

### RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☐ Initial Assessment
☐ 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, No 2, Jalan PJU 1A/7, Oasis Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia

Certification Unit:

Strategic Operating Unit (SOU) 7-Bukit Kerayong Palm Oil Mill

Location of Certification Unit: Bukit Kerayong Road, 42200 Kapar, Klang, Selangor, Malaysia

Date of Final Report: 18/06/2022



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

1. Company Details					
Parent Company	Sime Darby Plantation Ber	had			
RSPO Membership Number	1-0008-04-000-00	Memb	ership Appro	val Date	07/09/2004
Address	Level 5, Main Block, Plantation Tower, No 2, Jalan PJU 1A/7, Oasis Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia				
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Strategic Operating Unit (SOU) 7 – Bukit Kerayong Palm Oil Mill				
Location / Address	Bukit Kerayong Road, 422	00 Kapa	r, Klang, Selan	gor, Malays	sia
Website	www.simedarbyplantation	.com			
Management Representative	Mdm Shylaja Devi Vasudevan Nair Azlan Md Kambali (Mill Manager)  E-mail  Kks.bk.kerayong@simedarbyplan tation.com				
Telephone	018-987 7151		Facsimile	N/A	

2. Certification Informat	ion			
Certificate Number	RSPO 550181	Certificat	te Start Date	15/04/2021
Date of First Certification	15/04/2011	Certificat	e Expiry Date	14/04/2026
Scope of Certification	Production of Palm Oil and Pa	ılm Kernel		
Visit Objectives	<ul> <li>Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> <li>Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</li> </ul>			
Assessment Cycle	<ul> <li>□ Pre Assessment (Choose an item.)</li> <li>□ Initial Assessment</li> <li>⋈ Annual Surveillance Assessment (ASA 2_1)</li> <li>□ Recertification Assessment (Choose an item.)</li> <li>□ Scope Extension</li> </ul>			
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020  Choose an item.  Malaysia National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil			
Supply Chain Module	☐ Identity Preserved; ☐ Mass Balance   Mill Capacity   30 mt/hr			
ISH certification Phase	☐ Eligibility ☐ Milestone A	☐ Milestone	B 🗵 Not Applicable	:



3. Other Certifications					
<b>Certificate Number</b>	Standard(s)	Certificate Issued by	Expiry Date		
MSPO 690368	MS2530-3:2013 (MSPO Part 3) – General principles for oil palm plantation and organised smallholders	BSI Services Malaysia Sdn Bhd	13/03/2023		
MSPO 682049	MS2530-4:2013 (MSPO Part 4) – General principles for palm oil mills		13/03/2023		
MSPO 714128	MSPO Supply Chain Certification Standard		31/07/2024		

4. Location(s) of Mill & Supply Bases					
Name		GPS Cool	rdinates		
(Mill / Supply Base / Group Manager / Smallholders)	Location	Latitude	Longitude		
Bukit Kerayong Palm Oil Mill	Bukit Kerayong Road, 42200 Kapar, Klang, Selangor, Malaysia	3° 11′ 12.7″ N	101° 22′ 29.6″ E		
Bukit Kerayong Estate	Jalan Bukit Kerayong, 42200 Kapar, Klang, Selangor, Malaysia	3° 10′ 31.3″ N	101° 21′ 00.5″ E		
Bukit Cheraka Estate	Jalan Jeram, 45809 Jeram, Selangor, Malaysia	3° 13′ 38.6″ N	101° 22′ 01.7″ E		

5. Description of Supply Base						
<b>New Planting Development</b>	⋈ No (no change in the state of the sta	☑ No (no change in total planted area) ☐ Yes (please refer to Principle 7 for details)				
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted	
Bukit Kerayong Estate	2,484.98	3.00	211.30	2,699.28	92.60	
Bukit Cheraka Estate	3,388.70	55.52	203.40	3,647.62	92.90	
Total	5,873.68	58.52	414.70	6,346.90	89.41	

6. Plantings & Cycle							
Estato / Swallhaldava		A	Age (Years)				Toomantuus
Estate / Smallholders	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Mature	Immature
Bukit Kerayong Estate	223.66	1174.34	1,086.98	-	-	2,261.32	223.66
Bukit Cheraka Estate	413.97	865.13	1,224.30	885.30	-	2,974.73	413.97
Total (ha)	637.63	2039.47	2,311.28	885.30	-	5,236.05	637.63
Note: *Only Mature area is considered as production area							

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7. Summary of Certified Tonnage of FFB (Own Certified Scope)					
Estate /		Tonnag	e / year		
Smallholders	Estimated last year (Apr 21 – Mar 22)	2.00	Actual (Jan 21 – Dec 21)		
		Previous license period (Jan 21 – Mar 21)	Current license period (Apr 21 – Dec 21)		
Bukit Kerayong Estate	62,176.10	19,110.19	41,330.56	63,150.74	
Bukit Cheraka Estate	72,609.20	23,340.23	48,360.34	75,410.56	
Total	134,785.30	42,450.42	89,690.90	138,561.30	

8. Summary of Certified Tonnage of FFB (from other certified unit(s))					
Estate /		Tonnage / year			
Smallholders	Estimated last year (Apr 21 – Mar 22)	Act (Jan 21 -	Forecast (Apr 22 – Mar 23)		
		Previous license period (Jan – Mar 21)	Current license period (Apr – Dec 21)		
Sg Buloh Estate		N/A	776.56		
Total		776	5.56		

9. Summary of Non-Certified Tonnage of FFB (outside supplier — excluded from certificate)						
Out growers /		Tonnag	je / year			
smallholders	Estimated last year (Apr 21 – Mar 22)	Act (Jan 21 -	cual - Dec 21)	Forecast (Apr 22 – Mar 23)		
		Previous license period (Jan 21 – Mar 21)	Current license period (Apr 21 – Dec 21)			
Clarity Crest	N/A	995.79	1,240.39	N/A		
Euro-Asia Brand	N/A	194.82	7.69	N/A		
Gan Estate	N/A	1,335.32	3,651.36	N/A		
Bakti Mas Sdn Bhd	N/A	4,141.22	4,510.95	N/A		
Budi Sawit	N/A	-	1,358.15	N/A		
Eng Huat Latex	N/A	1,057.01	2,614.77	N/A		
Klang Realty	N/A	63.16	1,666.66	N/A		
Landta Rasmi	N/A	1,481.51	934.45	N/A		
Meru Estate	N/A	-	142.96	N/A		
Rasa Dinamis	N/A	1,295.72	3,250.90	N/A		



Selamis Sawit	N/A	712.47	2,011.02	N/A
Syarikat Chuan Soon	N/A	5,823.33	13,445.15	N/A
Timah Jaharah	N/A	1,049.00	2,643.19	N/A
Total	N/A	55,62	N/A	

9A. I	9A. Monthly Records of Certified and Uncertified FFB Received since the last audit							
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)				
1	Jan-21	10,450.74	4,126.84	14,577.58				
2	Feb-21	10,165.12	2,606.78	12,771.90				
3	Mar-21	11,415.73	5,421.07	16,836.80				
4	Apr-21	10,418.83	6,071.19	16,490.02				
5	May-21	11,911.98	4,741.62	16,653.60				
6	Jun-21	12,770.78	5,840.46	18,611.24				
7	Jul-21	10,830.26	4,679.33	15,509.59				
8	Aug-21	12,944.61	3,932.96	16,877.57				
9	Sep-21	10,669.12	5,086.60	15,755.72				
10	Oct-21	10,860.34	4,822.06	15,682.40				
11	Nov-21	10,919.00	4,649.77	15,568.77				
12	Dec-21	9,561.37	3,648.31	13,209.68				
	TOTAL	132,917.88	55,626.99	188,544.87				

10. Summary of Certified Tonnage (not applicable for ISS)						
Estimated last year (Apr 21 – Mar 22)	Act (Jan 21 –	Forecast (Apr 22 – Mar 23)				
	Previous license period (Jan 21 – Mar 21)	Current license period (Apr 21 – Dec 21)				
FFB	FF	В	FFB			
134,785.30 mt	42,450.42 mt	90,467.46 mt	138,561.30 mt			
	132,917	7.88 mt				
CPO (OER: 20.35 %)	CPO (OER:	19.89 %)	CPO (OER: 20.50 %)			
27,428.81 mt	8,443.39 mt	17,993.98 mt	28,405.07 mt			
	26,437.	37 mt				
PK (KER: 5.00 %)	PK (KER:	PK (KER: 5.00 %)				
6,739.27 mt	2,003.66 mt	4,270.06 mt	6,928.07 mt			



C 272 72t	
6,2/3./2 mt	

10A. N	Monthly Records of Certified	CPO & PK since the last audit	
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Jan-21	2,078.65	493.27
2	Feb-21	2,021.84	479.79
3	Mar-21	2,270.59	538.82
4	Apr-21	2,072.31	491.77
5	May-21	2,369.29	562.25
6	Jun-21	2,540.11	602.78
7	Jul-21	2,154.14	511.19
8	Aug-21	2,574.68	610.99
9	Sep-21	2,122.09	503.58
10	Oct-21	2,160.12	512.61
11	Nov-21	2,171.79	515.37
12	Dec-21	1,901.76	451.30
	TOTAL	26,437.37	6,273.72

11. Summary of Actual Volume sold									
Current License period (Apr – Dec 21)									
	DCDO Cortified	Other Schem	es Certified	Conventional	Total				
	RSPO Certified	ISCC	Others	Conventional	Total				
CPO (MT)	784.74	-	-	9,049.13	9,833.87				
PK (MT)	1,904.69	-	-	383.68	2,288.37				
Credits	-	-	-	-	-				
Previous Lic	cense period (Jan – M	lar 21)							
CPO (MT)	1,655.28	-	-	4,145.28	5,800.56				
PK (MT)	1,494.80	-	-	88.00	1,582.80				
Credits	-	-	-	-	-				
Note: Conven	Note: Conventional is RSPO certified material but sold as non-RSPO.								

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)						
No. Buyers Name Palmtrace Trading Certified CPO Sold Certified PK Solicense Number (mt) (mt)						
1	ABC	TR-be27696c-cb29	-	3,399.49		



		TD 1 70 70 1 5		
2		TR-eb725616-ae45	-	
3		TR-c0e4f760-9d65	-	
4		TR-3ce10e0c-c706	-	
5		TR-1427cf12-a6ba	-	
6		TR-fd7c7920-b405	-	
7		TR-6b6e6033-4b4b	-	
8		TR-4e283a9f-5ab6	-	
9		TR-d3e5fce4-dfdb	-	
10		TR-7a460d82-b318	-	
11		TR-0153932e-ecc5	-	
12		TR-e38bab11-5808	-	
13		TR-06c06d42-8848	-	
14		TR-8c827108-10e8	-	
15		TR-455dba15-79b4	-	
16		TR-440412bc-870d	-	
17		TR-885fc868-0ed3	-	
18		TR-792c8ce9-d7d4	-	
19		TR-3675018d-e9d1	-	
20		TR-e62fa280-071a	-	
21		TR-c3bd5ae3-e119	-	
22		TR-80b4087c-b98c	-	
23		TR-03a4b863-1f50	-	
24		TR-4fd7fdfa-0836	-	
25		TR-ea2e1b3b-4b61	-	
26	EFG	TR-ed645163-63e7	784.74	-
27	HIJ	TR-fe877070-7819	1,655.28	-
		TOTAL	2,440.02	3,399.49

<sup>\*</sup>Most certified volumes sold as conventional. Remaining volume stored in storage tanks.

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



11C. Records of CPO & PK Sold as conventional since the last audit (if any)							
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)				
1	D	13,194.41	-				
2	К	-	471.68				
	TOTAL 13,194.41 471.68						

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)							
No.	o. Buyers Name PalmTrace Trading RSPO Credits of Certified License Number CPO Sold (mt)						
Nil	N/A	N/A	N/A				
	TOTAL N/A						

12. Independent Smallholders Certified Tonnage / Volume									
	Estimated last year (Not applicable)			Actual (Not applicable)			Forecast (Not applicable)		
Dhace	Eligibility	MS A	MS B	Eligibility MS A MS B		MS B	Eligibility	MS A	MS B
Phase	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	

13. Independent Smallholders Actual Sold Tonnage / Volume								
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE		
<b>Current L</b>	icense period	(Not applicable)						
Credits				N/A	N/A	N/A		
Physical	N/A	N/A	N/A					



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

#### **Certification Body:**

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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 24 - 28 January 2022. The audit programme is included as Section 2.3.

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

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

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

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

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

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

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

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



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

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

Assessment Program								
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)			
Bukit Kerayong Palm Oil Mill	✓	✓	✓	✓	✓			
Bukit Kerayong Estate	<b>√</b>	✓	✓	✓	✓			
Bukit Cheraka Estate	✓	✓	✓	✓	✓			

Tentative Date of Next Visit: January 9, 2023 - January 13, 2023

**Total Number of Mandays: 10.5** 

#### 2.2 BSI Assessment Team

Name	Role	Competency			
Hafriazhar Mohd. Mokhtar (HMM)	Team Leader	<b>Education:</b> Holds a Bachelor of Engineering (Hons.) Chemical Engineering, University Technology Malaysia			
		Work Experience: He has 20 years of working experience in mult engineering disciplines emphasized on science, technology and sustainabil He acquired many skills from being involved in various indust environments ranging from construction, plantation and mining bef auditing. In summary, his started his career as Environmental Officer (20 2003) in construction, Mill Engineer (2003-2008) in palm oil mill, Procontrol Engineer (2008-2011) in mining and Auditor (2011-present) vaccredited certification bodies.  Training attended: He has completed Social Auditing & SMETA Training HCV & HCS Introductory Training, ISO 45001 LA Training, MSPO LA Training Endorsed RSPO SCCS LA Training, Endorsed RSPO P&C LA Training, ISO 90 LA Training, ISO 50001 LA Training, and ISO 14001 LA Training			
		<b>Aspect covered in this audit:</b> During this audit, he covered Policy and commitment, Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue and RSPO Supply Chain, HCV, General Custody of Chain, Rules on Market Communications & Claims.			
		Language proficiency: Fluent in English and Bahasa Malaysia			
Muhammad Fadzli Masran (MFM)	Team Member	<b>Education:</b> Holds a Bachelor Degree in Forestry Science, University Putra Malaysia			
		<b>Work Experience:</b> He has more than 10 years working experience in palm oil estate as Assistant Manager managing operations and sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. He involved in internal auditing on ISO9001 and ISO14001 standards.			



		Tuelinia a - Handada II. has associated ICO INC 0004, 44004, 45004 (0110)
		<b>Training attended:</b> He has completed ISO IMS 9001, 14001, 45001 (OHS 18001) Lead Auditor Course, Endorsed RSPO Lead Auditor Course, MSPO Lead Auditor Course, Endorsed RSPO Supply Chain Certification training course, MSPO Supply Chain Certification System (SCCS) Auditor training Course, CQI and IRCA Certified ISO 9001:2015 Lead Auditor Training Course, HCV and GIS Training and SMETA Requirements Training.
		<b>Aspect covered in this audit</b> During this assessment, he assessed the aspects of Economic management plan, estate best practices, natural and biodiversity conservation, Waste management, GHG, HCV, Environment responsibility, training, environment impact assessment and management plan and RSPO supply chain requirements.
		Language proficiency: Fluent in Bahasa Malaysia and English
Yusof Khairan Nizar Ahmad Tarmizi (YKN)	Team Member	<b>Education:</b> Holds a Bachelor of Corporate Administration (Hons), MARA University of Technology and a Master of Science in Occupational Safety and Health Management-Northern University of Malaysia.
		<b>Work Experience:</b> Has more than 30 years of working experience in varies industries including as safety officer in manufacturing company; consultant and trainer for management systems including ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, OHSAS 18001:2007, MS1722:2011, Environmental Legislation; contract auditor with varies accredited certification bodies for scheme including Malaysia Sustainable Palm Oil (MSPO), RSPO Principles & Criteria; MPOCC Registered Peer Reviewer and was a Certificate of Safety and Health Officer-Malaysian Insurance Institute.
		<b>Training attended:</b> He has completed ISO 9001:2000 IRCA/IATC A Lead Auditor Training; ISO 14001:2004 IEMA Approved EMS Advanced Lead Auditor Training Course; OH&SMS IRCA Certified Lead Auditor Training Course; MS 1722 Lead Auditor Training; MSPO Auditing; Endorsed RSPO P&C 2018 Lead Auditor Course; SMETA Requirements Training; HCV & HCS Introductory Training. Also attended the Quality & Environmental MS Auditing Skills Based on Risk Management, Conformity Assessment – For Bodied Providing Audit and Certification (ISO/IEC 17021:2015) collaboration with Institute of Quality Malaysia, ISO/IEC 17021. MSPO Peer Reviewer Training (MPOCC).
		<b>Aspect covered in this audit:</b> During the assessment, he covered Economic management plan, mill best practices, Occupation Health Safety requirement, HIRARC, training and management plan and RSPO supply chain requirements.
		Language proficiency: Fluent in English and Bahasa Malaysia

#### **Accompanying Persons:**

Name	Role
Mohamed Hidhir Zainal Abidin	BSI Qualifying Reviewer (Observer)



#### 2.3 Assessment Plan

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

Date	Time	Subjects	нмм	MFM	YKN	МН
Sunday, 23/1/2022	PM	Audit team travel to Kapar/Kuala Selangor	<b>\</b>	<b>&gt;</b>	<b>\</b>	<b>✓</b>
Monday, 24/1/2022 Day 1 Bukit	9:00 AM - 9:30 AM	Opening meeting  Opening presentation by audit team leader  Confirmation of assessment scope and finalize audit plan	✓	<b>~</b>	✓	<b>~</b>
Kerayong Palm Oil Mill	9:30 AM - 1:00 PM	Plant visit:  FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, lab, weighbridge, and palm product storage area etc.	<b>~</b>	<b>~</b>	<b>~</b>	>
	10:30 AM - 11:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	<b>✓</b>	ı	ı	<b>~</b>
	1:00 PM - 2:00 PM	Lunch break	<b>√</b>	<b>√</b>	<b>√</b>	<b>~</b>
2:00 PM - 4:30 PM		Document Review P1 – P7:  SOPs, review on management plans, SEIA documents, GHG records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, RSPO SCC general requirements, supply chain for CPO mill, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.	>	>	>	>
	4:30 PM - 5:00 PM	<ul><li>Auditors discussion</li><li>Day 1 Interim Closing Briefing</li></ul>	✓	✓	✓	✓
Tuesday, 25/1/2022 Day 2 Bukit Kerayong Estate	9:00 AM - 1:00 PM	Field visit:  Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	<b>√</b>	<b>√</b>	<b>√</b>	<b>✓</b>



Date	Time	Subjects	нмм	MFM	YKN	МН
	10:30 AM - 11:30 PM	Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	<b>√</b>	-	-	<b>√</b>
	1:00 PM - 2:00 PM	Lunch break	✓	✓	✓	✓
2:00 PM - 4:30 PM		Document Review P1 – P7:  General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM, HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	<b>√</b>	<b>√</b>	<b>√</b>	<b>√</b>
	4:30 PM - 5:00 PM	<ul><li>Auditors discussion</li><li>Day 3 Interim Closing Briefing</li></ul>	<b>√</b>	✓	<b>√</b>	<b>&gt;</b>
Thursday, 27/1/2022 Day 3 Bukit Cherakah Estate	9:00 AM - 1:00 PM	Field visit:  Boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill etc.	<b>✓</b>	<b>✓</b>	<b>✓</b>	<b>√</b>
10:30 AM - 11:30 PM		Meeting with stakeholders (Government, village representatives, smallholders, employee union representatives, vendor etc.)	<b>√</b>	-	-	<b>√</b>
	1:00 PM - 2:00 PM	Lunch break	<b>✓</b>	✓	<b>✓</b>	<b>~</b>
	2:00 PM - 4:30 PM	Document Review P1 – P7:  General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM, HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	<b>&gt;</b>	<b>✓</b>	<b>✓</b>	<b>&gt;</b>
	4:30 PM - 5:00 PM	<ul><li>Auditors discussion</li><li>Day 3 Interim Closing Briefing</li></ul>	<b>√</b>	✓	<b>√</b>	>
Friday, 9:00 AM – 1:00 PM Day 4		Mill SCCS: RSPO Supply Chain, General Custody of Chain, Rules on Market Communications & Claims etc.	<b>√</b>	-	-	<b>√</b>
	10:30 AM - 11:30 PM	Day 4 Interim Closing Briefing	✓	-	-	✓





Date	Time	Subjects	нмм	MFM	YKN	МН
Bukit Kerayong Palm Oil Mill	11:30 PM - 12:00 PM	Closing Meeting	<b>√</b>	-	-	<b>✓</b>



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

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

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



		1
	management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.  Papua New Guinea - Markham Farming Company	
	Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: <a href="https://www.rspo.org/certification/public-announcement">www.rspo.org/certification/public-announcement</a>	
	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): <a href="https://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations">https://www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations</a> . ACOP 2020 has been cross-referenced as below: <a href="https://www.rspo.org/members/29">www.rspo.org/members/29</a>	
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> 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 <b>Major</b> non-compliance shall be raised	No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as these 2 assets were disposed.	Complied
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 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	New plantings within Sime Darby Plantation Berhad that have completed NPP notification  1. NBPOL (Poliamba Limited) 23/05/2020 – no comments <a href="https://rspo.org/certification/new-">https://rspo.org/certification/new-</a>	Complied



plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited

2. NBPOL (Guadalcanal Plain Palm Oil Ltd)

06/04/2018 - no comments

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

plantingprocedure/public-consultations/new-britainpalm-oil-a-subsidiary-of-sime-darby-plantationbhd-quadalcanal-plain-palm-oil-ltd

