initiative called ULULA (Impact Worker Helpline) was introduced effective from 4th September 2021 as part of improvement on the existing grievance procedure.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	The on-site verification through consultation among internal and external stakeholders and documented records reviewed shown that SOU 19 keeps parties to a grievance informed of progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders in addressing issues raised by stakeholders. Furthermore, neither any complaints nor land dispute occurred in the SOU 19 certification unit at the time of audit as verified through stakeholder consultation.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	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.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	The mill and estates' management have made contribution to the local communities based on the requests from stakeholders such as the local community requested assistance from estate for gotong-royong activity.	Complied
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.			
4.4.1	(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	Copies of land titles were available and verified. Details of the respective land titles to demonstrate the right to use the land as shown below. Quit rents were paid accordingly. There was no	Complied

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	history of land tenure and the actual legal or customary use of the land are available. - Critical (Major) compliance -	evidence of any part of the land overlapping with customary land owners.			
		Estates	Land title		
			HS(D) No./ PTD Ref/Lot ref.	Land Use Type	Size (ha)
1	Pagoh Estate	GRN 89107/lot 28, Mukim Jorak, District Muar	No specific term	407.518	Freehold
		GRN 93881/lot 2159, Mukim Jalan Bakri, District Muar	No specific term	1,039.2327	Freehold
		Total land titles: 30 Total area: 2,331.74 ha			

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		2	Lanadron Estate	HSD 3834/PTD7518 Total land titles: 15 Total area: 1,703.9575 ha	Agriculture	603.0368	Lease period ended on 22/5/2100	
			3	Pengkaln Bukit Estate	GRN 93882/ lot 2161	No specific term	380.2021	Freehold
					GRN 82108/ lot 3164	No specific term	201.3311	Freehold
					HSD 91203/ lot 1532 Total land titles: 35 Total area: 2,128.919 ha	No specific term	258.6042	Freehold

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4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	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 related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.	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 related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land. Sime Darby Plantation has developed Human Rights Charter last revised 2020, under Clause 3.1.1 where the company ensures the operating environment is free from conflict by undertaking robust free, prior and informed consent (FPIC) process to any new developed.	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	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities.	Complied

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	status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	Boundary stone and trenches were available to demarcate the boundary of land.	
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	There is no land dispute recorded. Boundary stone was identified and marked in the GPS surveyed map. Trenches were available to demarcate the boundary and this has confirmed by interviewed with the neighbouring smallholder and local community.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	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 related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	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 related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied

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	- Critical (Major) compliance -		
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied

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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 plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	No new plantings are established on local peoples' land. This was verified through stakeholders' consultation.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	No new land acquired for SOU Pagoh. This was verified through stakeholders' consultation.	Complied
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 -	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
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 -	SOP as per indicator 4.6.1.	Complied

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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 issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
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 issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Sime Darby Plantation Berhad has developed Flowchart and Procedures on Handling Land Disputes, version 1 dated 01/11/2008. The procedure has detailing the process if any issues reported by local communities regarding land dispute. Negotiation process will be initiated which included the Estate Management, Land Management Department, Regional Heads, Zone Heads, third parties' involvement including stakeholders. Compensation of calculation and distribution to the affected parties will be determined by Land Management Department.	Complied
4.7.2	(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 -	SOP as per indicator 4.7.1.	Complied

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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.</p> <p>- Minor compliance -</p>	<p>There was no community that have lost access and rights to land for plantation expansion as the operating units expands the planting area under certified area.</p>	Complied
<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.</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities. Boundary stone and trenches were available to demarcate the boundary of land.</p>	Complied
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p>	<p>No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders reported during the time of audit through interviewed with the local communities.</p>	Complied

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	- Minor compliance -	Boundary stone and trenches were available to demarcate the boundary of land.	
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 -	Prices paid for FFB are stated in the Schedule 3 of the Contract Agreement between SDP and the FFB Suppliers. All FFB suppliers have a copy of the contract agreement for their reference. Any discrepancies of weight or prices paid can be brought forward to the mill management through the grievance procedures that have been in place. Current and previous period prices are also publicly displayed at the weighbridge office for the reference of the FFB suppliers. MPOB Monthly Average and Mill OER & KER is used to determine the prices of FFB for payment to the FFB Suppliers. No changes from previous report.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Critical (Major) compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019. Nevertheless, the FFB suppliers understand the pricing of FFB which is in accordance to the MPOB Monthly Average for CPO and PK. Interview with the FFB Suppliers indicate that they are aware on the pricing mechanism of KKS Pagoh.	Complied
5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Critical (Major) compliance -	Pricing is based on the MPOB Monthly Average Price for CPO and PK and the OER and KER awarded by KKS Pagoh. This was affirmed by verifying the Self Billed Invoice to the FFB Suppliers.	Complied

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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>	<p>There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Pagoh Mill ensures that all Outsider FFB suppliers are provided with a fair, legal and transparent contract agreement. Sampled the contract agreement as below;</p> <p>i) Agreement Number: P/P/1220/FFB02695L FFB Supplier: Gan Estate Plantation Contract Period: 1/1/2021 – 31/12/2021</p> <p>ii) Agreement Number: P/P/1220/FFB02594L FFB Supplier: Tiong Oil Palm Contract Period: 1/1/2021 – 31/12/2021</p>	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>	<p>Pagoh Mill ensures that all agreed payments to its Outsider FFB Suppliers are in a timely manner in accordance to the contract agreement which is on or before the 10th day of the following month. Payments are done every 30 days. Verified the payment details as below;</p> <p>Supplier: Gan Estate Plantation Invoice Number: P/AFVCH-201126 Invoice Date: 30/9/2021 Contract Date: 1/1/2021 Total Amount Including SST: RM 36,560.12</p>	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>	<p>The Mill conducts regular calibration on their weighbridges used to determine the FFB tonnage for all FFB suppliers. Latest Calibration was done on 2/12/2020; Safety Tag No: DE18003769 by metrology Corporation Malaysia Sdn Bhd.</p>	Complied

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5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Complied
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Complied

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5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	There are no smallholders under the KKS Pagoh certification as the estates that supply FFB to KKS Pagoh are more than 50 Ha as defined RSPO MYNI 2019.	Complied
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	Sime Darby Plantation has developed Human Rights Charter to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. They will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy could be downloaded from https://www.simedarbyplantation.com/sustainability/human-rights-charter	Complied
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers. - Critical (Major) compliance -	Interviewed with the workers comprises of different gender and nationalities as well as the parolees confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers, no charging of recruitment fees for the foreign workers and offered job based on	Complied

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		capability. The worker can request for job transfer if they found they unfit for the job assigned to them.	
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	Sime Darby Plantation has developed a Career Progression for Workers Level (both local and foreign workers), Doc. No.: SDP/HRUM/2020/SOP01 where the promotion of workers is based on the work performance, suitability, and the leadership quality of the worker. The recruitment of foreign workers is through Human Resource Department in HQ based the regulation requirements.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	Interviewed with the female employees in Pagoh Palm Oil Mill and estates confirmed that pregnancy testing is not conducted prior to work. They still will be able to offer for work if they are pregnant.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	The Group Sustainability Policy covers the commitment facilitating the opportunity for advancement of women at all levels in our organisation and ensuring their protection. The policy was communicated through the Gender Committee meeting conducted quarterly. SDPB has introduced the new Terms of Reference (TOR) for Gender Representatives and Gender Committee, dated March 2021 which supersede the previous Gender Committees Gender Committee Handbook, First Edition 2014. In this new TOR, a more definitive roles, and responsibilities as well as governance structure and programmes were added in. Gender Committee were established by the mill and estates management and verified at each operating unit. Meetings conducted at respective units as below: i) Pagoh POM: 30/4/21, 6/10/21 ii) Pagoh Estate: 15/9/21, 25/3/21 iii) Lanadron Estate: 7/10/21, 10/6/21 iv) Pengkalan Bukit Estate: 24/5/21, 7/8/21	Complied