3. NBPOL (Ragu Agri Industries Limited)

29/01/2018 - no comments

https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd

4. NBPOL (Ragu Agri Industries Limited)

02/09/2016 - no comments

https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-ramu-agri-industries-limited

- 5. NBPOL (Higaturu Oil Palms) 21/06/2016 no comments <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-higaturu-oil-palms">https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-higaturu-oil-palms</a>
- 6. NBPOL (Poliamba Limited Lamawan) 07/04/2014 – no comments captured in RSPO Website <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamawan-png">https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamawan-png</a>
- 7. NBPOL (Poliamba Limited Lamendauen) 07/04/2014 – no comments captured in RSPO Website <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamendauen-png">https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamendauen-png</a>
- 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

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

10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website <a href="https://rspo.org/certification/new-plantingprocedure/public-consultations/new-plantingprocedure/public-consu



	<u>britainpalm-oil-limited-higaturu-oil-palm</u>	
	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	
	12. Sime Darby (Liberia) Plantation Inc 06/03/2012	
	– no comments captured in RSPO website	
	https://rspo.org/certification/new- plantingprocedure/public-consultations/sime-	
	darbyliberia-plantation-incnew-planting-assessment1	
	13. Sime Darby (Liberia) Plantation Inc 06/03/2012	
	<ul><li>no comments captured in RSPO website</li></ul>	
	https://rspo.org/certification/new-	
	plantingprocedure/public-consultations/sime-	
	darbyliberia-plantation-incnew-planting-assessment	
	Management units for 11 – 13 above were disposed.	
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute	No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as both sites was disposed.	Complied
Settlement Facility, in accordance with	The RaCP tracker was checked. There are 21	
RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	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.	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue are mainly awaiting for Land Titles. The last audit was conducted between July 2020 – August 2020. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance	Complied



Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue are mainly awaiting for Land Titles. The last audit was conducted between July 2020 – August 2020. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	No any critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company	Complied

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

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



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

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

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





		Sabak Bernam Estate					
		Sg. Samak Estate					
5	Seri Intan/Selaba	Seri Intan Oil Mill	-	Teluk Intan,	Certified	03/03/2011	-
		Selaba Oil Mill		Perak			
		Seri Intan (+ Selaba) Estate					
		Sabrang Estate	2				
		Sogomana Estate					
		Sg. Wangi Estate					
		Bikam Estate					
		Cluny (+ Bedford) Estate					
6	Tennamaram	Tennamaram Oil Mill		Bestari Jaya,	Certified	03/03/2011	-
		Tennamaram Estate		Selangor			
		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,	Certified	19/05/2011	-
		East Estate		Selangor			
		Sepang Estate					
		Dusun Durian Estate					
9	West	West Oil Mill		Carey Island,	Certified	19/05/2011	-
		West Estate		Selangor			

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

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

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



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



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



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

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

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

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

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

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

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	T				1	I	I	
	PT Indotruba	Sekunyir			Seruyan and			
	Tengah	Seruyan Estate			West Kotawaringin District – Central Kalimantan			
13	PT Swadaya Andika	Selabak Mill	-	-	Kotabaru District	Certified	16/03/2012	Mill closed down and all the supply bases
		Selabak Estate			– South Kalimantan			was transferred to Rantau Mill – PT Laguna Mandiri. The Selabak Est, Randi Est,
		Randi Estate			Kaliffaffaff			Sangkoh Est, Lanting Est is currently under
		Sangkoh Estate						PT Laguna Mandiri – Rantau Factory
		Lanting Estate						certification.
14	PT Bina Sains	Sungai Pinang Mill	-		Musi Rawas	Certified	11/09/2012	
	Cemerlang	Sungai Pinang Estate	-	-	District – South Sumatera			308.35 ha is still in process.
		Bukit Pinang Estate			Samatera			
15	PT Teguh Sempurna	Pemantang Mill	-		Seruyan and East	Certified	05/07/2011	-
		Pemantang Estate	-	-	Kotawaringin District – Central			
		Kawan Batu Estate			Kalimantan			
		Hatan Tiring Estate						
		Batang Garing Estate						
16	PT Bhumireksa Nusa	Teluk Bakau Mill	-	-	Indra Giri Hilir	Certified	11/10/2011	-
	Sejati	Teluk Bakau Estate			District – Riau			
		Nusa Lestari Estate						
		Nusa Perkasa Estate						
		Mandah Mill					01/04/2014	
		Mandah Estate						
		Rotan Semelur Estate						
17		Teluk Siak Mill	-	-		Certified	11/10/2011	-

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	PT Aneka	Teluk Siak Estate			Pekanbaru, Siak			
	Intipersada	Pinang Sebatang Estate			District – Riau			
		Aneka Persada Estate						
18	PT Tamaco Graha	Ungkaya Mill	-	-	Morowali District	Certified	10/7/2012	-
	Krida	Ungkaya Estate			– Sulawesi			
		Plasma TGK Estate	TBC	TBC	- Tengah	TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
19	PT SIME Indo Agro	Bukit Ajong Mill	-	-	Sanggau District	Certified	18/10/2010	Land legalisation process for East Est for
		West Estate			–West Kalimantan			5815.64 ha is still in process.
		East Estate			Kalimantan			
		East* Estate /Sei Mawang Estate	2023	-		-		Land legalisation for Sei Mawang is still in process
		East Plasma Estate	-	-		Certified	18/7/2016	-
		West Plasma Estate						
20	PT Padang Palma	Blang Simpo Mill	-		Aceh Tamiang	Certified	03/05/2013	-
	Permai /PT Perkasa Subur Sakti	Tamiang (PT PPP) Estate	-	-	and East Aceh District –			
	Sabai Sakai	Batang Ara (PT PSK) Estate			Nanggroe Aceh Darussalam			
		Blang Simpo-01 Estate			2 a. a.s.a.a			
		Blang Simpo-02 Estate						
21	PT Sandika Natapalma	Lembiru Mill	-	-	Ketapang District  - West	Certified	03/07/2014	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru
		Lembiru Estate			Kalimantan			Mill.
		Awatan Estate						

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

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

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





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

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



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	Waraston Mill			
	Bebere Estate			
	Kumbango Estate			
	Togulo Estate			
	Dami Estate			
	Waisisi Estate			
	Kautu Estate			
	Karausu Estate			
	Moroa Estate			
	Bilomi Estate			
	Loata Estate			
	Haella Estate			
	Garu Estate			
	Daliavu Estate			
	Sapuri Estate			
	Malilimi Estate			
	Rigula Estate			
	Numundo Estate			
	Navarai / Karato ME /KDC EU Estate			
	Volupai / Lotomgam / Natupi / Goruru Estate			
	Lolokoru Estate			
	Ove Estate			
	Tamare Estate			
	Smallholders LSS Mosa (1822)			



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



#### 3.3 Details of Nonconformities

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

During this Assessment there was three (3) Critical (Major) nonconformities, two (2) Minor nonconformities and two (2) Opportunity For Improvements raised. The Sime Darby Plantations SOU 7 Bukit Kerayong Palm Oil Mill & Supply Base Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. Due to the nature of Major NC CAP able to verified off-site. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2156242-202201-M1	Date Issued	28/1/2022
Due Date	27/4/2022	Date of nonconformity Closure	25/4/2022
Clause & Category (Critical / Minor)	2.1.1 (Critical)		
Statement of Nonconformity:	Bukit Kerayong Palm Oil Mill has not conducted Noise Risk Assessment and found no evidence of compliance established after revision of the related Regulations in 2019		
Requirement Reference:	The Unit of Certification complies with legal requirements		
Objective Evidence:	Noise Risk Assessment under newly revised Occupational Safety and Health (Noise Exposure) Regulations 2019, was not conducted yet as required.		
Corrections:	NRA has been conducted on 7 <sup>th</sup> February 2022		
Root Cause Analysis:	Monitoring of legal compliance is not effectively establish		
Corrective Actions:	Site Safety & Sustainability Officer is task to monitor any legal compliance in SOU 7		
Assessment Conclusion:	Due to the nature of Major NC CAP able to verified off-site, all evidences were requested to submitted for off-line verification. Documented evidences received as following:		
	- Initial Noise Risk Assessment Report Bukit Kerayong Palm Oil Mill; Assessment Date: 7 <sup>th</sup> February 2022; Prepared by: Mohd. Rashid Bin Haji Gelamdin; DOSH Reg. # HQ/94/PEB/00/08; Procoma Environmental (M) Sdn. Bhd.		
	- Job description revision of Site Safety & Sustainability Officer include task to monitor legal compliance in SOU 7		
	Based on the documented evidences provided, the CAP verified to be sufficient to address the Major NC. Hence, Major NC closed on 25/4/2022.		

Non-conformity				
NCR Ref #	2156242-202201-M2	Date Issued	28/1/2022	
Due Date	27/4/2022	Date of nonconformity Closure	25/4/2022	



Clause & Category (Critical / Minor)	3.4.3 (Critical)
Statement of Nonconformity:	The environmental management plan was not effectively implemented.
Requirement Reference:	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.
<b>Objective Evidence:</b>	Bukit Kerayong POM:
	Sighted during site visit, there was a mini tractor park in front of the scheduled waste store with engine leakage without any appropriate attendance. This was against the Environmental Improvement Plan/Pollution Prevention Plan FY 2021 dated 02/01/2021.
	Bukit Kerayong Estate:
	The estate disposed the clinical waste (SW 404) through VMO. The VMO didn't acquired any written permission/approval from DOE to transport the scheduled waste to his facilities.
Corrections:	Bukit Kerayong POM:
	To provide tray to contain any leakages from the parking tractor.
	Bukit Kerayong Estate (BKE):
	BKE have communicated with Kualiti Alam on clinical waste disposal arrangement on 26/1/2022. All the clinical waste will be disposed by Kualiti Alam effective January 2022.
Root Cause Analysis:	Environmental management plan is not being communicated well
Corrective Actions:	Briefing on management plan implementation awareness to the workers and staff by the management
Assessment Conclusion:	Due to the nature of Major NC CAP able to verified off-site, all evidences were requested to submitted for off-line verification. Documented evidences received as following:
	- Photo of containment tray provided at tractor parking
	- Email communications record with Kualiti Alam on clinical waste disposal arrangement on 26/1/2022
	Based on the documented evidences provided, the CAP verified to be sufficient to address the Major NC. Hence, Major NC closed on 25/4/2022.

Non-conformity				
NCR Ref #	2156242-202201-M3	Date Issued	28/1/2022	
Due Date	27/4/2022	Date of nonconformity Closure	25/4/2022	
Clause & Category (Critical / Minor)	6.2.4 (Critical)			
Statement of Nonconformity:	The area surrounding the workers' housing is not fully maintained in a clean and sanitary condition as per weekly inspection of workers' housing requirements 23.(1)(a) of Workers' Minimum Standards of Housing and Amenities Act.			



Requirement Reference:	The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.
Objective Evidence:	During housing inspection visit in Bukit Cherakah Estate, it was found that there are rubbish being dumped without proper bin and collection along the fence near house # 53 in Main Division. In Braunston division, it was found that a septic tank near house # 14 cover was broken exposing the tank that also filled with rubbish. Trailing with the records of latest Housing Inspection (EWR) dated 21/12022 and the Housing Complex / Nest / Community Hall Inspections checklist dated 22/1/2022 indicated good condition of inspected areas which not reflective of its actual conditions sighted above.
Corrections:	- Arrangement has been made with KDEB waste management for domestic waste collection three days in a week effective February 2022. The management has place roro bin at all division for rubbish collection.
	- To ensure that weekly line site inspection do thorough check on cleanliness, sanitation and waste management.
	- Broken septic tank have been identified and repair work already been carried out in February 2022
Root Cause Analysis:	Worker awareness on good sanitation practices is still need to be improved
<b>Corrective Actions:</b>	- To educate worker to make sure use of RoRo bin so that no domestic waste visible outside line site area.
	- To educate worker on good sanitation practices and inform the management if their surrounding area is not well maintaining.
	- To educate / instil awareness to the worker to be more alert to their surroundings area and make report for repairs and betterment.
Assessment Conclusion:	Due to the nature of Major NC CAP able to verified off-site, all evidences were requested to submitted for off-line verification. Documented evidences received as following:
	- Records of email communication between Bukit Cheraka Estate with rubbish disposal contractor KDEB Waste Management dated 27/1/2022
	- Photos of damaged septic tank been repaired
	- Records of awareness training to workers dated 27/1/2022
	Based on the documented evidences provided, the CAP verified to be sufficient to address the Major NC. Hence, Major NC closed on 25/4/2022.



Non-conformity			
NCR Ref #	2156242-202201-N1	Date Issued	28/1/2022
Due Date	Next assessment	Date of nonconformity Closure	Open
Clause & Category (Critical / Minor)	3.7.3 (Minor)		
Statement of Nonconformity:	Bukit Kerayong Palm Oil Mill has not established evidence of appropriate training is provided for workers as per Training Matrix for Supply Chain Certification Standard (SCCS) and no record available as requested.		
Requirement Reference:	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.		
Objective Evidence:	<ul> <li>No Training record available as requested for Supply Chain Certification Standard (SCCS) in Bukit Kerayong Palm Oil Mill.</li> <li>A Training Matrix FY2022 for SOU7 Bukit Kerayong POM covering all levels of employees and types of Training Requirements for Operational Unit. Training of RSPO Supply Chain is required for Mill Manager, Mill Sr. Assistant, Mill Assistant, QA, Process Supervisor, Store Clerk, Chargemen.</li> </ul>		
Corrections:	To conduct SCCS training to all related personnel specified in SCCS SOP by RSQM/GSD on 25th February 2022		
Root Cause Analysis:	The training conducted is not comprehensive		
<b>Corrective Actions:</b>	To review training matrix according to SCCS SOP dated April 2019 and assign QA to monitor training plan		
Assessment Conclusion:	CAP has been accepted. Evidence of implementation and the CAP effectiveness to address the Minor NC to be verified during next assessment.		

Non-conformity			
NCR Ref #	2156242-202201-N2	Date Issued	28/1/2022
Due Date	Next assessment	Date of nonconformity Closure	Open
Clause & Category (Critical / Minor)	7.3.1 (Minor)		
Statement of Nonconformity:	The waste identifications was not covering all waste generated in the estate.		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
Objective Evidence:	Bukit Cherakah Estate The waste such as spent lubricant/hydraulic oil, contaminated rags, contaminated		
	PPE, contaminated spill kit, used batteries, used tyre and others were not identified		



	in the waste identification. Thus, the management plan was not covering the unidentified waste.	
Corrections:	To identify and include all waste generated in the estate and update waste management plan accordingly	
Root Cause Analysis:	Waste identification was not updated effectively	
Corrective Actions:	Training on scheduled waste management by RSQM personnel and monitoring of waste management plan by SSSO	
Assessment Conclusion:	CAP has been accepted. Evidence of implementation and the CAP effectiveness to address the Minor NC to be verified during next assessment.	

Opportunity for Improvements			
OFI#	Description		
2156242- 202201-I1	3.6.1: In Chemical Store the risk of exposure or incidental spill of chemicals to body parts such as eye and skin in as stated in sampled SDS of Glyphosate and Glufosinate Ammonium that required immediate plenty use of water such as emergency shower and eye bash to be further enhanced with adequate facility.		
2156242- 202201-I2	6.2.2: The terminology written in contractor's workers' pay slips such as "others" for the workers' salary deduction could be made clear further.		

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

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

Non-conformity			
NCR Ref #	2007911-202101-M1	Date Issued	7/1/2021
Due Date	6/4/2021 Date of nonconformity 6/4/2021 Closure		6/4/2021
Clause & Category (Critical / Minor)	2.2.2 Critical (Major)		
Statement of Nonconformity:	Evidence of legal due diligence of contracted third parties was 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:	i) Reviewed the pay slips and Daily Oil Mill Declared Weight – By Delivery Note for September 2020 found that 4 of the contractor's workers (FFB transporter) in Bukit Kerayong Estate have worked on rest day for 3 days without paying according to Employment Act 1955. The sampled workers as below: I/C No. :730622-10-55XX, 890911-10-51XX, 711125-10-64XX and 650128-10-68XX Date of Work on Rest Day – 06/09/2020, 13/09/2020 and 27/09/2020
	ii) Contract between KSG enterprise and workers have not detailed out the terms
	and conditions and compliance toward Employment Act 1955 requirements.
	Previous minor was not effectively closed and upgraded to major NC.
Corrections:	i) Estate to investigate the cause and issue letter to FFB transporter for them to ensure the workers they employ comply with the legal requirements (wages, rest day (double pay), work on rest day etc) and reimburse workers with the payments due within the timeline stipulated also to make clear of our expectations.
	<ul> <li>To issue warning letter to KSG enterprise for them to issue revised employment contract with the compliance toward Employment Act 1955 requirement detailing on annual leave, rest day, termination clause, sick leave etc.</li> </ul>
Root Cause Analysis:	Ineffective monitoring system on contractor's compliance to legal labour requirement and employment act 1955
Corrective Actions:	<ul> <li>To emphasize checks on suppliers during internal audits/or planned inspection on contractor by RSQM/Estate/Mill management</li> </ul>
	ii) Estate management will ensure all contractor's document comply with Employment Act 1955 and will be monitor continuously.
<b>Assessment Conclusion:</b>	Remote Major NC close out verification:
	i) Warning letter to KSG Enterprise dated 22nd January 2021 was verified. Briefing and meeting with the contractor (KSG Enterprise) was carried out on 10/3/21 as to emphasis on the legal compliance and due diligence process for contractors. Minute of meeting dated 10/3/21 was made available for verification.
	ii) Investigation was done by the estate showed that the workers has not worked on rest day. Duty roaster for all drivers for September 2020 was verified. Other related employment documentations pay slip, employment contract were kept for reference and evidence of verification.
	iii) Supplier audit/verification was made to ensure compliance with the legal requirements and conformance with RSPO P&C MYNI 2019 requirements. Latest supplier verification was carried out on 6/4/21 by RSQM - CER person in charge. Based on the report, no non-compliance recorded for the verification.
	Implemented evidence was found to be sufficient to close the NC on 6/4/21. Continuous implementation will be further verified in the next assessment.
ASA 2_1 Verification:	Verification of evidence confirmed that the CAP implemented effectively to address the nonconformity. Hence, Major NC remained closed.



Non-conformity			
NCR Ref #	2007911-202101-M2	Date Issued	7/1/2021
Due Date	6/4/2021	Date of nonconformity Closure	6/4/2021
Clause & Category (Critical / Minor)	6.7.2 Critical (Major)		
Statement of Nonconformity:	First Aid Kits does not full expired	y contain required items and	d contain items that has
Requirement Reference:	understood by all workers. A (English and/or Bahasa Ma to the workforce. Assigned	procedures are in place and Accident procedures are availa laysia) and explained in the operatives trained in first aid irst aid equipment is available periodically reviewed.	able in national languages language understandable are present in both field
Objective Evidence:	Found in first aid box 6 at Mill's workshop includes items that are expired. Dettol Antiseptic cream expired on 01/01/2021, Alcohol Swab expired in May 2018. Also items are not available i.e. Eye drop and latex glove.  Previous minor was not effectively closed and upgraded to major NC.		
Corrections:	To check and replace/top-u	p all the first aid box in the m	nill
Root Cause Analysis:	Inadequate tools to mo contents/medication	onitor first aid system a	and the expiration of
Corrective Actions:	provided by MA or Assistant masterlist are accessible to safety meeting.	re including first aid kit box in t In-charge with all expiry dat all first aid box holder and r son to monitor first aid kit ar	tes of medication and the eviewed during quarterly
Assessment Conclusion:	engineer. Details related to Process supervisor is the per Implemented evidence was Continuous implementation	for March 2021 checked by expiry date and number of it erson in charge appointed for s found to be sufficient to will be further verified in the	ems updated in the list. first aid kit monitoring. close the NC on 6/4/21. next assessment.
ASA 2_1 Verification:	Verification of evidence contact the nonconformity. Hence,	firmed that the CAP implemer Major NC remained closed.	ited effectively to address

Non-conformity			
NCR Ref #	2007911-202101-M3	Date Issued	7/1/2021
Due Date	6/4/2021	Date of nonconformity Closure	6/4/2021



Clause & Category (Critical / Minor)	3.3.2 Critical (Major)
Statement of Nonconformity:	Procedures were not fully implemented according to the respective SOP.
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.
Objective Evidence:	The disposal of filters, contaminated rags and gloves at mill is not according to the MQMS – Handling of Environmental Aspects. The filters, contaminated rags and gloves shall be disposed as scheduled waste. However it was found that it was disposed in a mixed bin located at the sterilization station next to the scheduled waste store.
Corrections:	<ul> <li>i) Filter, contaminated rags and gloves have been transferred to schedule waste store for disposal immediately.</li> <li>ii) To re-evaluate and review Environment Impact/Aspect Evaluation for Bukit Kerayong Estate and develop action plan in Environment Management Plan should the new revised EIE has a high compliance potential of non-compliance to environmental regulation</li> </ul>
Root Cause Analysis:	Training not carried out on handling of chemical, scheduled wastes and on the EAI/EIE procedure
Corrective Actions:	RSQM to plan a scheduled waste training to person handling schedule waste in the mill and to include monitoring of schedules waste in workplace inspection checklist to ensure all scheduled waste are dispose according to Environment Quality (Scheduled Waste) Reg. 2005.  RSQM will plan a training/coaching session with person-charge on the Environmental Impact Evaluation/Assessment by in Feb/Mar 2021 to ensure it comply with related act and requirement
Assessment Conclusion:	Remote Major NC close out verification:  i) Related training for scheduled waste and eswiss training was carried out on 11/2/21 by RSQM-OSH officer. Training was given to the estate assistant, store keeper and MA as to update on the requirement related to eswiss and scheduled waste. For Bkt Kerayong POM, the training was done on 15/1/21.  ii) Evaluation and identification of environment aspect (EIA and EIE) was revised on 8/2/21. Related significant aspects contributes to the establishment of environmental management plan for FY2021. Refresher training on environmental aspects and impacts was carried out on 10/2/21.  iii) Related inventory has been updated and included the latest waste generation for April 2021. 5th schedule dated 6/4/21 was verified.  Implemented evidence was found to be sufficient to close the NC on 6/4/21. Continuous implementation will be further verified in the next assessment.
ASA 2_1 Verification:	Verification of evidence confirmed that the CAP implemented effectively to address the nonconformity. Hence, Major NC remained closed.



Non-conformity			
NCR Ref #	2007911-202101-M4	Date Issued	7/1/2021
Due Date	6/4/2021	Date of nonconformity Closure	6/4/2021
Clause & Category (Critical / Minor)	6.7.3 Critical (Major)		
Statement of Nonconformity:	Sighted workers exposed to required PPEs as required.	potential hearing loss, legs ar	nd eyes injury not wearing
Requirement Reference:	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Objective Evidence:	Mill. ii) Substitute worker at loa	phted at various high noise ar ding bay and lorry driver not Bukit Kerayong Estate not wea	wearing safety boots.
Corrections:	PPE	to mandore and spraying gang	
Root Cause Analysis:	Lack of effective monitoring driver	system for PPE usage by wor	kers, contractor and lorry
Corrective Actions:	PPE monitoring book. ii) To enforce AP checks or	ensure workers have full PPE n OCP lorry drivers at the entr ne driver found not wearing a	rance point and to keep a
Assessment Conclusion:	for OCP driver. Related reco reminder was given to the PPE compliance in future. T Implemented evidence wa	everification:  ance was done by supervisor pord monitoring dated 6/4/21 verelevant workers to ensure to raining on PPE was done 10/s found to be sufficient to a will be further verified in the	vas verified. Warning and that no repeated issue of 2/21 for all workers. close the NC on 6/4/21.
ASA 2_1 Verification:	Verification of evidence con the nonconformity. Hence,	firmed that the CAP implemen Major NC remained closed.	ited effectively to address



Non-conformity			
NCR Ref #	2007911-202101-N1	Date Issued	7/1/2021
Due Date	24/1/2022	Date of nonconformity Closure	24/1/2022
Clause & Category (Critical / Minor)	3.4.2 (Minor)		
Statement of Nonconformity:	Social management and mo participation of affected sta	nitoring plan was not compre keholders	hensively developed with
Requirement Reference:		n, a SEIA is available and s ng plans have been develop	
Objective Evidence:	union meeting 29/12/20 wand monitoring plan. Based	Inputs from stakeholders (internal and external) from OCP meeting 18/11/20, union meeting 29/12/20 were not included in the development of management and monitoring plan. Based on the SIA plan for FY2021, none of the above issues included in the management plan	
Corrections:	Meeting, Stakeholder Meeti	te new Social Management Ing and Union Meeting and volumestakeholder. All action plan volumes	vill take necessary action
Root Cause Analysis:	Ineffective mechanism to up organized.	Ineffective mechanism to update the action plan to include issues raised in meeting organized.	
Corrective Actions:	To establish a comprehensive list of inputs to be systematically reviewed for Social Management Plan. (including other concerns from other channels such as Gender Meeting, Stakeholder, Union Meeting, Complaint Books, other grievance mechanism, IOM by Management/HR etc).  Social Management Plan to be reviewed by management every quarterly followed by internal audit checks.		
Assessment Conclusion:	The corrective action plan is be further verified in the ne	accepted. Effectiveness of coxt assessment.	orrective action taken will
ASA 2_1 Verification:	the nonconformity. It was for continual improvement plans on Social Impact Assessment Working Condition: Underst Housing Condition/Living In - Housing complex overall - Organize more social act - Organize meeting with some The assessment was conducted to the social and the social and the social and the social act - In the social act - Organize meeting with social	maintenance and cleanliness civities such as family day	of SOU 7 documented the SOU 7 Management Plan findings: ntitlement  ation Manual; subsection spect/impacts evaluation ed out the annual review



Bukit Kerayong POM
Latest review was conducted on $06/01/2021$ by the OSH Coordinator and approved by the Manager with no changes on made to the EAI and EIE since last review was conducted.
Bukit Kerayong Estate
Latest review was conducted on $03/01/2021$ by the OSH Coordinator and approved by the Manager with no changes on made to the EAI and EIE since last review was conducted.
Bukit Cheraka Estate
Latest review was conducted on 02/01/2022 by the OSH Coordinator and approved by the Manager with no changes on made to the EAI and EIE since last review was conducted.
Hence, Minor NC was closed on 24/1/2022

Non-conformity			
NCR Ref #	2007911-202101-N2	Date Issued	7/1/2021
Due Date	24/1/2022	Date of nonconformity Closure	24/1/2022
Clause & Category (Critical / Minor)	3.5.2 (Minor)		
Statement of Nonconformity:	Employment procedures we	re not effectively implemente	ed.
Requirement Reference:	Employment procedures are	e implemented, and records a	re maintained.
Objective Evidence:	Referring to the latest inter-office mail dated 3/12/19 by Head of HR Upstream, newly revised contract for new local recruits and existing local workers issued under enclosure 1 – new recruitment – Peninsular Malaysia and enclosure 4 – existing employee – Peninsular.  Enclosure 4 was not available for existing local workers at Bukit Kerayong POM for;  Employee ID: 0000009838  Employee ID: 0000029579		
Corrections:	To issue a revised employ	ment contract to all existing IOM with immediate effect.	employee including the
Root Cause Analysis:	The reason to re-issue the new employment contract is not properly communicated and lack of enforcement on the ground		
Corrective Actions:	and ensure comply with Em To monitor the implementa	close communication with Reployment Act 1955.  Ition of the communicated property Regional HR/Careline or RS	rocedure during site visit
Assessment Conclusion:	The corrective action plan is be further verified in the ne	accepted. Effectiveness of coxt assessment.	orrective action taken will



ASA 2_1 Verification:	Verification of evidence confirmed that the CAP implemented effectively to address the nonconformity. It was found that for recruitment, selection, hiring, promotion, retirement and termination are well implemented with records well maintained as per SOP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liaison and recruitment, documentation and processing (Doc no: WMU/DP SOPP/JAN2016/R1), workforce management centre (WMC) Sua Betong, Careline and estate are available upon request.
	Additionally, there's Bukit Kerayong POM recruitment procedures as per Standard Operating Procedure Title: Hiring of Local Workers; Doc. # 01-12-19; Effective date: 1/12/2019; Rev. # 1. Implementation also include induction as per sample Bukit Kerayong POM implemented New Workers Briefing last dated 11/10/2021. Hence, Minor NC was closed on 24/1/2022

Non-conformity			
NCR Ref #	2007911-202101-N3	Date Issued	7/1/2021
Due Date	Next Assessment	Date of nonconformity Closure	24/1/2022
Clause & Category (Critical / Minor)	2.1.2 (Minor)		
Statement of Nonconformity:	System for ensuring legal cand regulations not effective	compliance in place and to trely implemented.	rack changes to the laws
Requirement Reference:	A documented system for el means to track changes to t	nsuring legal compliance is in the laws and regulations.	place. This system has a
Objective Evidence:	<ol> <li>Scheduled Waste Regulation 2005 requires training to be provided 2 years once and Occupational Safety and Health (Noise Exposure) Regulation 2019 requires training to be provided. No training was provided at mill. However, the summary of compliance shows all regulations are 100% compliance.</li> <li>As according to the Bukit Cherekah Estate internal audit, an OFI was raised regarding maintaining the e-Swiss was not complying with EQA 1974. However in the Legal Other Requirement Register – Summary of Compliance, it was stated that 100% compliance on EQA 1974 (Scheduled Waste) Regulation 2005.</li> </ol>		
Corrections:	RSQM will conduct a training/coaching session with the respective operating unit representative on monitoring legal compliance tentatively on 10th February 2021		
Root Cause Analysis:	No proper training to pe compliances in the operation	rson in-charge on monitor g unit	ing and updating legal
Corrective Actions:	operating unit training plan	nitoring of legal compliance every year. n the respective PIC as and wl	·
Assessment Conclusion:	The corrective action plan is be further verified in the ne	accepted. Effectiveness of coxt assessment.	orrective action taken will



ASA 2_1 Verification:	Verification of evidence confirmed that the CAP implemented effectively to address the nonconformity. Based on Standard Operating manual (SOM) Version 1:2008 defined competence, training and awareness requirements in estate operations. Proses of developing Training Needs and Plan were included and conducted as following:
	Bukit Kerayong POM:
	Available a Training Plan for FY2022 for SOU7 Bukit Kerayong POM. Among Training in the plan included among others:
	OSH Act and Regulations (Feb)
	Environmental Quality Act and Regulations 1974 (Feb)
	Understanding Group Policy & Authority (GPA 8.4) and COBC. Oct)
	Hirarc Aug)
	NADOOPOD (Jun)
	EHS Functions and Responsibilities (Sep)
	Foreign Worker Induction Programme (April)
	Safe Driving Technique (July)
	Working at Height (Sep)
	Training SCCS for RSPO (Nov)
	RSPO Training (July) and etc.
	Bukit Cheraka Estate:
	Available Training Plan FY 2022 and among included in the plan:
	Hirarc (Dec)
	OSH Committee & Function and Responsibility (Jan, Apr, Jul, Oct)
	SOP Training (Nov)
	Harvesting Induction Training (Jan-Mac), Aug-Sep)
	Chemical & Spraying training (Apr,Sep)
	Fire Fighting (may)
	RSPO and MSPO Awareness (Nov).
	Policy training (Jan, Nov-Dec)
	Scheduled Waste management (Dec)
	COBC/Whistle Blowing training (Jan, Sep).
	Hence, Minor NC was closed on 24/1/2022

Oppor	tunity for Improvement
OFI#	Description
OFI 1	OFI Statement:
	7.12.4
	1. The HCV management plan and monitoring could be further improved to ensure consistent
	implementation:
	a) Water catchment area water sampling consistency at Bukit Kerayong Estate.



- b) The development of Management Plan at Bukit Kerayong Estate can be further improved especially on the proposed completion date. All of the actions are on-going actions but a propose completion date was identified. Monitoring records of erosion and encroachment at Bukit Cheraka Estate.
- 2. The implementation of biodiversity management plan could be improved to demonstrate consistency across the entire SOU 7. At Bukit Cheraka Estate it was demonstrated that management plan of the CSA is available however it was not available in Bukit Kerayong Estate especially at plot P08C and P08A.

#### **Verification / Follow-up actions:**

Reviewed the implementation of the management plan as follows:

#### **Bukit Kerayong Estate**

- 1. The estate has conducted briefing and training on HCV area. Reviewed the training records as follows:
  - a. HCV training for workers dated 17/05/2021
  - b. Muster briefing on environmental and HCV area in the estate dated 18/10/2021
- 2. The estate monitored the HCV area (water catchment) on monthly basis conducted by the AP. Reviewed the monitoring records dated 10/10/2021, 10/11/2021 and 14/12/2021.
- 3. The estate has identified the CSA area at P08A and P08C. Signage has been erected at the area as sighted during site visit.
- 4. The estate conducted water sampling for HCV area (water catchment) on quarterly basis. Latest sampling was conducted on 24/01/2022. The results was yet to be received by the estate.

#### **Bukit Cheraka Estate**

- 1. The estate has identified the CSA area at P13D and P01D. Signboard has been erected at the area. Sighted during site visit at P01D, no evidence of encroachment at the area.
- 2. The estate has erected signboard at HCV area in P04B and P94A as sighted during site visit. No evidence of encroachment at the area.

The estate conducted HCV area monitoring on monthly basis. The monitoring cover on encroachment/trespassing, wildlife issues/conflicts/sightings, pollutions/erosion issues and others complete with picture of the areas. Reviewed the monitoring records dated 11/01/2022, 10/12/2021, 15/11/2021 and 10/10/2021. No recurrence of the issue.

#### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1874552-202001-M1	Critical	6.2.3	24/1/2020	10/4/2020
1874552-202001-M2	Critical	3.6.1	24/1/2020	10/4/2020
1874552-202001-N1	Minor	4.2.3	24/1/2020	Closed on 7/1/2021
1874552-202001-N2	Minor	2.2.2	24/1/2020	Escalated to Major NC
1874552-202001-N3	Minor	7.12.7	24/1/2020	Closed on 7/1/2021
1874552-202001-N4	Minor	3.3.2	24/1/2020	Escalated to Major NC
1874552-202001-N5	Minor	6.7.2	24/1/2020	Escalated to Major NC
2007911-202101-M1	Critical	2.2.2	7/1/2021	Closed on 6/4/2021
2007911-202101-M2	Critical	6.7.2	7/1/2021	Closed on 6/4/2021
2007911-202101-M3	Critical	3.3.2	7/1/2021	Closed on 6/4/2021



2007911-202101-M4	Critical	6.7.3	7/1/2021	Closed on 6/4/2021
2007911-202101-N1	Minor	3.4.2	7/1/2021	Closed on 24/1/2022
2007911-202101-N2	Minor	3.5.2	7/1/2021	Closed on 24/1/2022
2007911-202101-N3	Minor	2.1.2	7/1/2021	Closed on 24/1/2022
2156242-202201-M1	Critical	2.1.1	28/1/2022	Closed on 25/4/2022
2156242-202201-M2	Critical	3.4.3	28/1/2022	Closed on 25/4/2022
2156242-202201-M3	Critical	6.2.4	28/1/2022	Closed on 25/4/2022
2156242-202201-N1	Minor	3.7.3	28/1/2022	Open
2156242-202201-N2	Minor	7.3.1	28/1/2022	Open

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

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Sime Darby Plantations SOU 7 Bukit Kerayong Palm Oil Mill & Supply Base Certification Unit's environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by 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	Stakeholders contacted			
<b>Type of Stakeholder</b> (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)		
School Headmaster/Representative	SJKT Ladang Jalan Acob	Face to face interview		
Estate Supplier	BMSPU Enterprise	Face to face interview		
Local Village Representatives	Kampung Simpang 3, Jeram	Face to face interview		
Workers' union (NUPW) representative	NUPW	Face to face interview		
Foreign Workers' (FW) Representatives	All estates and mill FW	Face to face interview		
Estate Shop Keeper	<ul><li>Bukit Kerayong Estate Shop</li><li>Bukit Cheraka Estate Shop</li></ul>	Face to face interview		
Estate Healthcare Assistant	<ul><li>Bukit Kerayong Estate Clinic</li><li>Bukit Cheraka Estate Clinic</li></ul>	Face to face interview		
Gender Committee Representatives	Chief Clerk	Face to face interview		

...making excellence a habit."



All consulted stakeholders provided positive feedbacks as per sample as following:

Stak	eholders comment
1	Feedbacks: Local workers & foreign workers NUPW representatives  No restrictions by management to all mill and estate employees to join union. Almost all local workers associated with NUPW while more than 50% foreign workers become member. Required fees paid by company with no issue.  Audit Team verification and response:  No further issue.
2	Feedbacks: School Headmaster/Representative Estate management always participated in school events except during Covid-19 Movement Control Orders. A lot of contributions received from estate management including school children's excellent award  Audit Team verification and response:
3	Feedbacks: Estate supplier & shop keeper  No issue in contractual matters since company always give priority to locals and/or long-served contractor to provide service/contract work. Contract pricing fair to both parties for direct award contract unless involve tendering that need to be negotiated. Nevertheless, negotiated price for specific contract/tender work if awarded still fair to both parties.
	Audit Team verification and response:  No further issue.
4	<b>Feedbacks:</b> Local Village Representatives  Both mill and estate management always helpful and contributed a lot to local villagers. Contributions including food basket to Covid-19 quarantined families and recently house cleaning with foods and clothes to families affected by flood.
	Audit Team verification and response:  No further issue
5	<b>Feedbacks:</b> Estate Medical Assistant (MA) Issue related to Covid-19 pandemic was handled well by management and all personnel. No serious positive case. No other viral case occurred since last audit.
	Audit Team verification and response:  No further issue
6	<b>Feedbacks:</b> Gender committee representatives  No new mothers at any of the Estates and Mill within Teluk Sengat Business Unit. In case of any, the committee representative will take actions to address any needs that have been identified.
	Audit Team verification and response:  No further issue.



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

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

#### 3.5 Impartiality and conflict of interest

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



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

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Sime Darby Plantations SOU 7 Bukit Kerayong Palm Oil Mill & Supply Base has complied with the Malaysia National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Sime Darby Plantations SOU 7 Bukit Kerayong Palm Oil Mill & Supply Base is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Hafriazhar Mohd. Mokhtar	Name: NOOR ARIZAN AHMAN
Company Name: BSI Services Malaysia Sdn. Bhd.	Company Name: SIME DARBY PLANTATION BERHAD.
Title: Lead Auditor	Title: SOU CHAIRMAN SR. MANAGE
Signature:	Signature:  (I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)  Sime Darby Plantation Berhad Bukit Cheraka Estate (647766-V)  NOOR ARIZAN BIN AHMAD Senior Manager
Date: 17/5/2022	Date: 24.05-2022.



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

Criterio	on / Indicator	Assessment Findings	Compliance
Princip	le 1: Behave ethically and transparently		
	on 1.1: The unit of certification provides adequate information to relevant iate languages and forms to allow for effective participation in decision make		RSPO Criteria, in
1.1.1	(C) Documents that are specified in the RSPO P&C are made available to the public Critical (Major) compliance -	Based on the Estate Quality Management System; Sub-Section 5.5 Management Responsibility; Appendix 5.5.3.2 Procedure for External Communication; Version 1; Issue date: 1/1/2008, documents specified for mill and all estates within SOU 7 Certification Unit made available as per sample as following:  - Land titles/user rights  - Occupational health and safety plans  - Plans and impact assessments relating to environmental and social impacts  - HCV documentation  - Pollution prevention and reduction plans  - Details of complaints and grievances  - Continuous improvement plans  - Public summary of certification assessment report  - Group Sustainability Policy  - Record of contributions to community development	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.  - Minor compliance -	Interview conducted on-site with sampled internal and external stakeholders confirmed that the information provided in appropriate languages and accessible to them.	Complied

		Bukit Kerayong POM workers morning briefing latest dated 17/1/2022. Bukit Cherakah Estate latest conducted the meeting with External Stakeholders on 20/1/2022 attended by local community representatives among neighboring resident area, schools, mosque, temple, vendors and authorities (PDRM). The minutes of meeting records indicated that most of feedbacks from stakeholders during previous meeting have been addressed and updated to relevant stakeholders.	
1.1.3	(C) Records of requests for information and responses are maintained Critical (Major) compliance -	<ul> <li>SOU 7 maintained records of request for information and responses as per sample sighted as following:</li> <li>Bukit Kerayong POM: Request by Top Glove R&amp;D to take 1kg palm oil ash dated on 7/10/2021 responded immediately by mill allowing the request.</li> <li>Bukit Kerayong Estate: Workers housing repair request recorded on 16/8/2021.</li> <li>Bukit Cherakah Estate: Request by SJKT Ladang Bukit Cheraka for school field grass cutting; Letter ref. # SJKTLBC 400-6/2/1 (18); Date: 21/10/2021</li> <li>All requests found to be responded within short time by respective recipients.</li> </ul>	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.  - Critical (Major) compliance -	Consultation and communication procedure documented as the Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 for handling communication regarding social issues. Additionally, there's Mill Quality Management System Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).	Complied

		Procedures were briefed to external stakeholders during the consultation meeting and to all workers during workers meeting and assembly sessions from time to time.	
		Bukit Kerayong POM Procedure as per Flowchart for External Communication. Sample communication as per records of Communication and Complain Logbook by Stakeholder and Workers.	
		Sighted Bukit Kerayong Estate Assistant Manager, Mr. Muhammad Zubari Bin Roslan has been nominated representative as per letter of appointment for person in-charge dated 11/1/2021.  BKE Buku Aduan Kerosakan latest dated 20/1/2022.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.  - Minor compliance -	The latest Stakeholders Lists for all operating units within SOU 7 sighted available as updated on July 2021. Information of stakeholders' details available included person in charge, address, e-mail and contact number for various stakeholders' category among internal and external stakeholders including local communities, authorities, vendors and neighbours etc.	Complied
Criterio	on 1.2: The unit of certification commits to ethical conduct in all business of	perations and transactions.	
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.  - Minor compliance -	SOU 7 has implemented policy on code of ethical conduct and integrity (Code of Business Conduct - COBC) which covered all operations in the plantation operation. Briefing session was given to all workers of audited operating units.	Complied
		For example, Bukit Kerayong POM briefing of policies to the workers were latest conducted during workers morning briefing on 17/1/2022.	
		For labour agent and contractors, Sime Darby has applied its Vendor COBC (30 May 2018), It includes the Fair Business practices-ensuring that we promote fair business practices and	

1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	compete in an ethical manner, labour & human rights, ethics & management practices.  The Vendor Integrity Pledge (VIP) sighted available for sampled Bukit Kerayong POM vendor Teras Integrasi Sdn. Bhd.; Date: 8/11/2021.  Monitoring including internal audit latest done for Bukit Kerayong POM on 12/10/2021. Integral audit conducted by integral auditors.	Complied
	- Minor compliance -	POM on 13/10/2021. Internal audit conducted by internal auditors training led by Mohd. Saiful Bari Munir assisted by 4 internal auditors from HQ and regional SQM personnel. Bukit Cherakah Estate Internal Audit conducted on 12/10/2021.	
Princip	le 2: Operate legally and respect rights		
Criterio	on 2.1: There is compliance with all applicable local, national and ratified in	ternational laws and regulations.	
2.1.1	(C) The Unit of Certification complies with legal requirements - Critical (Major) compliance -	<ul> <li>Sampled evidence of compliance and found evidence as below: Bukit Kerayong POM</li> <li>MPOB License No 562906004000 for 180,000 MT/Year valid from 01/08/21-31/07/22.</li> <li>Diesel Permit under KPDNKK (B.PGK.SEL/5782) for 15,000 Litres valid from 23/07/21-22/07/22.</li> <li>Renewal of Fire Certificate (Serial No. 317224) was supposed on 03/09/21 as letter dated 13/08/21 from PgB Ishapari b. Ismail (O/B Asst. Director) JBP Selangor. Not able to come and will propose a new date. Expired 24/02/21.</li> </ul>	Non- compliance
		<ul> <li>License for Abstraction of Water from Lembaga Urus Air Selangor (LUAS) License No GWAL: (p9) 000312 dated 16/02/21-15/02/22.</li> <li>JTK Selangor allowed Overtime under Sect. 60A(4)(a) Employment Act 1955 for 130 Hrs with normal working hour of 7 hour. Workers not allowed to work 5 Hrs continuously daily</li> </ul>	



- without a 30 minutes break. Kamal Pardi (Director JTK Selangor).
- JTK license for Deduction of Wages under Section 24 Employment Act 1955 as letter dated 18/12/19 for Life Insurance Contribution from Great Eastern & MCIS from Ahmad Mudi Onn b. Nor (Director JTK Selangor).
- Bukit Kerayong POM has DOE License for Prescribed Premise under Section 18(1) EQA 1974. Renewal License as Letter dated 30/06/21 approved and valid from 01/07/21-30/06/22.
- Audiometric Test was conducted by PROCOMA Environmental (M) Sdn. Bhd. for 75 paxs tested on 05/04/21. 64 with Normal Audiogram and 11 with Abnormal Audiogram and need OHD Referral.
- CHRA was conducted by DOSH Registered Assessor (HQ/09/ASS/00/124) on 04/11/20 for 7 Work Units.
- Fume Hood (1 Unit) have Written Approval under Regulations 38 of Clean Air Regulations 1978 dated 13/05/14 and Written Notification under Regulation 5 of Clean Air Regulations 2014 for (1 unit) Fume Hood in Laboratory, dated 26/06/18.
- Fume Hood Inspection done by Hygiene Tech (Alam Hijau Integrasi Sdn Bhd done 04/07/21.
- Noise Risk Assessment under newly revised OSH (Noise Exposure) Regulations was not conducted yet.