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		There was no sexual harassment case reported so far at all OU.	
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	There is no discrimination based on religion, gender, nationality etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary etc. This was confirmed during stakeholder’s consultation, worker’s interview, complaint book and trade union meeting. Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste. They were paid according to the Minimum Wage Order 2020 without any discrimination. Interviewed with both the female and male workers confirmed that no discrimination has occurred.	Complied
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).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Critical (Major) compliance -	Sime Darby has sign the Collective Agreement with National Union of Plantation Workers (NUPW). Sample of employment contracts are reviewed and the agreements are signed in both English and home country language (i.e. Hindi, Bahasa Malaysia/Indonesia). Upon the foreign workers arriving to the estate, they will be inducted for the terms and conditions of employment contract and briefed on the company’s policies. This has confirmed by interviewed with the foreign workers.	Complied
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members. - Critical (Major) compliance -	Details of payments and conditions of employment are stated and documented in the employment contracts given to all workers. The contract contains terms related to duration, hours of work, overtime, annual/medical leave, public holiday, mutual termination, salary deductions, maternity entitlement, etc. The terms are in compliance with the Employment Act 1955, Minimum Wages Order 2020, SOCSO Act 1969, EPF Act 1991, EIS Act 2017, and the MAPA/NUPW agreement.	Complied

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		<p>Payroll documents, namely the payslip, also give accurate information on compensation for all work done. This includes those who receive daily-rated wages, piece rated wages, payment for any overtime work done, and public holiday pay. Also confirmed via sampled payslips that wages were paid in compliance with national legal requirements. Salary deductions and overtime were in accordance with the relevant laws (SOCSCO, EPF, EIS) and Labour Office permits. None of the sampled workers had any family members performing work.</p> <ul style="list-style-type: none"> • Employment contracts template, "Employment Contract Extension for Foreign Worker (Peninsular – Indonesia/ Nepalese) – ECE1 • Check-roll records, Estate/mill daily attendance report, CKRRD005 <p>Employee Master List, SEMUA report.</p>	
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>Based on review of punch cards, workers’ employment contracts and payslips, evidence was available that Pagoh POM and its supply base were able to demonstrate compliance with Employment Contracts 1955 related to regular working hours, overtime, sickness and holiday entitlement, maternity leave, etc. This includes statutory deductions (SOCSCO, EPF, EIS) and non-statutory deductions (e.g. union/NUPW, water, electricity bills, etc) in accordance with Labour Office permits. These permits are as detailed out under Indicator 2.1.1 above.</p> <p>Sampled during the audit were the following workers’ employment contracts and payslips for the month of April 2021 (peak), January 2021 (low) and May 2021 (average/medium)</p> <p><u>Pagoh POM (6 workers sampled from total of 53 workers)</u></p>	Complied

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		<p>Employee ID 0000086360, 0000086603, 0000086597, 00000126703, 00000150261, 00000158034.</p> <p><u>Pagoh Estate (9 workers sampled from total of 132 workers)</u> Employee ID 000117156, 000011553, 000067056, 0000152752, 00000125145, 00000153331, 0000149787, 0000101957, 0000140859.</p> <p><u>Lanadron Estate (10 workers sampled from total of 141 workers)</u> Employee ID 000162325, 0000135533, 000141159, 000108541, 0000155084, 0000155851, 0000011329, 0000125964, 0000154499, 0000139953.</p> <p><u>Pengkalan Bukit Estate (12 workers sampled from total of 216 workers)</u> Employee ID 0000011792, 0000011840, 0000102028, 000108681, 0000155084, 0000123823, 0000128429, 0000139661, 0000163008, 0000154551, 0000155105, 0000129934.</p> <p>Briefing related to pay and calculation was done on 5/7/2021 at Pagoh Estate.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on 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>The basic amenities and facilities at the quarters provided by the company to the workers includes electricity, water and domestic waste disposal. Electricity and water were supplied by government and deducted from salary. Seen the budget for housing repairs, sanitation, garden upkeep and CAPEX & OPEX from all operating units.</p> <p>Seen the record for weekly line site inspection done by Medical Assistant (estate) and QA (mill) in fortnightly basis as per the new</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>Workers Minimum Housing and Amenities Regulation 2020. Inspection records checked:</p> <table border="1" data-bbox="1137 435 1928 783"> <thead> <tr> <th>Estate/Mill</th> <th>Date of inspection</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Pagoh POM</td> <td>2/10/21 and 24/9/21</td> <td>Nil</td> </tr> <tr> <td>Pagoh Estate</td> <td>3/9/21 and 10/9/21</td> <td>Nil</td> </tr> <tr> <td>Lanadron Estate</td> <td>27/9/21 and 24/9/21</td> <td>Nil</td> </tr> <tr> <td>Pengkalan Bukit Estate</td> <td>9/10/21 and 30/9/21</td> <td>Nil</td> </tr> </tbody> </table> <p>For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilites).</p>	Estate/Mill	Date of inspection	Remarks	Pagoh POM	2/10/21 and 24/9/21	Nil	Pagoh Estate	3/9/21 and 10/9/21	Nil	Lanadron Estate	27/9/21 and 24/9/21	Nil	Pengkalan Bukit Estate	9/10/21 and 30/9/21	Nil	
Estate/Mill	Date of inspection	Remarks																
Pagoh POM	2/10/21 and 24/9/21	Nil																
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Pengkalan Bukit Estate	9/10/21 and 30/9/21	Nil																
<p>6.2.5</p>	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -</p>	<p>There were sundry shops located in the estates compound and the estates are nearby to the nearest town. The workers can easily access to adequate, sufficient and affordable foods and goods. Price of goods were displayed at the sundry shops. Workers interview confirmed that they can easily purchase foods at the nearest shop or choose to go nearest town away from the estate by using their transport until the main guard post and public transport to the nearest town.</p>	<p>Complied</p>															
<p>6.2.6</p>	<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. PROCEDURAL NOTE:</p>	<p>Sime Darby Plantation Berhad – Pagoh POM has provided the decent living wage for both local and foreign workers based on PREVAILING WAGES assessment. It includes wage, service bonus, meals, housing, health, facilities, sports and recreation, education, creche, welfare, etc. The payslip sighted in clause 6.2.1 showed that</p>	<p>Complied</p>															

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<p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits 	<p>the salary received complied with the minimum wage order 2020 and the decent living wage set up by the group which is foreign worker is RM1,799.11/worker and local RM1,613.76/worker.</p> <p>Note: Until housing basket can be determine (work in progress-data type need to pull from various departments and further segregated), in the interim SDP will refer to CA amount of RM125.</p>	
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	<ul style="list-style-type: none"> • 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>All the core works are performed by permanent and full-time employees in SOU 19 Pagoh Palm Oil Mill and supply bases. No contract worker was employed. The estate has appointed contractor for FFB transporter and the workers are permanently working in the estate.</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> <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. • Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively. 	Complied

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		During the interview with workers, there are no evidence received that there is restriction from the company to allow workers to join trade union. The workers have their freedom to join union.	
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request. - Minor compliance -	NUPW Committee was established in Pagoh Palm Oil Mill and the last meeting was conducted on 4/8/2021. Issues were raised during the meeting and recorded in the meeting minutes. Management plan was developed for the issues raised by the NUPW representatives and action has been taken accordingly. Interviewed with the NUPW representatives confirmed that the issues raised during the meeting were resolved. He informed that there is no any further pending issue reported during the time of audit. Sighted meeting minutes at other operating units as per below Pagoh Estate – 11/2/21 Pagoh POM – 4/8/21 Lanadron Estate – 30/8/21 Pengkalan Bukit Estate – 17/8/21	Complied
6.3.3	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. - Minor compliance -	Interviewed with the NUPW representatives and the workers confirmed that the election of the representatives were elected freely by the workers without any interference of management.	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	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:	Complied

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		<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. <p>Field observation, interviewing with workers and 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>	
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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 Liason & 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>There is no young worker employed in Pagoh POM certification unit.</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>The unit of certification has communicated the Human Right Charter, Social Policy and Vendor COBC through the stakeholder meeting and muster briefing. For example, COBC briefing was given on 3/1/2021 at Pagoh POM.</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>- Critical (Major) compliance -</p>	<p>The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:</p> <p>We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:</p> <ul style="list-style-type: none"> • Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims. • Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation. <p>The policy was communicated on 17/7/2021 during muster briefing and Gender Committee meeting on 15/9/21.</p>	Complied