#### Bukit Kerayong Estate

- CHRA was conducted by DOSH Registered Assessor (HQ/09/ASS/00/124) on 28/04/20 for 10 Work Units.
- Noise Risk Assessment was done by Renash Solution (M) Sdn. Bhd on 26-27/10/21.



- Audiometric test was conducted by Procoma Environmental (M) Sdn Bhd on list of Bukit Kerayong Estate Audiometric Screening FY 2022 tested on 20/01/22 for 34 employees (all as process identified in NRE conducted). Report still not received yet.
- JTK approval for Overtime under Section 60A(4)(a) Employement Act 1955 dated 27/03/17 Maximum 130 Hours for daily work of 7 Hours.
- JTK Approval for Deduction of Wages under Section 24 of Employment Act 1955-Koperasi Pekerja Ladang dated 11/02/19.
- JTK Approval for Deduction of Wages under Section 24 of Employment Act 1955 for life Insurance (RM 20 monthly) dated 29/05/20.
- Bukit Cheraka Estate
- JTK Approval for Deduction under Section 24 of Employment Act 1955 for payment of bill, utility (water, electricity) Life Insurance (Great Eastern and personal loan) dated 05/03/18.
- JTK Approval for Deduction of Wages under Section 24 of Employment Act 1955-Koperasi Pekerja Ladang dated 11/02/19.
- JTK approval for Overtime under Section 60A(4)(a) Employement Act 1955 dated 27/03/17 Maximum 130 Hours for daily work of 7 Hours.
- MPOB License 589377011000 Ladang Bukit Cheraka (lot 2969, Mukim Jeram) valid from 01/10/21-30/09/22.
- MPOB License 526188002000 Ladang Bukit Cheraka (Lot 1144-4538 Mukim Jeram) Size 3632.29 Ha. Valid from 01/02/21-31/01/22.
- Air Compressor SL PMT 34551 valid till 25/07/22.
- License for Abstraction of Water from Lembaga Urus Air Selangor (LUAS) License No GWAL: (P9) 001004 dated

		<ul> <li>01/07/21-30/06/22 at Telaga 1, Ladang Bukit Cheraka (Lot 2200).</li> <li>Diesel Permit/Barang kawalan for Ladang Bukit Cheraka under Regulation9(2) No SL/KSL/01/SK for 14,000 Litres of Diesel, valid from 26/08/21-25/08/22.</li> <li>Diesel Permit/Barang kawalan for Ladang Bukit Cloh under Regulation9(2) No SL/KSL/02/21/SK for 455 Litres of Diesel and 14,000 Litres for diesel valid from 26/08/21-25/08/22.</li> <li>Noise Risk Assessment was done by Renash Solution (M) Sdn. Bhd on 27/10/21 as Baseline Report sampled.</li> </ul>	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.  - Minor compliance -	SOU 26 had documented the Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. List of applicable legal and other requirements was made available during the assessment. Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4a: Procedure for Legal and Other Requirements dated 1 November 2008. Tracking of changes is by Sime Darby SQM team disseminated to all SOU.	Complied
		Bukit Cheraka Estate has a Legal and Other Requirements Register (LORR). Evaluation of Compliance score card with total compliance score is 100% (satisfactory) as stated in the document approved by Sr. Manager (Noor Arizan b. Ahmad).	
		Update of Legal changes as sighted in the LORR as in Plantation Quality management System (PQSM) Revision History. For FY 2021 included:	
		30/05/21: Anti Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001	

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		<ul> <li>30/05/21: Malaysian Anti-Corruption Commission Act (Ammended) 2018.</li> <li>30/05/21: Whistleblower Protection Act 2010.</li> </ul>	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.  - Minor compliance -	Bukit Kerayong Estate  Sampled Bondary marking at Block P10C, P10A at Jalan Akob Division adjacent to Taman Kar Permai where a trenching sighted along the bourder and no over planting beyond it. Another sampled boundary at Block P15C in Jalan Akob Division adjascent to West Coast Expressway (WCE) Highway where a fencing erected along the bourder.	Complied
		Bukit Cherakah Estate  The trenching was sighted with boundary clearly demarcated adjacent to Lambourne Estate at Block 17A and no overplanting.	
Criteri	on 2.2: All contractors providing operational services and supplying labour,		
2.2.1	A list of contracted parties is maintained.  - Minor compliance -	The list of contracted parties at the mill and estates are made available in the List of Stakeholder. The contracted parties included FFB supply and short-term vendors.	Complied
		Bukit Kerayong Estate  Available List of Stakeholder for SOU7 Bukit Kerayong Estate FY 2022. Under List of Contractor and Supplier listed:  KSG Enterprise Sdn. Bhd. and BMSPV Enterprise.	

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	- Minor compliance -	Plantation to ensure no withholding of employee passport, paid with minimum wage (RM 1,100 or RM 1,200). Further sampling on BMSPV Contract on their workers dated 26/11/21 (Loganathan A/L Sankaran). Contains term such as job specification, wages, working hours, holiday and rest day, Requirements to comply with RSPO and policies of clients or workplace included Employment Act 1955.	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.  - Minor compliance -	Contract with Gan Estate Contractor Sdn Bhd dated 01/01/21 signed Vendor Integrity Pledge on Vendor Code of Business Conduct (VCOBC)) addendum is in place to demonstrate agreement between SDP and vendors had include in clause 5.7 and 5.8 to abolish child labour, forced labour and trafficked labour.  Sampled KSG Enterprise Sdn. Bhd dated 01/09/21 Adhoc Contract for land Transportation Services (Contract) with Sime Darby Plantation. Duration of Contract 01/09/21-31/12/21 for FFB. Under para 2 Compliance with laws specifically required contractor to comply with relevant legislation under Employment Act 1955 and related legislation covering disallowing child, forced and trafficked labour and young workers.  Found Inter Office Mail on Declaration on Compliance by Contractor-Contract Management dated 12/01/22 to KSG Enterprise Sdn. Bhd and BMSPV Enterprise. A contractor to declare:  1. Contractor/vendor and migrant worker informed that passport should be under their possession at all times (Yes).  2. Contractor/vendor informed and assure worker (local/migrant) pain with minimum wage as required (Yes).  3. Contractor/vendor agree to provide copy of employment contract (Yes).	Complied

Criterio	on 2.3: All FFB supplies from outside the unit of certification are from legal	4. Contractor/Vendor agree to provide payslip and all statutory deduction (EPF/SOCSO/Workman Compensation Insurance) on workers (local/migrant) on monthly basis (Yes).  5. At all times Contractor/Vendor must check and confirm conformance as agreed. Action to be taken against noncomplying contractor/vendor. (Yes).  sources.	
2.3.1	<ul> <li>(C) For all directly sourced FFB, the mill requires:</li> <li>Information on geo-location of FFB origins</li> <li>Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder</li> <li>One or more supporting documents for claims</li> <li>Valid MPOB license</li> <li>Critical (Major) compliance -</li> <li>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.</li> </ul>	All the directly sourced FFBs are independent estates/out growers. The list of the suppliers with MPOB License and geo-location is available and maintained. From Main Estate:  Bukit Cheraka Estate  Bukit Kerayong Estate  OCP Estates (Bakti Mas Bina, Budi Sawit, Clarity Crest, Eng Huat Latex Concrete, Euro-Asia Brand, Gan Estate, Meru Estate. Rasa Dinamis, Selamis Estate, Syarikat Chuan Soon, Timah Jaharah).  For indirectly sourced FFBs through traders or collection centres, Bukit Kerayong POM has identify plans under the Responsible Sourcing Guidelines to collect data of the smallholders that are	Complied
	- Minor compliance -	supplier to the traders or collection centres.	
Princip	le 3: Optimise productivity, efficiency, positive impacts and resilie	nce	
Criterio	n 3.1: There is an implemented management plan that aims to achieve lor	g-term economic and financial viability.	
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.  - Critical (Major) compliance -	SOU 7 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.	Complied
		Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning.	

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Sighted the annual budget FY 2021 and business plan FY 2021 -FY 2025 In the 5 years business plan include items as follows: a. Palm oil mill 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 i. Total crop projection and yield potential ii. Activity direct cost a. Mature upkeep b. Manuring c. Harvesting and collection d. Transportation e. Nursery iii. Estate administration a. Admin Cost iv. Labour overhead v. Road and bridges vi. Cost of production. The budget plan was reviewed annually with both actual and forecasted amount for 5 years (up to 2025) and well documented upon request.

3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.  - Minor compliance -	SOU 7 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. Observed the replanting program for the next financial year as follows:				Complied		
			2022	2023	2024	2025	2026	
		Bukit Kerayong	89.32	0.00	97.23	0.00	0.00	
		Bukit Cheraka	48.87	65.40	95.19	71.80	192.85	
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. Among the agenda discussed in the meeting as follows:				Complied		
		Results of internal audits covering MSPO/RSPO/SCCS						
		2. Customer feedback						
		3. Status of	preventive	e and corre	ective action	าร		
		4. Follow u	action fro	om manage	ement revie	w		
		5. Changes	that could	affect the	manageme	ent system		
		6. Recommendation for improvement						
		7. Improve process	ment of eff	fectiveness	of the mar	nagement s	system and	

		8. Resources needs			
		Latest management review operating units as follows:	each		
		Operating Unit	Date		
		Bukit Kerayong POM	25/10/2021		
		Bukit Kerayong Estate	09/12/2021 and 14/01/2022		
		Bukit Cheraka Estate	10/01/2022		
	on 3.2: The unit of Certification regularly monitors and reviews their economic demonstrable Continuous improvement in key operations.	nic, social and environmental pe	erformance and develops and im	plements	s action plans
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.  - Critical (Major) compliance -	environmental and safety im action plan established based Workers Grievances and etc. 1. To continuously brief entitlement, salary calcula 2. EWR members will inspand quarters and report to the 3. Create further awarenes training and recycling can 4. Monitoring by photo with	established covering the so apacts in the operating units. I on the SIA, EAI/EIE, Social Dia Among the plan established such workers about their beneation and ex-gratia payment. Deect any damage of the house management team to take actions on recycling among the throupaigns date of terracing in the field on to ensure no illegal wiring	The alog, a as: efits, sing on	Complied
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].	RSPO metrics template for So found to be consistent with every second template.	OU 7 made available for verificatividence sighted.	ition	Complied



	PROCEDURAL NOTE:		
	The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed.  Until such metrics is agreed and developed, companies will carry on with existing reporting		
	e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.		
	- Minor Compliance -		
Criterio	on 3.3: Operating procedures are Appropriately documented, consistently im	plemented and monitored.	
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place Critical (Major) compliance -	Sime Darby Plantation has established SOPs for the Palm Oil Mill and the Estates operation. Bukit Kerayong Palm Oil Mill has maintained Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes Mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. Estates have a separate SOP (Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual) covers land preparation, planting material, upkeep, harvesting, transport etc.  Sighted in Bukit Cheraka Estate a new SOP:  • Emergency Preparedness and Response Procedure (UM/HSE/SP/02) for Sime Darby Plantation Berhad, version 0, date approved 17/11/21 (Superseded Version: Nil), Approved by Roslin Azmy Hassan (CEO Upstream Malaysia).  • Safety and Health Committee Procedure (UM/HSE/OCP/08) for Sime Darby Plantation Berhad, Version 0, date approved 17/11/21 (Superseded Version: Nil), Approved by Roslin Azmy Hassan (CEO Upstream Malaysia).  • Contractor & Vendor Management Procedures for Sime Darby Plantation Berhad, Version 0, date approved 17/11/21 (Superseded Version: Nil), Approved by Roslin Azmy Hassan (CEO Upstream Malaysia).	Complied

		Medical Access Procedures (UM/HSE/OCP/09) for Sime Darby Plantation Berhad Version 0, date approved 17/11/21 (Superseded Version: Nil), Approved by Roslin Azmy Hassan (CEO Upstream Malaysia).	
3.3.2	A mechanism to check consistent implementation of procedures is in place Minor Compliance -	Sime Darby Plantation has established a system to monitor the mill and estate operation. The Structured Oil Recovery Assessment (SORA) (for Mill) / Structured Crop Recovery Assessment (SCRA) (for estates) and Planning and Monitoring Unit visited the operating units quarterly. Their report covers on all aspect of operation.	Complied
		In addition to estate operation, visit by agronomist was made yearly. The report focusing on rainfall, yield [performing and underperforming], palm nutrition status, field observation agronomic matters and fertilizer recommendation has been included in the report. All the reports of monitoring were available at estate and mill office for references. Plantation Advisory Department, Performance Monitoring Unit, Quality Management Unit (PSQM) inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Third party visit/inspection was also done as part legal compliance monitoring. Bukt Cheraka Estate	
		Sighted email dated 10/05/21 sent on behalf of Sagathavan Kannan Nambiar from Nurul Liyana Sulaiman (Plantation Advisory Department). Stated the estate has been rated FAIR with score of 78.13 points. It was rated FAIR for previous visit in September 2020 with score of 72.75 points. Among topic cover in Executive Summary included:	
		<ul><li>Overview of estate</li><li>Manpower management</li></ul>	

		,	
		Crop recovery	
		Performance YPH	
		EFB Application	
		Mechanisation	
		Pest & diseases (Bagworm, cattle intrution & potential revenue loss)	
		Replanting & immature area	
		OER & yield	
3.3.3	Records of monitoring and any actions taken are maintained and available Minor Compliance -	Monitoring of action and operation implementations as SOPs are conducted accordingly. Sighted sample records included:	Complied
		Plantation Advisor Report dated 07-09 September 2020	
		Internal audit conducted on 25/11/2020.	
		General Manager visit report dated 11/06/2020	
		Safety and Health Inspections conducted once in every 4 months.	
	on 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA ment and monitoring plan is implemented and regularly updated in ongoing		d environmental
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/out-grower scheme, is documented.  - Critical (Major) compliance -	The estates and mill conducted Environmental Impact Assessment to identify the environmental aspect in all estate activities and documented in Environmental Aspects Impacts Identification form and Environmental Impacts Evaluation form. The assessment covers all activities in the estates and mill. The assessment was conducted base on SOP established. Refer SOP Standard Operation Manual; subsection 5.4; Planning and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure.	Complied



3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.	No new planting in all estates within SOU 7. For existing operations, the operating unit of SOU 7 documented the continual improvement plan as per Bukit Kerayong POM SOU 7 Management	Complied
	- Minor Compliance -	Plan on Social Impact Assessment with areas if concerns/key findings:	
		Working Condition: Understanding of workers benefits entitlement	
		Housing Condition/Living Improvement:	
		- Housing complex overall maintenance and cleanliness	
		- Organize more social activities such as family day	
		- Organize meeting with stakeholder	
		The assessment was conducted base on Standard Operation Manual; subsection 5.4; Planning and Appendix 5.4.1b: Environmental aspect/impacts evaluation procedure. In the SOP stated the POM and Estates carried out the annual review of environmental impacts documented in Registration of Environmental Aspects and Impacts.	
		Bukit Kerayong POM	
		Latest review was conducted on 06/01/2021 by the OSH Coordinator and approved by the Manager with no changes on made to the EAI and EIE since last review was conducted.	
		Bukit Kerayong Estate	
		Latest review was conducted on 03/01/2021 by the OSH Coordinator and approved by the Manager with no changes on made to the EAI and EIE since last review was conducted.	
		Bukit Cheraka Estate	

		Latest review was conducted on 02/01/2022 by the OSH Coordinator and approved by the Manager with no changes on made to the EAI and EIE since last review was conducted.	
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.  - Critical (Major) compliance -	The management plan established base on operation with significant impact to the environment. The management plan was reviewed annually. The management plan stated the environmental issue, mitigation actions, monitoring plan and person responsible for monitoring implementation.	Non- compliance
		The operating units sampled have established the Environmental Management Program base on the significant impacts identified in the EAI/EIE conducted. The plan stated the Environmental issue, mitigating measures and person responsible. The plan was reviewed on annually basis.	
		Reviewed the implementation of the management plan FY 2021 as follows:	
		Bukit Kerayong POM	
		1. The mill has completed the installation of VORSEP system. Reviewed the service report no. 3104 dated 16/11/2021, 3530 dated 05/10/2021, 3052 dated 14/09/2021, and 3523 dated 28/09/2021.	
		2. The estate has completed the repair and construct new EFB yard wall with strong structure. Reviewed the contract form no. 4300542160 dated 04/05/2021.	
		Sighted during site visit, there was a mini tractor park in front of the scheduled waste store with engine leakage without any appropriate attendance. This was against the Environmental Improvement Plan/Pollution Prevention Plan FY 2021 dated 02/01/2021.	
		Bukit Kerayong Estate	



- 1. The estate maintain the inventory and disposal records for empty pesticides container. Latest disposal of empty container was conducted on 22/03/2021 as per official receipt no. CR03/2021-2.
- The estate conducted scheduled vehicle maintenance to ensure the vehicle running in good conditions and effective energy consumptions. Reviewed the daily inspection and maintenance records for TF015 and TF016 FY 2021

The estate disposed the clinical waste (SW 404) through VMO. The VMO didn't acquired any written permission/approval from DOE to transport the scheduled waste to his facilities.

#### **Bukit Cheraka Estate**

- The estate maintain the records of scheduled waste generated in the Scheduled Waste Inventory form and notify to DOE through ESWISS. Reviewed the latest inventory records for the month of January 2022.
- 2. The estate continuously trained the workers on spillage management. Reviewed the training records dated 25/11/2021
- 3. The estate continuously conducted training on HCV area to ensure awareness among the workers. reviewed the training records dated 11/10/2021
- 4. The estate planting beneficial plant *Pueraria Javanica* (pj), *Calapogonium Caeruleum* (cc) at replanting area to prevent soil erosion. Reviewed the planting records for field 2021A.
- 5. Latest implementation of Monitoring Oil Palm Pal (OPP) Digital Housing Complaint System Effective from December 2021.

**Criterion 3.5:** A system for managing human resources is in place.

3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.  - Minor Compliance -	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented as the SOP for workforce management unit (Doc no: WMU/TOC-SOPP/March 2016) dated 30/03/2016 for foreign worker while for locals, the employment recruitment included liaison and recruitment, documentation and processing (Doc no: WMU/DP SOPP/JAN2016/R1), workforce management centre (WMC) Sua Betong, Careline and estate are available upon request.  Additionally, there's Bukit Kerayong POM recruitment procedures	Complied
		as per Standard Operating Procedure Title: Hiring of Local Workers; Doc. # 01-12-19; Effective date: 1/12/2019; Rev. # 1	
3.5.2	Employment procedures are implemented, and records are maintained Minor Compliance -	Employment procedures are well implemented with records well maintained as per information reported in indicator 6.1.1 to 6.6.2 below. Implementation also include induction as per sample Bukit Kerayong POM implemented New Workers Briefing last dated 11/10/2021.	Complied
Criterio	on 3.6: An occupational health and safety (H&S) plan is documented, effective	vely communicated and implemented.	
3.6.1	and procedures are documented and implemented Critical (Major) compliance -	Bukit Kerayong POM Hazard identification was conducted as OSH Risk Assessment Register for Boiler Operation, Sterilizer Operation, Kernal Plant Operation amd laboratory Operation dated 21/12/21 approved by Azlan M Kambali.	Complied
		Bukit Kerayong Estate	
		Noise Risk Assessment conducted (Personal Monitoring) by Renash Solution Sdn Bhd between 26-27/10/20. Among High Noise Area detected are Workshop (86.3 dBA-Foreman). Tracktor Driver (91.5 dBA), Driver Mechanical Buffolo (90.1 dBA), Driver Exhoust Machine (88.4 dBA). Grasscutter (89.7 dBA). Medical Surveillance. Hazard Identification, Rik Assessment and Control	

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(Hirarc) FY 2022. Acknowledged by Estate Manager dated 05/01/22. Covering Office Operation, Security, Weeding, Pest and Diseases, Boundary Management.

**Bukit Cheraka Estate** 

Sighted revised Hirarc due to accident in 2021:

- Cutting and stacking fronds with hazard hit by pole/sickle/axe/hoe and risk score 12 (High). Recommended risk control: Morning muster briefing about PPE usage among worker to avoid any unnecessary incident. PIC Staff/Asst. Manager, Dateline 30/09/21. Reviewed by Bibi Safina (Safety Rep.) dated 30/09/21
- Repair and maintenance with hazard of slip, trip and fall and risk score 9 (Medium), Recommended risk control: Administration team to give SOP's briefing among foreman. PPE for Foreman will be improvised. PIC Staff/Asst. Manager, dateline 26/02/1. Reviewed by Bibi Safina (Safety Reps) dated 24/02/21.
- Load FFB and loose fruits into trailer with hazard snapping frond and risk score 12 (High). Recommended risk control: Reminder all tractor driver about accident and important of PPE usage. PIC Staff/Asst. Manager, dated 06/11/21. Reviewed by Bibi Safina (Safety Reps) dated 06/11/21.
- Travelling back to home with hazard of slip, trip and fall and risk score 9 (Medium). Recommended risk control: Briefing on Safety Awareness to all workers at morning muster. PIC Staff/Asst. manager, Dateline 20/10/21. Reviewed by Bibi Shafina (Safety Reps) dated 20/10/21.
- Cutting Creepers on palm uprooting woody upright with hazard slip, trip and fall and risk score 12 (High). Recommended risk control: Morning muster briefing about PPE usage among

		weeding workers to avoid any unnecessary incident. PIC Staff/Asst. Manager, Dateline 30/09/21. Reviewed by Bibi Shafina (Safety Reps) dated 27/09/21.	
		In Chemical Store the risk of exposure or incidental spill of chemicals to body parts such as eye and skin that required immediate use of water such as emergency shower and eye bash to be further enhanced with adequate facility.	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.  - Critical (Major) compliance -	Bukit Kerayong POM OSH Plan for FY 2022 established and found included the topic such as Review of Legal Compliance, training on ERP, Review of Documentations, Risk Management, Hirardc, Workplace Inspection, PPE Training, Medical Surveillance, First Aid Training, ESH Management System and etc.	Complied
		Bukit Kerayong Estate	
		OSH Plan was established as sighted for FY 2021 and FY 2022 as sampled.	
Criterio	n 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract w	orkers are appropriately trained.	
3.7.1	<b>(C)</b> 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	Sime Darby Plantation established a Standard Operating manual (SOM) Version 1:2008 defined competence, training and awareness requirements in estate operations. Proses of developing Training Needs and Plan were included.	Complied
	assessments of training.	Bukit Kerayong POM:	
	- Critical (Major) compliance -	Available a Training Plan for FY2022 for SOU7 Bukit Kerayong POM. Among Training in the plan included among others:	
		OSH Act and Regulations (Feb)	
		Environmental Quality Act and Regulations 1974 (Feb)	
		Understanding Group Policy & Authority (GPA 8.4) and COBC. Oct)	

		<ul> <li>Hirarc Aug)</li> <li>NADOOPOD (Jun)</li> <li>EHS Functions and Responsibilities (Sep)</li> <li>Foreign Worker Induction Programme (April)</li> <li>Safe Driving Technique (July)</li> </ul>	
		<ul> <li>Working at Height (Sep)</li> <li>Training SCCS for RSPO (Nov)</li> <li>RSPO Training (July) and etc.</li> </ul>	
		Bukit Cheraka Estate: Available Training Plan FY 2022 and among included in the plan:  Hirarc (Dec) OSH Committee & Function and Responsibility (Jan, Apr, Jul, Oct) SOP Training (Nov) Harvesting Induction Training (Jan-Mac), Aug-Sep) Chemical & Spraying training (Apr,Sep) Fire Fighting (may) RSPO and MSPO Awareness (Nov). Policy training (Jan, Nov-Dec) Scheduled Waste management (Dec)	
3.7.2	Records of training are maintained Minor Compliance -	<ul> <li>COBC/Whistle Blowing training (Jan, Sep).</li> <li>Schedule Waste and First Training done on 15/01/21 attended 53 employees.</li> <li>Emergency Drill Training done on 17/02/21 attended by 35 employees.</li> </ul>	Complied



- PPE Training done on 08/01/21 attended by 47 employees.
- Morning Briefing sighted on 17/01/22 attended by 37 employees consist of Hirarc, Scheduled waste, policies, complaint, OPP and passport, procedure for going out to seek medical attention and labour issues.

#### **Bukit Kerayong Estate**

- Chemicals and Spraying Training conducted on 17/09/21 and attended by 13 employees.
- Briefing and Training on Workers Helpline Awareness on 06/09/21 and attended by 29 employees.
- Foreign and local Workers Induction Programme, Harvesting Induction Programme (ODP Workers) on 04/01/21 and attended by 12 employees.
- First Aid Training was conducted on 23/08/21 and attended by 17 employees.
- First Aid Training on Emergency Step to Handle Incident and Basic First Aid Box Item for Staff and Mandore on 15/11/21 and attended by employees.
- Safe Operation Procedure (Harvesting) conducted on 25/11/21 and attended by 33 employees.
- Social Dialogue Workshop conducted on 15/12/21.
- Training on Hirarc to harvester Representatives conducted on 27/12/21 attended by 28 + 30 employees.

#### **Bukit Cheraka Estate**

- COBC/Whistle Blowing training & Passport Keeping Briefing conducted on 10/11/21 and attended by 35+29 employees.
- First Aid training was conducted on 23/08/21 and attended by 10 employees (mandores).



		<ul> <li>House Inspection Training was conducted 15/02/21 and attended by 12 employees.</li> <li>eSWISS Training was conducted on 11/02/21 and attended by 13 employees.</li> <li>Briefing for workers, contractors on Hirarc done on 28/12/21 and attended by 16 employees and contractor (BMSP Ent, KSG Enterprise). 10/02/21attended by 12 employees.</li> </ul>	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.  - Minor Compliance -	A Training Matrix FY2022 for SOU7 Bukit Kerayong POM covering all levels of employees and types of Training Requirements for Operational Unit. Training of RSPO Supply Chain is required by Mill Manager, Mill Sr. Assistant, Mill Assistant, QA, Process Supervisor, Store Clerk, Chargemen. SCCS Training record and evidence not available as requested for for Supply Chain Certification Standard (SCCS) in Bukit Kerayong Palm Oil Mill.	Non- compliance
	n 3.8: Supply chain requirement for mills Il supply chain requirements are considered as <b>Critical (C)</b> . However it will r	not contribute to suspension if there is more than 5 non-compliance w	ithin a principle)
3.8.1	Identity Preserved Module  A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.  Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	Bkt Kerayong POM initially under Identity Preserved module where there were only two (2) supplying estates namely Bukit Kerayong and Bukit Cheraka Estate. Starting from August 2020 onwards, mix of uncertified FFB from OCP @ Outside Crop Purchase from direct and indirect suppliers. Bukit Kerayong POM is no longer maintaining the IP module and downgraded to MB module.	Complied

3.8.2	Mass Balance Module  A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Bukit Kerayong Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	Complied
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. The figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in 12-months license period.	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 mill license available at PalmTrace as following:  - Member ID: RSPO_PO1000000155  - Member category: Oil Mill  - RSPO Membership No.: 1-0008-04-000-00	Complied
3.8.5	Documented procedures  The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:  a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.  b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).	Available a Procedure under Sime Darby Plantation — Plantation Quality Management System — Sustainable Plantation Management System: Appendix 15; Standard Operating Procedure (SOP) for Sustainability Supply Chain and Traceability; Version 2; Issue no.: 3; Issue date: Feb 2018.  This procedure has been established to covers responsibility, reporting of certified CPO/PK, non-conformance material, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, Record keeping, Training, Complaint Communication and Claim and etc.	Complied

	<ul> <li>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.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ul>		
3.8.6	<ul> <li>Internal Audit</li> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: <ul> <li>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b. Effectively implements and maintains the standard requirements within its organisation.</li> <li>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</li> </ul> </li> </ul>	As sampled, Sime Darby Plantation Berhad has established requirement for Internal Audit in SOP for Sustainable Supply Chain and Traceability of SPMS Appendix 15 (18: Internal Audit); Version 2; Issue # 5; Date: April 2019. The procedure conforms to the requirements in the RSPO SCCS. The latest Internal Audit for RSPO SCCS was done on 13/10/2021 conducted by GSM Malaysia & Central East RSQM. 1 major NC and 1 OFI were raised on SCCS requirements. Root causes and Corrective Action were taken accordingly as reported by Group Sustainability Department.	Complied
3.8.7	<ul> <li>Purchasing and Goods In</li> <li>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul>	Sime Darby Plantation Berhad has established a Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Version 2, Issue No.: 5 dated 04/19. For incoming FFB delivered to mill from the estates, the transporters presented the FFB Consignment Note or Weighbridge Tickets to the mill weighbridge operator in order the FFB to be received by the mill for both certified and noncertified FFB from outside crop purchases (OCP) as per sample tickets as following:	Complied

		1) Contified Cumplion Built Chamber Estates FED was a tisked #	
		1) Certified Supplier: Bukit Cheraka Estate; FFB received ticket # 49982; Nett weight: 11,490 kg; Date: 9/12/2021	
		2) Certified Supplier: Bukit Kerayong Estate; FFB received ticket # 1989; Nett weight: 11,550 kg; Date: 10/12/2021	
		3) OCP Supplier: Euro Asia Brand Holding Company Sdn. Bhd. (Shalimar Estate Ijok); FFB received ticket # 167743; Nett weight: 7,690 kg; Date: 30/8/2021	
		4) OCP Supplier: Meru Estate; FFB received ticket # 170767; Nett weight: 2,500 kg; Date: 10/12/2021	
		The weighbridge operator will check the source of FFB before received to ensure they are certified FFB. A copy of the RSPO certificate for the supplying estates is kept. All the incoming of FFBs will be recorded in the Daily Production Summary Report. The SOP under Section 11. Non-Conforming Products and Documents explained the handling of non-conforming products and/ or documents.	
3.8.8	Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):  a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued;	Information for RSPO certified products is made available in document Shipping Announcement as sampled below:  CSPO  The name and address of the buyer: ABC  The name and address of the seller: Bukit Kerayong POM  The loading or shipment/ delivery date: 26/03/21  The date on which the documents were issued: 26/03/21  RSPO certificate number: RSPO PO100000155 (SC Model: MB)  A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Crude Palm Oil (CPO) - RSPO MB	Complied



	) pepo 1:5 1	T	7
	e) RSPO certificate number;	- The quantity of the products delivered: 40.32 MT	
	f) A description of the product, including the applicable supply chain	- Any related transport documentation: Nil	
	model (Identity Preserved or Mass Balance or the approved	- A unique identification number: TR-ed645163-63e7	
	abbreviations);	CSPK	
	g) The quantity of the products delivered;	- The name and address of the buyer: EFG	
	h) Any related transport documentation;	- The name and address of the seller: Bukit Kerayong POM	
	i) A unique identification number.	- The loading or shipment/ delivery date: 20/04/2021	
		- The date on which the documents were issued: 20/04/21	
		- RSPO certificate number: RSPO PO100000155 (SC Model: MB)	
		- A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Palm Kernel – RSPO MB	
		- The quantity of the products delivered: 35.20 MT	
		- Any related transport documentation: Nil	
		- A unique identification number: TR-fe877070-7819	
3.8.9	Outsourcing Activities	Bukit Kerayong POM did not outsource any of its activities to third	Complied
	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	party except the transportation of CPO. The transporter of PK is arranged by the customer themselves. Bukit Kerayong POM has legal ownership on the materials. The outsourced party is only physical handle the material as per the instruction from the mill. The CPO transporter, FGV Transport Services Sdn Bhd has signed	
	ii) The mill shall ensure the following:	on Letter of Award (LOA) dated 12/12/2020 which valid for 3 years	
	<ul> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> </ul>	and will be expiring on 31/10/2023. Under Clause 5 (d) (iii) has mentioned that the transporter shall permit CB to conduct audit	
	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	on its or its sub-contractors' operation and provide access to all relevant systems, documents and records when requested by the CB.	

	that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.  c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.  d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.	Documented control system procedure is incorporated under the LOA and Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability, Appendix 15, Version 2, Issue No. 5 dated April 2019 was communicated during contract signing.	
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 FGV Transport Services Sdn Bhd via Letter of Award (LOA) dated 12/12/2020, it was mentioned that the site has legal ownership of all input material to be included in outsourced processes as per Annexure 5, RSPO Supply Chain Certification Standard.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The outsource parties remain unchanged since last surveillance assessment.	Complied
3.8.12	<ul> <li>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</li> <li>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</li> </ul>	<ul> <li>i) Sime Darby has established Standard Operating Procedure to maintain all records of evidence on the implementation of MSPO SCCS. The SOP was documented in Sustainability Plantation Management System, SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records.</li> <li>ii) As stated in SOP for Sustainability Supply Chain and Traceability, ver. 2, issue no. 5 dated April 2019 under section 5.0: Control of Documents and Records all traceability records should be maintained at minimum period of 3 years.</li> </ul>	Complied



	<ul> <li>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>iv) For Mass Balance Module, the mill: <ul> <li>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</li> <li>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</li> <li>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.</li> </ul> </li> </ul>	<ul> <li>iii) Bukit Kerayong POM receives and process both certified and noncertified FFB. Therefore, it uses the Mass Balance supply chain system and module.</li> <li>iv) a. Bukit Kerayong POM has established the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>b. All volumes of certified CPO and PK that were delivered were deducted from the material accounting system according to conversion ratios of OER and KER as per sample records of Mill production report Jan 2021 – Dec 2021 and FFB summary Jan 2021 – Dec 2021.</li> <li>c. Positive stock deliveries maintained through the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. No short selling made by Bukit Kerayong POM.</li> </ul>	
3.8.13	Extraction Rate  The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	Addressed in the Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 17.0 Conversion Factor.  Extraction rates were derived from actual production output that were measured daily by the mill and recorded in the daily production report. Actual rates for the period since last audit were available in the Mill production report Jan 2021 – Dec 2021.  Volume estimates for next period were based on historical extractions and FFB projection from estates.	Complied



3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	Extraction rates updated daily based on actual measurement of production output. Projected rates were based on historical extractions and FFB projection from estates.	Complied
3.8.15	Processing  For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	Addressed in the Plantation Quality Management System, Sustainable Plantation Management System, Appendix 15: Standard Operating Procedure (SOP) for Sustainable Supply Chain and Traceability ver. 2, year 2018, issue no. 5 dated April 2019 under section 7.0 receiving FFB at the mill and 9.0 Process Monitoring.  Bukit Kerayong POM receives and process both certified and noncertified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	Complied
3.8.16	<ul> <li>Registration of Transactions</li> <li>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</li> <li>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.</li> </ul>	<ul> <li>i) Based on the downloaded transactions register from the certification unit's Palmtrace, the company was able to demonstrate that it has been registering its transactions in the Palmtrace accordingly.</li> <li>ii) Based on the announcement (transaction) summary, all the registrations were found to be in order.</li> </ul>	Complied
3.8.17	Claims  The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied



Gener	al 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.	Not Applicable as no "off-product" claim made by Bukit Kerayong POM in the industry public domain.	Not Applicable
4.2	In corporate communications a member is allowed to:  a. Display its RSPO membership status  b. Display the RSPO web address (www.rspo.org)  c. State that the member supports the work of the RSPO  d. State the member's history with regard to the RSPO.  e. Use the RSPO trademark to promote its membership of the RSPO.  Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.	Not applicable as no "off-product" claim made by Bukit Kerayong POM in the industry public domain.	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 Bukit Kerayong POM in the industry public domain.	Not Applicable
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as no "off-product" claim made by Bukit Kerayong POM in the industry public domain.	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.	Mill does not use the RSPO Corporate logo.	Complied
Busine	ess 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; RSPO 550181.	Complied
5.3	<ul> <li>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</li> <li>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</li> <li>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</li> </ul>	Bukit Kerayong POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not Applicable
5.4	A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification. For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.	Bukit Kerayong POM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not Applicable
Busine	ess to consumer communication		
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm	Not applicable to Bukit Kerayong POM as they do not conduct business to consumer claims.	Not Applicable



	products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.		
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.	Not applicable to Bukit Kerayong POM as they do not conduct business to consumer claims.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Not applicable to Bukit Kerayong POM as no on-pack claims on RSPO-certified sustainable oil palm products are used	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not applicable to Bukit Kerayong POM as they do not conduct business to consumer claims.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Not applicable to Bukit Kerayong POM as they do not conduct business to consumer claims.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	There was no use of RSPO Trademark logo.	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.	There was no use of RSPO Trademark logo.	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 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	Not applicable as Bukit Kerayong POM do not fall under the category of retailers or food service companies.	Not Applicable

...making excellence a habit."



ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="https://www.rspo.org">www.rspo.org</a> .		
MODULE B – MASS BALANCE SPECIFIC RULES		
Minimum Mass Balance content		
95% or above of the oil palm content must be RSPO MB-certified.	Bukit Kerayong POM is producing crude palm product and does not involved in any labelling of end product.	Complied
Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Bukit Kerayong POM is producing crude palm product and does not involved in any labelling of end product.	Complied
Labelling and trademark (MB)		
<ul> <li>Members are allowed to use the RSPO label in one of the following ways:</li> <li>Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</li> <li>The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> </ul>	Bukit Kerayong POM is producing crude palm product and does not involved in any labelling of end product.	Complied

license number trademark or the at least 4 pt (1.4  In on-pack come anywhere on the provided in the R	incomplete the property of the applicable trademark is displayed, the applicable trademark must be shown immediately under or next to the extra statement. Font must be Calibri, font size must be mm or 0.06 inch).  Immunications, the RSPO trademark can be printed as pack. Further guidance on use of the trademark is also trademark License Terms and Conditions and in the ules on Market Communications & Claims document.		
Messaging (MB)			
includes:  • [Oil palm product mills and plantate in the supply chate.]  • The volume of [ product reflects produced by RSP In off-product communications:  • Anything that care.	oil palm products][palm oil]/[palm kernel oil] in this an equivalent volume of palm oil or palm kernel oil of certified mills and plantations.  munications, reference to (or images of) particular action units, if the relationship to those units can be	Bukit Kerayong POM is producing crude palm product and does not involved in any labelling of end product.	Complied
Principle 4: Respect comm	nunity and human rights and deliver benefits		
Criterion 4.1: The unit of Ce	rtification respects human rights, which includes respec	cting the rights of Human Rights Defenders.	
	, 3,	SOU 7 has implemented the Sime Darby's Human Rights Charter where they committed to recognizing the role of Human Rights	Complied

	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.  - Critical (Major) compliance -	Defenders in accordance to the United Nations declaration on Human Rights Defender.  Awareness and training to all workers in order for them to understand their responsibility in respect of human rights were conducted by Bukit Kerayong POM on 17/1/2022, Bukit Kerayong Estate on 7/1/2022 and Bukit Cheraka Estate on 11/10/2021.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations.  - Minor compliance -	Based on the interview of internal stakeholders among workers as well relevant external stakeholders, the mill and estates within SOU 7 do not instigate violence or use any form of harassment in their operations.	Complied
Criterio	on 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
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.  - Critical (Major) compliance -	Based on the records of complaints and grievances no issue of whistle-blowing that requires anonymity of complainants and/or grievance parties. Interview conducted with internal stakeholders among workers and relevant external stakeholders also confirmed the information.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.  - Minor compliance -	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.  Under Sime Darby website, there is Whistleblowing e-form provide a mechanism for reporting, investigating and remedying any wrongdoing.	Complied

4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.  - Minor compliance -	Neither any complaints nor land dispute occurred in the SOU 7 Certification Unit since the last audit.	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
Criterio	on 4.3: The unit of Certification contributes to local sustainable developmen	t 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 -	Contributions made as per sample as following: Bukit Kerayong POM contribution to employees affected by flood; date 13/1/2022: - RM 2,000 for family staying at own house - RM 1,500 for single staying at own house - RM 1,000 for family staying at company's house - RM 500 for single staying at company's house Bukit Kerayong Estate and Bukit Cherakah Estate distribution of new lockers dated 20/11/2021 & briefing of Procedure on Foreign Worker's Individual Passport Safe Keeping.	Complied
Criterio	on 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 cons	sent.
4.4.1	<b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents Related to the history	SOU 7 estates were able to demonstrate the evidence of legal ownership if its lands through possession of land titles. The estates has a list of all its land titles which have the information about	Complied