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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>SDPSB has implemented Social Policy, Gender Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Briefing of the policies was conducted during morning muster and the policies was displayed at the notice board outside the office.</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>Briefing of the new mother assessment was conducted during the Gender Committee meeting for SOU 19 and recorded in the minute of meeting at each visited OUs.</p> <p>As of 6/10/21, there was no new mother in Pagoh Palm Oil Mill verified through interviewed with the Chairman of Gender Committee and female workers. There was assessment for new mothers conducted on 25/3/2021 at Pagoh Estate during stakeholder meeting. As reported no new mother at the estate.</p> <p>At Lanadron Estate, the latest new mother needs assessment was done on 1/8/2021. Based on the assessment, the new mother has requested that the company to allow for scheduled break for breast-feeding and time-off for post-natal/monthly check-up at government clinic. The assessment was done on 25/5/2021 for Pengkalan Bukit Estate. Similar request was noted on the time allocation for breast feed and post-natal check for new born baby.</p>	Complied
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>Sime Darby Plantation has developed Gender Committee Handbook, First Edition 2014 for implementation framework and guidelines where grievance reporting procedure for gender was developed. The new Term of Reference for Gender Representative and Gender Committee, dated March 2021 has been introduced to improve on</p>	Complied

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		<p>the implementation of gender related activities in Sime Darby Plantation.</p> <p>Any cases must be reported to Social & Environment Projects Unit of the PSQM Department. Incident report template was established. Flowchart and Procedure on Handling Social Issues, version 1, dated 01/11/2008 was implemented as well. Initial negotiation between the management and the dispute parties should be taken within two weeks after outbreak of issue which the involvement of disputed parties, zone heads, third parties and stakeholders. Besides, the company has implemented Whistleblowing Channels where the e-Form, email address and toll free number/ hotline can be found in http://www.simedarbyplantation.com/corporate/governance/whistleblowing. Furthermore, the company developed Policy on Protection of Human Rights Defenders (HRDs) where if the complaint cannot be solved through this manner, HRDs can be provided legal remedies such as litigation or alternate dispute resolution options including mediation and arbitration in situations where complaints cannot be resolved internally.</p>	
Criterion 6.6: No forms of forced or trafficked labour are used.			
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 	<p>The recruitment cost was declared by the labour agent from source country for the applicable fees. Sampled for PT Wira Karitas & PT Cahaya Lombok for Indonesia effective date on 22/04/2019 (RM 1,505.00) and Agensi Pekerjaan Dashan International Sdn Bhd for India (RM1,870 – Kolkata, Chennai – RM 1,670) for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent.</p>	Complied

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	<ul style="list-style-type: none"> • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Passport was kept by the management voluntarily or they can keep it by themselves. 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. Passport lockers are provided for those who want to keep their own passport.</p> <p>There is no contract substitution as the employment contract signed between Sime Darby and embassy of Indonesia and India was same with the employment contract signed between worker and estate/mill.</p> <p>Based on the workers interview, the overtime was given voluntarily if any work offered. 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. 	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p>	<p>SDPSB has implemented a Sime Darby’s Human Rights Charter on where they committed as below:</p>	<p>Complied</p>

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	<p>- Critical (Major) compliance -</p>	<p>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> <p>They also provided awareness and training to all the foreign workers for them to understand their responsibility in respect of human rights as included in the Group Sustainability Policy on 3/1/2021 at Pagoh POM.</p>	
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<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. - Critical (Major) compliance -</p>	<p>The Estate and Mill Manager in SOU 19 has been appointed as Person Responsible / Chairman for Safety and Health in the estate as per appointment letter signed by the Regional CEO. The Estate Manager has appointed the medical Assistant as person responsible for Safety and health issue in the estate and Mill.</p> <p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the Estate/Mill Manager. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on the matters arising from the previous meetings, accident and incident report, workplace inspection, and training.</p> <p>The OSH Committee meeting was conducted on quarterly basis. Reviewed the latest minutes meeting FY 2021 as follows: Pagoh POM</p>	<p>Complied</p>

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		<p>Reviewed the minutes meeting dated 04/02/2021 and 28/04/2021. For 3rd quarter meeting, the meeting was postponed due to Covid 19 Pandemic and National Recovery Plan Phase 1 - 4 as per memo dated 27/06/2021 signed by Regional CEO.</p> <p>Pagoh Estate</p> <p>Reviewed the minutes meeting dated 06/01/2021, 08/04/2021 and 02/10/2021. For 3rd quarter, the meeting scheduled on 08/07/2021 was postponed due to Covid 19 Pandemic as per Estate Internal Memo dated 01/07/2021.</p> <p>Lanadron Estate</p> <p>Reviewed the minutes meeting dated 12/03/2021, 09/06/2021 and 06/10/2021.</p> <p>Pengkalan Bukit Estate</p> <p>Reviewed the minutes meeting dated 24/02/2021, 04/05/2021 and 06/08/2021.</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident of emergency procedure is presented in Mill Quality Management System Standard Operation manual (MQMS SOM) dated November 1st, 2008. Flowchart of emergency handling was presented in Appendix 5.5.3.3.</p> <p>Additionally, the mill has established flowchart and organization chart for emergency response plan for fire, accident, working at height, chemical spillage, oil spillage, effluent spillage, explosion, and Pandemic</p> <p>The operating units continuously provide training to the workers to ensure the awareness on the ERP. Reviewed the training records as follows:</p> <ol style="list-style-type: none"> 1. Emergency Response Plan (Equipment) at Pagoh POM training dated 04/10/2021 	<p>Complied</p>

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		<ol style="list-style-type: none"> 2. Chemical spill drill training at Pagoh POM dated 15/02/2021 3. Fire extinguisher and firefighting training at Lanadron Estate dated 26/08/2021 4. Preventive management and oil spillage kit training at Pengkalan Bukit Estate dated 06/07/2021 5. First aid and fire drill training at Pengkalan Bukit Estate dated 08/07/2021 6. Fire drill training at Pengkalan Bukit Estate dated 09/09/2021 <p>The operating units maintain the records of accidents including JKKP 6 forms reported to DOE, medical leaves certificates, accidents investigations reports and HIRARC review. The accidents occurrence were reported to the Headquarters through Rapid 4 systems and DOSH by submitting the JKKP 6 form through MyKKP system.</p> <p>Reviewed JKKP 6 report as follows:</p> <ol style="list-style-type: none"> 1. Accident occur on 18/06/2021 at Pagoh Estate on Workshop for Vehicles repairs and maintenance. JKKP 6 report submitted on 20/06/2021. 2. Accident occur on 20/09/2021 at Pagoh POM on Ramp FFB Yard. JKKP 6 report submitted on 25/09/2021. 3. Accident occur on 25/03/2021 at Lanadron Estate on Linesite Operation. JKKP 6 report submitted on 05/04/2021 as the additional medical certificate started on 29/04/2021. 4. Accident occur on 12/09/2021 at Pengkalan Bukit Estate on FFB collection operation. JKKP 6 for was on 20/09/2021 5. Accident occur on 11/08/2021 at Pengkalan Bukit Estate for harvesting operation. JKKP 6 form was submitted on 18/08/2021 	
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		<p>The operating provided first aid kit/box and located in designated places or assigned to competent first aider. The operating units has also has established an information on the location of first aid box, name and contact no. of the assigned first aider and communicated through briefing, training and displayed on notice board. First aid kit was monitored on timely basis as follows:</p> <ol style="list-style-type: none"> 1. Pagoh POM - First aid monitoring was conducted on monthly basis. Reviewed the monitoring records as todate September 2021 for first aid box no. 03, 05 and 06. 2. Pagoh Estate - First aid monitoring was conducted on monthly basis. Reviewed the monitoring records dated 24/07/2021, 26/08/2021 and 25/09/2021. 3. Lanadron Estate - First aid monitoring was conducted on monthly basis. Reviewed the monitoring records dated 27/07/2021, 03/08/2021, 01/09/2021 and 01/10/2021 4. Pengkalan Bukit Estate - First aid kit inspection was conducted on monthly basis. Reviewed the monitoring records dated 26/08/2021, 27/09/2021 and 07/10/2021. <p>The mill continuously provided training to ensure the competency for the first aider. Sighted the training records as follows:</p> <ol style="list-style-type: none"> 1. Pagoh POM - First Aider training dated 08/10/2021 2. Pagoh Estate - First aid training and sanke bite training dated 30/06/2021 3. Lanadron Estate - First aid training dated 07/10/2021 4. Pengkalan Bukit Estate First aid and fire drill training dated 08/07/2021 	
6.7.3	(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	The mill and estates visited provided appropriate PPE to all workers according to the job type. The PPE given as per HIRARC and Pictorial Safety Standard (PSS) dated 17/3/2008.	Complied

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	<p>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>Pagoh POM The mill maintained the records of PPE issue in the PPE Issuance Record Book. Reviewed the PPE issuance for workers with employment no. 164165, 150261, 127779 and 130722.</p> <p>Pagoh Estate Noted during site visit at spraying gang at P17A, the sprayers were provided with safety helmets, goggle, 3M half face respirator, aprons and wellington boots. Noted during the interview, the understanding on the importance of PPE use is acceptable.</p> <p>Lanadron Estate Noted during site visit at P07NA, noted that sprayers were provided with safety helmets, goggle, 3M half face respirator, aprons and wellington boots. Reviewed the PPE records for workers with employment no. 108542, 110284, 113371 and 162424.</p>	
<p>6.7.4</p>	<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>Medical care is provided to all the employees. Reviewed on workers profile records found that all workers are covered by the accident insurances.</p> <p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial). Reviewed the form 8A, "Jadual Caruman" for July, August and September 2021 for contribution of all employees including staff.</p> <p>For local workers, they were also covered with Employment Insurance Scheme. Reviewed the SIP form, ""Jadual Caruman" for July, August and September 2021 for contribution of all employees including staff.</p> <p>For accident eligible for SOCSO claim, the operating units has made claim to SOCSO. Reviewed the application as follws:</p>	<p>Complied</p>

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		1. Application letter for accident occur on 20/09/2021 at Pagoh POM. Refer letter no. SocsoHalili-b/1/2021/MFH/ps dated 24/09/2021													
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2020 as reported to DOSH as follows: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>Pagoh POM</td> <td style="text-align: center;">1</td> <td style="text-align: center;">1</td> </tr> <tr> <td>Pagoh Estate</td> <td style="text-align: center;">1</td> <td style="text-align: center;">25</td> </tr> <tr> <td>Lanadron Estate</td> <td style="text-align: center;">7</td> <td style="text-align: center;">22</td> </tr> </tbody> </table>	Operating units	Accident Cases	LTA	Pagoh POM	1	1	Pagoh Estate	1	25	Lanadron Estate	7	22	Complied
Operating units	Accident Cases	LTA													
Pagoh POM	1	1													
Pagoh Estate	1	25													
Lanadron Estate	7	22													
Principle 7: Protect, conserve and enhance ecosystems and the environment															
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.															
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Although there have been no outbreaks of leaf eating pests, beneficial plants are being established along roadsides to attract natural predators. The estates visited has established IPM program. The plan was reviewed on annually basis. The IPM consist of Planting Beneficial	Complied												

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		<p>Plant, Rat Baiting Applications and Barn Owl Census. Sighted the sampled implementation of the plan as follows:</p> <p>Pagoh Estate</p> <ol style="list-style-type: none"> 1. Latest barn owl census was conducted in August 2021 with 71% occupancy was recorded. 2. The estate has established beneficial plant planting program FY 2021. As at September 2021, 140.00 ha was completed. <p>Lanadron Estate</p> <ol style="list-style-type: none"> 1. The estate has established Barn Owl Box in the estate at ratio of 1:12.02 ha. Latest barn owl census was conducted in August 2021 with occupancy recorded at 25%. 2. 1st rat baiting campaign was conducted in July and August 2021. Reviewed the application records for field 2011A, 2010B, 2017B and 2015A. 	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>In SOU 19, 3 plant species were used for IPM such as Tunera subulata, Cassia cobanensis, and Antigonon leptopus.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>No evidence and records of fire usage for pest control at all estate visited.</p> <p>Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest:</p> <p>“We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:</p> <ol style="list-style-type: none"> ix. Zero tolerance of the use of fire within our land boundaries and conservation areas, and the establishment of effective monitoring 	Complied

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		and prevention systems, as well as protective firefighting measures in and around our operation.”													
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.															
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 1/7/2011. Selected products are specific to the target pest, weed and disease. Some of recommended pesticides are:</p> <p>Immature planting (sample)</p> <p>i. General weeds : Glyphosate</p> <p>ii. Pennisetum polystachion : Metsulfuron Methyl</p> <p>iii. Stenochlaena palustris : Sodium chlorate</p> <p>Mature planting</p> <p>i. Grass weed and Asystasia : glyphosate & 2,4-D amine</p> <p>The selection is also evaluated by the agronomist during his visit to the estate.</p>	Complied												
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate.</p> <p>Sighted the sampled records of pesticides usage per ha at estates visited FY 2020 as follows:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Pagoh</th> <th>Lanadron</th> <th>Pengkalan Bukit</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>0.129</td> <td>0.293</td> <td>0.925</td> </tr> <tr> <td>Feb</td> <td>0.119</td> <td>0.909</td> <td>0.740</td> </tr> </tbody> </table>	Month	Pagoh	Lanadron	Pengkalan Bukit	Jan	0.129	0.293	0.925	Feb	0.119	0.909	0.740	Complied
Month	Pagoh	Lanadron	Pengkalan Bukit												
Jan	0.129	0.293	0.925												
Feb	0.119	0.909	0.740												

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		Mar	0.118	0.243	0.667		
		Apr	0.065	0.312	0.900		
		May	0.058	0.164	0.581		
		Jun	0.114	0.024	1.160		
		Jul	0.090	0.280	0.587		
		Aug	0.107	0.609	0.367		
		Sep	0.141	0.452	1.261		
		Oct	0.137	0.362	0.331		
		Nov	0.131	0.382	0.217		
		Dec	0.118	0.590	0.121		
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5.</p> <p>The estates visited has established management plan to reduce chemical usage FY 2020. The mitigation plan include:</p> <ol style="list-style-type: none"> To increase expand the beneficial plant planting at new replanting field in year 2021. To increase up to 2dm/hectare to enhance the biological control of insect infestation To increase the barn owl box ratio to 1:5 hectare in 2022 to increase the biological control of rat infestation 				Complied	
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -</p>	<p>No evidence of prophylactic use of pesticides in the estates visited as per Register of Chemicals Hazardous to Health for all estates visited.</p>				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</p>	<p>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:</p>				Complied	

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	<p>by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>Protect and disclose environmental impacts and minimise resource use stated:</p> <p>'We aim to minimise our foot print and continuously reduce our use of resources through:</p> <ul style="list-style-type: none"> iv. Implementing integrated pest management programs, with no use of paraquat or chemicals classed as hazardous under the WHO 1A. We will phase out the WHO 1B and those additional chemicals listed in the Stockholm or Rotterdam Conventions." <p>All estates has established Register of Chemicals Hazardous to Health. No class 1A and 1B were used in the estates. Only class II, III & IV chemical used at visited estates. Sighted and verified at all estates visited, Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat.</p> <p>As for usage of highly toxic/limited pesticides, the estates acquired permit from Department of Agriculture. Sighted the permit as follows:</p> <p>Permit to purchase highly toxic/limited pesticides no. JHR/2021/ACP/58(GL) to purchase 150.00 kg of Acephate dated 28/06/2021.</p>	
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 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>The pesticides operators has been given training regarding the usage safety and health issue and proper way for chemical application and attend monthly health surveillance done by the Medical Assistant.</p> <p>Reviewed the training records as per criteria 3.7.2.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides</p>	Complied

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		are kept in the store and securely locked and comply with regulation.	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	Pesticide containers were found to be recycled and used as premix containers. The access containers were all triple rinsed and punctured and stored at the designated store before they are disposed to the licensed recycle waste collector. Sighted the latest consignment note for disposal of triple rinsed and punctured chemical drums as below: - Lanadron Estate <ul style="list-style-type: none"> Latest Disposal of empty chemical drums as recycle waste disposed on 14/4/2021 to SS Setia Teknologi Enterprise. Cash Receipt No: 1875; 66 Pcs of Chemical Containers, 20 Pcs of Kenlon Containers & 2360 fertilizer bags. Pengkalan Bukit Estate <ul style="list-style-type: none"> Latest Disposal of empty chemical drums as recycle waste disposed on 27/7/2021 to SS Setia Teknologi Enterprise. Cash Receipt No: 1936; 56 pcs of Chemical Containers, 1020kg fertilizer beg and 52kg ally bottle. 	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. - Critical (Major) compliance -	No aerial spray activities conducted in SOU 19	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Pagoh Estate	Complied