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of land tenure and the actual legal or customary use of the land are available.  - Critical (Major) compliance -	names of lease, hectare, terms & conditions, lease period and grant numbers. Copies of the land titles were available at the estate's offices while the original were kept at headquarter.  Example of land titles checked:			
	Estate	Land title	Land use type	Tenure
	Bukit Cheraka	Sample : GRN45562, lot no. 4503, Mukim Jeram, District: Kuala Selangor title area: 343.70 ha Total titles: 28 (1,633.09 ha) Sample : GRN47691, lot no. 4586, Mukim Jeram, District: Kuala Selangor title area: 273.7694 ha Total titles: 105 (2,104.34 ha)	Agriculture & not categorized/gazetted	Freehold
	Bukit Kerayong	Sample : GRN52712, lot no. 2894, Mukim Jeram, District: Kuala Selangor title area: 11.71 ha Total titles: 21	Agriculture & not categorized/gazetted	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 of land dispute issue occurs in all estates within SOU 7 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.  - Minor compliance -	No issues of land dispute issue occurs in all estates within SOU 7 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.  - Minor compliance -	No issues of land dispute issue occurs in all estates within SOU 7 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.  - Minor compliance -	No issues of land dispute issue occurs in all estates within SOU 7 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	Complied

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4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal,	Boundary maps available for all estates within SOU 7 clearly	Complied
	customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).  - Critical (Major) compliance -	demarcating estate area with location and coordinate of boundary stone and pegs as per sample Bukit Cheraka Estate BC, Bk Cloh, Bk Panjong & Braunston Div. GPS Surveyed Map (Boundary Stone Map); Data Source: GPS Surveyed; Projection Universal Transverse Mercator 47N; Datum: WGS 1984; Print Scale: A3; Prepared by: R&D – Precision Agriculture Unit (NHM) May 2019.	
		There is no land dispute recorded since last audit. In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	No issues of land dispute issue occurs in all estates within SOU 7 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
	- Minor compliance -	In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	
4.4.5	<b>(C)</b> 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.	No issues of land dispute issue occurs in all estates within SOU 7 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied
	- Critical (Major) compliance -	In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.  - Minor compliance -	No issues of land dispute issue occurs in all estates within SOU 7 that requires FPIC process since the last audit. Consultation with relevant stakeholders conducted on-site confirmed the information.	Complied

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		In order to deal with future arising land dispute (if applicable), the Sustainable Plantation Management System (SPMS) Appendix 3 dated 01/11/2008 documented the process in handling boundaries disputes.	
	<b>n 4.5:</b> No new plantings are established on local peoples' land where it cae alt with through a documented system that enables these and other stake		
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.  - Critical (Major) compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 7. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Not Applicable
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.  - Critical (Major) compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 7. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Not Applicable
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.  - Minor compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 7. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Not Applicable



4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.  - Minor compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 7. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Not Applicable
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.  - Minor compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 7. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Not Applicable
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.  - Minor compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 7. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Not Applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.  - Minor compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 7. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.  - Critical (Major) compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 7. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are	Complied



		not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.			
	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 -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 7. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Not Applicable		
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.  - Critical (Major) compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 7. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Not Applicable		
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings.  - Minor compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 7. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Not Applicable		
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.  - Minor compliance -	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within SOU 7. The estate lands are legally owned by Sime Darby Plantation Berhad. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Not Applicable		

	on 4.7: Where it can be demonstrated that local peoples have legal, customent of rights, subject to their FPIC and negotiated agreements.	stomary or user rights, they are compensated for any agreed land	acquisitions and
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place Critical (Major) compliance -	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Not Applicable
		There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Not Applicable
	- Critical (Major) compliance -	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.  - Minor compliance -	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Not Applicable
		There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	
Criterio rights.	on 4.8: The right to use the land is demonstrated and is not legitimately con	ntested by local people who can demonstrate that they have legal, cu	stomary, or user
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.	Not Applicable
	- Minor compliance -	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	

4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.  - Critical (Major) compliance -	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.  There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Not Applicable	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)  - Minor compliance -	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.  There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Not Applicable	
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).  - Minor compliance -	Sime Darby Plantation Berhad has been established Flowchart and Procedures on Handling Land Disputes dated 1/11/2008. Compensation procedure has been clearly stated in the procedure as well.  There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Not Applicable	
Princip	le 5: Support smallholder inclusion			
Criterio	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 -	As sampled Bukit Kerayong POM, does not directly source FFB from smallholders. Mill purchased from outside FFB either from independent estates or dealers or collection centres. The FFB purchasing prices are stated in the FFB purchasing contract. The pricing is calculated following the MPOB price. Then no publicly available FFB pricing is applicable. However Bukit Kerayong POM posting the MPOB Daily FFB Price as sighted at Weight Bridge	Complied	

		(October-December 2021 and January 2022). Date 24/01/22 Central RM63.45/1% OER).	
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 -	Bukit Kerayong POM did not directly source FFB from independent smallholders. Mill purchased from outside FFB either from independent estates, dealers or collection centres. The pricing mechanism is available in the FFB purchasing contract. Explanation to independent smallholders on FFB pricing not applicable.	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 -	In Bukit Kerayong POM, the FFB pricing is calculated based MPOB price guidance. Mill does not purchase FFB directly from smallholders, this fair pricing is not necessary to be provided to independent smallholders.	Complied
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.  - Critical (Major) compliance -	Bukit Kerayong POM does not purchase FFB directly from independent smallholders. Hence this indicator is not necessary. However the pricing mechanism for purchasing FFB from independent estates or out growers or collection centre is available in the FFB purchasing contract.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.  - Minor compliance -	Sampled FFB purchasing Contracts Agreement (P/P/1220/FFB02637L) with independent estates or out growers. Sample of contract with Gan Estate Contractor Sdn. Bhd. dated 01/01/21 was reviewed. The contract is legally binding to Malaysia regulations. Valid till 31/12/21. The contents are fair, legal and transparent and with agreed time frame.	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given Critical (Major) compliance -	Sampled FFB Receive Ticket No 170651 dated 07/12/21 from KSHG Enterprise Sdn. Bhd. On the ticket stated:  Net weight: 11,950 Kg  Deduction: 0	Complied

		Sampled FFB Received Ticket No 170652 dated 07/12/21 from Klangrealty. On ticket stated:  Net weight: 4,850 Kg  Deduction: 0  Sampled FFB Received Ticket No 171572 dated 15/01/21 from Timah Jaharah. On ticket stated  Net weight 4,940 Kg  Deduction: 0  Sampled FFB Received from Bukit Cheraka Estate Ticket No 171574 dated 15/01/22.  Net Weight: 11,690  Deduction: 0  Sampled Payment to Gan Estate Contractor Sdn. Bhd. (Vendor No 1001010936) Document date 11/10/21, Clearing on 14/10/21, Document date 31/10/21, Clearing on 08/11/21. Document sate	
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government).  - Minor compliance -	30/11/21, Clearing date 10/12/21.  Sampled Annual Stamping & Verification (calibration) for weight bridge (Electronics Computerized Truck Scale System) Metter Toledo IND 246 with capacity of 60,000Kg X 10 Kg as Service Report A-04482 dated 12/10/21 from Teras Integrasi Sdn Bhd. mentioned as Checked, Verified and in Good Working Order. Certificate No. D158648, Sticker No. DE18-000806 (Signed by licensed company De metrology Sdn Bhd) under Regulation 16, 28A & 45 of Peraturan-Peraturan Timbang dan Sukat 1981, Akta Timbang dan Sukat 1972.	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control	The FFB sent to Bukit Kerayong Oil Mill are supplied mainly from two own estates namely Bukit Kerayong Estate and Bukit Cheraka Estate. Sime Darby Plantation has also developed responsible	Complied

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	system (ICS), who holds the certificates, and who holds and sells the certified material.  - Minor compliance -	sourcing guidelines (RSG) in approaching third party FFB & CPO suppliers to ensure the fruits and CPO are sourced from identified, legal and responsible sources. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers. As part of Sime Darby Plantation Responsible Sourcing Guidelines (RSG), potential supplier will be assessed to ensure no deforestation after 2010, no planting of peat area after 010; have valid land title (valid ownership sample suppliers of dealers) and have valid MPOB license for their oil palm planting, transport and selling of FFB.	
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 -	As verified no direct sourcing from independent smallholders. Bukit Kerayong POM source external FFB from independent out growers and traders/collection centres. Sime Darby Plantation has developed 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) and the Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 explaining and providing process for handling communication including grievances.	Complied
Criterio	on 5.2: The unit of certification supports improved livelihoods of smallholde	rs 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 is no independent smallholders associated to Bukit Kerayong POM and the mill is sourcing FFB from independent estates and traders/collection centres. Currently, Sime Darby Plantation is implementing Responsible Sourcing Guidelines to improve the sourcing of legal FFB.  Bukit Kerayong Estate  Meeting with Stakeholders SOU7 as Minutes for FY 2022 conducted	Complied
		on 20/01/22 at Dewan Komuniti Ladang Bukit Cheraka. Attended by 36 Stakeholders such as Chairman of taman Sri Kerayong, Reztech, Eng Soon Estate, KSG Enterprise, Kovil, BMSPV Enterprise,	

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		Masjid Nurul Hidayah, PDRM Jeram, Ketua Kampung Simpang 3, Jeram, IWK, Rasa Dinamis, Yong Seng and etc. Discussion on complaint and grievances, Briefing on sustainability, quality management, RSPO, MSPO, SCCS certification, Sustainability Policies, Communication Procedure, Fire Prevention, Legal Compliances.	
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 -	Meeting with Stakeholders SOU7 as Minutes for FY 2022 conducted on 20/01/22 at Dewan Komuniti Ladang Bukit Cheraka. Attended by 36 Stakeholders such as Chairman of taman Sri Kerayong, Reztech, Eng Soon Estate, KSG Enterprise, Kovil, BMSPV Enterprise, Masjid Nurul Hidayah, PDRM Jeram, Ketua Kampung Simpang 3, Jeram, IWK, Rasa Dinamis, Yong Seng and etc. Discussion on complaint and grievances, Briefing on sustainability, quality management, RSPO, MSPO, SCCS certification, Sustainability Policies, Communication Procedure, Fire Prevention, Legal Compliances.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.  - Minor compliance -	Since 2016, Sime Darby Plantation has developed and implement the Responsible Sourcing Guidelines to promote legality FFB production of smallholders which the traders or collection centres source from the work program developed by SDP is to evaluate 10 smallholders attached to the traders or collection centres annual.	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling Critical (Major) compliance -	There is no independent smallholders associated to SOU 7 Bukit Kerayong.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.  - Minor compliance -	There is no independent smallholders associated to SOU 7 Bukit Kerayong.	Complied

Criterio	Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> 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 -	SOU 7 has implemented Group Sustainability & Quality Policy Statement signed by Group Managing Director on 2 <sup>nd</sup> December 2019. The policy shall be guided by the commitments spelt out in the Company's in Human Rights Charter (HRC) where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.	Complied	
6.1.2	(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 -	Records of employments and interview conducted on-site with sampled internal and external stakeholders confirmed that the workers and groups including local communities, women, and migrant workers have not been discriminated against.	Complied	
6.1.3	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 -	No discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed from job vacancy advertisement and sample recruitment sighted.	Complied	
6.1.4	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 -	Pregnancy testing was conducted only for women employee involved in chemical handling work to ensure no pregnant women working with the risk of chemical exposure. All women employees involved in chemical handling work within SOU 7 underwent Urine Pregnancy Test (UPT) conducted by respective estate's Hospital Assistant upon request only.	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 and through Gender Committee Handbook, First Edition	Complied	

		2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. It explained the types of gender-based violence & grievance procedures. Meetings were conducted quarterly according to the handbook. Gender Committee were established by the mill and estates management.	
		The latest meeting were conducted as per records of Gender Committee SOU 7 Central East Region Meeting; Date: 7/1/2022; Venue: Bukit Kerayong Estate Meeting Room.	
		No sexual harassment case been reported since the last audit.	
6.1.6	There is evidence of equal pay for the same work scope Minor compliance -	No discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed during stakeholder's consultation, worker's interview, complaint book and trade union meeting.	Complied
		Sighted the job description of each workers mention the same regardless of skin colour, religion, race and caste. Evidence of equal pay sighted based on passports & work permit, work agreement, payslip, attendance & checkroll and Socso 8A form of March 2021, May 2021 & December 2021 for sample female and male employees as following:	
		Bukit Kerayong POM:	
		- Employee ID # 163844; F; Date joined: 24/6/2021 - Employee ID # 163845; F; Date joined: 24/6/2021	
		- Employee ID # 163643, F; Date joined: 8/8/2021	
		- Employee ID # 157998; M; Date joined: 17/2/2020	
		- Employee ID # 154469; M; Date joined: 14/9/2019	
		- Employee ID # 152134; F; Date joined: 1/7/2019	
		- Employee ID # 136302; F; Date joined: 29/8/2017	

	- Employee ID # 097974; M; Date joined: 16/12/2013
	- Employee ID # 159777; M; Date joined: 10/9/2020
	- Employee ID # 141122; M; Date joined: 20/3/2018
	Bukit Kerayong Estate:
	- Employee ID # 160980; F; Date joined: 18/11/2020
	- Employee ID # 110432; F; Date joined: 1/9/2002
	- Employee ID # 108124; M; Date joined: 26/11/2014
	- Employee ID # 151198; M; Date joined: 30/5/2019
	- Employee ID # 132130; M; Date joined: 17/3/2017
	- Employee ID # 147236; M; Date joined: 4/12/2018
	- Employee ID # 009802; M; Date joined: 1/5/2009
	- Employee ID # 154984; M; Date joined: 14/9/2019
	- Employee ID # 122908; M; Date joined: 18/6/2016
	- Employee ID # 088444; F; Date joined: 1/3/2013
	Bukit Cherakah Estate:
	- Employee ID # 3903; F; Date joined: 8/4/1976
	- Employee ID # 3914; F; Date joined: 1/7/1983
	- Employee ID # 3946; F; Date joined: 2/11/1998
	- Employee ID # 3973; M; Date joined: 16/4/2008
	- Employee ID # 5399; M; Date joined: 1/1/1999
	- Employee ID # 83008; M; Date joined: 1/12/2012
	- Employee ID # 142527; M; Date joined: 2/5/2018
	- Employee ID # 82282; M; Date joined: 1/8/2012
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		- Employee ID # 88506; M; Date joined: 1/3/2013	
		- Employee ID # 141275; M; Date joined: 19/3/2018	
		- Employee ID # 150948; M; Date joined: 27/5/2019	
		- Employee ID # 156524; M; Date joined: 20/11/2019	
	<b>n 6.2:</b> Pay and conditions for staff and workers and for contract workers a ving wages (DLW).	lways meet at least legal or industry minimum standards and are suff	icient to provide
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.  - Critical (Major) compliance -	All the workers are under direct employment and some electrical works are under contractor workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary and etc. as per employment contract in compliance with requirements of available collective agreement i.e. MAPA Circular No. 1/2020; Date: 14/1/2020; Minimum Wages Order 2020 (MWO 2020) for the following:  I) MAPA/NUPW Agreement on the Wages of Harvesters, Harvesting Kanganies, Loaders and "Other Loaders" on Oil Palm Estates, 2020  II) MAPA/NUPW Palm Oil Mill Employees' Agreement, 2020  III) MAPA/NUPW Rubber Tappers' Wage Agreement, 2020  IV) MAPA/NUPW Field and Other General Employees and Fringe Benefits Agreement, 2020  Work agreements also in compliance with Permit of Salary Deduction under Section 24 Employment Act 1955 for Electricity Bill payment; Ref. # BHG.PU/9/129 JLD 33 (53); Date: 6/7/2017.	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	As per Inter-Office Mail from Sime Darby Plantation's Head, HR Upstream to Senior Managers/Managers Estate & Mill for all Northern Region, Central East Region, Central West Region on Implementation of Revised Workers' Contracts and Register of Maternity Leave and Allowances; Date: 3/12/2019.	Complied

	compensation for all work performed. This includes a form of record for work done by family members.  - Critical (Major) compliance -	All workers work agreement were also based on MAPA Circular No. 1/2020; Date: 14/1/2020; Minimum Wages Order 2020 (MWO 2020) where the order provides for the minimum wages rates payable to an employee who works in a place of employment in any City Council or Municipal Council area as specified in the schedule.	
6.2.3	(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.  - Critical (Major) compliance -	Records of payslip and check-roll documents available to the workers for sample employees sighted as per indicator 6.1.6 above. Records shown all relevant legal compliance requirements were met by SOU 7.	Complied
6.2.4	(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.  - Critical (Major) compliance -	The mill and estates within SOU 7 established the Employee Welfare Committee (EWC) as a team to represent and conduct the housing inspection based on area assigned to designated representative. Sighted sample housing and facilities inspections conducted as following:  - Bukit Kerayong Estate workers housing complex inspection latest dated 20/1/2022. VMO visit latest dated 6/1/2022.  - Bukit Cherakah Estate main division workers housing inspection was latest conducted on 21/1/2022 for house # 61 to # 72, on 12/1/2022 for house # 46 to 60, on 4/1/2022 for house # 31 to 45, on 29/12/2021 for house # 16 to 30 and on 20/12/2021 for house # 1 to 15. Sighted the records of inspection conducted by the person in-charge of accommodation (PIOA) of employee welfare representative (EWR) indicated all occupied houses in good conditions. Additionally, there's also a Housing Complex / Nest / Community Hall Inspections conducted by the estate MA, dated on 21/1/2022 for main and Cloh divisions and on 22/1/2022 for Braunston division. Inspection forms for all 3 division indicated	Non- compliance

		the score of 98% for main division, 96% for Cloh division and 100% for Braunston division.  These regular weekly and bi-weekly inspections which recorded manually in paper forms requires extensive use of papers, depend on number of houses available in an estate or operating unit. The use of this paper forms which printed on one side only does not really helpful to support the environmentally friendly practice. Furthermore, some of the inspection results as per criteria that were mainly based on the requirements of applicable legal Workers Minimum Housing and Amenities Standard Act did not fully reflective of the actual conditions as per sighted during the visit. This was due to that the paper forms only printed with the criteria with no visual oxidence of increated because and its process.	
		criteria with no visual evidence of inspected houses and its areas. However, during housing inspection visit in Bukit Cherakah Estate, it was found that there are rubbish being dumped without proper bin and collection along the fence near house # 53 in Main Division. In Braunston division, it was found that a septic tank near house # 14 cover was broken exposing the tank that also filled with rubbish. Trailing with the records of latest Housing Inspection (EWR) dated 21/12022 and the Housing Complex / Nest / Community Hall Inspections checklist dated 22/1/2022 indicated good condition of inspected areas which not reflective of its actual conditions sighted above.	
		This indicated that the area surrounding the workers' housing is not fully maintained in a clean and sanitary condition as per weekly inspection of workers' housing requirements 23.(1)(a) of Workers' Minimum Standards of Housing and Amenities Act.  Hence, a Major NC has been raised on the matter.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	The mill and estates within SOU 7 ensured affordable food for its employee through canteen food price monitoring as part of terms	Complied



	- Minor compliance -	in the Mill Canteen Tenancy/Rental Agreement for sundry shop operators.	
6.2.6	A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.  PROCEDURAL NOTE:  STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE  With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).  Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.  In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil i	SOU 7 conducted the Prevailing Wage Assessment and calculated individual local and foreign workers current salary including nonmonetary benefit given average mill and estate Local Workers RM: 1,769.50; Foreign Workers: RM1,920.41. Prevailing Wage Assessment conducted by Group Sustainability & Quality Manager (GSQM) Sime Darby Plantation.	Complied

6.2.7	<ul> <li>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).</li> <li>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: <ul> <li>Updated assessment on prevailing wages and in-kind benefits</li> <li>There is annual progress on the implementation of living wages</li> <li>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</li> <li>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.</li> <li>Minor compliance -</li> </ul> </li> <li>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to</li> </ul>	Employment contracts detailing payments and conditions of employment available to the permanent workers employed as per	Complied
	jobs that are temporary or seasonal.  - Minor compliance -	samples sighted in indicator 6.2.2 above. No casual, temporary and day labour employed within all operating units within SOU 7.	
freedom	<b>n 6.3:</b> The unit of Certification respects the rights of all personnel to form of association and collective bargaining are restricted under law, the emplopersonnel.		
6.3.1	(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.  - Critical (Major) compliance -	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:  - Providing Equal Opportunities: We promote diversity and inclusion and will not condone discrimination.  - Respecting Freedom of Association: We respect the rights of	Complied

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 -	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 and the workers have their freedom to join the NUPW/MAPA union.  The mill and estates within SOU 7 established the Employee Welfare Committee as operating unit level collective bargaining medium. Sighted the records of latest NUPW meeting for Bukit Kerayong POM as per Social Dialogue # 5; Date: 7/10/2021. For Bukit Cherakah Estate, latest meeting between the workers' union/NUPW representatives with management was conducted on	Complied
		22/3/2021. Meeting was chaired by the estate's Senior Assistant Manager and attended by Assistant Managers, Medical Assistant (MA) and all representatives of NUPW in Bukit Cherakah Estate. The minutes of meeting available upon request.	
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.	Interview with workers union representatives (NUPW Chairman & NUPW Secretary) confirmed that they were independently elected as the NUPW by all members of NUPW among mill and estate workers via an election without interference by the management.	Complied
Critorio	- Minor compliance -  n 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	The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:	Complied
	supplier agreements Minor compliance -	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:	
		- 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.	
		<ul> <li>Ensuring Favourable Working Conditions: We ensure decent living and working conditions for all our employees. We strive to provide a fair wage and access to basic needs for all our employees and workers in our operations.</li> </ul>	
		- 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.	
		<ul> <li>Protecting the Rights of Children: We seek to promote the wellbeing of children, and safeguard them from any form of maltreatment or exploitation, including child sex tourism, child trafficking, child labour and child pornography.</li> </ul>	
		Verification of workers master list confirmed that there is no child labour hired.	
		For contractors, the abolishment of child labour & protecting the rights of children available in the Vendor COBC clause 5.8, Human Rights Charter-protecting the rights of children.	
6.4.2	<b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above	The screening procedure was included as per SOP Hiring of locals dated 01/11/2019 by the assistant operating unit while for foreign	Complied

	company policy minimum age, whichever is higher. There is a documented age screening verification procedure.  - Critical (Major) compliance -	workers, the Workforce Management Unit Liaison & Recruitment SOPP (WMU/LR-SOPP/March2016) dated 30/03/2016 under clause procedures recruitment team shall be guided by approved requirement; Age 18-45 years old).	
6.4.3	(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.  - Critical (Major) compliance -	Based on the interview and employees master lists data, no young person below 18 years old employed within all operating units within SOU 7.	Complied
6.4.4	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.  - Minor compliance -	Interview conducted on-site with sampled internal and external stakeholders confirmed that the information on no child labour policy and the negative effects of child labour were provided in appropriate languages and accessible to them.  Records of communication sighted available for communication with Outside Crop Purchase (OCP) provider sample Gan Estate Contractor Sdn. Bhd.; Agreement # P/P/1220/FFB02637L; Effective date: 1/1/2021	Complied
Criterio	on 6.5: There is no harassment or abuse in the workplace, and reproductive	e rights are protected.	
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.  - Critical (Major) compliance -	The Group Sustainability & Quality Policy Statement signed by Group Managing Director on 02/12/2019 includes as below:  We respect the rights of our employees, our workers in our operations and our communities through our commitments which include, but are not limited to:	Complied
		- Eliminating Violence and Sexual Harassment: We seek to promote an environment where all forms of harassment and abuse are eliminated and to provide support for victims.	
		- Eradicating any form of Exploitation: We endeavour to eradicate any form of forced or bonded labour, slavery, human trafficking and sexual exploitation.	