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	- Critical (Major) compliance -	<p>1. Latest medical surveillance was conducted on 18 and 24/08/2021 by OHD with reg. no. HQ/19/DOC/00/00374 involving 51 workers as per recommendation reports from CHRA reports dated August 2020.</p> <p>Lanadron Estate</p> <p>1. The estate conducted medical screening for all the sprayers on monthly basis during VMO visits. Reviewed the VMO visit records dated 26/08/2021 and 22/09/2021.</p> <p>2. Latest medical surveillance was conducted on 05 and 06/10/2021 for 15 chemical handlers. The results has yet to be received by the estate.</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>Sime Darby has established Gender Policy on Motherhood Responsibilities and Reproductive Rights on prohibition of all confirmed pregnant and breast-feeding woman to work with pesticides. The policy has been communicated to the workers through induction training for new workers, morning briefing, iCARE Safety and Health Townhall meeting, and displayed at various notice board within the estate.</p> <p>The estates visited prohibited all confirmed pregnant and breast-feeding woman to work with pesticides as per internal memo signed by the Assistant Manager. The memo has been displayed on the notice board at few strategic place in the estate</p>	Complied
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
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>Wastes management plan is developed through the environmental aspects and impacts assessment. The mitigation measures were then derived from this exercise. Generally, the scheduled wastes were disposed through licensed vendors, organic wastes were disposed through landfill. Nonetheless, the wastes management</p>	Non-compliance

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		<p>plan can be further enhanced by including the management of recyclable wastes from the household and office such as plastic bottles/containers, glass, papers and metal. Management already review the Waste management dated 1/9/2021.</p> <p>As per verification of Waste management plan for Pagoh Estate (approval 1/9/2021) and Lanadron Estate (3/1/2021) not identified used PPE and used Rag that contaminated with oil as scheduled waste.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Generally, the workers have demonstrated good understanding in proper disposal of wastes. The visited labour quarters were observed to be in clean condition. Wastes were properly disposed as mentioned in Indicator 7.3.1.</p> <p>SW disposed through licensed contractors which were verifiable through eSwis. Examples of Consignment notes verified:</p> <p>Pagoh POM:</p> <p>2021090311FIAY5C dated 3/9/2021 – SW 109 2021090312DEKYM1 dated 3/9/2021 – SW 110 20210730132N64XE dated 30/7/2021 – SW 324 20210739126IC17W dated 30/7/2021 – SW 322</p> <p>Lanadron Estate</p> <p>20210826109NKAEL dated 26/8/2021 – SW 404 20210708120QREPA dated 8/7/2021 – SW 305 20210708138H5Z9J dated 8/7/2021 – SW 409 2021070813CZMOXL dated 8/7/2021 – SW 410</p>	Complied

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		<p>Pengkalan Bukit Estate 2021082614Y6Q2KH dated 26/8/2021 – SW 404 2021070816BT3S6X dated 8/7/2021 - SW 305 2021070816FS3TXO dated 8/7/2021 – SW 409</p> <p>For Domestic waste, the disposal was at CMZONE Solution using MTJJ Enterprise latest record as per verification in Pengkalan Bukit Estate (Tax Invoice: MTJJ/PB/RC/07/21) dated 31/7/2021. Payment voucher(Document No: 16000484666) dated 30/8/2021.</p>	
7.3.3	<p>The unit of certification does not use open fire for waste disposal. - Minor compliance -</p>	<p>There was no wastes disposal by using open fire observed during the site visits.</p>	Complied
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -</p>	<p>Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield.</p> <p>The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents;</p> <p>a) EQMS chapter B8 - Leguminous Cover Crops b) EQMS chapter B14 – Manuring c) ARM Section 8 – Manuring</p>	Complied
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -</p>	<p>Plant Nutrition and Protection Unit (PNU) prepare the annual fertilizer recommendation base leaf analysis result. Leaf analysis show the nutrient level was used as the guidance for the recommendation.</p>	Complied

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		<p>As per company SOP, the soil sampling analysis carried at 5 years interval.</p> <p>The leaf analysis and soil analysis report was made available for review.</p> <p>Pagoh Estate Latest Soil sampling was conducted on 30/08/2018, refer report no. S67/2018 Latest Foliar sampling was conducted on 29/06/2021 refer report no. P290/2021</p> <p>Lanadron Estate Latest Soil sampling was conducted on 20/02/2018, refer report no. S22/2018 Latest Foliar sampling was conducted on 09/03/2021 refer report no. P111/2021</p>			
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>EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Pagoh POM. Currently only Pagoh Estate and Pengkalan Bukit Estate are applying the EFB mulching due to distance from the mill. The best practice of EFB application is described in the ARM. Records were available for verification. Based on the records, it was noted that the EFB application rate per hectare was around 40 mt/Ha.</p>	Complied		
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>The estate maintain the records of manuring application as per recommendation by the agronomist.</p> <p>Observed application records as per agronomist recommendation: Pagoh Estate</p> <table border="1" data-bbox="1137 1310 1928 1353"> <tr> <td>Month program: Jan 2021</td> <td>Month program: Jan - Feb 2021</td> </tr> </table>	Month program: Jan 2021	Month program: Jan - Feb 2021	Complied
Month program: Jan 2021	Month program: Jan - Feb 2021				

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		Field: P2018A Ha program: 78.54 ha Type: AC Rate/palm: 1.50 kg/palm Month completed: Feb 2021	Field: P2003 Ha program: 78.70 ha Type: RP Rate/palm: 2.00 kg/palm Month completed: Apr 2001	
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 -	<p>Maps of any soil categories available at all visited operating units. Soil map prepared by R&D-RSGA Precision Agriculture Unit (SHMNA).</p> <p>Lanadron Estate The soil map prepared by R&D-RSGA Precision Agriculture Unit (SHMNA) dated 15 June 2015. Majority soil series identified in the estate were Bria 36.1%, Acid Sulphate 20.48% and Sogomana 12.82%. No fragile soils identified estate.</p> <p>Pengkalan Bukit Estate The soil map prepared by R&D-RSGA Precision Agriculture Unit (SHMNA) on 11/11/2015 for Main, Pagoh and Paya Redan Division. Main soil series identified in the estate were Rengam 21.88%, Prang, 12.85%, Munchong 30.29% and Alluvium 11.22%.</p> <p>Pagoh Estate The soil map prepared by R&D-RSGA Precision Agriculture Unit (SHMNA) in 1/11/ 2012. Majority soil series identified in the estate are Lanchang 35.91%, Alluvium 13.24% and Rengam 34.41%.</p>		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	There was no replanting on steep slopes at the sampled estates. Generally, the areas with slopes above 25 degrees were left unplanted and regeneration of plants growth was observed.		Complied

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	contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification. - Minor compliance -		
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No new planting at all the sampled estates.	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Not Applicable as there is no new planting in the certification unit.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Not Applicable as there is no new planting in the certification unit.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Not Applicable as there is no new planting in the certification unit.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	Not applicable as no peat soil in this certification unit.	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE:	Not applicable as no peat soil in this certification unit.	Complied

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	<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>		
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no peat soil in this certification unit.	Complied
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	Not applicable as no peat soil in this certification unit.	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>- Critical (Major) compliance -</p>	Not applicable as no peat soil in this certification unit.	Complied
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>	Not applicable as no peat soil in this certification unit.	Complied

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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>	Not applicable as no peat soil in this certification unit.	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>Water management plan at all the sampled estates were in place and implemented as verified through records of Water Management Action Plan West Estate FY 2021:</p> <ul style="list-style-type: none"> - Line site water usage - Water leakage - Workshop – rain water harvesting <p>Identification and management of wastewaters:</p> <ul style="list-style-type: none"> - Chemical mixing area - Sprayer PPE washing area - Workshop - Line site & office - Washrooms <p>Workers have adequate access to clean water which were supplied through their own water treatment plant and public domain (Syarikat Air Johor). The potable water supplied to the workers through water treatment plants was tested for NSDWQ compliance on monthly basis. Among the parameters tested were pH, TDS, Turbidity, Chloride, Al, E. Coli and Total Coliform. Based on the test report by an accredited lab (SAMM No. 030), generally the certification unit complied to the regulated limit.</p>	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>Water courses and wetlands are protected as per documented Guidelines on River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). From the site observation the buffer zone was followed as per guidelines. Based on verification at all the sampled estates, the riparian zones were satisfactorily maintained, and no evidence of agrochemicals application seen. Monitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/rivers, version 1, year 2008, issue no. 1, dated 1/11/2008.</p> <p>The water sampling for Sungai Muar conducted by management dated 10/8/2021 (IE884/2021) the result showed positive impact as per verification.</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>The mill applies the biological system with 14 ponds in series for its treatment of effluent. The mill is disposing its effluent to the water ways. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Last 12 months results were verified where highest BOD was 20 ppm while lowest was 5 ppm.</p> <p>Latest final discharge result for analysis was on 2/9/2021 with result BOD of 6.00 ppm.</p>	Complied
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The mill continues to monitor its water use per tonne FFB processed which data obtained from a flowmeter. Mill water use per tonne of FFB 187,558 Liter/FFB for year 2020.</p>	Complied
<p>Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</p>			

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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>At the estates, the plan to optimize the usage of diesel is by regular maintenance of diesel-powered machinery and educational programme for the operators on fuel saving. At the mill, the utilization of fiber and shell as biofuel for boiler operation is consistently implemented to generate electricity through turbines. This helps to reduce the dependency to fossil fuel.</p>	Complied
<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>Main sources of GHG emission identified were methane (CH) emission through POME treatment and boiler stack from the mill. Other less significant GHG emissions identified including CO, SOx and NOx from various sources including fossil fuel, chemical and fertilizer consumptions mainly from estates activities.</p> <p>The emission value is recorded and calculated through the utilisation of RSPO’s Palm GHG Calculator ver. 4.</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>Not applicable since no new development by the certification unit.</p>	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>Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment, among the identified sources of gaseous emissions were boiler chimney, diesel engines and POME to name a few. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring for dust particulate.</p>	Complied

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		SOU 19 has its monitoring system to report its significant pollutants and emissions from the operating units' activities for example monitoring stack emission from mill's boiler operation by competent consultant. The mill has conducted its stack sampling at regulated frequency (twice a year) without fail. Based on the stack sampling reports dated 22/6/2021 by Procoma Environmental (M) Sdn Bhd, the particulate matter from the chimney no.1 were reported to be below the regulated limit i.e. 150 mg/m3 which is 0.79 mg/m3 and Carbon monoxide was 300 mg/m3 below DOE standard 1000 mg/m3.	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Guided by SDPB ARM, preparation of replanting using fire is not allowed. Based on site visit at replanting field no. 08C (Lanadron Estate), P19A & 2020A (Pagoh Estate), there was no trace of burning observed. Palm trunks were chipped and windrowed.	Complied
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 -	Hotspot monitoring managed by HQ (Fire Hotspot Monitoring Team) – if any fire detected, inform estate. Sime Darby Daily Hotspot Monitoring system has been in place since November 2013 using NASA satellite data. The system monitors any possible occurrence of fire within or nearby the concession areas throughout Sime Darby Plantation Upstream operation globally. At the estates level, there are fire prevention team established. Among the mechanisms to prevent fire are training on fire-fighting for the ERT, preparing the fire-fighting facilities such as tractor mounted with water bowser and submersible water pump.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Sampling in Pengkalan Bukit estate, Lanadron estate and Pagoh estate, The management give a Buletin SD included information regarding to fire prevention to all stakeholder (included Hor Lee estate) dated 3/8/2021. From the invitation and record all	Complied

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		stakeholder been received the bulletin as per interview verification and record.	
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, this indicator is not applicable during this assessment. The immature areas are of replanted area.	Complied
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Critical (Major) compliance -</p>	SOU 19 has conducted HCV re-assessment and documented in HCV Re- Assessment for Strategic Operating Unit (SOU) 19 Pagoh on 24 - 27 November 2015 by Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Sdn. Bhd. Final Report (Version 2.0) dated August 2016. HCV area identified for SOU 19 Pagoh as follows: i) Water Catchment area – category HCV 4 (Pagoh Estate, Pengkalan Bukit Estate) ii) River Reserve (Muar River)– category HCV 4 (Lanadron Estate)	Complied
7.12.3	<i>Indicator is not applicable in Malaysia context</i>		Not Applicable
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or	No RTE identified as per in HCV Re-Assessment for Strategic Operating Unit (SOU) 19 Pagoh on 24 -27 November 2015 by	Complied

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	<p>enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>Plantation Sustainability Quality Management (PSQM) Department, Sime Darby Plantation Sdn. Bhd. Final Report (Version 2.0) dated August 2016.</p> <p>The sampled estates have established and documented HCV area/Biodiversity management Plan. Generally among the plans established were:</p> <ul style="list-style-type: none"> - maintaining signages - continue to record HCV monitoring such as wildlife sighting, encroachment and illegal hunting - enhancing HCV awareness among employees. <p>The estates continue to train the workers on HCV and RTE Species. Signage on prohibition of illegal hunting or fishing, no swimming and chemical application at buffer zone area were erected at the HCV area. Noted during site visit, all the signage was well maintained.</p>	
<p>7.12.5</p>	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>Not applicable since there is no land clearing after November 2005.</p>	<p>Complied</p>
<p>7.12.6</p>	<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 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>	<p>The estates continue to train the workers on HCV and RTE Species. Signage on prohibition of illegal hunting or fishing, no swimming and chemical application at buffer zone area were erected at the HCV area, housing area and notice board to educate the workers. Last trainings to workers on HCV were conducted on 02/09/2020 at the muster ground and 7/7/2020 at the community hall. For Lanadron Estate HCV and biodiversity training conducted by</p>	<p>Complied</p>

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		management was on 14/9/2021. The monitoring conducted by monthly basis and the record was available in each sampling estate.	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	Not applicable since there is no land clearing after November 2005. Nonetheless, educational activities on RTE species were done through a few means such as briefings/training and no hunting signage. Interview with workers showed that they have a good understanding in the restriction of capturing the RTE species. There also record of HCV monitoring sampling in Lanadron Estate, latest was on 1/10/2021 and previously was on 15/9/2021 at buffer zone Sg Muar.	Complied
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	Not applicable since there is no land clearing after November 2005.	Complied

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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** for **Pagoh POM** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted **2020** for **Pagoh POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.21
PKO	0

Extraction	%
OER	20.04
KER	5.25

Production	t/yr
FFB Process	149,427.38
CPO Produced	29948.05
PKO Produced	0

Land Use	Ha
OP Planted Area	11,193.48
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	11,193.48

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	37382.35	0.32	14952.53	8.87	0	0	52334.88	
CO ₂ Emission from fertilizer	4568.05	0.04	1170.54	0.69	0	0	5738.59	
NO ₂ Emission	2372.21	0.02	505.59	0.30	0	0	2877.79	
Fuel Consumption	569.32	0	103.34	0.06	0	0	672.65	
Peat Oxidation	0	0	0	0	0	0	0	
Sink								
Crop Sequestration	-35145.21	-0.30	-14173.01	-8.41	0	0	-49318.22	
Conservation Sequestration	0	0	0	0	0	0	0	
Total	9746.71	0.08	2558.98	1.52	3437.58	0	15743.27	

*Note: Includes both estates and smallholders

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	29290.30	0.20
Fuel Consumption	61.53	0
Grid Electricity Utilization	675.61	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	30027.43	0.20

Summary of Kernel Crusher Emission and Credit (if applicable)