		The policy was communicated through the Gender Committee meeting conducted quarterly.	
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.  - Critical (Major) compliance -	SOU 7 has implemented Social Policy, Gender Policy and Social & Humanity Management Policy dated January 2015 where the management is committed to develop and apply a policy to prevent sexual harassment and other forms of violence against women and to protect their reproductive rights. The policy was displayed on the notice board which was accessible by the workers. Briefing of the policies was conducted during morning muster and the policies was displayed at the notice board outside the office.	Complied
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.  - Minor compliance -	As verified during on-site interview with relevant stakeholders, management of mill and estates within SOU 7 conducted the assessment of new mothers in consultation with new mothers and taken actions to address their needs as per sample for Bukit Kerayong POM new mothers needs assessment dated on 22/10/2021.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.  - Minor compliance -	Interview conducted on-site with sampled internal stakeholders among all workforce confirmed that the information on grievance mechanism, which respects anonymity and protects complainants where requested, is established and communicated to them.  No grievance issues that requires the implementation of the mechanism occurs in all operating units within SOU 7 since the last audit.	Complied
Criterio	n 6.6: No forms of forced or trafficked labour are used.		
6.6.1	<ul> <li>(C) All workers have entered into employment voluntarily and the following are prohibited:</li> <li>Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> </ul>	The recruitment cost were declared by the labour agent from source country for the applicable fees. Sampled for Tenaga Kerja Indonesia (TKI) Kepada Agensi (PL) Dan Sponsor (PL) for Indonesia effective date on 01/06/2017 (IDR 6,150,000) and Amoza Travels	Complied



- Charging the workers for recruitment fees.
- Contract substitution
- Involuntary overtime
- · Lack of freedom of workers to resign
- Penalty for termination of employment
- Debt bondage
- Withholding of wages
- Critical (Major) compliance -

for India (INR 50000) for documents required, medical, insurance, transportation, etc. No other hidden recruitment fees paid to agent.

Passport was kept by the management voluntarily. There is agreement letter signed by worker and employer on the safekeeping passport at office. If the workers want to obtain the passport for own usage, they can anytime request for it.

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.

Overtime was given voluntarily. Sighted the overtime request form where employer offer work to worker after working hour/rest day/public holiday.

The termination of service clearly stated that the termination of employment if:

- 1. The company is not satisfied with your performance
- 2. You end employment for any reason; this may include abscondment, resignation or termination before expiry of the fixed term or extended term.
- 3. You commit any misconduct, including theft, fraud, insubordination, negligence or any other form of crime.
- 4. You have breached any express or implied terms of your employment.
- 5. Fail medical examination based on FOMEMA result.
- 6. Involved in any act that will affect the reputation of the company.

No penalty, debt bondage and withholding of wages been imposed to worker if they want to resign. This has been confirmed through the interview and employment contract signed.

6.6.2	(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.  - Critical (Major) compliance -	SOU 7 has implemented a Sime Darby's Human Rights Charter on where they committed as below:  a. Providing equal opportunity  b. Respecting freedom of association  c. Eradicating any form of exploitation  d. Ensuring favourable working conditions  e. Enhancing Safety and Health  They also provided awareness and training to all the foreign workers in order for them to understand their responsibility in respect of human rights. For e.g.: All the workers have provided with induction training in Sua Betong Estate or based estate during their arrival to Malaysia.	Complied
Criterio	on 6.7: The unit of certification ensures that the working environment unde	r its control is safe and without undue risk to health.	
6.7.1	(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.  - Critical (Major) compliance -	Bukit Kerayong POM The Safety and Health Committee for Year 2022 where Chairman is Azlan b. Md Kambali, Secretary is Mohd Hafiz Md. Hashim. The meeting was conducted regularly for FY 2021 (Bil 50/2021-1) done on 02/12/21, (Bil 49/2021-2) done on 28/06/21, (Bil 48/2021-1) done on 02/03/21 and 12/12/20. OSH related and welfare issues were discussed as observed.	Complied
		Bukit Kerayong Estate Safety and health Committee established as Organization Chart sighted. The Meeting of Safety and Health Committee were conducted on 28/12/21, 13/10/21, May 2021 (postponed as letter From Estate manager dated 10/05/21 due to Covid-19) and 16/02/21. Bukit Cheraka Estate	

		Available OSH Organization Chart 2022 where Chairman is Noor Arizan b. Ahmad (Sr. Estate Manager), Secretary is Bibi Safina Aman Khan with employer respresentatives and employees representatives. The regular meeting was done in 2021 as evidence from Minutes of Meeting of Safety and Health Committee dated 24/01/22, 28/10/21, 17/08/21, 12/04/21, 22/01/21.	
6.7.2	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.  - Minor compliance -	During sampling at Laboratory found Fire extinguisher sent out for service. Available outside the lab another unit on standby. In Workshop available list of First Aider as posted name Selvam (01116252427). In Bukit Kerayong Estate as sampled in Chemical Store, Workshop, the fire extinguishers were well-maintained and valid.  Bukit Kerayong Estate  Sighted A Flowchart for Response to an Environmental an OSH Emergency Includes Accident/Incident, another one Fire, Explosion, Diesel Spillage and Pesticides Spillages. From Safety and Health Committee Minutes of Meeting dated 28/12/21 mentioned from October-December 2021, a total of 6 cases reported in Main Division and 4 cases reported in Jalan Akob Division. (All cases below 4 days MC and First aid cases).  Bukit Cheraka Estate  Sime Darby Plantation has established a Standard Operating Procedure of Incident, Accident and Non-conformance Management (SDP/GSQM (ESH) 204-OD 16 dated 30/05/19. The contents frovide quality and guidance of activity to ensure incident and accident reported, investigated, corrected and prevented from recurring. Accident Classified as the respective procedure: Class 1C Non-Occupational fatality (Accident)  Class 1D Non-Occupational fatality (Health)	Complied

		Class 2A Occupational Permanent Disability (Accident) Class 2B Occupational Permanent Disability (Health) Class 3A Occupational Temporary Disability (Accident) Class 3B Occupational Temporary Disability (Health) Class 4A Occupational Minor Accident Class 4B Occupational Minor Health case Class 5A Medical treatment Case (Accident) Class 5B Medical treatment Case (Health) Class 6A First Aid Case (Accident). Class 6B First Aid Case (Health) Class 7 Dangerous Occurrence Class 8 Property Damages Class 9 Near Miss Accident Class 10 Non-Occupational Accident/Health Class 11 Environmental Incident. Class 12 Business Interruption	
		Class 14 Social Cases (Human Rights)	
6.7.3	<b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.  - Critical (Major) compliance -	Bukit Kerayong POM Sampled a Bin Card for Safety Vest, Safety Helmet, Safety Helmet (Chain Guard), Safety Helmet (Trip). Sighted Safety Shoes Book 2021 (Oct) to 60 Operators, Crop Checker (Amri, Babu, Jamal, Azli), Maintenance team (Selvam, Suresh, Kumar), Lab Team (Bala, Shima, Sundary, Hari, Rakesh), Electrical team (Rasis, Adim), AP Team (Sheda, Jati, Azuri, Afifi, Hairi, Aiman, Arasu, Shift (Khairol, Shamsuriah, Kunalan, Mohan Raj, Ari Armada, Ainul Fikri, Bijaya,	Complied

		Juniar, Mahir, Sabri, Kusnadi, Salimin, Chandran, Ari Azman, Septian Hadi, Muniswaran and etc).  Bukit Kerayong Estate  Available PPE Record Book for distribution for PPE to all employees.  Among types of PPE included Rubber Boots, Safety Boots, Vest, Apron, Mask, Cotton Gloves, Nitrile Gloves and etc. Name of receiver, quantity and date of received stated clearly in the record book. Observed at Chemical Mixing Area requirements of PPE such as apron, nitrile gloves, boots and cartridge mask. Workers not to bring back PPE after washing and taking bath after applying pesticides. Last spraying was conducted 4 months ago.  Bukit Cheraka Estate  Sampled in Bukit Cloh Division at Block 14 B harvester with Helmet, safety boots, gloves, safety glass, vest and sickles and A20B Sprayers with Safety glass, cartridge mask, apron, nitrile gloves and safety boots.	
6.7.4	All workers are provided with medical care and covered by accident insurance. Costs incurred from work- related incidents leading to injury or sickness are covered in accordance with Malaysian law.  - Minor compliance -	As required by Malaysian legal requirement, local and foreign workers required to be covered by SOCSO for any medical care and accident at workplace. SOU7 as sampled found evidence of monthly contribution paid to SOCSO as below:  Bukit Kerayong POM  Sighted Form 8A (SOCSO) for contribution of Month of September 2021 covering insurance and beneficial coverage for workplace accident for 78 employees with amount of RM 3,122.70. October 2021 for 83 employees with amount of RM 3,139.10, November 2021 for 84 employees with amount of RM 3,499.30 and December 2021 for 86 employees with amount of RM 4,029.20.  Bukit Cheraka Estate	Complied

		Sighted Form 8A (SOCSO) for contribution of Month of April 2021 covering insurance and beneficial coverage for workplace accident for 288 employees with amount of RM 9,848.20 October 2021 for 263 employees with amount of RM 8,426.50, November 2021 for 84 employees with amount of RM 3,499.30 and Disember 2021 for 255 employees with amount of RM 10,829.60.	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.  - Minor compliance -	Bukit Kerayong POM has established accident statistic for year 2021 and notified to DOSH using JKKP dated 21/01/22. 2 accident reported on Kunalan A/L Nagappan (I/C: 900807105449) and Therumasundry A/P Kuppam@Madhavan (I/C: 741027105426). A total of 71 lost of working mandays. Total Working hours in 2021 is 219864.32.  Bukit Kerayong Estate	Complied
		Has not submitted yet to DOSH as according to HA the 2021 data and statistics was given to Estate manager for submission before end of January 2022.	
Principl	e 7: Protect, conserve and enhance ecosystems and the environment	ent	
Criterio	n 7.1: Pests, diseases, weeds and invasive introduced species are effective	ly managed using appropriate Integrated Pest Management (IPM) tec	hniques.
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.	Complied
		The estate has established IPM program. The plan was reviewed on annually basis. Reviewed the sampled implementation of the plan as follows:	

		Bukit Kerayong Estate  1. Latest bagworm census was conducted on September and December 2021. The census records the date of census, total palm census, total Larvae found per frond, mean cocoon per frond, threshold level >10. Infestation hectare, and treatment.	
		Latest barn owl census was conducted in August 2021.  Bukit Cheraka Estate	
		1. Latest bagworm census was conducted from June to October 2021. The census recorded census/treatment date, affected point, ha treatment, next census and census date. The census was conducted in 3 rounds.	
		Latest rat baiting campaign was conducted in July to September 2021 with average of 3 rounds. The baiting was stopped when the acceptance level were below 20%.	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.  - Minor compliance -	This is not practiced in the estates visited. None of species were referenced in the Global Invasive Species Database and CABI.org are used in the management of IPM.	:d
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist,	No evidence and records of fire usage for pest control at all estate visited.	:d
	and with prior approval of government authorities.  - Minor compliance -	Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest:	
		"We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:	

		conservation area	s, and the establishmen stems, as well as protect	our land boundaries and of effective monitoring tive firefighting measures	
Criterio	n 7.2: Pesticides are used in ways that do not endanger health of workers,	families, communi	ties or the environment.		
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.  - Critical (Major) compliance -	all agrochemical (ARM), SOP and Darby Plantation Reference Manua products are spec of recommended Immature planting - General weeds: - Pennisetum poly - Stenochlaena pa Mature planting - Grass weed and	are available the Agricular in the Safety Pictorial Sdn Bhd. Refer to Sal, issue:1 version:3 datific to the target pest, versioned pesticides are: g (sample) Glyphosate verstachion: Metsulfuron Nalustris: Sodium chlorate Asystasia: glyphosate 8		Complied
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.  - Critical (Major) compliance -	their LD 50, area to of applications) had	created, amount of a.i. ap ad been maintained and led records of pesticides	ve ingredients used and oplied per ha and number kept by the estate. usage per ha FY 2021 at Bukit Kerayong Estate	Complied

			T		1
		January	0.08	1.19	
		February	0.25	1.09	
		March	0.20	1.77	
		April	0.21	1.20	
		May	0.13	1.24	
		June	0.18	1.61	
		July	0.40	1.24	
		August	0.27	1.00	
		September	0.26	1.53	
		October	0.21	1.73	
		November	0.12	1.41	
		December	0.15	1.22	
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.  - Critical (Major) compliance -	are documented a Reference Manua	and justified in Sime Dar	r various field conditions by Plantation Agriculture ementation in the field is Manual Section 16.5.	Complied
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.  - Minor compliance -	No prophylactic u	se of pesticide were iden	tified in the estates.	Complied
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated		les used from Chemic	als Store and keeping panisation Class 1A or 1B,	Complied

	by a due diligence process, or when authorised by government authorities for pest outbreaks.  The due diligence refers to:  a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak Minor compliance -	or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used and kept as verified in Chemicals Store.  An Approval from Lembaga Racun dan Makhluk Perosak No. SEL/2022/ACP/0026(GL) to purchase Acephate from Ben Meyer Agriculture (M) Sdn. Bhd from 19/01/22-08/02/22 for quantity of 600 Kg to outbreak of bag worm attack.  Bukit Cheraka Estate  Sampled pesticides used from Chemicals Store and keeping pesticides categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used and kept as verified in Chemicals Store.  An Approval from Lembaga Racun dan Makhluk Perosak No. SEL/2021/ACP/0025(GL) to purchase Acephate from Ben Meyer Agriculture (M) Sdn. Bhd from 19/01/22-08/02/22 for quantity of 500 Kg to deal outbreak of bag worm attack.	
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.  - Critical (Major) compliance -	<ul> <li>Bukit Kerayong Estate</li> <li>Site visit and training on IPM of bagworm Control conducted on 16/12/21 attended by 12 employees as attendance list sampled.</li> <li>Trunk Injection training conducted on 13/09/21 and attended by 13 employees.</li> <li>Chemicals &amp; Spraying Safe Operation Procedure Training was conducted on 17/09/21 and attended by 13 employees.</li> </ul>	Complied
7.2.7	(C) Storage of all pesticides is in accordance with recognised best practices.  - Critical (Major) compliance -	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 are kept in the store and securely locked and comply with regulation as following:  Bukit Kerayong Estate	Complied

		The Chemicals Store found having chemical pictogram, signages as required with category of pesticides. Emergency shower allocated outside the store with spill kit and first aid box properly kept and in standby mode. SDS kept in the store and latest version maintained. Bukit Cheraka Estate  The Chemicals Store found having chemical pictogram, signages as required with category of pesticides. Emergency shower allocated outside the store with spill kit and first aid box properly kept and in standby mode. SDS kept in the store and latest version maintained.	
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 -	Empty pesticides containers were identified as recycle waste. All empty pesticides containers were triple rinse, puncture and stored at designated stored before disposed to licensed contractors, SS Setia Technology Enterprise. Refer approval letter from DOE no AS (B) J 91/110/619/069 Jld 3(37) dated 24/10/2018. Sighted the implementation of the triple rinse during site visit at the storage area.  Bukit Kerayong Estate	Complied
		The estates maintain the inventory and disposal records for empty pesticides container. Latest disposal of empty container was conducted on 22/03/2021 as per official receipt no. CR03/2021-2. Bukit Cheraka Estate  The estate maintain the inventory records for empty pesticides container waste inventory form. The empty containers were disposed as recycle waste through approved DOA contractors, S.S Setia Technology Sdn. Bhd. the estate maintain the disposal records for empty containers. Reviewed the disposal records as per official receipt no. 2100 dated 01/11/2021, 1904 dated 26/05/2021 and 09/01/2021.	

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 conducted at all operating units in SOU 7 as per sample observed group of sprayers at Block A20B Cloh Division was spraying pesticide (Tarang) and no aerial spraying applied as observed.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.  - Critical (Major) compliance -	Bukit Kerayong Estate  Medical Surveillance was conducted in FY 2021 by Klinik Faridah (HQ/17/DOC/00/00042) for 17 workers from estate (Pesticides) and 4 from Workshop (Welding Fume) and with normal result and no abnormal issued stated in the report. Among involved Store Clerk, Mandore Sprayer, Chemical Mixer, Trunk Injector, Sprayer, Foreman, Workshop Attendant.  Bukit Cheraka Estate  Found evidence of medical surveillance done in 2021, in 2022received a Quotation from Dr. Nik Mohd Azharuddin b. Nik Mohd Azman dated 2/11/2022 for 30 employees consist of Store Clerk, Foreman, Sprayers and mandores, Trunk Injector and mandore. Medical Surveillance 2021 was conducted by Klinik Faridah for 28 workers (All Fit) for Pesticides/Organophosphate and 2 workers (All Fit) for workshop exposure to welding fume.	Complied
7.2.11	(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.  - Critical (Major) compliance -	Bukit Kerayong Estate, all sprayers are male and no underaged or below 18 years old. except 2 upkept mandores (Lalitha and Saroh A/P Thanggavello), both age above 35 years old and not pregnant or breastfeed babies.  In Bukit Cheraka Estate, sprayers in Cloh Division are man as verified and sighted during site visit. The same team will be operating for other division in spraying activity in Bukit Cheraka Estate.	Complied



Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.					
and disposal based on toxicity and hazardous characteristics, is documented and implemented.	The mill and estates has identified the waste products and source pollution generated. The waste are categorized as follows:  Palm Oil Mill			Non- compliance	
	Туре	Item Description	Location		
		Scheduled Waste	Used lubricant	Workshop	
		Used batteries	Workshop		
			Used chemicals	Laboratory	
	Domestic waste	Rubbish	Workers housing complex, office, workshop, store		
		Recycle waste	POME	Mill effluent pond	
			EFB	Mill	
		Estates			
		Туре	Item Description	Location	
	Domestic waste	Rubbish	Workers housing complex, office, workshop, store		
			Sewage	Workers housing	
		Industrial Waste	Scrap Metal		

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Recycle waste	Empty pesticide containers, re-use empty container	Chemical stores
	POME	Mill effluent pond
	EFB	Mill

The waste identifications was not covering all waste generated in the estate. The waste such as spent lubricant/hydraulic oil, contaminated rags, contaminated PPE, contaminated spill kit, used batteries, used tyre and others were not identified in the waste identification.

OUs sampled has established management Plan base on the identification and source of pollutions and the documented in Waste management Plan FY 2021 and were available for review. In the management plan stated the type of waste, description, source of pollution, action to be taken and person responsible.

Reviewed the implementation of the management plan as follows:

#### **Bukit Kerayong POM**

1. The mill disposed EFB by send to neighboring sister estate as nutrient recycle program. Reviewed the EFB disposal records FY 2021 as follows:

Month	Bukit Cheraka Estate	Bukit Kerayong Estate
January	1168.30	864.57
February	854.35	953.75
March	1730.39	1154.61



April	1770.29	1123.06
May	1630.47	1212.55
June	1475.42	1372.58
July	868.80	1572.65
August	1788.70	906.33
September	1079.22	1050.00
October	509.59	1675.74
November	679.62	1083.55
December	916.85	674.45

- 2. The mill has appointed a contractors to collect and send the domestic waste to municipal landfill for disposal. Reviewed the invoice no.11926 dated 01/10/2021 for rubbish collection for the month of September 2021
- 3. The Scheduled Waste was disposed through licensed contractors, Pentas Flora Sdn. Bhd. Reviewed the consignment note as follows:
  - a. Disposal of SW 305, SW 322, SW, 409 and SW 417, Consignment Note no. 35579 dated 10/11/2020
  - b. Disposal of SW 305, SW 322, SW, 409 and SW 410, Consignment Note no. 40069 dated 02/05/2021
  - Disposal of SW 305, SW 322, SW, 409 and SW 410, Consignment Note no. 43210 dated 23/10/2021

**Bukit Kerayong Estate** 

		The municipal contractors collected the domestic waste on weekly basis and send the domestic waste to municipal landfill for disposal.
		2. The estate vehicle maintenance was conducted by Sime Darby Industrial. The waste generated was disposed by SDI. Reviewed the maintenance and used oil collection records dated 04/01/2022and 03/06/2021
		Bukit Cheraka Estate
		<ol> <li>The estate vehicle maintenance was conducted by Sime Darby Industrial. The waste generated was disposed by SDI. Reviewed the maintenance and used oil collection records dated 23/12/2021, 04/10/2021 and 02/07/2021.</li> </ol>
		2. The estate maintain the inventory records for empty pesticides container waste inventory form. The empty containers were disposed as recycle waste through approved DOA contractors, S.S Setia Technology Sdn. Bhd. the estate maintain the disposal records for empty containers. Reviewed the disposal records as per official receipt no. 2100 dated 01/11/2021, 1904 dated 26/05/2021 and 09/01/2021.
		The estate disposed the clinical waste through licensed contractors, Future NRG Sdn. Bhd. Reviewed the latest disposal records dated 25/01/2021 with consignment note no. 2022012511L2NY53.
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.  - Minor compliance -	Proper disposal of waste material was conducted as per waste management plan established. Noted during interview with the workers, the understanding on waste management were satisfactory.
		Sighted during site visit, the domestic waste were placed in dustbin before collected by the municipal, MPKS and disposed at municipal landfill.