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

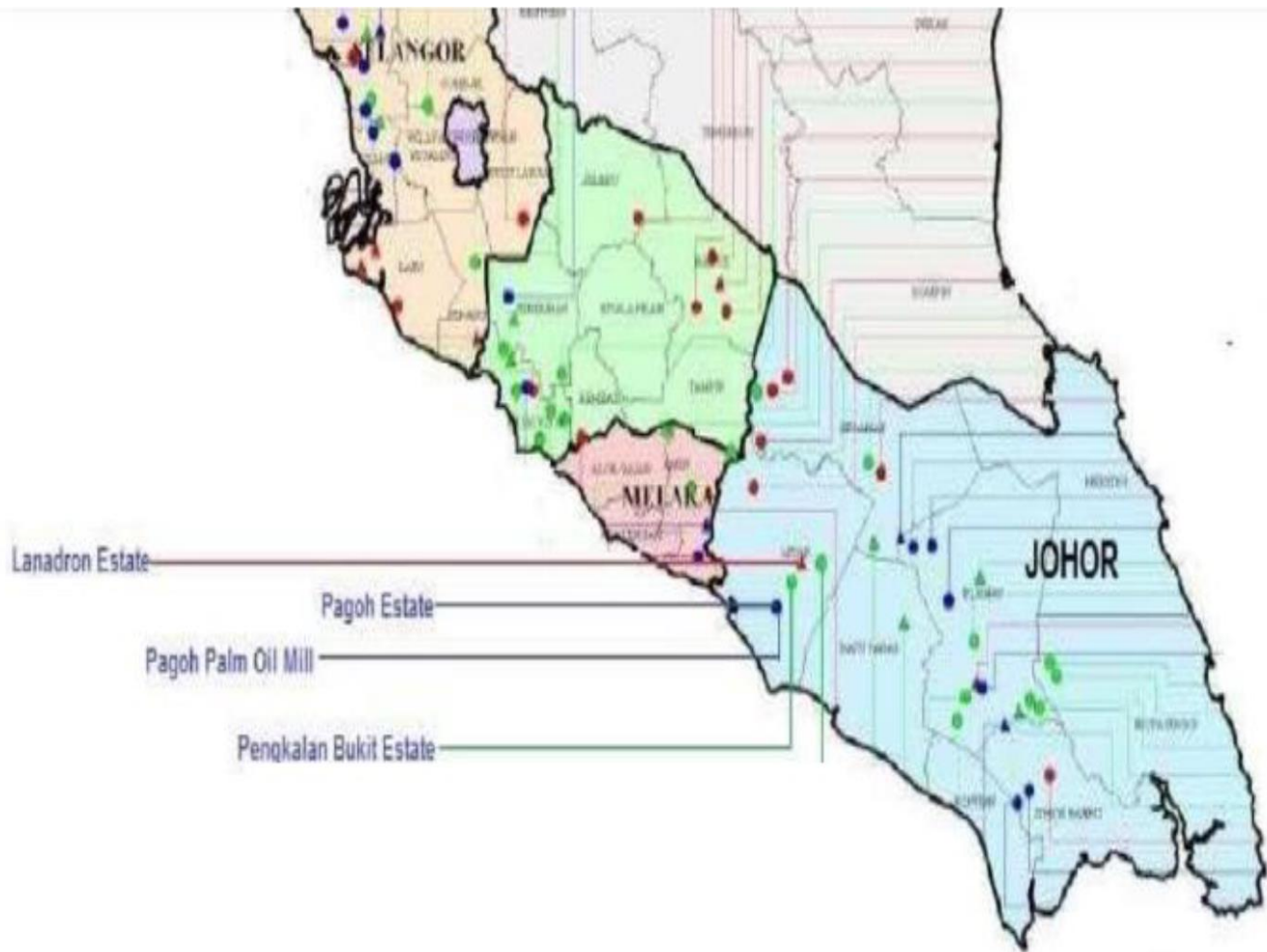
*This mill has no kernel crusher operation.

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

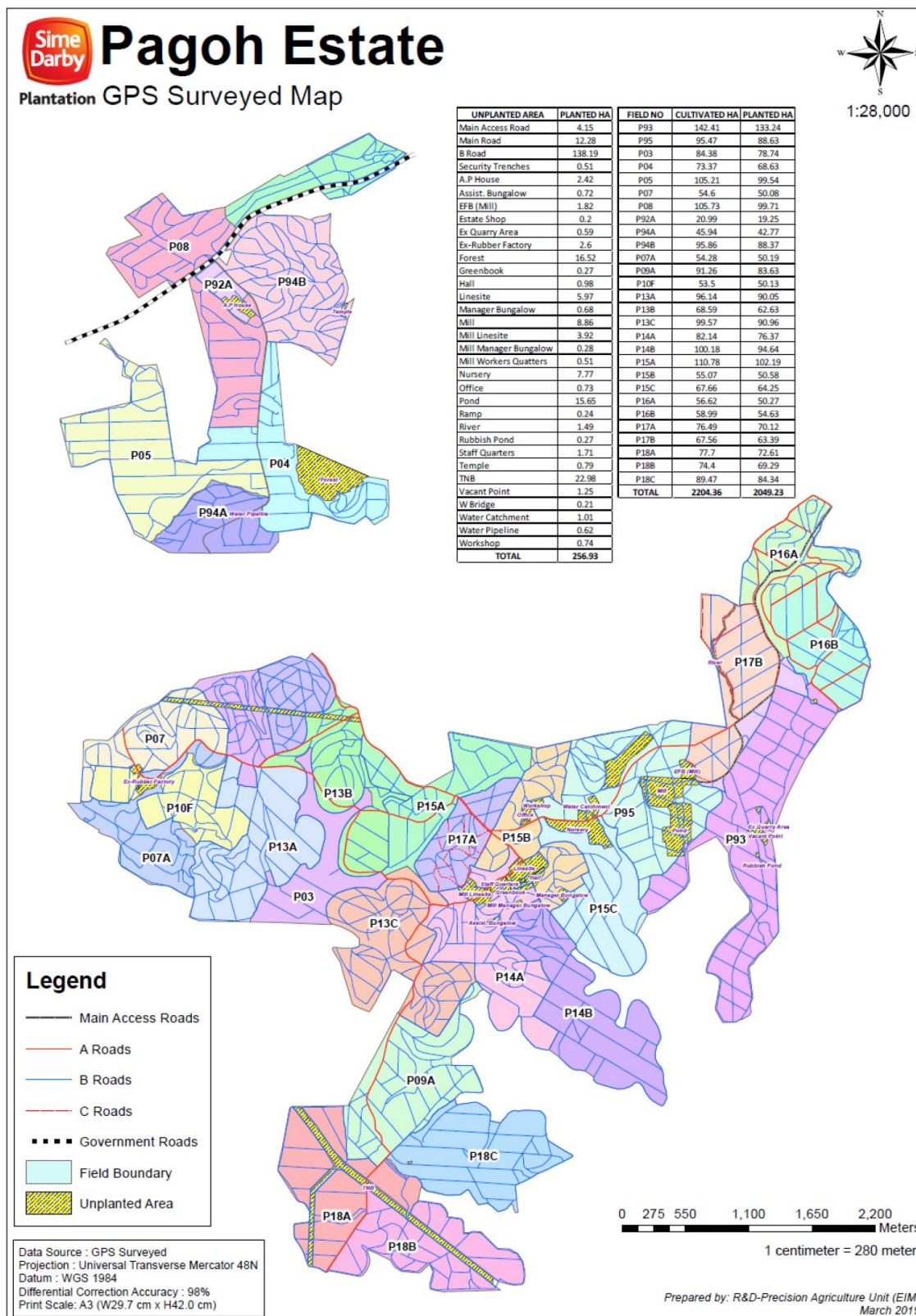
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

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Appendix C: Location Map of Certification Unit and Supply bases