		No evidence of fire used for waste disposal.	
7.3.3	The unit of certification does not use open fire for waste disposal.  - Minor compliance -	There was no evidence of fire used for waste disposal in all estates visited.	Complied
		Domestic waste was collected by municipal, MPKS and disposed at the municipal landfill.	
Criterio	on 7.4: Practices maintain soil fertility at, or where possible improve soil fer	tility to, a level that ensures optimal and sustained yield.	
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.  - Minor compliance -	Good agriculture practices which follows the group agriculture manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield as per SOP bellows:	Complied
		The sustaining of the soil fertility is guided by the organization SOPs content among others as stated in sections of the following documents;	
		a) EQMS chapter B8 - Leguminous Cover Crops	
		b) EQMS chapter B14 – Manuring	
		c) ARM Section 8 – Manuring	
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.  - Minor compliance -	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.	Complied
		As per company SOP, the soil sampling analysis carried at 5 years interval.	
		The leaf analysis and soil analysis report was made available for review. Noted the sample analysis report for estate visited as follows:	
		Bukit Kerayong Estate	

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		Latest foliar sampling was conducted on 05/01/2021 – 31/01/2021 as per Bukit Kerayong Estate – 2022 Agronomic and Fertiliser recommendations report – oil palm dated 16/07/2021 by Agronomist, Plant nutrient and protection unit.  Latest soil sampling was conducted in April 2018 as per analysis			
			2018 dated 11/06/2018.	2010 as per analysis	
		Bukit Cheraka E			
		Latest foliar sampling was conducted on 18/05/2021 – 28/06/2021 as per Bukit Cheraka Estate – 2022 Agronomic and Fertilise recommendations report – oil palm dated 05/11/2021 by Agronomist, Plant nutrient and protection unit.		onomic and Fertiliser ated 05/11/2021 by lit.	
			olling was conducted in Augus 2018 dated 25/09/2018.	st 2018 as per analysis	
7.4.3	Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.		ed EFB by send to neighb program. Reviewed the EF		Complied
	- Minor compliance -	Month	Bukit Cheraka Estate	Bukit Kerayong Estat	
		January	1168.30	864.57	
		February	854.35	953.75	
		March	1730.39	1154.61	
		April	1770.29	1123.06	
		May	1630.47	1212.55	
		June	1475.42	1372.58	
		July	868.80	1572.65	
		August	1788.70	906.33	

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		September	1079.22		1050.00	
		October	509.59		1675.74	
		November	679.62		1083.55	
		December	916.85		674.45	
7.4.4	Records of fertiliser inputs are maintained Minor compliance -	recommendation Reviewed the s	tain the records of by the agronomist. sample application FY 2021 as follows	records as pe	·	Complied
		Bukit Kerayong E				
		Month Program 2021		1onth program: I ïeld: 2016A	May 2021	
		Field: 2012C		ype: RP (28% P	2O5)	
		Type: AC (25%	NI)	onth completed		
		Month complete	ed: June 2021	·		
		Bukit Cheraka Es				
		Month Program	: Feb 2021 M	1onth program: 1	June 2021	
		Field: 2018B	Fi	ield: 2002B		
		Type: AS	T	ype: RP		
		Month complete	ed: March 2021 M	1onth completed	: August 2021	



7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available.  - Critical (Major) compliance -	Soil map was available at the estates for review prepared by the R&D — Precision Agriculture Unit. Reviewed the soil maps as follows:		Complied
	Charles (Charles and Charles a		Soil Series	
		Bukit Kerayong Estate	Bernam (28.43%), Briah (38.59%), Jawa (2.45%), Kangkong (2.21%), Sedu (6.97%), Selangor (7.37%), Serdang (0.67%), Tongkang (7.62%), Unclassified (5.69%).9	
	Bukit Cheraka Estate	Bernam (28.87%), Bungor (0.16%), Colluvium (1.55%), Jawa (13.56%), Local alluvium (3.56%), Malacca (1.12%), Munchong (0.19%), Organic Clay (7.32%), Sedu (1.45%), Selangor (5.09%), Serdang (1.77%), Tongkang (9.64%), Unclassified (25.72%).		
7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.	in documented in Slope and River Protection Policy signed by the		Complied
	- Minor compliance -	from any new plantation development and replanting program. All the existing crop and vegetation shall be maintain accordingly.		
7.5.3	There is no new planting of oil palm on steep terrain Minor compliance -	No new planting conducted at all estates visited.		Complied

**Criterion 7.6:** Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.

7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.  - Critical (Major) compliance -	No new planting conducted at all estates visited.  Soil series map available for both estates visited. No fragile soil categorized in the estates visited as per soil map issued by R&D Precision Agriculture Unit.  As sighted in estates visited, the estate have taken into account the land terrain, drainage and road systems in planning the long range replanting program (LRRP).	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 -	No new planting conducted at all estates visited.  Addressed in the Sime Darby Planation Group Sustainability and Quality Policy Statement signed by the Group Managing Director on 2/12/2019 and Responsible Agriculture Charter under section 3.2: Protect and enhance forest:  "We will seek to protect and enhance forest and wildlife, and minimise carbon emission from land use change through:  vii. No new development of peat areas, regardless of depth or location. We will seek to rehabilitate existing plantings on peats where possible.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.  - Minor compliance -	No new planting conducted at all estates visited.  The R&D Precision Agriculture Unit conducted assessment and provided the estates with topography maps.  Topographic contour (water movement) map for Bukit Cheraka Estate were also available which are both used to manage the drainage and road works in the estates.	Complied
Criterio	on 7.7: No new planting on peat, regardless of depth after 15 November 20	18 and all peatlands are managed responsibly.	
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.  - Critical (Major) compliance -	No peat soil identified at all estates visited in SOU 7. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable



7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.  PROCEDURAL NOTE:  Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).  - Minor compliance -	No peat soil identified at all estates visited in SOU 7. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised Critical (Major) compliance -	No peat soil identified at all estates visited in SOU 7. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place Critical (Major) compliance -	No peat soil identified at all estates visited in SOU 7. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.  This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.  Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.  - Critical (Major) compliance -	No peat soil identified at all estates visited in SOU 7. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable



7.7.6	(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2019) and associated audit guidance.  - Critical (Major) compliance -	No peat soil identified at all estates visited in SOU 7. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable
7.7.7	(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.  - Critical (Major) compliance -	No peat soil identified at all estates visited in SOU 7. Verified there is no new planting activity in the estate visited. Hence, the criteria is not applicable.	Not Applicable
Criterio	on 7.8: Practices maintain the quality and availability of surface and ground	water.	
7.8.1	A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses	The mill has established Water Management Plan and reviewed on annually basis. The Plan focusing on management of waste water and contingency plan during water shortage.	Complied
	<ul><li>the following:</li><li>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</li><li>b) Workers have adequate access to clean water.</li><li>- Minor compliance -</li></ul>	The estate has established Water Management Plan and reviewed on annually basis. The Plan focusing on management of water quality of main water inlet/outlet for pollutants for estate operation, monitor the usage of fresh water, reuse/recycle of waste water, and contingency plan during water shortage	
		Noted during the interview with workers in all operating units sampled, access to clean water is adequately provided to workers for household consumption. Water supply is by government @ SYABAS.	

7.8.2	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	Management (Management of Plantation; dated April 2014).	is guided by River Reserve River Reserve in Sime Darby es are guided by the following	Complied
	occurred during the previous cycle.	River width	Buffer zone	
	- Critical (Major) compliance -	> 40 meters	50 meters	
		20 to 40 meters	40 meters	
		10 to 20 meters	20 meters	
		5 to 10 meters	10 meters	
		< 5 meters	5 meters	
		Bukit Kerayong Estate		
		Sg. Sembilang in field P12A. No	g. Tambak Jawa in field P09B and evidence of chemical applications were desilt on annual basis by the age.	
			or sampling on annually basis. FY inducted on 19/01/2021. Reviewed ted 05/02/2021.	
		Bukit Cheraka Estate		
		No natural water course flow thro	ough the estate	
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.  - Minor compliance -			Complied

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3 <sup>rd</sup> quarter:				
Month	Parameter	Results		
July	BOD	933.00		
30/07/2021	рH	7.30		
August	BOD	310.00		
31/08/2021	рH	7.70		
September	BOD	235.00		
30/09/2021	рH	7.60		

#### 4th quarter:

Month	Parameter	Results
October	BOD	235.00
21/10/2021	pН	7.60
November	BOD	254.00
12/11/2021	рН	7.80
December	BOD	136.00
16/12/2021	рН	7.80



7.8.4	Mill water use per tonne of FFB is monitored and recorded.  - Minor compliance -	Mill monitored the water usage per ton FFB processed on monthly basis. reviewed the records FY 2021:		Complied
		Month	Water L/Ton FFB	
		January	0.58	
		February	1.21	
		March	1.03	
		April	1.41	
		May	1.56	
		June	1.32	
		July	1.59	
		August	1.37	
		September October	1.22	
		November	1.32	
		December	1.35	
		Average	1.27	
Criteri	on 7.9: Efficiency of fossil fuel use and the use of renewable energy is optim	nised		
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented.  - Minor compliance -	The mill and estate monitored the diesel usage per ton FFB process/production on monthly basis. Reviewed the data FY 2021 as follows:		Complied
		Month	Diesel L/Ton FFB	



	Bukit Kerayong POM	Bukit Kerayong Estate	Bukit Cheraka Estate
January	0.13	1.52	2.15
February	0.08	1.53	1.91
March	0.07	0.99	1.65
April	0.06	0.91	1.24
May	0.07	0.94	1.42
June	0.03	1.22	1.59
July	0.09	1.26	1.35
August	0.05	1.61	1.59
September	0.07	1.33	1.46
October	0.11	1.08	1.95
November	0.01	1.17	1.87
December	0.07	1.40	2.05

The operating units has established plan to optimise the usage of fossil fuel. Among the implementation of the management plan established as follows:

- 1. The estates visited was using biodiesel for vehicle fuel.
- 2. The estate conducted scheduled vehicle maintenance to ensure the vehicle running in good conditions and effective energy consumptions. Reviewed the daily inspection and maintenance records for TF015 and TF016 FY 2021 in Bukit Kerayong Estate and TF013, TM TM036 and TM037 for Bukit Cheraka Estate.

	<b>7.10:</b> Plans to reduce pollution and emissions, including greenhouse gold to minimise GHG emissions.	ases (GHG), are developed, implemented and monitored and new de	velopments are
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.  - Critical (Major) compliance -	Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.  Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 4.0 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was correct.	Complied
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).  - Critical (Major) compliance -	No development within Bukit Kerayong POM Certification Unit since 2014.	Complied
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.  - Critical (Major) compliance -	Significant pollutants identification was conducted during Environmental Aspect Identification and Environmental Impact Evaluation conducted. Environmental management plan were documented under Environmental Improvement Plan/Pollution Prevention Plan for FY 2021. Implementation of plan is being monitored by appointed person in charge with target of time frame for completion.	Complied
Criterio	n 7.11: Fire is not used for preparing land and is prevented in the manage	d area	

7.11.1	(C) Land for new planting or replanting is not prepared by burning Critical (Major) compliance -	Addressed in Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law – EQA and Regulations 1974.  No open burning noted based on the records on the land clearing and felling for the replanting at visited estates. Method of land clearing and preparation was used such as felling & chipping, cambering/land forming and path construction.	Complied	
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 -	Emergency Preparedness and Response Procedures. Refer document no. UM/HSE/SP/02	Complied	
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.  - Minor compliance -	The operating units communicates the fire prevention plan and control measures to all stakeholders during meeting. Reviewed the minutes for Stakeholders Meeting for SOU 7 dated 20/01/2022.	Complied	
	n 7.12: Land clearing does not cause deforestation or damage any area represt. HCVs and HCS forests in the managed area are identified and protected		jh Carbon Stock	
7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.  A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.  - Critical (Major) compliance -	There is no land clearing that damaged primary forest or any area required to protect or enhance HCV observed since November 2005 in SOU 7.	Complied	
7.12.2	<ul><li>(C) HCVs, HCS forests and other conservation areas are identified as follows:</li><li>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.</li></ul>	Central Zone: Strategic Operating Unit (SOU) 7 Bukit Kerayong, Final Report ver. III dated December 2015 by Plantation Sustainability Quality Management (PSQM) Department, dated		

	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.  PROCEDURAL NOTE:  Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).	Estate  Bukit Kerayong  Bukit Cheraka	Area Water Catchment Slope	Ha 3.00 55.52	HCV Status 4 4	
	- Critical (Major) compliance -			L		
7.12.3	Indicator is not applicable in Malaysia context					Not Applicable
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).  - Critical (Major) compliance -	identified in by the estate Plan under Reviewed to Bukit Keray 1. The estate Review a. HC b. Mu estate 2. The estate monthly records 3. The estate Plan under Review a. HC b. Mu estate Plan under Review a. HC b. Mu estate Plan under Review a. HC b. The estate Plan under Review a. HC b. Mu estate Plan under	has established HCV in the report and Conste and documented section High Consense the implementation of the implementation of the training for worker at the training for worker aster briefing on entate dated 18/10/202 state monitored the y basis conducted by a dated 10/10/2021, state has identified the has been erected	servation Set A in the Environm vation Value Are f the management oriefing and trads as follows: street and the AP. Review 10/11/2021 and the CSA area as in the CSA area.	side area identified nental Managemental Managemental Managemental Biodiversity. The plan as follows ining on HCV area and HCV area in the later catchment) or wed the monitoring at 14/12/2021. The post and post post and post post identification at post and post post identification at post post post post post post post pos	

		<ol> <li>The estate conducted water sampling for HCV area (water catchment) on quarterly basis. Latest sampling was conducted on 24/01/2022. The results was yet to be received by the estate.</li> <li>Bukit Cheraka Estate</li> <li>The estate has identified the CSA area at P13D and P01D. Signboard has been erected at the area. Sighted during site visit at P01D, no evidence of encroachment at the area.</li> <li>The estate has erected signboard at HCV area in P04B and</li> </ol>	
		P94A as sighted during site visit. No evidence of encroachment at the area.  The estate conducted HCV area monitoring on monthly basis. The monitoring cover on encroachment/trespassing, wildlife issues/conflicts/sightings, pollutions/erosion issues and others complete with picture of the areas. Reviewed the monitoring records dated 11/01/2022, 10/12/2021, 15/11/2021 and 10/10/2021.	
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.  - Minor compliance -	No HCV with existing rights of local communities was identified that needs to be set aside.	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working	No RTE species were identified in the assessment conducted as per Addendum Report to HCV Re-Assessment for Selangor Central Zone: Strategic Operating Unit (SOU) 7 Bukit Kerayong, Final Report ver III dated December 2015 by Plantation Sustainability Quality Management (PSQM) Department, dated January 2020.	Complied



	for the company is found to capture, harm, collect, trade, possess or kill these species.  - Minor compliance -		
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 -	No RTE species were identified in the assessment conducted as per Addendum Report to HCV Re-Assessment for Selangor Central Zone: Strategic Operating Unit (SOU) 7 Bukit Kerayong, Final Report ver III dated December 2015 by Plantation Sustainability Quality Management (PSQM) Department, dated January 2020.	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 -		Complied



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

The GHG emissions that were produced in 2021 for Bukit Kerayong Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2020 for Bukit Kerayong Palm Oil Mill and supply base are as following:

Emission per product	tCO₂e/tProduct
СРО	1.05
PKO	1.05

Extraction	%
OER	20.72
KER	5.35

Production	t/yr
FFB Process	147,600.87
CPO Produced	30,578.06
PKO Produced	7,903.69

Land Use		На
OP Planted Area		9,815.20
OP Planted on peat		0.00
Conservation (forested)		0.00
Conservation (non-forested)		0.00
	Total	9,815.20

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

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB
Emission								
Land Conversion	87079.30	0.59	0.00	0.00	0.00	0.00	87079.30	0.59
CO <sub>2</sub> Emission from fertilizer	2045.88	0.11	0.00	0.00	0.00	0.00	2045.88	0.11
NO <sub>2</sub> Emission	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fuel Consumption	1377.56	0.14	0.00	0.00	0.00	0.00	1377.56	0.14
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-80750.80	-0.55	0.00	0.00	0.00	0.00	-80750.80	-0.55
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	10955.34	0.07	0.00	0.00	0.00	0.00	10955.34	0.07

\*Note: Includes both estates and smallholders



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

	tCO₂e	tCO <sub>2</sub> e/tFFB
Emission		
POME	28932.27	0.20
Fuel Consumption	95.71	0.00
Grid Electricity Utilization	575.66	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	29603.64	0.20

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

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

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

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

POME Diverted to Anaerobic Digestion:				
Divert to anaerobic pond (%)	100			
Divert to methane captured (flaring) (%)	0.00			
Divert to methane captured (energy generation) (%)	0.00			

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

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



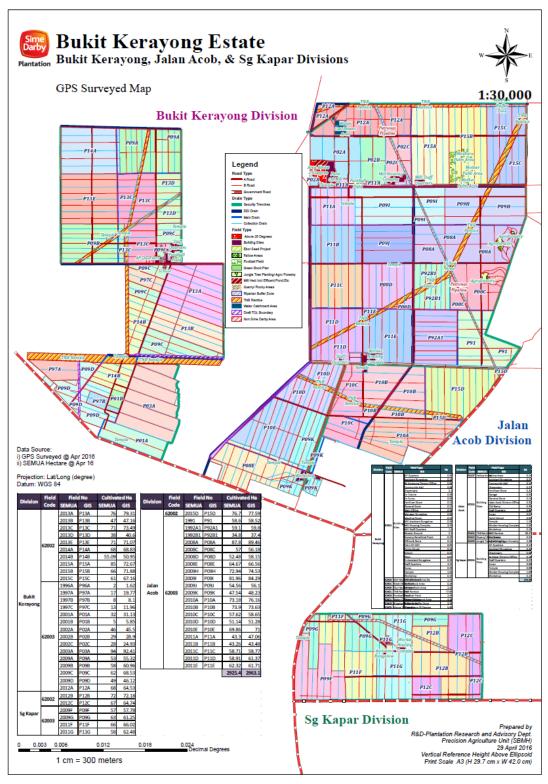
...making excellence a habit."

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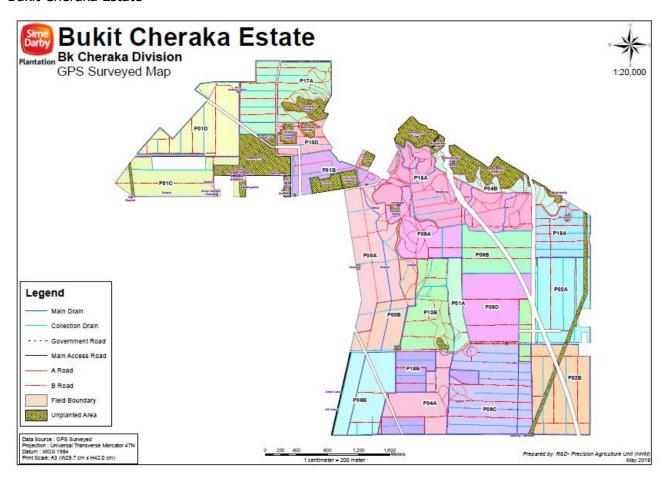
#### **Appendix D: Estate Field Map**

**Bukit Kerayong Estate** 





#### **Bukit Cheraka Estate**





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

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB	joining	Smallholder ID	
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area	Production			
Nil	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
			ı	Total						
Note	Note: * are smallholders sampled in this audit.									



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

a.i Active Ingredient

BOD Biochemical Oxygen Demand

CB Certification Bodies

CHRA Chemical Health Risk Assessment

COD Chemical Oxygen Demand

CPO Crude Palm Oil

CSPO Certified Sustainable Palm Oil
CSPKO Certified Sustainable Palm Kernel Oil

EFB Empty Fruit Bunch

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

FFB Fresh Fruit Bunch

FPIC Free, Prior, Informed and Consent

GAP Good Agricultural Practice

GHG Greenhouse Gas

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

IP Identity Preserved

IS - CSPO Independent Smallholder Certified Sustainable Palm Oil

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

ISCC International Sustainable Carbon Certification

ISS Independent Smallholder Standard

LD50 Lethal Dose for 50 sample

MB Mass Balance

MSDS Material Safety Data Sheet

MT Metric Tonnes
OER Oil Extraction Rate

OSH Occupational Safety and Health

PK Palm Kernel
PKO Palm Kernel Oil
POM Palm Oil Mill

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment
RSPO Roundtable on Sustainable Palm Oil

P&C Principles & Criteria

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

SEIA Social & Environmental Impact Assessment

SIA Social Impact Assessment SOP Standard Operating Procedure