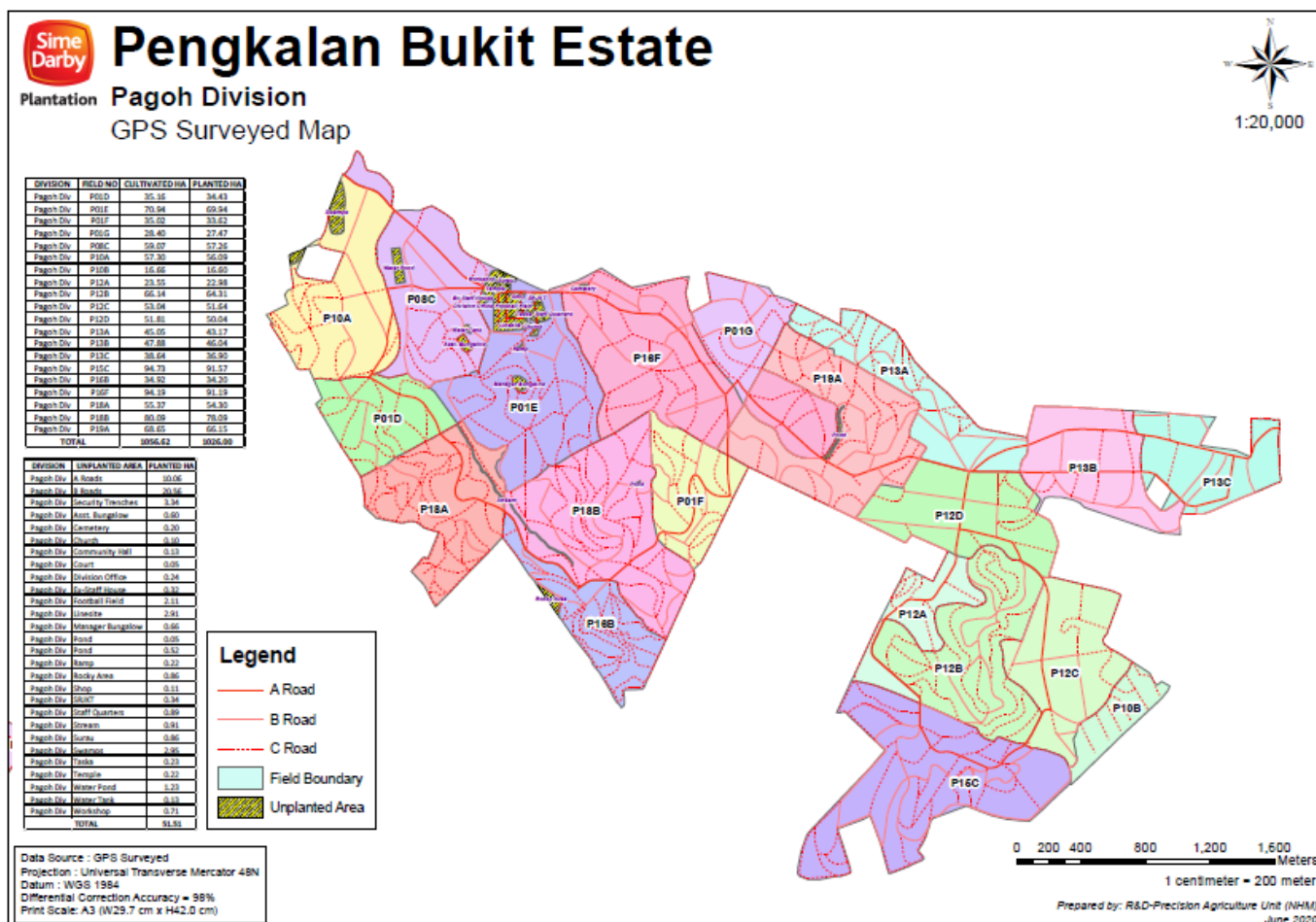


Appendix D: Estate Field Map



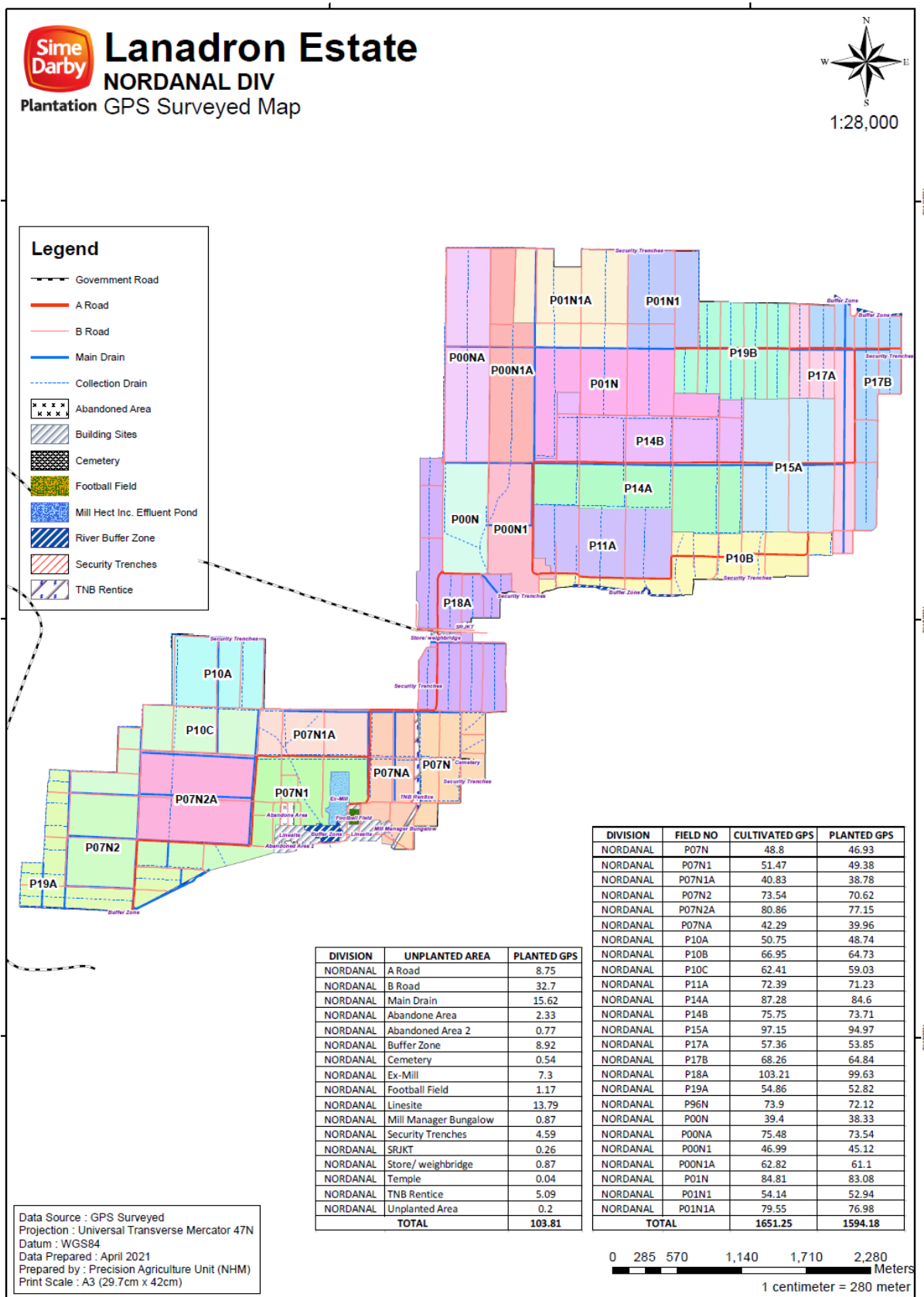
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Lanadron Estate

NORDANAL DIV

Plantation GPS Surveyed Map



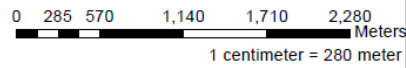
Legend

- Government Road
- A Road
- B Road
- Main Drain
- Collection Drain
- Abandoned Area
- Building Sites
- Cemetery
- Football Field
- Mill Hect Inc. Effluent Pond
- River Buffer Zone
- Security Trenches
- TNB Rentice

DIVISION	FIELD NO	CULTIVATED GPS	PLANTED GPS
NORDANAL	P07N	48.8	46.93
NORDANAL	P07N1	51.47	49.38
NORDANAL	P07N1A	40.83	38.78
NORDANAL	P07N2	73.54	70.62
NORDANAL	P07N2A	80.86	77.15
NORDANAL	P07NA	42.29	39.96
NORDANAL	P10A	50.75	48.74
NORDANAL	P10B	66.95	64.73
NORDANAL	P10C	62.41	59.03
NORDANAL	P11A	72.39	71.23
NORDANAL	P14A	87.28	84.6
NORDANAL	P14B	75.75	73.71
NORDANAL	P15A	97.15	94.97
NORDANAL	P17A	57.36	53.85
NORDANAL	P17B	68.26	64.84
NORDANAL	P18A	103.21	99.63
NORDANAL	P19A	54.86	52.82
NORDANAL	P96N	73.9	72.12
NORDANAL	P00N	39.4	38.33
NORDANAL	P00NA	75.48	73.54
NORDANAL	P00N1	46.99	45.12
NORDANAL	P00N1A	62.82	61.1
NORDANAL	P01N	84.81	83.08
NORDANAL	P01N1	54.14	52.94
NORDANAL	P01N1A	79.55	76.98
TOTAL		1651.25	1594.18

DIVISION	UNPLANTED AREA	PLANTED GPS
NORDANAL	A Road	8.75
NORDANAL	B Road	32.7
NORDANAL	Main Drain	15.62
NORDANAL	Abandone Area	2.33
NORDANAL	Abandoned Area 2	0.77
NORDANAL	Buffer Zone	8.92
NORDANAL	Cemetery	0.54
NORDANAL	Ex-Mill	7.3
NORDANAL	Football Field	1.17
NORDANAL	Linesite	13.79
NORDANAL	Mill Manager Bungalow	0.87
NORDANAL	Security Trenches	4.59
NORDANAL	SRJKT	0.26
NORDANAL	Store/ weighbridge	0.87
NORDANAL	Temple	0.04
NORDANAL	TNB Rentice	5.09
NORDANAL	Unplanted Area	0.2
TOTAL		103.81

Data Source : GPS Surveyed
 Projection : Universal Transverse Mercator 47N
 Datum : WGS84
 Data Prepared : April 2021
 Prepared by : Precision Agriculture Unit (NHM)
 Print Scale : A3 (29.7cm x 42cm)



RSPO P&C Public Summary Report

Revision 12 (Jun 2021)

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